SAN FRANCISCO
PLANNING DEPARTMENT

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

# Executive Summary
## EIR Certification/CEQA Findings
## Planning Code Text and Map Amendments
## Development Agreement
## Conditional Use Authorization/Planned Unit Development

HEARING DATE: SEPTEMBER 5, 2019

| | |
|---|---|
| *Record No.:* | **2015-014028ENV/CUA/PCA/MAP/DVA** |
| *Project Address:* | **3333 California Street (aka 3333 California Street Mixed-Use Project)** |
| *Zoning:* | RM-1 (Residential – Mixed, Low Density)<br>40-X Height and Bulk District |
| *Block/Lot:* | 1032 / 003 |
| *Project Sponsor:* | Laurel Heights Partners LLC<br>c/o: PSKS<br>150 Post Street, Suite 320<br>San Francisco, CA 94108 |
| *Property Owner:* | Laurel Heights Partners LLC<br>c/o: PSKS<br>150 Post Street, Suite 320<br>San Francisco, CA 94108 |
| *Staff Contact:* | Nicholas Foster, AICP, LEED GA – (415) 575-9167<br>nicholas.foster@sfgov.org |
| *Recommendation:* | **Approval with Conditions** |

## SUMMARY

On September 5, 2019, the Planning Commission ("Commission") will consider a series of approval actions related to the proposed 3333 California Street Project ("Project"). The Commission has previously reviewed the Project as part of the Draft Environmental Impact Report ("DEIR") hearing on December 13, 2018. The Historic Preservation Commission ("HPC") reviewed the Project at hearings on May 11, 2018 and December 5, 2018. Should the Commission approve the Project on September 5, the Board of Supervisors would then conduct hearings which could result in the City's final approval or disapproval of the Project.

## REQUIRED COMMISSION ACTION

The following is a summary of actions that the Commission will consider at the hearing, which are required to implement the Project:

1. Certify the Final Environmental Impact Report ("FEIR") pursuant to the California Environmental Quality Act ("CEQA");
2. Adopt findings under CEQA, including findings rejecting alternatives as infeasible and adopting a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program

("MMRP");

3. Recommend that the Board of Supervisors approve an ordinance that would primarily: (1) amend the Planning Code Text to establish the 3333 California Special Use District; (2) amend the associated Zoning and Height Maps; (3) extinguish Resolution 4109; and
4. Recommend that the Board of Supervisors approve a Development Agreement ("DA"); and
5. Approve a request for Conditional Use Authorization, pursuant to Planning Code Sections 253, 303, and 304 and Board of Supervisors Resolution No. 183-19 to allow structures to exceed 40 feet in a RM Zoning District, a change of use for an existing child care facility (to be replaced at a different location on the project site), and a Planned Unit Development ("PUD") with modifications from the requirements of the Planning Code.

## PROJECT DESCRIPTION

The Project would redevelop the subject property with a mix of residential, retail, child care, open space, and parking uses. The existing 14,000 gross-square-foot (gsf) annex building, surface parking lots and ramp structures would be demolished, and the existing 455,000 gsf office building ("Center Office Building"), would be partially demolished and adaptively reused for residential uses (as two separate buildings, "Center Building A" and "Center Building B") with up to three stories added to each. The Project would also construct thirteen new buildings, ranging from 4-story duplex townhouses to 6-story apartment buildings, as residential-only buildings ("Masonic"; "Euclid"; "Mayfair"; and the seven "Laurel Duplex" buildings), and mixed-use buildings ("Plaza A"; "Plaza B"; and "Walnut") containing non-residential uses on the ground and second floors. Overall, the Project includes a total of approximately 1,428,000 gsf of new and rehabilitated floor area, comprising: approximately 978,000 gsf of residential floor area (include 744 dwelling units); approximately 35,000 gsf of retail floor area; an approximately 15,000 gsf childcare facility (accommodating approximately 175 children); approximately 400,000 gsf devoted to off-street parking with 857 parking spaces (including approximately 10 car share spaces); and 839 bicycle spaces.

A total of 25% of the Project's dwelling units will be deed-restricted, on-site affordable units designated for low-income senior households. These affordable units will be located in the proposed Walnut Building on California Street and consist of 185 studio and 1-bedroom units for seniors plus 1 on-site manager's unit.

The Project would provide 52 percent of the overall lot area (approximately 233,000 square feet) as grade-level open area, some of which would be public open space and some of which would be private open space exclusively for residents. The Project would include a total of approximately 125,000 square feet (or roughly 2.88 acres) of publicly-accessible landscaped open space with multi-purpose plazas, lawns, pathways. New public pedestrian walkways would cross the property in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approximately along the line of Walnut Street (Walnut Walk) and in an east-west direction between Laurel Street and Presidio Avenue along the line of Mayfair Drive (Mayfair Walk). The Project would also include streetscape improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Project Site. These physical improvements to the Site are in service of meeting the goals and objectives of the Better Streets Plan. Specifically, the Project would include the following streetscape and pedestrian improvements: a new at-grade street crossing; sidewalk expansion; enhanced paving; installation of new street trees and street lighting on various public rights-of-way. Some of these improvements require a

major encroachment permit from the Department of Public Works and are subject to Board of Supervisors approval.

The proposed scope of work before the Commission was analyzed in the 3333 California Street Mixed-Use EIR as the "Project Variant" (or just "Variant"). The primary difference between the base project and the Variant is that the Variant includes 185 senior affordable dwelling units plus 1 on-site manager's unit instead of office use within the Walnut Building. Under the Variant, the Walnut Building would contain four additional floors (22 feet taller) to accommodate the residential uses. On August 19, 2019, the Project Sponsor submitted a letter to the Department requesting Conditional Use Authorization of the Variant.

## ISSUES AND OTHER CONSIDERATIONS

- **Public Comment & Outreach.** To date, the Department has received one letter in opposition to the proposed Project prior to the official 20-day neighborhood notification period. The Project Sponsor held over 150 community meetings since 2015.

- **Planning Code Text and Zoning Map Amendments (Board File No. 190844).** On July 30, 2019, Supervisor Catherine Stefani introduced an ordinance that would amend the Planning Code to establish the 3333 California Street Special Use District ("SUD") and make other related Code amendments. The purpose of the SUD is to facilitate the Project, and to give effect to the associated Development Agreement. The Ordinance would allow certain non-residential uses along California Street; specify off-street parking for childcare uses, establish affordable housing and open space requirements, establish procedures for permit approvals, and resolve a 1950's-era development restriction on the property (City Planning Commission Resolution 4109). The Ordinance would also amend the Zoning Map to change the Height and Bulk Designation of the site from 40-X to 40-X, 45-X, 67-X, 80-X, and 92-X.

- **Development Agreement ("DA") (Board File No. 190845)**. The DA between the City and the Project Sponsor will set forth vesting rights for the Project and establish a set of public benefits. The Project's public benefits include:

    - **Affordable Housing.** The Project would restrict 25% of all residential units built within the site as affordable to low-income senior households. These units will be located in the 6-story Walnut Building near California Street and consist of 185 studio and 1-bedroom units for seniors. The Walnut Building will also include one on-site manager's unit.

    - **Open Space.** The Project would include a total of 125,226 square feet (or 2.88 acres) of privately-owned, publicly-accessible landscaped open space with multi-purpose plazas, lawns, pathways and streetscape improvements. The provision of open space exceeds what is required by the Code. The project includes ADA-accessible pedestrian pathways bisecting the Project Site from north to south and from east to west to provide safe connections to the surrounding street grid. Further, the Project Sponsor would be responsible for maintaining the privately-owned, publicly-accessible open spaces and the street improvements proposed around the perimeter of the site that will improve pedestrian safety and visibility.

    - **Child Care Facility.** The Project would include a 14,665 gross square foot child care facility within the ground floor of the Walnut Building designated to accommodate approximately 175 children, including a contiguous outdoor activity area. The child care facility would

serve a range of ages from infants through pre-school and would reserve 10% of its licensed seats for children of low-income families.

- **Workforce Development Program.** The Project would implement a workforce commitment program to encourage local business participation, including an LBE participation goal established by the City's Contract Monitoring Division as well as participation in the City's First Source Hiring Requirements.
- **Transportation Demand Management (TDM) Plan.** The Project includes a TDM Plan that implements 75% of applicable target points, exceeding the 50% requirement otherwise required pursuant to Planning Code Section 169.3(e)(2).
- **Auxiliary Water Supply System (AWSS) Community Benefit Fee.** The Project Sponsor would pay a $1,055,000 AWSS Community Benefit Fee to support the expansion of the Fire Department's AWSS system.

- **Conditional Use Authorization**. Pursuant to Planning Code Sections 253, and 303, the Project is required to obtain Conditional Use Authorization to allow structures to exceed 40 feet in a RM Zoning District; for a change of use for an existing child care facility (to be replaced at a different location on the project site) pursuant to Board Ordinance No. 190230; and to allow a PUD with the requested modifications from the requirements of the Planning Code.
- **Planned Unit Development:** The project requests modifications from Planning Code requirements for:
  - **Rear Yard (Section 134).** The Project does not provide a code-complying rear yard. However, the Project provides for a greater amount of open space accessible to residents of the development, in lieu of the required rear yard.
  - **Permitted Obstructions (Section 136).** The Project includes bay windows that exceed the dimensional limits allowed per Code. However, in an attempt to improve the overall visual interest of the buildings, the Project provides a varied bay window design within each of the buildings.
  - **Dwelling Unit Exposure (Section 140).** The Project includes Dwelling Units that do not face onto an open area as defined by the Code. However, the Project has been designed such that the majority of the units (97%) meet the requirements for dwelling unit exposure.
  - **Standards for Off-Street Parking, Freight Loading, and Service Vehicle Facilities (Section 155).** The Project would include the required off-street parking and freight loading spaces, but not necessarily on the same lot as the use served after the proposed subdivisions of the Site. However, the Project provides sufficient off-street parking and freight loading for the uses served within enclosed garages with the minimum number of access points as necessary as to reduce the total number of curb cuts on the Site.
  - **Dwelling Unit Density (Sections 207, 209.3)**. The Project includes 744 Dwelling Units, exceeding the base number of units permitted within the RM-1 Zoning District (559) but not exceeding the number of units permitted in the next more intense Zoning District (745). The Project would provide much-needed housing, with a range of unit types, including the provision of senior affordable housing units, as well as family-sized units of 3 or more bedrooms.

- **Measurement of Height (Planning Code Section 260).** The Project proposes both new structures and alterations to an existing nonconforming building that would otherwise exceed the heights established by the underlying Height and Bulk District. However, the Project's goals of maximizing residential density at the Site warrant relief from the measurement of height, especially when considering that the Site's unique topography—which includes an approximately 67-foot difference in elevation across the Site—does not easily lend itself to a uniform method by which to measure height.

## ENVIRONMENTAL REVIEW

On November 8, 2018, the Department published the 3333 California Street Mixed Use Project Draft Environmental Impact Report ("DEIR") for public review (Case No. 2015-0014028ENV). The DEIR was available for public comment until January 8, 2019. On December 13, 2018, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting to solicit comments regarding the DEIR. The Historic Preservation Commission held a duly advertised hearing on said DEIR on December 5, 2018 at which the Historic Preservation Commission formulated its comments on the DEIR. On August 22, 2019, the Department published a Comments and Responses to Comments ("RTC") document, responding to comments made regarding the DEIR prepared for the Project. On September 5, 2019 the Commission will consider certification of the Final Environmental Impact Report ("FEIR") for the Project, and will determine if it is adequate, accurate and complete. In addition, on September 5, 2019, the Commission must adopt the CEQA Findings for the FEIR, prior to the approval of the Project (See Case No. 2015-014028ENV/PCA/MAP/DVA/CUA).

## BASIS FOR RECOMMENDATION

- The Project would maximize residential density on the Site, providing a significant number of new market-rate and senior affordable housing units, including family size units of 3 bedrooms or more, thus contributing to the City's housing goals—a top priority for the City and County of San Francisco.
- The Project would revitalize an underutilized parcel that is predominately occupied by surface parking lots, driveways, and a large, existing noncomplying structure containing a non-conforming office use.
- The Project would include ground-floor retail uses along California Street that would enliven the streetscape, and serve both on-site future residents as well as residents within the neighborhood.
- The Project would include include a considerable amount of privately-owned, publicly-accessible landscaped open space with multi-purpose plazas, lawns, pathways and streetscape improvements.
- The Project would include numerous streetscape and pedestrian improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Site, and would integrate the site into the surrounding street grid by including new publicly accessible pedestrian pathways (Mayfair Walk and Walnut Walk).
- The Project would pay additional public benefit fees as set forth in the Development Agreement.

## ATTACHMENTS:

Draft Motion – Conditional Use Authorization, Exhibit A: Conditions of Approval
Draft Motion – CEQA Findings
Draft Resolution – Planning Code Text and Map Amendments, Draft SUD Ordinance
Draft Resolution – Adoption of Development Agreement, Draft DA Ordinance
Exhibit B – Plans and Renderings
Exhibit C – Environmental Determination (includes MMRP)
Exhibit D – Land Use Data
Exhibit E – Maps and Context Photos
Exhibit F - Public Correspondence
Exhibit G - Project Sponsor Brief
Exhibit H – Inclusionary Affordable Housing Affidavit
Exhibit I – Anti-Discriminatory Housing Affidavit
Exhibit J – First Source Hiring Affidavit
Exhibit K – Development Agreement, Development Agreement Application, and Director's Report on Development Agreement Negotiations.

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San Francisco,
CA 94103-2479

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**415.558.6378**

Fax:
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# Planning Commission Draft Motion

HEARING DATE: SEPTEMBER 5, 2019

| | |
|---|---|
| *Record No.:* | 2015-014028CUA |
| *Project Address:* | 3333 California Street |
| *Zoning:* | RM-1 (Residential – Mixed, Low Density)<br>3333 California Street Special Use District<br>40-X, 67-X, 80-X, and 92-X Height and Bulk Districts |
| *Block/Lot:* | 1032 / 003 |
| *Project Sponsor:* | Laurel Heights Partners, LLC<br>c/o: PSKS<br>150 Post Street, Suite 320<br>San Francisco, CA 94108 |
| *Property Owner:* | Laurel Heights Partners, LLC<br>c/o: PSKS<br>150 Post Street, Suite 320<br>San Francisco, CA 94108 |
| *Staff Contact:* | Nicholas Foster, AICP, LEED GA – (415) 575-9167<br>nicholas.foster@sfgov.org |
| *Recommendation:* | **Approval with Conditions** |

**ADOPT FINDINGS TO APPROVE A CONDITIONAL USE AUTHORIZATION AND PLANNED UNIT DEVELOPMENT THAT WOULD ALLOW STRUCTURES TO EXCEED 40 FEET IN HEIGHT WITHIN AN RM ZONING DISTRICT AND 3333 CALIFORNIA STREET SPECIAL USE DISTRICT AND FOR AN EXISTING CHILD CARE FACILITY TO CHANGE OF USE TO RESIDENTIAL USE, PURSUANT TO SECTIONS 253, 303, AND 304 OF THE PLANNING CODE MODIFICATIONS TO THE REAR YARD REQUIREMENTS (SECTION 134), PERMITTED OBSTRUCTIONS (SECTION 136), DWELLING UNIT EXPOSURE (SECTION 140), GENERAL STANDARDS FOR OFF-STREET PARKING, FREIGHT LOADING, AND SERVICE VEHICLE FACILITIES (SECTION 155); DWELLING UNIT DENSITY (SECTION 207), AND MEASUREMENT OF HEIGHT (SECTION 260) AT 3333 CALIFORNIA STREET (ASSESSOR'S BLOCK 1032, LOT 003) WITHIN THE RM-1 ZONING DISTRICT AND A 40-X, 67-X, 80-X, AND 92-X HEIGHT AND BULK DISTRICT, AND TO MAKE FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.**

## PREAMBLE

On March 29, 2016, Don Bragg on behalf of Laurel Heights Partners, LLC (hereinafter "Project Sponsor") filed an Environmental Evaluation Application with the San Francisco Planning Department (hereinafter "Department") for the 3333 California Street Mixed-Use Project (hereinafter "Project") located at 3333 California Street within the RM-1 (Residential – Mixed, Low Density) and 40-X Height and Bulk District. On June 30, 2017, the Project Sponsor filed an application for Conditional Use Authorization and Planned Unit Development.

The City and County of San Francisco, acting through the Planning Department (hereinafter "Department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code section 21000 *et seq*., hereinafter "CEQA"), the State CEQA Guidelines (Cal. Code. Regs. Title 14, section 15000 *et seq*., (hereinafter "CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

The Department determined that an environmental impact report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on September 20, 2017. The Department held a public scoping meeting on October 16, 2017 in order to solicit public comment on the scope of the project's environmental review.

On April 25, 2018, the Department published an initial study and provided public notice in a newspaper of general circulation of the availability of the initial study for public review and comment; this notice was mailed to the Department's list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on April 25, 2018.

On November 7, 2018, the Department published the draft EIR (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment, and of the date and time of the Commission public hearing on the DEIR; this notice was mailed to the Department's list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on November 7, 2018. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the Site on November 7, 2018.

On November 7, 2018, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, and to government agencies, the latter both directly and through the State Clearinghouse. A notice of completion was filed with the State Secretary of Resources via the State Clearinghouse on November 7, 2018.

The Historic Preservation Commission held a duly advertised hearing on said DEIR on December 5, 2018 at which the Historic Preservation Commission formulated its comments on the DEIR.

The Commission held a duly advertised public hearing on said DEIR on December 13, 2018 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on January 8, 2019.

The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 62-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a responses to comments document, published on August 22, 2019, distributed to the Commission and all parties who commented on the DEIR, and made available to others upon request at the Department.

The Department prepared a final EIR (hereinafter "FEIR") consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the responses to comments document, all as required by law.

On July 30, 2019, Supervisor Catherine Stefani introduced at the Board of Supervisors: (1) the Planning Code and Zoning Map amendments in Board File No. 190844, which amends the Planning Code to create

the 3333 California Street Special Use District and amend the Height and Bulk Districts applicable to the Site; and (2) the Development Agreement in Board File No. 190845.

On August 19, 2019, the Project Sponsor submitted a letter amending its application for Conditional Use Authorization and Planned Unit Development to request authorization to construct the Variant to the proposed Project.

On September 5, 2019, the Commission reviewed and considered the information contained in the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

On September 5, 2019, in Motion No. XXXXX, the Commission approved findings required by CEQA, including a statement of overriding considerations and adoption of a Mitigation Monitoring and Reporting Program (MMRP), under Case No. 2015-014028CUA, for approval of the Project, which findings are found in Attachment X to this Resolution No. XXXX and incorporated by reference as though fully set forth herein.

On September 5, 2019, the Commission conducted a duly notice public hearing at a regularly scheduled meeting and adopted: (1) Resolution No. XXXXX, recommending that the Board of Supervisors approve the requested Planning Code Text and Map Amendments set forth in Board File No. 190844; and (2) Resolution No. XXXXX recommending that the Board of Supervisors approve the draft Development Agreement in Board File No. 190845.

The Planning Department Commission Secretary is the custodian of records, located in the File for Case No. 2015-014028CUA at 1650 Mission Street, Fourth Floor, San Francisco, California.

On September 5, 2019, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on Conditional Use Application No. 2015-014028CUA.

The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of the applicant, Department staff, and other interested parties.

**MOVED,** that the Commission hereby authorizes the Conditional Use requested in Application No. 2015-014028CUA, subject to the conditions contained in "EXHIBIT A" of this motion, based on the following findings:

## FINDINGS

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

1. The above recitals are accurate and constitute findings of this Commission.

2. **Project Description.** The Project would redevelop the subject property with a mix of residential, retail, child care, open space, and parking uses. The existing 14,000 gross-square-foot (gsf) annex building, surface parking lots and ramp structures would be demolished, and the existing 455,000 gsf office building ("Center Office Building"), would be partially demolished and adaptively reused for residential uses (as two separate buildings, "Center Building A" and "Center Building B") with up to three stories added to each. The Project would also construct thirteen new buildings, ranging from 4-story duplex townhouses to 6-story apartment buildings, as residential-only buildings ("Masonic"; "Euclid"; "Mayfair"; and the seven "Laurel Duplex" buildings), and mixed-use buildings ("Plaza A"; "Plaza B"; and "Walnut") containing non-residential uses on the ground and second floors. Overall, the Project includes a total of approximately 1,428,000 gsf of new and rehabilitated floor area, comprising: approximately 978,000 gsf of residential floor area (include 744 dwelling units); approximately 35,000 gsf of retail floor area; an approximately 15,000 gsf childcare facility (accommodating approximately 175 children); approximately 400,000 gsf devoted to off-street parking with 857 parking spaces (including approximately 10 car share spaces); and 839 bicycle spaces.

   A total of 25% of the Project's dwelling units will be deed-restricted, on-site affordable units designated for low-income senior households. These affordable units will be located in the proposed Walnut Building on California Street and consist of 185 studio and 1-bedroom units for seniors plus 1 on-site manager's unit.

   The Project would provide 52 percent of the overall lot area (approximately 233,000 square feet) as grade-level open area, some of which would be public open space and some of which would be private open space exclusively for residents. The Project would include a total of approximately 125,000 square feet (or roughly 2.88 acres) of publicly-accessible landscaped open space with multi-purpose plazas, lawns, and pathways. New public pedestrian walkways would cross the property in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approximately along the line of Walnut Street and in an east-west direction between Laurel Street and Presidio Avenue along the line of Mayfair Drive. The Project would also include streetscape improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Site. These physical improvements to the Site are in service of meeting the goals and objectives of the Better Streets Plan. Specifically, the Project would include the following streetscape and pedestrian improvements: a new at-grade street crossing; sidewalk expansion; enhanced paving; installation of new street trees and street lighting on various public rights-of-way. Some of these improvements require a major encroachment permit from the Department of Public Works and are subject to Board of Supervisors approval.

   The proposed scope of work before the Commission was analyzed in the EIR as the "Project Variant" (or just "Variant"). The primary difference between the base project and the Variant is that the Variant includes 185 senior affordable dwelling units plus 1 on-site manager's unit instead of office use within the Walnut Building. Under the Variant, the Walnut Building would also contain four additional floors (22 feet taller) to accommodate the residential uses. On August 19,

2019, the Project Sponsor submitted a letter to the Department requesting Conditional Use Authorization of the Variant.

3. **Site Description and Present Use.** The Project Site ("Site") is 447,361-square-foot, or 10.25-acre, single parcel located on Lot 003 on Assessor's Block 1032. The irregularly shaped parcel is bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west. The two-story building that houses the SF Fire Credit Union, located on a triangular-shaped lot at the northeast corner of Assessor's Block 1032 (corner of California Street and Presidio Avenue), is on a separate parcel and is not part of the Site. The Site, which serves as the University of California, San Francisco (UCSF) Laurel Heights Campus, is developed with a four-story, 455,000 gsf office building (including a 93,000 gsf, three-level, partially below-grade parking garage) at the center of the site; a one-story, 14,000 gsf annex building at the corner of California and Laurel Streets; three surface parking lots; and landscaping or landscaped open space. Approximately 63 percent of the Site is covered by buildings or other impermeable surfaces (e.g., internal roadways and surface parking lots) and 37 percent is landscaping or landscaped open space. Current uses on the Site are office, research, laboratory, child care, and parking. UCSF is in the process of shifting its uses to other campus locations in the city. The Site has been identified as being individually eligible for listing in the California Register of Historical Resources under Criterion 1 (events), and Criterion 3 (design/construction). The Site is eligible under Criterion 1 for its association with the broad pattern of development in San Francisco as a corporate campus adapted to an urban environment. The subject property represents an important and new approach to corporate office planning as a unique adaptation of the suburban corporate campus property type. The Site is also eligible under Criterion 3 for its overall Midcentury Modern architecture designed by Edward B. Page, set within a Midcentury Modern landscape designed by Eckbo, Royston & Williams.

4. **Surrounding Properties and Neighborhood.** The Site is located within the Laurel Heights area of San Francisco's Presidio Heights neighborhood. It is adjacent to the Pacific Heights and Western Addition neighborhoods (to the east) and just north of the Anza Vista area of the Inner Richmond neighborhood. The parcel is located within an RM-1 Zoning District and a 40-X Height and Bulk District. Low- to mid-rise residential uses surround the Site to the north, east, south, and west across California Street, Presidio Avenue, Euclid Avenue, and Laurel Street. Other land uses near the Site include the SF Fire Credit Union, at the southwest corner of California Street and Presidio Avenue, adjacent to the Site; the Jewish Community Center of San Francisco (JCCSF), at the northwest corner of California Street and Presidio Avenue, across the street from the Site; San Francisco Fire Station No. 10, across Masonic Avenue southeast of the Site; the San Francisco Municipal Railway's (Muni) Presidio Division and Yard at 875 Presidio Avenue (a bus storage, maintenance depot, and administration building, across Euclid and Masonic avenues south of the Site); and the Laurel Village Shopping Center along California Street, across Laurel Street west of the Site.

5. **Public Outreach and Comments.** To date, the Department has received one letter in opposition to the proposed Project prior to the official 20-day neighborhood notification period. The Project Sponsor held over 150 community meetings since 2015.

6. **CEQA Findings.** On September 5, 2019, by Motion No. XXXXX, the Commission certified as adequate, accurate and complete the FEIR for the 3333 California Mixed-Use Project. A copy of Commission Motion No. XXXXX is in the file for Case No. 2015-014028ENV. Also on September 5, 2019, by Motion No. XXXXX, in Attachment A to said Motion, the Commission adopted findings, including a statement of overriding considerations and an MMRP, pursuant to CEQA. In accordance with the actions contemplated herein, the Commission has reviewed the FEIR and adopts and incorporates by reference as though fully set forth herein the findings, including the statement of overriding considerations, pursuant to CEQA, adopted by the Commission on September 5, 2019 in Motion No. XXXXXXX. Attachment A.

7. **Planning Code Compliance.** The Commission finds that the Project is consistent with the relevant provisions of the Planning Code in the following manner:

   A. **Use (Sections 202.2(f)(1), 209.2, 249.86, and 713).** Planning Code Sections 209.2 (RM-1), 249.86 (3333 California Street SUD), and 713 (NC-S) list allowable land uses, including residential and non-residential uses as either principally permitted, conditionally permitted, or not permitted.

   *The Project proposes residential uses throughout the Site, and both residential and non-residential uses within buildings with frontage on California Street. The underlying zoning district (RM-1) permits residential uses, including Senior Housing, and the 3333 California Street SUD (Planning Code section 249.86 (Board File No. 190844) allows certain non-residential uses as principally permitted within the ground and second floor of all buildings with frontage along California Street, including Flexible Retail Uses; Social Service or Philanthropic Facilities; and non-residential uses, subject to the use controls of the NC-S Zoning District. In addition to residential uses, the Project also includes a replacement Child Care Facility, which, is a principally permitted use in the RM-1 and 3333 California Street SUD Zoning Districts. Therefore, the uses at the Project would comply with the Planning Code.*

   B. **Use Size (Sections 121.2, 713).** The Planning Code permits non-residential uses up to 5,999 square feet and requires Conditional Use Authorization for 6,000 square feet or above within the NC-S Zoning District.

   *The Project proposes non-residential uses within buildings with frontage on California Street, as allowed in the 3333 California Street Special Use District (Planning Code Text and Map Amendment Ordinance (Board File No. 190884). At the time of entitlement, specific sizes for non-residential uses are unknown. However, under the 3333 California Street SUD, (Planning Code Text Amendment and Map Ordinance in Board File No. 190844), use size controls for non-residential uses would be subject to the use controls of the NC-S Zoning District, with conditional use authorization required to establish any non-residential use above 6,000 square feet.*

C. **Floor Area Ratio (Sections 123, 124, and 713).** The Planning Code establishes a basic floor area ratio (FAR) of 1.8:1 for non-residential uses within the NC-S Zoning District.

*The Site is 447,361 square feet in size. Therefore, up to 805,250 gsf of non-residential uses is permitted under the basic FAR limit. The Project proposes 34,496 gsf of non-residential uses within buildings with frontage on California Street, resulting in an FAR of 0.08:1, well below the maximum allowable FAR of 1.8:1. Therefore, the Project complies with Sections 123, 124 and 713.*

D. **Front Setback Areas (Section 132).** The Planning Code requires that new developments in RM-1 Districts provide front setbacks where one or both of the buildings adjacent to the subject property have front setbacks along a street or alley. If situated on a corner lot, the owner may elect which street or alley to designate as the front of the property.

*As a corner lot, as defined by the Code, the Project Sponsor elects Laurel Street as the front of the Site, for purposes of establishing the Front Setback Area. (Of the Site's five street frontages, Laurel Street represents the longest linear frontage.) Given there are no adjacent buildings along the Laurel Street frontage separated from the subject lot, the Project is therefore not subject to the Front Setback requirements of the Code.*

E. **Rear Yard (Section 134(a)(2)).** The Planning Code requires that the Project provide a rear yard equal to 45 percent of the lot depth, or, the average of adjacent properties. If averaged, no less than 25 percent of lot depth or 15 feet, whichever is greater.

*The Project does not provide a rear yard conforming to the strict requirements specified in the Code, and is therefore seeking a modification of section 134(a)(2) through the Planned Unit Development (PUD) process, pursuant to Section 304 (see Section No. 8 for additional findings).*

F. **Useable Open Space (Section 135).** The Planning Code requires that a minimum of 100 square feet of private usable open space, or 133 square feet of common usable open space be provided for Dwelling Units in RM-1 Zoning Districts. The area counting as usable open space must meet minimum requirements for area, horizontal dimensions, and exposure.

*In the 3333 California Street SUD, Planning Code Section 249.86, useable open space has been designated on an SUD-wide basis (Planning Code Text and Map Ordinance (Board File No. 190844*.) *Accordingly, compliance with usable open space requirements for any building in the SUD shall be evaluated on a project-wide basis and for consistency with the terms of the Development Agreement (Board File No. 190845).*

*The Project would provide private useable open space for 117 of the 744 Dwelling Units, therefore 11,700 square feet (sf) of private open space and 83,391 sf of common open space would be required. The Project satisfies this requirement by providing 11,700 sf of private usable open and 29,570 sf of common useable*

*open space within the eight of the proposed buildings. The Project provides 54,470 sf of additional common useable open space: Cypress Square + Eastern Mayfair Walk (24,780 sf); Lower Walnut Walk (14,950 sf); California Plaza (4,290 sf); and The Overlook (10,450 sf). This additional common useable open space fully satisfies the total amount of common usable open space required by Code. Additionally, the Project provides 70,756 sf of privately-owned, publicly-accessible open space that provides a benefit to both future residents of the Project as well as the General Public. On the whole, the Project provides a combination of private and common useable open space that meets the requirements of the Code, Therefore, the Project complies with Sections 135 and 249.86.*

G. **Permitted Obstructions (Section 136)**. The Planning Code outlines the requirements for features, which may be permitted over street, alleys, setbacks, yards or useable open space.

*The Project includes bay windows that exceed the dimensional limits allowed per Code and is therefore seeking a modification of section 136 through the Planned Unit Development (PUD) process, pursuant to Section 304 (see Section No. 8 for additional findings).*

H. **Streetscape and Pedestrian Improvements (Section 138.1).** Planning Code Section 138.1 requires that additions of Gross Floor Area equal to 20 percent or more to an existing building provide streetscape improvements consistent with the Better Streets Plan.

*The Project would include streetscape improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Site including Presidio, Masonic, and Euclid Avenues, as well as Laurel Street, and Mayfair Drive. These physical improvements meet the goals and objectives of the Better Streets Plan. Specifically, the Project would include the following streetscape and pedestrian improvements: a new at-grade street crossing; sidewalk widening; enhanced paving; installation of new street trees and street lighting on various adjacent public rights-of-way.*

*A key element of the Project's public improvements includes the reconfiguration of existing traffic slip lanes at the intersections of Presidio Avenue and Pine Street/Masonic Avenue and at Masonic and Euclid Avenues. These public improvements consist of bulb outs and other sidewalk improvements where two separate slip lanes are currently located. With the public improvements, the slip lane areas will remain publicly accessible, but will no longer be accessible to motorized vehicles. The Project public improvements that would be constructed in the expanded public sidewalk would require a sidewalk width change approval from the Department of Public Works. Installation of both the slip lane reconfiguration and the sidewalk expansion would be subject to a Street Improvement Permit issued by the Department of Public Works, all of these actions would be implemented through the major encroachment permit described below*

*Certain Project streetscape improvements include enhanced paving and landscaping where the Project's pedestrian pathways meet the public sidewalk. These improvements require a major encroachment permit from the Department of Public Works that is subject to Board of Supervisors approval. The*

*encroachment permit imposes long-term maintenance responsibility and liability for these improvements on the Project Sponsor.*

*Related to encroachments onto or over sidewalks, the Project proposes a total of 6 curb cuts, or vehicular access points (ingress and/or egress) to the Site (5 driveways accessing the Site from public rights-of-way and the privately-owned Walnut Street extension, extending southerly from California Street). The vehicular access plan was carefully reviewed by City staff, including, but not limited to, representatives from Planning, Public Works, and the Municipal Transportation Agency. All of the off-street parking and freight loading locations are completely enclosed and the driveway widths were reduced to minimum amounts required to accommodate safe and efficient vehicle circulation so as to preserve the pedestrian character of the district. Therefore, the Project is consistent with the Better Streets Plan and complies with Section 138.1*

I. **Standards for Bird-Safe Buildings (Section 139).** The Planning Code outlines the standards for bird-safe buildings, including the requirements for location-related and feature-related hazards.

*The Site is not located in close proximity to an Urban Bird Refuge as defined in Section 139. As such, the Project will include feature-related standards. Therefore, the Project complies with Section 139.*

J. **Dwelling Unit Exposure (Section 140).** The Planning Code requires that at least one room of each dwelling unit must face onto a public street, a rear yard, or other open area that meets minimum requirements for area and horizontal dimensions.

*The Project includes Dwelling Units that do not face onto an open area as defined by the Code, and is therefore seeking a modification through the Planned Unit Development (PUD) process, pursuant to Section 304 (see Section No. 8 for additional findings).*

K. **Street Frontages (Section 144).** The Planning Code restricts entrances to off-street parking to no more than one-third of the width of the ground story along the front lot line, or along a street side lot line, or along a building wall that is set back from any such lot line; but in no case less than 10 feet or more than 20 feet. Where two or more separate entrances are provided there shall be a minimum separation between such entrances of six feet.

*The Project proposes a total of seven entrances to off-street parking, with entrances ranging between 12-feet and 20-feet wide, as allowed by Code. Along the Presidio Avenue frontage, the Project provides a 15-foot entrance for off-street parking, and a 20-foot entrance for off-street freight loading, separated by seven feet, as allowed by Code. Therefore, the Project complies with Section 144.*

L. **Moderation of Street Fronts (Section 144.1).** The Planning Code requires that new dwellings within the RM-1 and RM-2 Districts be compatible with the established mixture of houses and apartment buildings in terms of apparent building width, requiring that on wider lots the front

of the building be divided visually into narrower segments, according to the predominant existing scale in such areas.

*As a corner lot, as defined by the Code, the Project Sponsor elects Laurel Street as the front of the Site. As such, the Project's Laurel Street frontage is subject to the provisions of Section 144.1. The Project includes three sets of buildings fronting Laurel Street: the Plaza A building, the Mayfair building, and the seven Laurel Duplex buildings. Each of the three sets of buildings provide variations in the horizontal depth of the front building walls by creating an organized rhythm of projections and notches ranging between 2 feet and 13 feet along the front building walls of each of the buildings, at intervals of not more than 35 feet. Therefore, the Project complies with Section 144.1.*

M. **Off-Street Parking (Section 151.1)**. The Planning Code does not require off-street parking spaces be provided, but instead provides maximum parking amounts, permitted as accessory, based on land use type.

*The Project would provide a total 847 off-street accessory parking spaces. For residential uses, up to 1.5 spaces per Dwelling Unit is permitted as accessory. With 744 Dwelling Units, up to 1,116 parking spaces would be allowed per Code. The Project proposes 744 parking spaces (a ratio of 1 parking space per Dwelling Unit), which, is within the maximum amount permitted by Code. For non-residential uses, the Planning Code permits off-street parking as accessory in the following amounts: up to 53 spaces would for Retail Sales and Service Uses; 78 spaces for Eating and Drinking Uses (food and beverage retail uses); and 11 spaces for Child Care Facility Use.*

*The DEIR (p. 4.C.80) identifies a required Mitigation Measure ("M-TR-2: Reduce Retail Parking Supply") to lessen the impact of the proposed Project's or Project Variant's parking supply for retail uses to less-than-significant levels. The Mitigation Measure limits parking for Retail Sales and Service Uses to 2.14 spaces per 1,000 gross square feet. Pursuant to Mitigation Measure M-TR-2, the Project is limited to a total of 74 off-street parking spaces for all retail uses. The Project proposes a total of 74 spaces for all retail uses.*

*For Child Care Facility Use, the Project proposes 29 spaces where 11 are permitted by Code as accessory. Therefore, the Project requires legislation to permit parking for Child Care Facility Use in an amount greater than is otherwise permitted by Code. Through a Planning Code Text and Map Ordinance (Board File No. 190844), the Planning Code would be amended to add Section 249.86, creating the 3333 California Street Special Use District. The Ordinance would allow off-street parking for any Child Care Facility Use at a rate of 1.5 spaces for each 9 children who could be accommodated in the Child Care Facility under the applicable child care licensing requirements at any one time. The Project proposes 29 off-street spaces for the Child Care Facility where 29 would be allowed under the Ordinance. Therefore, the Project complies with Section 151.1.*

N. **Off-Street Freight Loading (Section 152).** The Planning Code requires certain amounts of off-street freight loading space based on the type and size of uses in a project.

*The Project would provide a total of six off-street loading spaces where five are required by Code (the additional space provide as accessory). Three of the loading spaces would be located within the Walnut Building (accessible from Presidio Avenue), and the other three loading spaces would be located within the Masonic Building (accessible from Masonic Avenue). Therefore, the Project complies with Section 152.*

O. **General Standards of Off-Street Parking, Freight Loading, and Service Vehicle Facilities (Section 155)**. The Planning Code establishes general standards as to location and arrangement for required off-street parking and freight loading facilities.

*The Project would include both off-street parking and freight loading spaces not necessarily on the same lot as the use served after the proposed subdivisions of the Site, and is therefore seeking a modification through the Planned Unit Development (PUD) process, pursuant to Section 304 (see Section No. 8 for additional findings).*

P. **Bicycle Parking (Sections 155.1, 155.2).** The Planning Code establishes bicycle parking requirements for new developments, depending on use. A Class 1 space is located in a secure, weather-protected facility and intended for long-term use by residents and employees. A Class 2 space is located in a publicly-accessible and visible location, and intended for use by visitors, guests, and patrons.

*The Project includes 762 Class 1 and 77 Class 2 bicycle parking spaces (where 274 Class 1 and 69 Class 2 spaces are required by Code). The Class 1 bicycle parking spaces will be provided within each building, located within a secure, weather-projected facility, with independent access meeting the dimensional requirements of the Code. The Class 2 bicycle parking spaces would be located along each of the five street frontages encompassing the Site, near all main pedestrian entries to the uses (residential or non-residential) to which they are accessory. Therefore, the Project complies with Sections 155.1 and 155.2.*

Q. **Shower Facilities and Lockers (Section 155.4).** The Planning Code requires shower facilities and lockers for Non-Retail Sales and Service Uses in the following amounts: two showers and 12 clothes lockers where the Occupied Floor Area exceeds 20,000 square feet but is no greater than 50,000 square feet, and four showers and 24 clothes lockers are required where the Occupied Floor Area exceeds 50,000 square feet.

*The Project includes less than 50,000 square feet of non-residential uses and thus a total of 2 showers 12 lockers are required per Code. The Project would provide one shower and six lockers within each of the Plaza B and Walnut buildings. Therefore, the Project complies with Section 155.4.*

R. **Car Sharing (Section 166)**. The Planning Code establishes requirements for new developments to provide off-street parking spaces for car-sharing services. The number of spaces depends on the amount and type of residential or office use. The car-share spaces must be made available to a certified car-share organization at the building site or within 800 feet.

*The Project includes 10 car share spaces on the Site for both the residential and non-residential uses where 10 are required by Code. Therefore, the Project complies with Section 166.*

S. **Unbundled Parking (Section 167)**. The Planning Code requires all off-street parking spaces accessory to residential uses in new structures of 10 dwelling units or more, or in new conversions of non-residential buildings to residential use of 10 dwelling units or more, shall be leased or sold separately from the rental or purchase fees for dwelling units for the life of the dwelling units, such that potential renters or buyers have the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and the parking space.

*The Project will lease or sell all accessory off-street parking spaces separately from the rental or purchase fees for dwelling units for the life of the Dwelling Units. Therefore, the Project complies with Section 167.*

T. **Transportation Demand Management (TDM) Plan (Section 169).** The Planning Code requires applicable projects to finalize a TDM Plan prior Planning Department approval of the first building permit or site permit.

*The Project Sponsor submitted a completed Environmental Evaluation Application prior to July 14, 2016. Therefore, under Planning Code section 169, the Project must achieve 50% of the point target established in the TDM Program Standards, resulting in a required target of 39 points (50% of 78).*

*The Developer shall implement a site-specific Transportation Demand Management Plan included as part of a Development Agreement (Board File No. 190845). While the Project would be subject to Planning Code Section 169.3(e)(1) and required to implement a minimum of 50% of the applicable target points, the Project Sponsor commits through the Development Agreement, to be subject to Planning Code Section 169.3(e)(2) and to implement 75% of applicable target points, resulting in a target of 59 points (75% of 78). Otherwise, the Project remains subject to all of the provisions of Planning Code Section 169 et seq. Therefore, the Project complies with Section 169.*

*As currently proposed, the Project will achieve 59 points through the following TDM measures:*

- Improve Walking Conditions (Option A)
- Bicycle Parking (Option C)
- Showers and Lockers
- Bicycle Repair Station
- Bicycle Maintenance Services
- Fleet of Bicycles
- Car Share Parking (Option B)
- Delivery Supportive Amenities
- Provide Delivery Services
- Family TDM Amenities (Options A + B)
- On-site Childcare
- Multimodal Wayfinding Signage
- Real Time Transportation Information Displays

- Tailored Transportation Marketing Services (Option C)
- On-site Affordable Housing (Option B)
- Unbundled Parking (Option D)
- Parking Pricing

U. **Compliance with Special Restrictions (Section 174).** In 1952, the Commission adopted Resolution 4109 which approved a rezoning of the subject property to a First Residential District and included additional stipulations subject to future development of the Site. The Site has subsequently undergone additional rezoning, as it is now within an RM-1 District. However, the stipulations of future development as outlined in Resolution 4109 continue to apply, absent modification per Planning Code Section 174.

*Through a proposed Planning Code Text and Map Ordinance (Board File No. 190844), Commission Resolution No. 4109, and all related conditions, stipulations, special restrictions, and other limitations imposed in connection with Resolution No. 4109 will no longer apply and will be extinguished effective the date of the Ordinance.*

V. **Residential Density (Sections 207, 209.2, 304).** The Planning Code regulates residential density by zoning district. Within the RM-1 Zoning District, up to 3 units per lot or up to one dwelling unit per 800 square feet of lot area is permitted.

*The Project proposes a residential density that exceeds what is permitted within the RM-1 Zoning District. Therefore, the Project seeks a modification through the Planned Unit Development (PUD) process, pursuant to Section 304 (see Section No. 8 for additional findings).*

W. **Dwelling Unit Mix (Section 207.7).** The Planning Code requires that no less than 25% of the total number of proposed dwelling units shall contain at least two bedrooms and that no less than 10% of the total number of proposed dwelling units shall contain at least three bedrooms. Any fraction resulting from this calculation shall be rounded to the nearest whole number of dwelling units and units counted towards the three-bedroom requirement may also count towards the requirement for units with two or more bedrooms

*The Project would meet the dwelling unit mix requirement on a site-wide basis, as opposed to an individual building basis, with one-bedroom, two-bedroom, and three-bedroom units distributed across the Site, while the Plaza A building would contain the majority of the studio units, and the Laurel Duplexes would contain the majority of the four-bedroom units. The Project will provide the following dwelling unit mix: 27 studio units (3%); 392 one-bedroom units (53%), 195 two-bedroom units (26%), 103 three-bedroom units (14%); and 27 four-bedroom units (4%). With 44% of the dwelling units containing at least two bedrooms, the Project exceeds the dwelling unit mix requirement. Therefore, the Project complies with Section 207.7.*

X. **Height (Sections 260 and 261).** Planning Code requires that the height of buildings not exceed the limits specified in the Zoning Map and defines rules for the measurement of height.

*Given the Project proposes both new structures and alterations to an existing legal, nonconforming building that would otherwise exceed the heights established by the underlying Height and Bulk District, the Project requires relief from the Code. Through a proposed Planning Code Text and Map Ordinance (Board File No. 190844), the Site's underlying Height and Bulk District is 40-X, 45-X, 67-X, 80-X, and 92-X, accommodating the maximum height of each of the 13 buildings, as proposed by the Project. The Project seeks a modification through the Planned Unit Development (PUD) process, pursuant to Section 304, for minor deviations from the provisions for measurement of height in Sections 260 and 261 (see Section No. 8 for additional findings).*

Y. **Shadows on Parks (Section 295)**. The Planning Code requires a shadow analysis for projects over 40 feet in height to ensure that new buildings do not cast new shadows on properties that are under the jurisdiction of the San Francisco Recreation and Park Department.

*The Planning Department prepared an initial shadow fan that indicated the proposed Project may cast a shadow on either Laurel Hill Playground, or Presidio Heights Playground, both of which are properties under the jurisdiction of the San Francisco Recreation and Park Department ("Recreation and Park Department"). A detailed shadow analysis was performed by a qualified consultant that indicated the Project would not cast any new shadow on either Laurel Hill Playground or Presidio Heights Playground, nor any other open space under the jurisdiction of Section 295. As such, a No Impact Letter was issued on August 7, 2019.*

Z. **Transportation Sustainability Fee (TSF) (Section 411A)**. Section 411a requires projects that result in more than twenty new dwelling units or new construction of a non-residential use exceeding 800 square feet to pay the TSF to help meet the demands imposed on the City's transportation system by new developments, funding transit capital maintenance, transit capital facilities and fleet, and pedestrian and bicycle infrastructure.

*The Project will comply with Section 411A.*

AA. **Jobs Housing Linkage Fee (Section 413)**. Section 413 shall apply to any project that increases by 25,000 or more gross square feet the total amount of any combination of the following uses; entertainment, hotel, Integrated PDR, office, research and development, retail, and/or Small Enterprise Workspace.

*The Project will comply with Section 413.*

BB. **Child Care Requirement for Residential Projects (Section 414A)**. Section 414A shall apply to any residential development project that results in at least one net new residential unit.

*Under the requirements of section 249.86 (3333 California Street Special Use District, Board File No. 190844), the provisions of Section 414A do not apply to the Project so long as the Development Agreement is in effect. Instead, the Development Agreement (Board File No. 190845) stipulates that the Project provide a 14,665 square-foot child care facility, including an outdoor activity area, capable of accommodating at least 175 children, with 10% of the maximum number of permitted slots to be provided to children in low-income households.*

CC. **Inclusionary Affordable Housing Program (Section 415)**. The Planning Code sets forth the requirements and procedures for the Inclusionary Affordable Housing Program. Under Planning Code Section 415.3, these requirements apply to projects that consist of 10 or more units.

*Under the provisions of Planning Code Section 249.86, (3333 California Street Special Use District, Board File No. 190844), the provisions of Section 415 do not apply to the Project for as long as the Development Agreement is in effect. The Development Agreement (Board File No. 190845) outlines terms for the Project's affordable inclusionary housing provisions. At buildout, 25% of the Project's units will be deed-restricted, on-site affordable units designated for low-income senior households with incomes below 80% of Area Median Income (AMI), with an overall average of not more than 59% of AMI, as established by the Mayor's Office of Housing and Community Development (MOHCD). These affordable units will be located within the Walnut Building and consist of 185 studio and 1-bedroom units for seniors plus 1 on-site manager's unit.*

8. **Planning Code Section 303** establishes criteria for the Commission to consider when reviewing applications for Conditional Use approval. On balance, the project does comply with said criteria in that:

A. The proposed new uses and building, at the size and intensity contemplated and at the proposed location, will provide a development that is necessary or desirable, and compatible with, the neighborhood or the community.

*The Project is necessary and desirable in that it will create a new mixed-used infill development within the Laurel Heights neighborhood at a scale that appropriately preserves the diversity and vitality of the neighborhood, while also maintaining and contributing to the important aspects of the existing neighborhood, such as providing new housing opportunities with no displacement of any existing residential uses. The size and intensity of the proposed development is consistent with the policies and objectives of the General Plan and is necessary and desirable for this neighborhood and the surrounding community because it will provide new opportunities for housing and add new site amenities, including privately-owned, publicly-accessible open space, retail uses, and a child care facility, that will contribute to the character of the surrounding neighborhood. The pedestrian pathways (Mayfair and Walnut Walk) will open and connect the Site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the Site. The Project would revitalize an underutilized development lot that is predominately occupied by surface parking lots, driveways, and a large, existing legal nonconforming structure containing existing non-complying non-residential uses (office use). The*

*Project would introduce new residential uses across the entirety of the Site, with retail and childcare uses contained within structures fronting California Street. The influx of new residents will contribute to the economic vitality of the existing neighborhood by adding new patrons for the nearby retail uses. Above all, housing is a top priority for the City and County of San Francisco and the Project would maximize residential density on the Site through approvals as a Planned Unit Development (PUD).*

B. The proposed project will not be detrimental to the health, safety, convenience or general welfare of persons residing or working in the vicinity. There are no features of the project that could be detrimental to the health, safety or convenience of those residing or working the area, in that:

i. Nature of proposed site, including its size and shape, and the proposed size, shape and arrangement of structures;

*The Project is an infill development that replaces existing buildings and surface parking lots with a new mixed-use development that is on balance consistent with the General Plan. The Site is substantial in size at approximately 447,000 square feet (or roughly 10.25 acres). The Project maximizes residential density while also introducing new pedestrian connections, hard- and soft-scape open space, and allowing for a scale of development that is consistent with existing and proposed development in the area. The overall site plan, along with the design of each building, has been carefully crafted to allow for a consistent street wall and active ground floor spaces along California Street, with an appropriate variation in building design, texture and scale. The arrangement and sculpting of buildings is also designed to frame the network of pedestrian and visual pathways through the site and to its major open spaces, creating a sense of permeability and connectivity with the surrounding neighborhood.*

ii. The accessibility and traffic patterns for persons and vehicles, the type and volume of such traffic, and the adequacy of proposed off-street parking and loading;

*The Project has been designed to provide improved pedestrian and vehicular connections to the Site, as well as new pedestrian connections through the Site. Sufficient off-street parking, including for both the retail uses and child care facility, would be provided in underground parking garages, which would be appropriately accessed from the Walnut Street extension, Presidio Avenue, and Laurel Street.*

*The Project includes a total of six off-street loading spaces, two on-street commercial loading zones (on California Street), three on-street passenger loading zones (on Masonic Avenue, Euclid Avenue, and Laurel Street), and approximately 74 on-street public parking spaces. On-street freight and passenger loading zones are strategically placed nearest building entrances, with freight loading supporting the retail and non-residential uses along California Street.*

*The proposed Project also includes a TDM program in compliance with the TDM Ordinance and TDM Program Standards, and includes 10 car share parking spaces as required by Planning Code Section 166, as well as ample bicycle parking. Accessibility and traffic patterns, the type and volume of traffic, and the proposed off-street parking and loading are all discussed in additional detail in Project's Transportation Impact Study and other Project CEQA documents on file with the Planning Department. The Project is in close proximity to numerous public transit options, with various bus routes along California Street, and nearby along both the Geary Avenue and Sacramento Street commercial corridors.*

iii. The safeguards afforded to prevent noxious or offensive emissions such as noise, glare, dust and odor;

*The Project is primarily a residential development and therefore is not anticipated to create any noxious or offensive emissions or odors. The Project sponsor will comply with the City's standard construction-related conditions designed to minimize temporary dust impacts during the construction period. All potential Project impacts on noise, glare, and dust are discussed in the Project's FEIR, including the MMRP. In light of the nature of the development, applicable Code requirements and standard conditions of approval, and the conclusions reached in the Project's FEIR on file with the Planning Department, no noxious or offensive emissions such as noise, glare, dust, and odor are expected.*

iv. Treatment given, as appropriate, to such aspects as landscaping, screening, open spaces, parking and loading areas, service areas, lighting and signs;

*The Project will create a series of privately-owned, publicly-accessible new north/south and east/west pedestrian connections across the Site, including substantial new landscaping around and throughout the Site, and major new privately-owned, publicly-accessible open space. The open space plan and landscape design includes features such as plaza and garden elements, and over 300 new trees (including new and replacement trees). Lighting and signage will be incorporated as the Project design progresses, and will comply with applicable Code requirements. These and other Project elements will be consistent with the City's Better Streets Program.*

C. That the use as proposed will comply with the applicable provisions of the Planning Code and will not adversely affect the General Plan.

*The Project will generally comply with the provisions of the Planning Code, as amended in Board File No. 190844 and with the Development Agreement (Board File No. 190845). The Project will be, on balance, consistent with the General Plan, particularly with plans and policies related to locating dwelling unit density near transportation, creating new housing, including affordable/supportive housing, providing new publicly-accessible private open space, creating new pedestrian connections to and through the neighborhood, and implementing streetscape improvements. Further, the Project seeks a number of modifications to the requirements of the Code through the PUD process. The purpose of the*

*PUD process is to allow well-designed development on larger sites to request modifications from the strict requirements of the Planning Code, provided that the project generally meets the intent of these Planning Code requirements and will not adversely affect the General Plan. The requested modifications, and compliance with the PUD criteria and consistency with the General Plan are discussed under Section No. 8 and incorporated here by reference.*

D. That the use as proposed would provide development that is in conformity with the purpose of the applicable Use District.

*The Project is consistent with the stated purpose of RM-1 Zoning District and the 3333 California Street Special Use District. RM-1 Zoning Districts, as described in Section 209.2, contain a mixture of the dwelling types that broaden the range of unit sizes and the variety of structures, outdoor space at ground and upper levels regardless of form of structures, and non-residential uses to provide for the needs of residents. Shopping facilities and transit lines may be found within a short distance of these districts. On balance, the Project provides a range of unit sizes within a variety of structures, privately-owned, publicly-accessible open space, and retail uses to provide for the needs of residents. The site is located on and within walking distance of existing transit lines and located within walking distance of existing shopping facilities. The Project will include residential uses, and non-residential uses in a size that provides for the needs of residents.*

E. The use or feature satisfies any criteria specific to the use or feature in Subsections (g), *et seq*. of this Section.

*On February 26, 2019, a resolution (Board File No. 190230) was introduced, imposing interim zoning controls for 18 months to require a Conditional Use Authorization for a change of use from a Child Care Facility to another use. Any consideration of a Conditional Use Authorization for a change of use from a Child Care Facility to another use shall take into account the following factors:*

i. Any findings by the Office of Early Care and Education regarding the capacity of the existing Child Care Facility Use, the population served, and the nature and quality of services provided;

*The childcare facility currently located on the Site is operated by Bright Horizons, a national provider of childcare services. According to information on file with the Office of Early Care and Education, the existing facility is licensed for a total of 129 children, with an infant license for 42 children and a preschool license for 87 children. In addition, the Office believes that the existing facility has what is known as a 'Toddler Option' in order to also serve toddlers. However, the toddler license does not increase the total licensed capacity of 129. The existing facility is a National Association for the Education of Young Children (NAEYC) accredited program, which, is a nationally-recognized measure of early education quality.*

ii. The impact of the change of use on the neighborhood and community;

*The Project proposes to replace the existing childcare facility with a new childcare facility with capacity to serve approximately 175 children under current licensing requirements. While there may be a period of time during which the existing facility has ceased operations and the new facility is under construction, the Development Agreement (Board File No. 190845) requires the facility to be built as part of construction of the Walnut Building.*

*In addition, Bright Horizons will be opening a new childcare facility in the City Center project on Geary and Masonic that will accommodate the children who are enrolled at the existing facility. Because it is located on what is currently a UCSF campus property, the existing Bright Horizons facility gives preference to UCSF families, regardless of whether they live in the neighborhood. Pursuant to the Development Agreement (Board File No. 190845), the new childcare facility will be open to the general public. As such, it will result in expanded access to childcare for the neighborhood.*

iii. Whether there are sufficient licensed child care slots available within a one-mile radius of the site; and

*According to the Office of Early Care and Education, there are 19 licensed child care centers and 26 Family Child Care homes in the 94118 Zip Code's geographic area.*

iv. Whether the Child Care Facility Use to be converted will be relocated or replaced.

*The Project proposes to provide a new childcare facility with capacity to serve approximately 175 children under current licensing requirements. Bright Horizons, which operates the existing facility, anticipates opening a new childcare facility in the City Center project on Geary and Masonic.*

9. **Planning Code Section 304** establishes procedures for Planned Unit Developments, which are intended for projects on sites of considerable size, including an area of not less than half-acre, developed as integrated units and designed to produce an environment of stable and desirable character, which will benefit the occupants, the neighborhood and the City as a whole. In the cases of outstanding overall design, complementary to the design and values of the surrounding area, such a project may merit a well-reasoned modification of certain provisions contained elsewhere in the Planning Code.

A. **Modifications.** The Project Sponsor requests the following modification from the requirements of the Planning Code. These modifications are listed below, along with a reference to the relevant discussion for each modification.

i. **Rear Yard (Section 134):** *The Project does not provide a code-complying rear yard. As such, the Project is seeking a modification of the rear yard requirement defined in Planning Code Section 134.*

*The Commission finds this modification warranted, since the Project provides for a comparable amount of open space accessible to residents of the development, in lieu of the required rear yard.*

*The Site encompasses nearly the entirety of Block 1032, fronting several streets, with no existing pattern of mid-block open space since the majority of the Site is currently occupied by existing buildings and surface parking lots. As such, the Site is not configured in a manner that adheres to (or necessarily benefits from) the traditional rear yard requirements of the Code. The Project would improve existing conditions by creating new connections to the surrounding street grid and providing new open space through a series of private and public open spaces and landscaped areas, including private usable open space (residential), common usable open space, privately-owned, publicly-accessible open space, private open space for the child care facility, and other open areas (e.g., inner and outer courtyards).*

*On the whole, the Project would provide 52 percent of the overall lot area (approximately 233,000 square feet) as grade-level open area, some of which would be privately-owned, publicly-accessible public open space and some of which would be private open space exclusively for residents. The Project would include streetscape improvements and a total of approximately 125,000 square feet (or roughly 2.88 acres) of privately-owned, publicly-accessible landscaped open space with multi-purpose plazas, lawns, and pathways.*

ii. **Permitted Obstructions (Section 136):** *The Project includes bay windows that exceed the dimensional limits allowed per Code. As such, the Project is seeking a modification of the permitted obstructions requirements defined in Planning Code Section 136. The Commission finds this modification warranted, since the Project, in an attempt to improve the overall visual interest of the buildings, provides a varied bay window design within each of the buildings.*

*The Project includes bay windows within the Plaza B building on floors 1 through 4 that would not meet the strict requirements of the Code Sectioning governing permitted obstructions. The Project, in an attempt to improve the overall visual interest of the building through a varied bay window design, is providing five bay windows, ranging between 12'-0" to 19'-8", all of which exceed the nine-foot linear allowance per Code.*

iii. **Dwelling Unit Exposure (Section 140):** *The Project includes Dwelling Units that do not face onto an open area as defined by the Code. As such, the Project is seeking a modification of the dwelling unit exposure requirements defined in Planning Code Section 140. The Commission finds this modification warranted, since the Project has been designed in a manner that the majority of the units (97%) meet the requirements for dwelling unit exposure.*

*The Project has been designed to maximize dwelling unit exposure along street frontages, inner courts and/or open spaces between buildings that meet the strict requirements of the Code. Of the 744 Dwelling Units proposed, only 21 Dwelling Units (or approximately 3 percent of the total unit count) would not comply with the strict dimensional requirements of the Code.*

iv. **General Standards of Off-Street Parking, Freight Loading, and Service Vehicle Facilities (Section 155). (Sections 155):** *The Project would include both off-street parking and freight loading spaces not necessarily on the same lot as the use served after the proposed subdivisions of the Site. As such, the Project is seeking a modification of the general standards of off-street parking and freight loading requirements defined in Planning Code Section 155. The Commission finds this modification warranted, since the Project provides sufficient off-street parking and freight loading for the uses served within enclosed garages with the minimum number of access points as is necessary as to reduce the total number of curb cuts on the Site.*

*Pursuant to Section 155(a), required off-street parking and freight loading shall be located on the same lot as the use(s) served. While the Project is compliant with the amount of provided accessory off-street parking and required freight loading, the locations of both the off-street parking and freight loading spaces would not necessarily be provided on the same lot as the use served after the proposed subdivisions of the Site. The proposed site plan for four below-grade garages allows connection between garages, thereby reducing unnecessary on-street vehicular circulation around the Site.*

v. **Dwelling Unit Density (Sections 207, 209.3):** *The Project includes residential uses with a total of 744 Dwelling Units, exceeding the number of units permitted within the RM-1 Zoning District. As such, the Project is seeking a modification of the dwelling unit density limits as defined in Planning Code Sections 207 and 209.3. The Commission finds this modification warranted, since the Project would provide much-needed housing, with a range of unit types, including the provision of senior affordable housing units.*

vi. **Measurement of Height (Section 260):** *The Project includes proposed amendments to the underlying Height and Bulk Districts of 40-X, 45-X, 67-X, 80-X, and 92-X, as amended in the Zoning Map Ordinance (Board File No. 190844), The Project proposes both new structures and alterations to an existing nonconforming building that would otherwise exceed the heights established by the underlying Height and Bulk District. As such, the Project is seeking minor deviations from the provisions for measurement of height in Sections 260 and 261 for each of the proposed new and adapted buildings on the Site. The Commission finds this modification warranted, given the Site's unique configuration and the desire to maximize residential density at the Site. With the proposed height and bulk district amendments in Board File No. 190844, and the deviations from the provisions for measuring height, the maximum height of each of the 13 buildings would be accommodated.*

*The Site's topography varies significantly across the Site generally upsloping from east to west, and from north to south, with an approximately 67-foot total difference in elevation across the Site. The Site contains two existing buildings, the largest of which (Center Office Building), at 52'-10" tall, is deemed a legal, noncomplying structure pursuant to Code Section 180. The Project proposes an adaptive reuse of the Center Office Building, and the construction of 13 new buildings on the Site.*

*The proposed heights of each of the buildings contained within the Project are as follows: the Mayfair, Laurel Duplexes (seven individual buildings), Euclid, and Masonic buildings, each reaching a maximum height of 40 feet; the Plaza A and Plaza B Buildings, each reaching a maximum height of 45 feet; the Walnut Building reaching a maximum height of 67 feet; the Center Building A reaching a maximum height of 80 feet, and the Center Building B reaching a height of 92 feet. The Project proposed minor deviations from the provisions for measurement of height in Sections 260 and 261 for each of the proposed new and adapted buildings on the Site as follows:*

*Plaza A Building: The Plaza A Building fronts both Laurel Street and California Street. As such, the Project utilizes Laurel Street for the purposes of measuring height, pursuant to Section 260(a)(1)(D). Laurel Street has a slope of less than 5% and thus is measured at the midpoint of the frontage at existing curb. The measurement from Laurel Street is down-sloping and is carried to the line equidistant between Laurel Street and the Walnut Street Extension. The measurement is taken to 45 feet, to allow an additional 5 feet to accommodate adequate retail floor-to-floor heights.*

*Plaza B Building: The majority of the Plaza B Building is measured from the Walnut Street Extension per Section 260(a)(1)(B). A small portion of the NW corner is measured in the same manner as the Plaza A Building. The slope of Walnut Street varies, with the southern portion under 5% and the portion closer to California requiring stepping. Pursuant to Section 260(a)(3), the portion closer to California Street is measured in 55-ft segments. Measuring from the Walnut Street Extension is up-sloping and complies with Section 260(a)(1)(C), with the first 10-ft measured from the centerline of the segment at new curb, thereafter measured at the average of new grades on either side of the section. The measurement is taken to 45 feet, to allow an additional 5 feet to accommodate adequate retail floor-to-floor heights.*

*Walnut Building: The Walnut Building fronts California Street, Walnut Street Extension and Presidio Streets. For the western portions of the building the Project elects to measure down-sloping from the Walnut Street Extension per Section 260(a)(1)(D). The slope of the Walnut Street Extension varies, with the southern portion under 5% and the portion closer to California Street requiring stepping. Per Table 260 the portion closer to California Street is measured in 55-foot segments. The measurement from the Walnut Street Extension is down-sloping and is carried to the line equidistant between Walnut Street and Presidio Avenue. The eastern portions of the Walnut building is measured up-sloping from Presidio Avenue per Section 260(a)(1)(B). The slope of Presidio Avenue is less than 5% and is therefore measured at the midpoint of the frontage. Measuring from Presidio Avenue is up-sloping and complies with Section 260(a)(1)(C), with the first 10-ft measured from the centerline of frontage at existing curb, thereafter measured from the average of new grades on either side of the building. The measurement is taken to 67 feet, to accommodate adequate retail floor-to-floor heights, in addition to the additional floors accommodating the affordable housing building that will have 185 senior units and 1 on-site manager's unit, as proposed under the EIR Variant.*

*Euclid Building: The Euclid Building fronts onto Euclid Avenue and Walnut Walk. This area is measured from Euclid Avenue per Section 260(a)(1)(D). This site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Euclid Avenue slopes at 10%, the allowable height is measured at multiple cross-sections perpendicular to the building, taken at a maximum of 65-foot increments per Table 260. Each of the given reference points is derived from the existing grade at each cross-section, to arrive at the allowable height for points along that cross section.*

*Laurel Duplexes: The Laurel Duplexes front onto Laurel Street, and the heights of the buildings are measured from Laurel Street. This area of the Site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Laurel Street slopes at 7%, the allowable height is measured at a cross-sections perpendicular to the building, taken at the centerline of each duplex and no more than 65-foot apart per Table 260. Each of the given reference points is derived from the existing grade at each cross-section to arrive at the allowable height for points along that cross section.*

*Mayfair Building: The Mayfair Building fronts onto Laurel Street, and the height of the building is measured from Laurel Street. This site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Laurel Street slopes at 7%, the allowable height is measured at a cross-sections perpendicular to the building, taken at the centerline of each building step and no more than 65-foot apart per Table 260. Each of the given reference points is derived from the existing grade at each cross-section, to arrive at the allowable height for points along that cross section.*

*Center Buildings A and B: The measurement of height for the adapted Center Buildings A and B is the same process as the measurement of height of the existing, single Center Office Building, as taken from Laurel Street. As measured from Laurel Street, the existing Center Office Building is 52'-10" tall; as such, the structure is deemed an existing legal, noncomplying structure pursuant to Section 180. The Project would include the adaptive reuse of the Center Office Building for residential uses (as two separate buildings: Center Building A and Center Building B, linked by an above-grade pedestrian passage). For the adapted Center Building A, the measurement is taken to 80 feet, and for the adapted Center Building B, the measurement is taken to 92 feet, adding two and three floors to each building, respectively. The additional floors are necessary to accommodate the addition of 190 dwelling units between the two buildings, completing the adaptive reuse from a former office building into repurposed residential building.*

B. **Criteria and Limitations.** Section 304(d) establishes criteria and limitations for the authorization of PUDs over and above those applicable to Conditional Uses in general and contained in Section 303 and elsewhere in the Code. On balance, the Project complies with said criteria in that it:

1) Affirmatively promotes applicable objectives and policies of the General Plan;

*The Project promotes many of the objectives and policies of the various Elements of the General Plan, as discussed in greater detail below and incorporated here by reference.*

2) Provides off-street parking adequate for the occupancy proposes.

*The Project would provide sufficient off-street parking to adequately serve the residential and non-residential uses, with a maximum of 857 off-street vehicle parking spaces, inclusive of 10 car share spaces, which will accommodate the 744 residential units (including 185 senior housing units) as well as the retail and child care uses proposed.*

3) Provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by this Code;

*The Project would contain approximately 52 percent of the overall lot area (approximately 233,000 square feet – excluding green roofs) as open area, with portions to be developed with a combination of privately-owned, publicly-accessible open space, common open space (some of which would be open to the public) and private open space for residents. The Project would include a total of 125,226 square feet (or 2.88 acres) of publicly-accessible landscaped open space with multi-purpose plazas, lawns, and pathways. The Project would provide 71,405 square feet of open space in excess of that required under Section 135 of the Code.*

4) Be limited in dwelling unit density to less than the density that would be allowed by Article 2 of this Code for a district permitting a greater density, so that the Planned Unit Development will not be substantially equivalent to a reclassification of property;

*As the Site is located within the RM-1 Zoning District, the Site would be limited to a residential density equal to one fewer unit than what is permitted within the RM-2 Zoning District. With a modification of residential density as a PUD, with a site area of 447,361 square feet, the residential density on the Site would be limited to a maximum of 745 Dwelling Units. The Project proposes a total of 744 Dwelling Units, below the maximum allowed residential density as a PUD.*

5) In R Districts, include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts under this Code, and in RTO Districts include commercial uses only according to the provisions of Section 230 of this Code;

*The Project would contain commercial uses along California Street that would serve residents of the immediate vicinity and would be subject to commercial use size and Formula Retail controls in the NC-S zoning district, as specified in section 249.86, the 3333 California Special Use District. SUD (Planning Code Text and Map Ordinance (Board File No. 190844)). Because each of the buildings along California Street would*

*include commercial uses that are less than 6,000 feet, the retail uses would be smaller in scale and would therefore serve the immediate vicinity, and would not be expected to attract customers on a regional level.*

6) Under no circumstances be excepted from any height limit established by Article 2.5 of this Code, unless such exception is explicitly authorized by the terms of this Code. In the absence of such an explicit authorization, exceptions from the provisions of this Code with respect to height shall be confined to minor deviations from the provisions for measurement of height in Sections 260 and 261 of this Code, and no such deviation shall depart from the purposes or intent of those sections.

*The Project proposes both new structures and alterations to an existing nonconforming building that would otherwise exceed the heights established by the underlying Height and Bulk District, as modified by the Planning Code map ordinance in Board File No. 190844. As such, the Project is seeking minor deviations from the provisions for measurement of height in Sections 260 and 261 for each of the proposed new and adapted buildings on the Site.*

7) In NC Districts, be limited in gross floor area to that allowed under the floor area ratio limit permitted for the district in Section 124 and Article 7 of the Code;

*Through a proposed Planning Code Text and Map Ordinance (Board File No. 190844), the Planning Code would be amended to add Section 249.86, creating the 3333 California Street Special Use District. However, the Site would remain within the RM-1 Zoning District. As such, the Site is not located within an NC Zoning District, as defined within Article 7 of the Code.*

8) In NC Districts, not violate the use limitations by story set forth in Article 7 of this Code;

*Not applicable since the Site is located within a RM-1 Zoning District.*

9) In RTO and NCT Districts, include the extension of adjacent alleys or streets onto or through the site, and/or the creation of new publicly-accessible streets or alleys through the site as appropriate, in order to break down the scale of the site, continue the surrounding existing pattern of block size, streets and alleys, and foster beneficial pedestrian and vehicular circulation.

*Not applicable since the Site is located within a RM-1 Zoning District.*

10) Provide street trees as per the requirements of Section 138.1 of the Code.

*In total, the Project would provide 88 street trees. The Project would replace the existing 15 street trees along California Street, with 31 new street trees along California Street. Along the Laurel Street, Euclid Avenue, and Masonic Avenue frontages, up to 57 additional new street trees would be planted. The Project would pay the in-lieu fee for any required street trees that could not be planted. If any underground utilities or other barriers prevent a street tree from being planted, the proposed Project would be consistent with the requirements of Section 138.1(c)(2)(C)(iii). Additionally, eleven (11) key trees located on the Site would be preserved.*

11) Provide landscaping and permeable surfaces in any required setbacks in accordance with Section 132 (g) and (h).

*The Project is not subject to the requirements of Planning Code Section 132(g) and (h); however, the Project would provide new streetscape elements, including new street trees, new landscape areas and new sidewalk paving adjacent to the Site.*

10. **General Plan Compliance.** The Project is, on balance, consistent with the following Objectives and Policies of the General Plan for the reasons as set forth below:

## GENERAL PLAN: HOUSING ELEMENT

### Objectives and Policies

**OBJECTIVE 1:**
IDENTIFY AND MAKE AVAILABLE FOR DEVELOPMENT ADEQUATE SITES TO MEET THE CITY'S HOUSING NEEDS, ESPECIALLY PERMANENTLY AFFORDABLE HOUSING.

**Policy 1.1**
Plan for the full range of housing needs in the City and County of San Francisco, especially affordable housing.

**Policy 1.8**
Promote mixed use development, and include housing, particularly permanently affordable housing, in new commercial, institutional or other single use development projects.

**Policy 1.10**
Support new housing projects, especially affordable housing, where households can easily rely on public transportation, walking and bicycling for the majority of daily trips.

**OBJECTIVE 4:**
FOSTER A HOUSING STOCK THAT MEETS THE NEEDS OF ALL RESIDENTS ACROSS LIFECYCLES.

**Policy 4.1**
Develop new housing, and encourage the remodeling of existing housing, for families with children.

**Policy 4.4**
Encourage sufficient and suitable rental housing opportunities, emphasizing permanently affordable rental units wherever possible.

**Policy 4.5**
Ensure that new permanently affordable housing is located in all of the City's neighborhoods, and encourage integrated neighborhoods, with a diversity of unit types provided at a range of income levels.

**OBJECTIVE 11:**
SUPPORT AND RESPECT THE DIVERSE AND DISTINCT CHARACTER OF SAN FRANCISCO'S NEIGHBORHOODS.

**Policy 11.1**
Promote the construction and rehabilitation of well-designed housing that emphasizes beauty, flexibility, and innovative design, and respects existing neighborhood character.

**Policy 11.2**
Ensure implementation of accepted design standards in project approvals.

**Policy 11.3**
Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character.

**Policy 11.4:**
Continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan.

**Policy 11.6**
Foster a sense of community through architectural design, using features that promote community interaction.

**Policy 11.8**
Consider a neighborhood's character when integrating new uses, and minimize disruption caused by expansion of institutions into residential areas.

**OBJECTIVE 12**

BALANCE HOUSING GROWTH WITH ADEQUATE INFRASTRUCTURE THAT SERVES THE CITY'S GROWING POPULATION.

**Policy 12.1**
Encourage new housing that relies on transit use and environmentally sustainable patterns of movement.

**Policy 12.2**
Consider the proximity of quality of life elements, such as open space, child care, and neighborhood services, when developing new housing units.

**Policy 12.3**
Ensure new housing is sustainably supported by the City's public infrastructure systems.

**OBJECTIVE 13**
PRIORITIZE SUSTAINABLE DEVELOPMENT IN PLANNING FOR AND CONSTRUCTING NEW HOUSING.

**Policy 13.1**
Support "smart" regional growth that located new housing close to jobs and transit.

**Policy 13.3**
Promote sustainable land use patterns that integrate housing with transportation in order to increase transit, pedestrian, and bicycle mode share.

## GENERAL PLAN: COMMERCE AND INDUSTRY

**OBJECTIVE 1**
MANAGE ECONOMIC GROWTH AND CHANGE TO ENSURE ENHANCEMENT OF THE TOTAL CITY LIVING AND WORKING ENVIRONMENT.

**Policy 1.1**
Encourage development which provides substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences that cannot be mitigated.

**OBJECTIVE 3**
PROVIDE EXPANDED EMPLOYMENT OPPORTUNITIES FOR CITY RESIDENTS, PARTICULARLY THE UNEMPLOYED AND ECONOMICALLY DISADVANTAGED.

**Policy 3.2**
Promote measures designed to increase the number of San Francisco jobs held by San Francisco residents.

## GENERAL PLAN: TRANSPORTATION

**OBJECTIVE 2**
USE THE EXISTING TRANSPORTATION INFRASTRUCTURE AS A MEANS FOR GUIDING DEVELOPMENT AND IMPROVING THE ENVIRONMENT.

**Policy 2.1**
Use rapid transit and other transportation improvements in the city and region as the catalyst for desirable development and coordinate new facilities with public and private development.

**Policy 2.5**
Provide incentives for the use of transit, carpools, vanpools, walking and bicycling and reduce the need for new or expanded automobile and automobile parking facilities.

**OBJECTIVE 23**
IMPROVE THE CITY'S PEDESTRIAN CIRCULATION SYSTEM TO PROVIDE FOR EFFICIENT, PLEASANT, AND SAFE MOVEMENT.

**Policy 23.1**
Provide sufficient pedestrian movement space with a minimum of pedestrian congestion in accordance with a pedestrian street classification system.

## GENERAL PLAN: URBAN DESIGN ELEMENT

### Objectives and Policies

**OBJECTIVE 1:**
EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.

**Policy 1.2**
Recognize, protect and reinforce the existing street pattern, especially as it is related to topography.

**Policy 1.3**
Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.

**Policy 1.7**
Recognize the natural boundaries of districts, and promote connections between districts.

## GENERAL PLAN: RECREATION AND OPEN SPACE ELEMENT

### Objectives and Policies

**OBJECTIVE 1:**

ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM.

**Policy 1.1**
Encourage the dynamic and flexible use of existing open spaces and promote a variety of recreation and open space uses, where appropriate.

*The Project would provide a mixed-used development with residential (including substantial new affordable housing), retail, and open space uses, leveraging the Site's location along transit corridors and allowing people to work and live within close proximity to transit, consistent with numerous Housing Element and Transportation Element policies that encourage residential and mixed-use development near transit. Furthermore, as detailed in the Development Agreement (Board File No. 190845), the Project exceeds the Planning Code's inclusionary affordable housing requirements, and will provide a 25% level of on-site affordable housing at Project buildout, fulfilling the Housing Element's objective of encouraging affordable housing.*

*The Site is located in a transit-rich location, within close proximity to various bus lines. Future residents can walk, bike, or access MUNI, or regional bus service from the Site. The Project includes a detailed, TDM program tailored to the Project uses, with various performance measures, monitoring and enforcement measures designed to incentivize use of transit and other alternatives to single occupancy vehicle trips. In addition, the Project's streetscape design would enhance vehicular, bicycle, and pedestrian access and connectivity through the site. The Project would be easily accessed by bicyclists and pedestrians. These Project attributes are consistent with numerous General Plan policies encouraging development that includes environmentally sustainable patterns of movement.*

*The Project would remove portions of—and re-develop the remainder of—a large-scale building and rest of the site with a series of smaller state-of-the-art buildings designed to be consistent with the neighborhood character and scale. The Project's high-quality architectural and landscape design encourages variety, compatibility with the surrounding context, and strong urban design with prominent corners. The Project would incorporate varying heights, massing, and scale, creating a strong, consistent streetwall along the various street frontages, consistent with the Urban Design Element's objective to emphasize the characteristic pattern which gives to the City and its neighborhoods an image, a sense of purpose, and a means of orientation The Project has been designed to promote community interaction, both within the Project through common residential open space and with the broader community, through access to the privately-owned, publicly-accessible open space on the Site. The Project would also create new connections to the surrounding street grid, including new pedestrian connections, and other street and streetscape improvements.*

*The Project is located in an area that is well-served by retail and other neighborhood services, and would provide additional neighborhood-serving retail space along California Street. The Project would help meet the job creation goals, consistent with the Commerce and Industry Element, and as established in the City's Economic Development Strategy by generating new employment opportunities, and by providing expanded employment opportunities for City residents at varying employment levels both during and after construction. The*

*Development Agreement's community benefit programs include commitments to construction and operations workforce first source hiring, as well as local business enterprise requirements for construction and end use jobs.*

*The Project would include streetscape improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Site including Presidio, Masonic, and Euclid Avenues, as well as Laurel Street, and Mayfair Drive, consistent with the Urban Design Element's goal to recognize, protect and reinforce the existing street pattern. These physical improvements also meet the goals and objectives of the Better Streets Plan. Specifically, the Project would include the following streetscape and pedestrian improvements: a new at-grade street crossing; sidewalk widening; enhanced paving; installation of new street trees and street lighting on various adjacent public rights-of-way. These improvements require a major encroachment permit from the Department of Public Works that is subject to Board of Supervisors approval. The encroachment permit imposes long-term maintenance responsibility and liability for these improvements on the Project Sponsor.*

*On the whole, the Project would add a significant amount of housing to a site that is currently underutilized, well-served by existing and future transit, and is within walking distance of substantial goods and services. The Project would create appropriate residential density at a location that is well served by transit and would include substantial new on-site open space to support and activate the new active ground floor and open space uses in the proposed Project and to serve the broader neighborhood. The Project balances significant housing production with new and improved infrastructure and related public benefits, including an on-site child care facility.*

11. **Planning Code Section 101.1(b)** establishes eight priority-planning policies and requires review of permits for consistency with said policies. On balance, the Project complies with said policies in that:

    A. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses be enhanced.

    *The Project would have a positive effect on existing neighborhood-serving retail uses because it would bring additional residents to the neighborhood, thus increasing the customer base of existing neighborhood-serving retail.*

    B. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

    *The Project would not negatively affect the existing housing and neighborhood character. The Project would not displace any housing given the existing building contains only non-residential uses (primarily office use). Like the neighborhoods surrounding the Site, which includes a variety of uses, such as single family homes, multi-unit apartment buildings, the Jewish Community Center, the Laurel Village Shopping Center, and the Muni bus storage yard, the Project is mixed-use and mixed-income, and would provide a range of improvements, housing, and services that would preserve the neighborhood's cultural*

*and economic diversity. It would include approximately 744 units, 185 units of which would be affordable units for seniors with 1 on-site manager's unit. The remaining (market rate) units would consist of a range of unit sizes to accommodate a diverse set of residents.*

C. That the City's supply of affordable housing be preserved and enhanced,

*The Project would enhance the City's supply of affordable housing through its affordable housing commitments in the Development Agreement (Board File No. 190845), which will result in a total of 25% on-site affordable housing units.*

D. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking.

*The Project would not impede MUNI transit service or overburden streets and neighborhood parking. The Project is at a location well-served by transit and future residents and employees of the Project could access the Site via existing MUNI transit service. The Project does not include any commercial office uses that would generate commuter traffic, and the Project includes sufficient off-street parking and a robust transportation program with an on-site Transportation Demand Management (TDM) program.*

E. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.

*The Project does not include commercial office development, and does not displace any industrial or service uses. In addition, the proposed retail uses and other non-residential uses would provide future opportunities for resident employment and ownership in the service sector.*

F. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake.

*The Project includes substantial investment in upgrades to an existing building and construction of new buildings to comply with all current structure and seismic requirements under the San Francisco Building Code.*

G. That landmarks and historic buildings be preserved.

*There are no existing landmarked buildings on the Site. However, the Site, which is considered an historic resource for CEQA purposes and is listed in the California Register of Historic Resources, will be re-developed to include reuse of the existing Center Building and construction of 13 new buildings to accommodate 744 dwelling units, retail, child-care and parking along with significant landscaping and open space. The Project will comply with Mitigation Measure M-CR-1a, Documentation of Historical Resource, which requires the documenting and presenting of the site's history and character. In addition,*

*the Project will comply with Mitigation Measure M-CR-1b, Interpretation of the Historical Resource, which requires the sponsor to develop an interpretive program focused on the history of the Site.*

H. That our parks and open space and their access to sunlight and vistas be protected from development.

*The Site does not currently contain public parks or open spaces, and the Project would create major new privately-owned, publicly-accessible open spaces. The Project would not affect any of the City's existing parks or open space or their access to sunlight and vistas. The shadow diagrams prepared as part of the Project's CEQA review demonstrate that the Project would not cast shadows on any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission. The location, orientation and massing of structures on the Site has been designed to maximize solar access to the Project's open spaces, including the major new privately-owned, publicly-accessible open space. The current open space at the corner of Euclid Avenue and Mayfair Street will remain as part of the Project.*

12. **First Source Hiring.** The Project is subject to the requirements of the First Source Hiring Program as they apply to permits for residential development (Administrative Code Section 83.11), and the Project Sponsor shall comply with the requirements of this Program as to all construction work and on-going employment required for the Project. Prior to the issuance of any building permit to construct or a first addendum to the site permit, the Project Sponsor shall have a First Source Hiring Construction and Employment Program approved by the First Source Hiring Administrator, and evidenced in writing. In the event that both the Director of Planning and the First Source Hiring Administrator agree, the approval of the Employment Program may be delayed as needed.

*The First Source Hiring Program requirements are set forth in the Development Agreement. The Project Sponsor submitted a First Source Hiring Affidavit and prior to issuance of a building permit will comply with the applicable First Source Hiring Program requirements of the Development Agreement (Board File No. 190845).*

13. The Project is consistent with and would promote the general and specific purposes of the Code provided under Section 101.1(b) in that, as designed, the Project would contribute to the character and stability of the neighborhood and would constitute a beneficial development.

14. The Commission hereby finds that approval of the Conditional Use Authorization would promote the health, safety and welfare of the City.

## DECISION

That based upon the Record, the submissions by the Applicant, the staff of the Department and other interested parties, the oral testimony presented to this Commission at the public hearings, and all other written materials submitted by all parties, the Commission hereby **APPROVES Conditional Use Authorization Application No. 2015-014028CUA** subject to the following conditions attached hereto as "EXHIBIT A" in general conformance with plans on file, dated August 20, 2019, and stamped "EXHIBIT B", which is incorporated herein by reference as though fully set forth**.**

**APPEAL AND EFFECTIVE DATE OF MOTION:** Any aggrieved person may appeal this Conditional Use Authorization to the Board of Supervisors within thirty (30) days after the date of this Motion. The effective date of this Motion shall be the date of this Motion if not appealed (after the 30-day period has expired) OR the date of the decision of the Board of Supervisors if appealed to the Board of Supervisors. For further information, please contact the Board of Supervisors at (415) 554-5184, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102.

**Protest of Fee or Exaction:** You may protest any fee or exaction subject to Government Code Section 66000 that is imposed as a condition of approval by following the procedures set forth in Government Code Section 66020. The protest must satisfy the requirements of Government Code Section 66020(a) and must be filed within 90 days of the date of the first approval or conditional approval of the development referencing the challenged fee or exaction. For purposes of Government Code Section 66020, the date of imposition of the fee shall be the date of the earliest discretionary approval by the City of the subject development.

If the City has not previously given Notice of an earlier discretionary approval of the project, the Planning Commission's adoption of this Motion, Resolution, Discretionary Review Action or the Zoning Administrator's Variance Decision Letter constitutes the approval or conditional approval of the development and the City hereby gives **NOTICE** that the 90-day protest period under Government Code Section 66020 has begun. If the City has already given Notice that the 90-day approval period has begun for the subject development, then this document does not re-commence the 90-day approval period.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on September 5, 2019.

Jonas P. Ionin
Commission Secretary

AYES:

NAYS:

ABSENT:

ADOPTED: September 5, 2019

# EXHIBIT A

## AUTHORIZATION

This authorization is for a **Conditional Use Authorization** to allow structures to exceed 40 feet in a RM Zoning District; for a change of use for an existing child care facility, and to allow a **Planned Unit Development** with the requested modifications from the requirements of the Planning Code for: rear yard, permitted obstructions, dwelling unit exposure, standards for off-street parking and freight loading, dwelling unit density, and measurement of height, relating to a project that includes partial demolition of existing structures and adaptive reuse of a legal, noncomplying structure, and construction of a total of 13 new buildings containing residential and non-residential uses on the subject lot, located at 3333 California Street, within Lot 003 of Assessor's Block 1032, pursuant to Planning Code Sections 253, 303, and 304 within the RM-1 Zoning District and a 40-X Height and Bulk District; in general conformance with plans, dated **August 20, 2019**, and stamped "EXHIBIT B" included in the docket for Record No. **2015-014028CUA** and subject to conditions of approval reviewed and approved by the Commission on **September 5, 2019** under Motion No. **XXXXXX**. This authorization and the conditions contained herein run with the property and not with a particular Project Sponsor, business, or operator.

## RECORDATION OF CONDITIONS OF APPROVAL

Prior to the issuance of the building permit or commencement of use for the Project the Zoning Administrator shall approve and order the recordation of a Notice in the Official Records of the Recorder of the City and County of San Francisco for the subject property. This Notice shall state that the project is subject to the conditions of approval contained herein and reviewed and approved by the Planning Commission on **September 5, 2019** under Motion No. **XXXXXX**.

## PRINTING OF CONDITIONS OF APPROVAL ON PLANS

The conditions of approval under the 'Exhibit A' of this Planning Commission Motion No. **XXXXXX** shall be reproduced on the Index Sheet of construction plans submitted with the site or building permit application for the Project. The Index Sheet of the construction plans shall reference to the Conditional Use authorization and any subsequent amendments or modifications.

## SEVERABILITY

The Project shall comply with all applicable City codes and requirements. If any clause, sentence, section or any part of these conditions of approval is for any reason held to be invalid, such invalidity shall not affect or impair other remaining clauses, sentences, or sections of these conditions. This decision conveys no right to construct, or to receive a building permit. "Project Sponsor" shall include any subsequent responsible party.

## CHANGES AND MODIFICATIONS

Changes to the approved plans may be approved administratively by the Zoning Administrator. Significant changes and modifications of conditions shall require Planning Commission approval of a new Conditional Use authorization.

## Conditions of Approval, Compliance, Monitoring, and Reporting

PERFORMANCE

1. **Validity.** The authorization and right vested by virtue of this action is valid so long as the Development Agreement contained in Board of Supervisors File No. 190845 remains in effect.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

2. **Expiration and Renewal.** Should a Building or Site Permit be sought after the expiration of earlier termination of the Development Agreement (Board File No. 190845), then the project sponsor must seek a renewal of this Authorization by filing an application for an amendment to the original Authorization or a new application for Authorization. Should the project sponsor decline to so file, and decline to withdraw the permit application, the Commission shall conduct a public hearing in order to consider the revocation of the Authorization. Should the Commission not revoke the Authorization following the closure of the public hearing, the Commission shall determine the extension of time for the continued validity of the Authorization.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

3. **Diligent Pursuit.** Once a site or Building Permit has been issued, construction must commence within the timeframe required by the Department of Building Inspection and be continued diligently to completion.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

4. **Extension.** All time limits in the preceding three paragraphs may be extended at the discretion of the Zoning Administrator where implementation of the project is delayed by a public agency, an appeal or a legal challenge and only by the length of time for which such public agency, appeal or challenge has caused delay.
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

5. **Conformity with Current Law.** No application for Building Permit, Site Permit, or other entitlement shall be approved unless it complies with all applicable provisions of City Codes in effect at the time of such approval, unless such Code conflicts with the provisions of the Development Agreement (Board File No. 190845).
   *For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

6. **Additional Project Authorization**. The Project Sponsor must obtain an approval of a Planning Code Text and Map Ordinance (Board File No. 190844), giving effect to the 3333 California Street Mixed-Use Project. The Ordinance would amend the Planning Code to establish the 3333

California Street Special Use District (SUD) and make other conforming Code amendments. The Ordinance would specify development controls that apply to the SUD, allowing additional (non-residential) permitted uses along California Street; specifying parking for childcare use, affordable housing, and open space requirements; specifying director determination and discretionary review controls; and extinguishing City Planning Commission Resolution 4109. The Ordinance would also amend Zoning Maps SU03 and HT03, reclassifying the height and bulk designation of the site from 40-X Height and Bulk District to 40-X, 45-X, 67-X, 80-X, and 92-X Height and Bulk Districts. The conditions set forth below are additional conditions required in connection with the Project. If these conditions overlap with any other requirement imposed on the Project, the more restrictive or protective condition or requirement, as determined by the Zoning Administrator, shall apply. The Project Sponsor must also obtain an approval of the Development Agreement in Board File No. 190845, giving effect to the Development Agreement regarding the 3333 California Street Mixed-Use Project.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

7. **Mitigation Measures.** Mitigation measures described in the MMRP attached as Exhibit C are necessary to avoid potential significant effects of the proposed project and have been agreed to by the project sponsor. Improvement measures, also described in the MMRP attached as Exhibit C will further reduce the less-than-significant impacts of the Project and have been agreed to by the project sponsor. Implementation of both improvement measures and mitigation measures as to each building or component of the project is a condition of project approval.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

## DESIGN – COMPLIANCE AT PLAN STAGE

8. **Final Materials.** The Project Sponsor shall continue to work with Planning Department on the building design. Final materials, glazing, color, texture, landscaping, and detailing shall be subject to Department staff review and approval. The architectural addenda shall be reviewed and approved by the Planning Department prior to issuance.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

9. **Garbage, Composting and Recycling Storage.** Space for the collection and storage of garbage, composting, and recycling shall be provided within enclosed areas on the property and clearly labeled and illustrated on the building permit plans. Space for the collection and storage of recyclable and compostable materials that meets the size, location, accessibility and other standards specified by the San Francisco Recycling Program shall be provided at the ground level of the buildings.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

10. **Rooftop Mechanical Equipment.** Pursuant to Planning Code 141, the Project Sponsor shall submit a roof plan to the Planning Department prior to Planning approval of the building permit application. Rooftop mechanical equipment, if any is proposed as part of the Project, is required to be screened so as not to be visible from any point at or below the roof level of the subject building.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

11. **Lighting Plan.** The Project Sponsor shall submit an exterior lighting plan to the Planning Department prior to Planning Department approval of the building / site permit application.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

12. **Streetscape Plan.** The Development Agreement (Board File No. 190845) provides for certain streetscape improvements to be constructed and dictates the timing of such construction. In addition, the Project Sponsor is seeking approval of a major encroachment permit in connection with certain proposed streetscape improvements located in the public right of way, including new and replacement street trees and trees to replace certain existing significant trees (MEP). Pursuant to the applicable provisions of the Development Agreement and the MEP, the Project Sponsor shall continue to work with Planning Department staff, in consultation with other City agencies, to refine the design and programming of the Streetscape Plan so that the plan generally meets the standards of the Better Streets Plan and all applicable City standards. The Project Sponsor shall construct all required street improvements, consistent with the applicable provisions of the Development Agreement and the MEP.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

13. **Signage.** The Project Sponsor shall develop a signage program for the Project which shall be subject to review and approval by Planning Department staff before submitting any building permits for construction of the Project. All subsequent sign permits shall conform to the approved signage program. Once approved by the Department, the signage program/plan information shall be submitted and approved as part of the site permit for the Project. All exterior signage shall be designed to complement, not compete with, the existing architectural character and architectural features of the building.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

14. **Transformer Vault Location.** The location of individual project PG&E Transformer Vault installations has significant effects to San Francisco streetscapes when improperly located. However, they may not have any impact if they are installed in preferred locations. Therefore, the Planning Department recommends the following preference schedule in locating new transformer vaults, in order of most to least desirable:

a. On-site, in a basement area accessed via a garage or other access point without use of separate doors on a ground floor façade facing a public right-of-way;
b. On-site, in a driveway, underground;
c. On-site, above ground, screened from view, other than a ground floor façade facing a public right-of-way;
d. Public right-of-way, underground, under sidewalks with a minimum width of 12 feet, avoiding effects on streetscape elements, such as street trees; and based on Better Streets Plan guidelines;
e. Public right-of-way, underground; and based on Better Streets Plan guidelines;
f. Public right-of-way, above ground, screened from view; and based on Better Streets Plan guidelines;
g. On-site, in a ground floor façade (the least desirable location).

Unless otherwise specified by the Planning Department, Department of Public Work's Bureau of Street Use and Mapping (DPW BSM) should use this preference schedule for all new transformer vault installation requests.
*For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works at 415-554-5810, http://sfdpw.org*

15. **Overhead Wiring.** The Property owner will allow MUNI to install eyebolts in the building adjacent to its electric streetcar line to support its overhead wire system if requested by MUNI or MTA.
*For information about compliance, contact San Francisco Municipal Railway (Muni), San Francisco Municipal Transit Agency (SFMTA), at 415-701-4500, www.sfmta.org*

16. **Noise**. Plans submitted with the building permit application for the approved project shall incorporate acoustical insulation and other sound proofing measures to control noise.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

17. **Landscaping, Screening of Parking and Vehicular Use Areas.** Pursuant to Planning Code Section 142, the Project Sponsor shall submit a site plan to the Planning Department prior to Planning approval of the building permit application indicating the screening of parking and vehicle use areas not within a building. The design and location of the screening and design of any fencing shall be as approved by the Planning Department. The size and species of plant materials shall be as approved by the Department of Public Works. Landscaping shall be maintained and replaced as necessary.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

18. **Odor Control Unit.** In order to ensure any significant noxious or offensive odors are prevented from escaping the premises once the project is operational, the building permit application to

implement the Project shall include air cleaning or odor control equipment details and manufacturer specifications on the plans. Odor control ducting shall not be applied to the primary façade of the building.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

## PARKING AND TRAFFIC

19. **Transportation Demand Management (TDM) Program.** The Development Agreement (Board File No. 190845) provides the Project's TDM Plan. The Property Owner, and all successors, shall ensure ongoing compliance with the TDM Program for the life of the Project, which may include providing a TDM Coordinator, providing access to City staff for site inspections, submitting appropriate documentation, paying application fees associated with required monitoring and reporting, and other actions, all as more specifically set forth in the Development Agreement, which will be recorded in the Official Records of the Recorder of the City and County of San Francisco for the subject property.
*For information about compliance, contact the TDM Performance Manager at tdm@sfgov.org or 415-558-6377, www.sf-planning.org.*

20. **Parking for Affordable Units.** All off-street parking spaces shall be made available to Project residents only as a separate "add-on" option for purchase or rent and shall not be bundled with any Project dwelling unit for the life of the dwelling units. The required parking spaces may be made available to residents within a quarter mile of the project. All affordable dwelling units provided as part of the Project shall have equal access to use of the parking as the market rate units, with parking spaces priced commensurate with the affordability of the dwelling unit. Each unit within the Project shall have the first right of refusal to rent or purchase a parking space until the number of residential parking spaces are no longer available. No conditions may be placed on the purchase or rental of dwelling units, nor may homeowner's rules be established, which prevent or preclude the separation of parking spaces from dwelling units.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

21. **Car Share.** Pursuant to Planning Code Section 166, no fewer than **10** car share space shall be made available, at no cost, to a certified car share organization for the purposes of providing car share services for its service subscribers.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

22. **Bicycle Parking.** Pursuant to Planning Code Sections 155, 155.1, and 155.2, the Project shall provide no fewer than a total of **274** Class 1 and **69** Class 2 bicycle parking spaces (**261** Class 1 and **37** Class 2 bicycle parking spaces for the residential portion of the Project and **12** Class 1 and **32** Class 2 bicycle parking spaces for the non-residential portion of the Project). SFMTA has final authority on the type, placement and number of Class 2 bicycle racks within the public ROW. Prior

to issuance of first architectural addenda, the project sponsor shall contact the SFMTA Bike Parking Program at bikeparking@sfmta.com to coordinate the installation of on-street bicycle racks and ensure that the proposed bicycle racks meet the SFMTA's bicycle parking guidelines. Depending on local site conditions and anticipated demand, SFMTA may request the project sponsor pay an in-lieu fee for Class II bike racks required by the Planning Code. The Project shall provide no fewer than as required by Planning Code Sections 155.1 and 155.2.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

23. **Showers and Clothes Lockers.** Pursuant to Planning Code Section 155.3, the Project shall provide no fewer than **2** showers and **12** clothes lockers.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org* .

24. **Parking Maximum.** Pursuant to Planning Code Section 151 or 151.1, the Project shall provide no more than **1,219** off-street parking spaces for all uses.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

25. **Off-Street Loading.** Pursuant to Planning Code Section 152, the Project will provide a minimum of **5** off-street loading spaces.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

26. **Managing Traffic During Construction.** The Project Sponsor and construction contractor(s) shall coordinate with the Traffic Engineering and Transit Divisions of the San Francisco Municipal Transportation Agency (SFMTA), the Police Department, the Fire Department, the Planning Department, and other construction contractor(s) for any concurrent nearby Projects to manage traffic congestion and pedestrian circulation effects during construction of the Project.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

## PROVISIONS

27. **Anti-Discriminatory Housing.** The Project shall adhere to the requirements of the Anti-Discriminatory Housing policy, pursuant to Administrative Code Section 1.61.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

28. **First Source Hiring.** The Project shall adhere to the requirements of the First Source Hiring Construction and End-Use Employment Program as set forth in the Development Agreement (Board File No. 190845). Following expiration or termination of the Development Agreement, the provisions of the Administrative Code Section 83 regarding development projects shall apply.

*For information about compliance, contact the First Source Hiring Manager at 415-581-2335, www.onestopSF.org*

29. **Transportation Sustainability Fee.** The Project is subject to the Transportation Sustainability Fee (TSF), as applicable, pursuant to Planning Code Section 411A.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

30. **Jobs-Housing Linkage**. The Project is subject to the Jobs Housing Linkage Fee, as applicable, pursuant to Planning Code Section 413.
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

31. **Residential Child Care Impact Fee**. In lieu of compliance with the Residential Child Care Impact Fee (Section 414A), the Project is subject to the applicable terms of the Development Agreement (Board File No. 190845).
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

32. **Inclusionary Affordable Housing Program.** In lieu of compliance with the Inclusionary Affordable Housing Program (Section 415), the Project is subject to the applicable terms of the Development Agreement (Board File No. 190845).
*For information about compliance, contact the Case Planner, Planning Department at 415-558-6378, www.sf-planning.org*

## MONITORING - AFTER ENTITLEMENT

33. **Enforcement.** Violation of any of the Planning Department conditions of approval contained in this Motion or of any other provisions of Planning Code applicable to this Project shall be subject to the enforcement procedures and administrative penalties set forth under Planning Code Section 176 or Section 176.1. The Planning Department may also refer the violation complaints to other city departments and agencies for appropriate enforcement action under their jurisdiction.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

34. **Monitoring.** The Project requires monitoring of the conditions of approval in this Motion. The Project Sponsor or the subsequent responsible parties for the Project shall pay fees as established under Planning Code Section 351(e) (1) and work with the Planning Department for information about compliance.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

35. **Revocation due to Violation of Conditions.** Should implementation of this Project result in complaints from interested property owners, residents, or commercial lessees which are not resolved by the Project Sponsor and found to be in violation of the Planning Code and/or the specific conditions of approval for the Project as set forth in Exhibit A of this Motion, the Zoning Administrator shall refer such complaints to the Commission, after which it may hold a public hearing on the matter to consider revocation of this authorization.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

## OPERATION

36. **Eating and Drinking Uses**. As defined in Planning Code Section 202.2, Eating and Drinking Uses, as defined in Section 102, shall be subject to the following conditions:

A. The business operator shall maintain the main entrance to the building and all sidewalks abutting the subject property in a clean and sanitary condition in compliance with the Department of Public Works Street and Sidewalk Maintenance Standards. In addition, the operator shall be responsible for daily monitoring of the sidewalk within a one-block radius of the subject business to maintain the sidewalk free of paper or other litter associated with the business during business hours, in accordance with Article 1, Section 34 of the San Francisco Police Code.
*For information about compliance, contact the Bureau of Street Use and Mapping, Department of Public Works at 415-554-.5810, http://sfdpw.org.*

B. When located within an enclosed space, the premises shall be adequately soundproofed or insulated for noise and operated so that incidental noise shall not be audible beyond the premises or in other sections of the building, and fixed-source equipment noise shall not exceed the decibel levels specified in the San Francisco Noise Control Ordinance.
*For information about compliance of fixed mechanical objects such as rooftop air conditioning, restaurant ventilation systems, and motors and compressors with acceptable noise levels, contact the Environmental Health Section, Department of Public Health at (415) 252-3800, www.sfdph.org.*

*For information about compliance with construction noise requirements, contact the Department of Building Inspection at 415-558-6570, www.sfdbi.org.*

*For information about compliance with the requirements for amplified sound, including music and television, contact the Police Department at 415-553-0123, www.sf-police.org.*

C. While it is inevitable that some low level of odor may be detectable to nearby residents and passersby, appropriate odor control equipment shall be installed in conformance with the approved plans and maintained to prevent any significant noxious or offensive odors from escaping the premises.

*For information about compliance with odor or other chemical air pollutants standards, contact the Bay Area Air Quality Management District, (BAAQMD), 1-800-334-ODOR (6367), www.baaqmd.gov and Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

D. Garbage, recycling, and compost containers shall be kept within the premises and hidden from public view, and placed outside only when being serviced by the disposal company. Trash shall be contained and disposed of pursuant to garbage and recycling receptacles guidelines set forth by the Department of Public Works.
*For information about compliance, contact the Bureau of Street Use and Mapping, Department of Public Works at 415-554-.5810, http://sfdpw.org.*

37. **Sidewalk Maintenance.** The Project Sponsor shall maintain the main entrance to the building and all sidewalks abutting the subject property in a clean and sanitary condition in compliance with the Department of Public Works Streets and Sidewalk Maintenance Standards.
*For information about compliance, contact Bureau of Street Use and Mapping, Department of Public Works, 415-695-2017, http://sfdpw.org*

38. **Community Liaison.** Prior to issuance of a building permit to construct the project and implement the approved use, the Project Sponsor shall appoint a community liaison officer to deal with the issues of concern to owners and occupants of nearby properties. The Project Sponsor shall provide the Zoning Administrator and all registered neighborhood groups for the area with written notice of the name, business address, and telephone number of the community liaison. Should the contact information change, the Zoning Administrator and registered neighborhood groups shall be made aware of such change. The community liaison shall report to the Zoning Administrator what issues, if any, are of concern to the community and what issues have not been resolved by the Project Sponsor.
*For information about compliance, contact Code Enforcement, Planning Department at 415-575-6863, www.sf-planning.org*

# Draft Motion –
# CEQA Findings
# (Forthcoming)

# Draft SUD Resolution – Planning Code Text and Map Amendments, Draft SUD Ordinance

SAN FRANCISCO
PLANNING DEPARTMENT

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

# Planning Commission Resolution No. XXXXX

HEARING DATE: SEPTEMBER 5, 2019

| | |
|---|---|
| *Case No.:* | **2015-014028MAP/PCA** |
| *Project Name:* | **3333 California Street (aka 3333 California Street Mixed-Use Project)** |
| *Existing Zoning:* | Residential – Mixed, Low Density [RM-1] Zoning District<br>40-X Height and Bulk District |
| *Proposed Zoning:* | Residential – Mixed, Low Density [RM-1] Zoning District;<br>3333 California Street Special Use District<br>40-X, 45-X, 67-X, 80-X and 92-X Height and Bulk Districts |
| *Block/Lot:* | 1032/003 |
| *Project Sponsor:* | Laurel Heights Partners LLC<br>Don Bragg – (415) 395-0880 |
| *Staff Contact:* | Nicholas Foster, AICP, LEED GA – (415) 575-9167<br>nicholas.foster@sfgov.org |

**RESOLUTION RECOMMENDING THAT THE BOARD OF SUPERVISORS APPROVE, WITH MODIFICATIONS, AMENDMENTS TO THE PLANNING CODE, TO ESTABLISH THE 3333 CALIFORNIA STREET SPECIAL USE DISTRICT, TO SPECIFY USE CONTROLS THAT APPLY TO THE SUD, TO SPECIFY DIRECTOR DETERMINAITON AND DISCRETIONARY REVIEW CONTROLS; TO EXTINGUISH PLANNING COMMISION RESOLUTION 4109, TO AMEND HEIGHT AND BULK DISTRICT MAP NO. HT03 TO INCREASE THE HEIGHT LIMIT FOR ASSESSOR'S BLOCK 1032 LOT 003 FROM 40-X TO 40-X, 45-X, 67-X, 80-X AND 92-X AS DEPICTED IN THE BOARD OF SUPERVISORS FILE NO. 190844, AND TO AMEND SPECIAL USE DISTRICT MAP NO. SU03 TO INCLUDE THE NEW 3333 CALIFORNIA STREET SPECIAL USE DISTRICT; AND MAKING VARIOUS FINDINGS, INCLUDING FINDINGS UNDER PLANNING CODE SECTION 302; THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, AND FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN AND PLANNING CODE SECTION 101.1.**

WHEREAS, on July 30, 2019, pursuant to Planning Code section 302(b), Supervisor Catherine Stefani introduced an ordinance amending the Planning Code to add section 249.86 to establish the 3333 California Street Special Use District (herein "3333 California Street SUD"), amending Height and Bulk District Map No. HT03 and Special Use District Map No. SU03, to implement the 3333 California Street Mixed-Use Project ("Project"), and extinguishing Planning Commission Resolution No. 4109 ("Ordinance").

WHEREAS, the Ordinance would enable the Project. The Project would redevelop the subject property with a mix of residential, retail, child care, open space, and parking uses. The existing 14,000 gross-square-foot (gsf) annex building, surface parking lots and ramp structures would be demolished, and the existing 455,000 gsf office building ("Center Office Building"), would be partially demolished and adaptively reused for residential uses (as two separate buildings, "Center Building A" and "Center

Building B") with up to three stories added to each. The Project would also construct thirteen new buildings, ranging from 4-story duplex townhouses to 6-story apartment buildings, as residential-only buildings ("Masonic"; "Euclid"; "Mayfair"; and the seven "Laurel Duplex" buildings), and mixed-use buildings ("Plaza A"; "Plaza B"; and "Walnut") containing non-residential uses on the ground and second floors. Overall, the Project includes a total of approximately 1,428,000 gsf of new and rehabilitated floor area, comprising: approximately 978,000 gsf of residential floor area (include 774 dwelling units); approximately 35,000 gsf of retail floor area; an approximately 15,000 gsf childcare facility (accommodating approximately 175 children); approximately 400,000 gsf devoted to off-street parking with 857 parking spaces (including approximately 10 car share spaces); and 839 bicycle spaces. A total of 25% of the Project's dwelling units will be deed-restricted, on-site affordable units designated for low-income senior households. These affordable units will be located in the proposed Walnut Building on California Street and consist of 185 studio and 1-bedroom units for seniors plus 1 on-site manager's unit.

WHEREAS, the Ordinance would add Planning Code section 249.86 to establish the 3333 California Street SUD, which: 1) allows certain non-residential uses as principally permitted within the ground and second floor of all buildings with frontage along California Street, including Flexible Retail Uses; Social Service or Philanthropic Facilities; and non-residential uses, which non-residential uses would be subject to the use controls of the NC-S Zoning District; 2) specifies requirements for usable open space; 3) specifies off-street parking requirements for child care facilities; and 4) specifies affordable housing requirements applicable to the Project; specify director determination and discretionary review controls for the project; and extinguishes City Planning Commission Resolution 4109; .

WHEREAS, the Ordinance would amend the Zoning Map, specifically Height & Bulk District Map No. HT03 to increase the height limit for Block 1032, Lot 003 from 40-X to 40-X, 45-X, 67-X, 80-X, and 92-X, as depicted in Board of Supervisors File No. 190844.and Special Use District Map No. SU03 to include the new 3333 California Street Special Use District.

WHEREAS, the Ordinance would extinguish City Planning Commission Resolution 4109.

WHEREAS, this Resolution recommending the approval of the Ordinance is a companion to other legislative approvals relating to the Project, including recommendation for approval of the Development Agreement for the 3333 California Street Mixed-Use Project (Board File No. 190845) and the Conditional Use Authorization to allow structures to exceed 40 feet in a RM Zoning District; for a change of use for an existing child care facility, and to allow a Planned Unit Development with the requested modifications from the requirements of the Planning Code (Motion No. XXXXX).

WHEREAS, On September 5, 2019, the commission reviewed and considered the information contained in the Final Environmental Impact Report ("FEIR") for the 3333 California Street Mixed-Use Project, Planning Department Case No. 2015-014028ENV, consisting of the Draft EIR and the responses to comments document, and found that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code, and found further that the FEIR reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the responses to comments document contains no significant revisions to the DEIR that would require recirculation of the document pursuant to CEQA Guideline section 15088.5, and certified the completion of said FEIR in compliance with CEQA and the CEQA Guidelines in Motion No. XXXXXX; and

WHEREAS, On September 5, 2019, by Motion No. XXXXXXX, the Commission adopted findings, including a statement of overriding considerations and a mitigation monitoring and reporting program (MMRP), pursuant to CEQA;

WHEREAS the Planning Department, Jonas Ionin, Commission Secretary, is the custodian of records, located in Case No. 2015-014028ENV, at 1650 Mission Street, Fourth Floor, San Francisco,

WHEREAS, on September 5, 2019, the Commission conducted a duly noticed public hearing at a regularly scheduled meeting on the proposed Ordinance.

**NOW THEREFORE BE IT RESOLVED,** that the Commission has reviewed and considered the FEIR certified in Motion XXXXXX, and the adopts and incorporates by reference as though fully set forth herein, the findings, including the statement of overriding considerations, adopted by the Commission in Motion XXXXX on September 5, 2019;

**AND BE IT FURTHER RESOLVED** that pursuant to Planning Code section 302, the Planning Commission hereby finds that the Ordinance promotes the public welfare, convenience and necessity for the following reasons:

1. The Ordinance would give effect to the 3333 California Street Mixed-Use Project, thereby facilitating the development of currently under-utilized land for much-needed housing, commercial space, and open space.
2. The Ordinance would give effect to the 3333 California Street Mixed-Use Project, which in turn will provide employment opportunities for local residents during construction and post-occupancy, as well as a new open space for new and existing residents.
3. The Ordinance would give effect to the 3333 California Street Mixed-Use Project by enabling the creation of a new mixed-use development. This new development would integrate with the surrounding City fabric and the existing neighborhood and would constitute a beneficial development.
4. The Ordinance would enable the construction of a new vibrant, safe, and connected neighborhood, including a new publicly-accessible open space. The Ordinance would help ensure a vibrant neighborhood with active streets and open spaces, high quality and well-designed buildings, and thoughtful relationships between buildings and the public realm.
5. The Ordinance would enable construction of new housing, including new on-site affordable senior housing. These new uses would create a new mixed-use development that would strengthen and complement nearby neighborhoods.

**AND BE IT FURTHER RESOLVED**, that the Commission finds the Ordinance is in general conformity with the General Plan as set forth in Planning Commission Resolution No. XXXXX.

GENERAL PLAN: HOUSING ELEMENT

**Objectives and Policies**

**OBJECTIVE 1:**

IDENTIFY AND MAKE AVAILABLE FOR DEVELOPMENT ADEQUATE SITES TO MEET THE CITY'S HOUSING NEEDS, ESPECIALLY PERMANENTLY AFFORDABLE HOUSING.

**Policy 1.1**
Plan for the full range of housing needs in the City and County of San Francisco, especially affordable housing.

**Policy 1.8**
Promote mixed use development, and include housing, particularly permanently affordable housing, in new commercial, institutional or other single use development projects.

**Policy 1.10**
Support new housing projects, especially affordable housing, where households can easily rely on public transportation, walking and bicycling for the majority of daily trips.

**OBJECTIVE 4:**
FOSTER A HOUSING STOCK THAT MEETS THE NEEDS OF ALL RESIDENTS ACROSS LIFECYCLES.

**Policy 4.1**
Develop new housing, and encourage the remodeling of existing housing, for families with children.

**Policy 4.4**
Encourage sufficient and suitable rental housing opportunities, emphasizing permanently affordable rental units wherever possible.

**Policy 4.5**
Ensure that new permanently affordable housing is located in all of the City's neighborhoods, and encourage integrated neighborhoods, with a diversity of unit types provided at a range of income levels.

**OBJECTIVE 11:**
SUPPORT AND RESPECT THE DIVERSE AND DISTINCT CHARACTER OF SAN FRANCISCO'S NEIGHBORHOODS.

**Policy 11.1**
Promote the construction and rehabilitation of well-designed housing that emphasizes beauty, flexibility, and innovative design, and respects existing neighborhood character.

**Policy 11.2**
Ensure implementation of accepted design standards in project approvals.

**Policy 11.3**

Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character.

**Policy 11.4:**
Continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan.

**Policy 11.6**
Foster a sense of community through architectural design, using features that promote community interaction.

**Policy 11.8**
Consider a neighborhood's character when integrating new uses, and minimize disruption caused by expansion of institutions into residential areas.

**OBJECTIVE 12**
BALANCE HOUSING GROWTH WITH ADEQUATE INFRASTRUCTURE THAT SERVES THE CITY'S GROWING POPULATION.

**Policy 12.1**
Encourage new housing that relies on transit use and environmentally sustainable patterns of movement.

**Policy 12.2**
Consider the proximity of quality of life elements, such as open space, child care, and neighborhood services, when developing new housing units.

**Policy 12.3**
Ensure new housing is sustainably supported by the City's public infrastructure systems.

**OBJECTIVE 13**
PRIORITIZE SUSTAINABLE DEVELOPMENT IN PLANNING FOR AND CONSTRUCTING NEW HOUSING.

**Policy 13.1**
Support "smart" regional growth that located new housing close to jobs and transit.

**Policy 13.3**
Promote sustainable land use patterns that integrate housing with transportation in order to increase transit, pedestrian, and bicycle mode share.

## GENERAL PLAN: COMMERCE AND INDUSTRY

**OBJECTIVE 1**
MANAGE ECONOMIC GROWTH AND CHANGE TO ENSURE ENHANCEMENT OF THE TOTAL CITY LIVING AND WORKING ENVIRONMENT.

**Policy 1.1**
Encourage development which provides substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences that cannot be mitigated.

**OBJECTIVE 3**
PROVIDE EXPANDED EMPLOYMENT OPPORTUNITIES FOR CITY RESIDENTS, PARTICULARLY THE UNEMPLOYED AND ECONOMICALLY DISADVANTAGED.

**Policy 3.2**
Promote measures designed to increase the number of San Francisco jobs held by San Francisco residents.

## GENERAL PLAN: TRANSPORTATION

**OBJECTIVE 2**
USE THE EXISTING TRANSPORTATION INFRASTRUCTURE AS A MEANS FOR GUIDING DEVELOPMENT AND IMPROVING THE ENVIRONMENT.

**Policy 2.1**
Use rapid transit and other transportation improvements in the city and region as the catalyst for desirable development and coordinate new facilities with public and private development.

**Policy 2.5**
Provide incentives for the use of transit, carpools, vanpools, walking and bicycling and reduce the need for new or expanded automobile and automobile parking facilities.

**OBJECTIVE 23**
IMPROVE THE CITY'S PEDESTRIAN CIRCULATION SYSTEM TO PROVIDE FOR EFFICIENT, PLEASANT, AND SAFE MOVEMENT.

**Policy 23.1**
Provide sufficient pedestrian movement space with a minimum of pedestrian congestion in accordance with a pedestrian street classification system.

## GENERAL PLAN: URBAN DESIGN ELEMENT

### Objectives and Policies

**OBJECTIVE 1:**
EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.

**Policy 1.2**
Recognize, protect and reinforce the existing street pattern, especially as it is related to topography.

**Policy 1.3**

Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.

**Policy 1.7**
Recognize the natural boundaries of districts, and promote connections between districts.

## GENERAL PLAN: RECREATION AND OPEN SPACE ELEMENT

### Objectives and Policies

**OBJECTIVE 1:**
ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED, AND INTEGRATED OPEN SPACE SYSTEM.

**Policy 1.1**
Encourage the dynamic and flexible use of existing open spaces and promote a variety of recreation and open space uses, where appropriate.

*The Project would provide a mixed-used development with residential (including substantial new affordable housing), retail, and open space uses, leveraging the Site's location along transit corridors and allowing people to work and live within close proximity to transit, consistent with numerous Housing Element and Transportation Element policies that encourage residential and mixed-use development near transit. Furthermore, as detailed in the Development Agreement (Board File No. 190845), the Project exceeds the Planning Code's inclusionary affordable housing requirements, and will provide a 25% level of on-site affordable housing at Project buildout, fulfilling the Housing Element's objective of encouraging affordable housing.*

*The Site is located in a transit-rich location, within close proximity to various bus lines. Future residents can walk, bike, or access MUNI, or regional bus service from the Site. The Project includes a detailed, TDM program tailored to the Project uses, with various performance measures, monitoring and enforcement measures designed to incentivize use of transit and other alternatives to single occupancy vehicle trips. In addition, the Project's streetscape design would enhance vehicular, bicycle, and pedestrian access and connectivity through the site. The Project would be easily accessed by bicyclists and pedestrians. These Project attributes are consistent with numerous General Plan policies encouraging development that includes environmentally sustainable patterns of movement.*

*The Project would remove portions of—and re-develop the remainder of—a large-scale building and rest of the site with a series of smaller state-of-the-art buildings designed to be consistent with the neighborhood character and scale. The Project's high-quality architectural and landscape design encourages variety, compatibility with the surrounding context, and strong urban design with prominent corners. The Project would incorporate varying heights, massing, and scale, creating a strong, consistent streetwall along the various street frontages, consistent with the Urban Design Element's objective to emphasize the characteristic pattern which gives to the City and its neighborhoods an image, a sense of purpose, and a means of orientation The Project has been designed to promote community interaction, both within the Project through common residential open space and with the broader community, through access to the privately-owned, publicly-accessible open space on the Site. The Project would also create new connections to the surrounding street grid, including new pedestrian connections, and other street and streetscape improvements.*

*The Project is located in an area that is well-served by retail and other neighborhood services, and would provide additional neighborhood-serving retail space along California Street. The Project would help meet the job creation goals, consistent with the Commerce and Industry Element, and as established in the City's Economic Development Strategy by generating new employment opportunities, and by providing expanded employment opportunities for City residents at varying employment levels both during and after construction. The Development Agreement's community benefit programs include commitments to construction and operations workforce first source hiring, as well as local business enterprise requirements for construction and end use jobs.*

*The Project would include streetscape improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Site including Presidio, Masonic, and Euclid Avenues, as well as Laurel Street, and Mayfair Drive, consistent with the Urban Design Element's goal to recognize, protect and reinforce the existing street pattern. These physical improvements also meet the goals and objectives of the Better Streets Plan. Specifically, the Project would include the following streetscape and pedestrian improvements: a new at-grade street crossing; sidewalk widening; enhanced paving; installation of new street trees and street lighting on various adjacent public rights-of-way. These improvements require a major encroachment permit from the Department of Public Works that is subject to Board of Supervisors approval. The encroachment permit imposes long-term maintenance responsibility and liability for these improvements on the Project Sponsor.*

*On the whole, the Project would add a significant amount of housing to a site that is currently underutilized, well-served by existing and future transit, and is within walking distance of substantial goods and services. The Project would create appropriate residential density at a location that is well served by transit and would include substantial new on-site open space to support and activate the new active ground floor and open space uses in the proposed Project and to serve the broader neighborhood. The Project balances significant housing production with new and improved infrastructure and related public benefits, including an on-site child care facility.*

**AND BE IT FURTHER RESOLVED,** that the Commission finds the Ordinance is in general conformity with Planning Code Section 101.1 as set forth in Planning Commission Resolution No. XXXXX.

A. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses be enhanced.

*The Project would have a positive effect on existing neighborhood-serving retail uses because it would bring additional residents to the neighborhood, thus increasing the customer base of existing neighborhood-serving retail.*

B. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

*The Project would not negatively affect the existing housing and neighborhood character. The Project would not displace any housing given the existing building contains only non-residential uses (primarily office use). Like the neighborhoods surrounding the Site, which includes a variety of uses, such as single family homes, multi-unit apartment buildings, the Jewish Community Center, the Laurel Village Shopping Center, and the Muni bus storage yard, the Project is mixed-use and mixed-income, and would provide a range of improvements, housing, and services that would preserve the neighborhood's cultural*

*and economic diversity. It would include approximately 744 units, 185 units of which would be affordable units for seniors with 1 on-site manager's unit. The remaining (market rate) units would consist of a range of unit sizes to accommodate a diverse set of residents.*

C. That the City's supply of affordable housing be preserved and enhanced,

*The Project would enhance the City's supply of affordable housing through its affordable housing commitments in the Development Agreement (Board File No. 190845), which will result in a total of 25% on-site affordable housing units.*

D. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking.

*The Project would not impede MUNI transit service or overburden streets and neighborhood parking. The Project is at a location well-served by transit and future residents and employees of the Project could access the Site via existing MUNI transit service. The Project does not include any commercial office uses that would generate commuter traffic, and the Project includes sufficient off-street parking and a robust transportation program with an on-site Transportation Demand Management (TDM) program.*

E. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.

*The Project does not include commercial office development, and does not displace any industrial or service uses. In addition, the proposed retail uses and other non-residential uses would provide future opportunities for resident employment and ownership in the service sector.*

F. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake.

*The Project includes substantial investment in upgrades to an existing building and construction of new buildings to comply with all current structure and seismic requirements under the San Francisco Building Code.*

G. That landmarks and historic buildings be preserved.

*There are no existing landmarked buildings on the Site. However, the Site, which is considered an historic resource for CEQA purposes and is listed in the California Register of Historic Resources, will be re-developed to include reuse of the existing Center Building and construction of 13 new buildings to accommodate 744 dwelling units, retail, child-care and parking along with significant landscaping and open space. The Project will comply with Mitigation Measure M-CR-1a, Documentation of Historical Resource, which requires the documenting and presenting of the site's history and character. In addition, the Project will comply with Mitigation Measure M-CR-1b, Interpretation of the Historical Resource, which requires the sponsor to develop an interpretive program focused on the history of the Site.*

H. That our parks and open space and their access to sunlight and vistas be protected from development.

*The Site does not currently contain public parks or open spaces, and the Project would create major new privately-owned, publicly-accessible open spaces. The Project would not affect any of the City's existing parks or open space or their access to sunlight and vistas. The shadow diagrams prepared as part of the Project's CEQA review demonstrate that the Project would not cast shadows on any property under the jurisdiction of, or designated for acquisition by, the Recreation and Park Commission. The location, orientation and massing of structures on the Site has been designed to maximize solar access to the Project's open spaces, including the major new privately-owned, publicly-accessible open space. The current open space at the corner of Euclid Avenue and Mayfair Street will remain as part of the Project.*

**AND BE IT FURTHER RESOLVED,** that the Commission recommends approval of the proposed Ordinance with the following modifications:

1) Amend the SUD to establish applicable Childcare requirements under Planning Code 414A to conform to the terms in the Development Agreement.

2) Update the open space plan map in the SUD to conform to the open space square footages to updated plans.

**AND BE IT FURTHER RESOLVED,** that the Commission authorizes the Planning Director to take such actions and make such changes as deemed necessary and appropriate to implement this Commission's recommendation of approval and to incorporate recommendations from other City agencies and/or the Board, provided that such changes do not materially modify the proposed legislation approved by the Commission.

I hereby certify that the Planning Commission ADOPTED the foregoing Resolution on September 5, 2019.

Jonas P. Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED: September 5, 2019

**BOARD of SUPERVISORS**

**City Hall**
**1 Dr. Carlton B. Goodlett Place, Room 244**
**San Francisco 94102-4689**
**Tel. No. 554-5184**
**Fax No. 554-5163**
**TDD/TTY No. 554-5227**

August 5, 2019

Planning Commission
Attn: Jonas Ionin
1650 Mission Street, Ste. 400
San Francisco, CA 94103

Dear Commissioners:

On July 30, 2019, Supervisor Stefani submitted the following proposed legislation:

**File No. 190844**

**Ordinance amending the Planning Code to add Section 249.86 to create the 3333 California Street Special Use District and amending Sectional Maps SU03 and HT03 of the Zoning Map; and making environmental findings, and findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1.**

**File No. 190845**

**Ordinance approving a Development Agreement between the City and County of San Francisco and Laurel Heights Partners, LLC, a Delaware limited liability company, for the development of an approximately 10.25-acre site located at California Street at Presidio Avenue with various public benefits, including 25% affordable housing, a child care center comprised of approximately 14,665 square feet, and approximately 4.47 acres of open space; making findings under the California Environmental Quality Act, findings of conformity with the General Plan, and the eight priority policies of Planning Code, Section 101.1(b); approving certain development impact fees for the project, and waiving certain Planning Code fees and requirements; and confirming compliance with or waiving certain provisions of Administrative Code, Chapter 56, and ratifying certain actions taken in connection therewith, as defined herein.**

The proposed ordinances are being transmitted pursuant to Planning Code, Section 302(b), for public hearing and recommendation. The ordinances are pending before the Land Use and Transportation Committee and will be scheduled for hearing upon receipt of your response.

Angela Calvillo, Clerk of the Board

By: Erica Major, Assistant Clerk
Land Use and Transportation Committee

c: John Rahaim, Director
Scott Sanchez, Acting Deputy Zoning Administrator
Corey Teague, Zoning Administrator
Lisa Gibson, Environmental Review Officer
Devyani Jain, Deputy Environmental Review Officer
AnMarie Rodgers, Director of Citywide Planning
Dan Sider, Director of Executive Programs
Aaron Starr, Manager of Legislative Affairs
Joy Navarrete, Environmental Planning
Don Lewis, Environmental Planning

[Planning Code, Zoning Map - 3333 California Street Special Use District]

**Ordinance amending the Planning Code to add Section 249.86 to create the 3333 California Street Special Use District and amending Sectional Maps SU03 and HT03 of the Zoning Map; and making environmental findings, and findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1.**

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
**Additions to Codes** are in *single-underline italics Times New Roman font*.
**Deletions to Codes** are in ~~*strikethrough italics Times New Roman font*~~.
**Board amendment additions** are in double-underlined Arial font.
**Board amendment deletions** are in ~~strikethrough Arial font~~.
**Asterisks (* * * *)** indicate the omission of unchanged Code subsections or parts of tables.

Be it ordained by the People of the City and County of San Francisco:

Section 1.

(a) On _____ the Planning Commission conducted a duly noticed public hearing on the proposed 3333 California Street Project (Project), including the proposed Planning Code and Zoning Map amendments, and by Resolution No. _____ recommended the proposed amendments for approval. The Planning Commission found that the proposed Planning Code and Zoning Map amendments were, on balance, consistent with the City's General Plan as it is proposed to be amended and with Planning Code Section 101.1(b) for the reasons set forth in Planning Code Resolution No. _____. A copy of said Resolution is on file with the Clerk of the Board of Supervisors in File No._____ and is incorporated herein by reference

(b) California Environmental Quality Act. At its hearing on _____, and prior to recommending the proposed Planning Code and Zoning Map amendments for approval, the Planning Commission certified a Final Environmental Impact Report (FEIR) for the Project

pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.), the CEQA Guidelines (14 Cal. Code Reg. Section 15000 et seq.) and Chapter 31 of the Administrative Code. In accordance with the actions contemplated herein, this Board has reviewed the FEIR and concurs with its conclusions, and finds that the actions contemplated herein are within the scope of the Project described and analyzed in the FEIR. The Board hereby adopts and incorporates by reference as though fully set forth herein the Commission's CEQA approval findings, [including a statement of overriding considerations], adopted by the Planning Commission on _____ in Motion No. _____. This Board also adopts and incorporates by reference as though fully set forth herein the Project's Mitigation Monitoring and Reporting Program (MMRP). Said findings and MMRP are on file with the Clerk of the Board of Supervisors in File No. _____.

(b) On _____, the Planning Commission, in Resolution No. _____, adopted findings that the actions contemplated in this ordinance are consistent, on balance, with the City's General Plan and eight priority policies of Planning Code Section 101.1. The Board adopts these findings as its own. A copy of said Resolution is on file with the Clerk of the Board of Supervisors in File No. _____, and is incorporated herein by reference.

(c) Pursuant to Planning Code section 302, this Board finds that the Planning Code and Zoning Map amendments will serve the public necessity, convenience, and welfare for the reasons set forth in Planning Commission Resolution No. _____, and the Board incorporates such reasons herein by reference.

Section 2. Article two of the Planning Code is hereby amended by adding Section 249.86, to read as follows:

*(a) Location. A Special Use District entitled the 3333 California Special Use District (SUD), the general boundaries of which are California Street to the north, Presidio Avenue to the east,*

*Masonic Avenue to the southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west, as more specifically shown on Section Map SU03 of the Zoning Maps of the City and County of San Francisco, is hereby established for the purpose set forth below.*

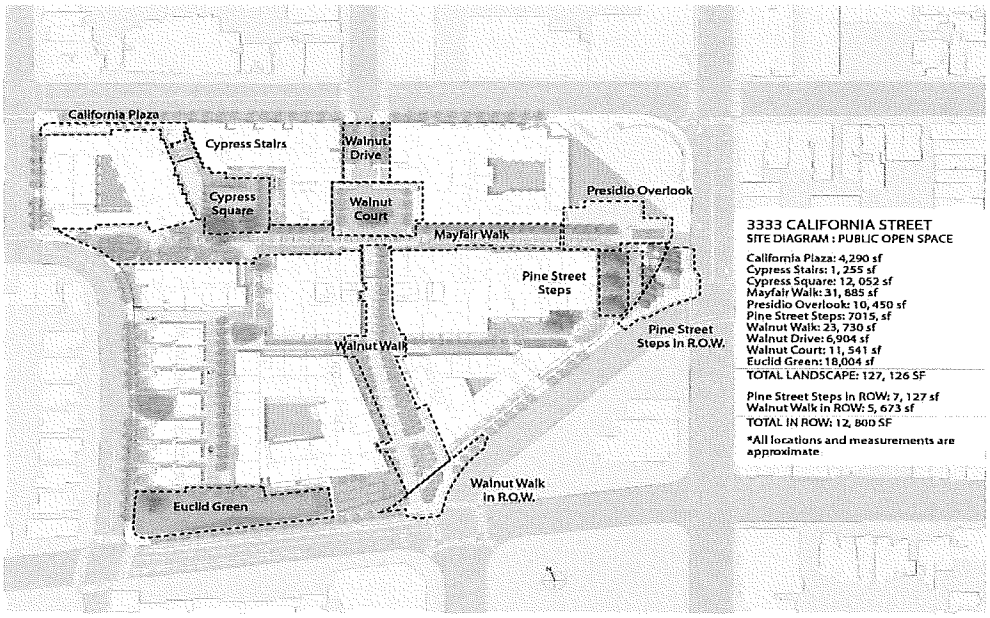
*(b) Purpose. The purpose of the SUD is to facilitate the development of a mixed use project in a transit-rich location with residential, non-residential, child care, open space, and related uses, and to give effect to the Development Agreement for the 3333 California Street project, as approved by the Board of Supervisors in the ordinance in File No. _____. The SUD will provide benefits to the City including but not limited to: replacement of a large-scale office building with a series of smaller buildings designed to be consistent with the scale and character of the neighborhood; construction of hundreds of new housing units, including family sized units and on-site senior housing with affordability levels exceeding on-site City requirements; and on-site child care facility; and construction and maintenance of new, publicly accessible open spaces and new connections to the surrounding street grid, including new pedestrian connections, and other street and streetscape improvements.*

*(c) Development Controls. Applicable provisions of the Planning Code shall apply to the SUD except as otherwise provided in this Section. In the event of a conflict between other provisions of the Planning Code and this Section, the provisions of this Section 249.86 shall control.*

*(1) Additional Permitted Uses. In addition to the uses permitted in the RM-1 zoning district, the following uses are principally permitted within the ground floor and second floor of all buildings with frontage on California Street: (i) Flexible Retail Uses; (ii) Social Service or Philanthropic Facilities; and (iii) non-residential uses, which shall be subject to the use controls of the NC-S zoning district applicable to such uses.*

*(2) Usable Open Space Requirements. Usable open space required under Section 135 has been designed on an SUD-wide basis. The open space requirement shall be met through a combination of private and common usable open spaces, as defined in Section 135, that will be*

*associated with individual buildings as well as approximately 56,000 square feet of privately owned, publically accessible parks and plazas that will be counted as common usable open space, provided such space is otherwise complaint with Section 135(g) and developed in accordance with the Development Agreement for the project, including without limitation, Schedule 1 (Community Benefits Linkages and impact Fee Schedule) thereof. The open space plan depicted below generally sets forth the approximate location and size of such privately owned, publically accessible open space. Accordingly, compliance with usable open space requirements for any building in the SUD shall be evaluated on a project-wide basis and for consistency with the terms of the Development Agreement. Upon expiration or termination of the Development Agreement, the then-applicable open space requirements of the Planning Code shall apply to any future development, provided however, that any building which has satisfied its open space requirements in accordance with this subsection (c)(2) prior to the expiration of the Development Agreement shall be deemed to be Code-conforming as to open space requirements and shall not constitute a noncomplying structure or nonconforming use under the provisions of Article 1.7, notwithstanding the expiration of the Development Agreement.*



*(3) Child Care Facility Parking. Off-street parking spaces for any child care facility shall be permitted at a rate of 1.5 parking spaces for each nine (9) children who could be accommodated in the child care facility under the applicable child care licensing requirements at any one time.*

*(4) Inclusionary Housing. For so long as the Development Agreement is in effect, the affordable housing requirements of the Development Agreement shall govern. Upon expiration or termination of the Development Agreement, the then-applicable Inclusionary Affordable Housing requirements set forth in Planning Code 415 et seq shall apply to any future development, without reference to the date of any earlier development application.*

*(5) Director Determination. During the term of the Development Agreement, all site and/or building permit applications for construction of new buildings or alterations of, or additions to existing structures ("Applications") submitted to the Department of Building Inspection shall be forwarded to the Planning Department for consistency review. For purposes of this subsection, Applications do not include any interior modifications or alterations, provided however that any such modification or alteration shall otherwise comply with the applicable requirements of the Planning Code. In no event may the Planning Director or Commission approve an Application that is not in substantial conformance with this Section 249.86, the Development Agreement, or any conditional use authorization and planned unit development authorization.*

*(6) Discretionary Review. No requests for discretionary review shall be accepted or heard for projects within the SUD.*

Section 3. City Planning Commission Resolution 4109, November 13, 1952. Effective as of the effective date of this ordinance, City Planning Commission Resolution No. 4109, and all related conditions, stipulations, special restrictions, and other limitations imposed in connection with the 1952 re-classification of the property (Assessor's Block 1032, Lot A) (the

"Property") from a First Residential District to a Commercial District shall no longer apply to the Property and is hereby extinguished.

Section 4. The San Francisco Planning Code is hereby amended by amending Special Use District Map SU03 of the Zoning Map of the City and County of San Francisco, as follows:

| Description of Property | Special Use District Hereby Approved |
|---|---|
| Assessor's Block/Lot 1032/0033 | 3333 California Street Special Use District |

Section 5. The San Francisco Planning Code is hereby amended by amending Sectional Map HT03 of the Zoning Map of the City and County of San Francisco, based on Assessor's Parcel Maps on the effective date of this legislation, as follows:

| Description of Property | Height and Bulk Districts to be Superseded | Height and Bulk Districts Hereby Approved |
|---|---|---|
| Assessor's Parcel Block No. 1032, Lot 003 (an approximately 2.13 acre area of the northwestern portion of Lot 003 from California Street south approximately 215.00' and from Laurel Street east approximately 451.75') | 40-X | 45-X |

| | | |
|---|---|---|
| Assessor's Parcel Block No. 1032, Lot 003 (an approximately 1.64 acre area of the northeastern portion of Lot 003 from California Street south approximately 197.00' and approximately 270.63' west of the northeastern most property corner along the California Street frontage) | 40-X | 67-X |
| Assessor's Parcel Block No. 1032, Lot 003 (an approximately 0.69 acre area measuring approximately 190.25' by 158.39' centrally located within Lot 003 197' south of California Street) | 40-X | 80-X |
| Assessor's Parcel Block No. 1032, Lot 003 (an approximately 1.54 acre area measuring approximately 190.25' by 182.72' centrally located on the eastern side of Lot 003 197' south of California Street) | 40-X | 92-X |

A pictorial representation of the above height and bulk districts on Assessor's Parcel Block 1032, Lot 3 is contained in Board of Supervisors File No. _____.

Section 6. Effective Date and Operative Date. This ordinance shall become effective 30 days after enactment. Enactment occurs when the Mayor signs the ordinance, the Mayor returns the ordinance unsigned or does not sign the ordinance within ten days of receiving it, or the Board of Supervisors overrides the Mayor's veto of the ordinance. This Ordinance shall become operative only on (and no rights or duties are affected until) the later of (a) 30 days from the date of its passage, or (b) the date that Ordinance _____, approving the Development Agreement for the Project, has become effective. A copy of said Ordinance is on file with the Clerk of the Board of Supervisors in File No. _____.

APPROVED AS TO FORM:
DENNIS J. HERRERA, City Attorney

By: _____
Audrey Williams Pearson
Deputy City Attorney

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FILE NO. 190844

# LEGISLATIVE DIGEST

[Planning Code, Zoning Map - 3333 California Street Special Use District]

**Ordinance amending the Planning Code to add Section 249.86 to create the 3333 California Street Special Use District and amending Sectional Maps SU03 and HT03 of the Zoning Map; and making environmental findings, and findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1.**

## Existing Law

Currently, the property at 3333 California Street (Assessor's Block 1032, Lot 003)("the property"), generally bounded by California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street/Mayfair Drive, is zoned RM-1 with a height limit of 40 feet. The property is also subject to Planning Commission Resolution 4109, which governs the location, type, and size of uses on the property.

## Amendments to Current Law

This ordinance would create a special use district for the property, to facilitate the reuse of the existing office building as two residential buildings, and the development of 13 new buildings, including seven duplexes. The special use district would be subject to the Planning Code controls for parcels zoned RM-1, except it would have special controls related to open space, parking for child care uses, and inclusionary housing. The district also would allow buildings fronting California Street to include, at the ground and second floors, flexible retail uses, social services or philanthropic facilities, and non-residential uses, subject to the controls of NC-S zoning. Permits for the buildings would be reviewed by the Planning Director for consistency with a development agreement (proposed in separate legislation) and the special use district controls, and requests for discretionary review would not be considered.

The ordinance would increase the height limit for buildings on the northern half of the property. Along California Street, between Laurel Street and the continuation of Walnut Avenue, the height limit would increase to 45 feet. On California Street between the continuation of Walnut Avenue and Presidio Avenue (but not including the northeast corner lot containing the San Francisco Fire Credit Union Building) the height limit would increase to 67 feet. In the interior of the property, at the current location of the existing building, the height limit would increase to 80 feet and 92 feet. The height limit would remain 40 feet along Laurel Street south of the intersection with Mayfair Drive, and along Euclid Avenue and Masonic Avenue to approximately Pine Street.

The ordinance would revoke Resolution 4109.

## Background Information

Laurel Heights Partners, LLC, a Delaware limited liability company ("Developer") has proposed a mixed-use development project ("Project") that includes converting an existing office building into two residential buildings, constructing 13 new buildings containing approximately 744 residential units, including 185 on site affordable senior residential units, and approximately 34,496 square feet for retail/restaurant/commercial use. The Project would also include 10 below-grade parking garages with approximately 857 parking spaces, an approximately 14,665 gross square foot space for child care use, approximately 41,288 square feet of private open space, and approximately 127,126 square feet of privately owned, publicly accessible open space that will include public pathways through the site and an existing open space at Euclid Avenue.

City staff has negotiated a development agreement with the Developer for a term of 15 years. Under the development agreement, Developer will attain the vested right to develop the Project in return for specified community benefits, including the affordable housing, public open space, child care facility, transportation, street improvements, auxiliary water supply system contribution, and workforce commitments made by Developer. The Board will consider the development agreement in separate legislation.

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EXHIBIT

July 16, 2019

# 3333 CALIFORNIA DRIVE

*NOTE: ALL DIMENSIONS SHOWN ARE APPROXIMATE




ZONING HEIGHT MAP

# Draft DA Resolution – Adoption of Development Agreement, DA Ordinance

SAN FRANCISCO
PLANNING DEPARTMENT

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

# Planning Commission Resolution No. XXXXX

HEARING DATE: SEPTEMBER 5, 2019

| | |
|---|---|
| *Record No.:* | 2015-014028DVA |
| *Project Address:* | 3333 California Street |
| *Existing Zoning:* | RM-1 (Residential – Mixed, Low Density)<br>40-X Height and Bulk District |
| *Proposed Zoning:* | RM-1 (Residential – Mixed, Low Density)<br>3333 California Street Special Use District (SUD)<br>40-X, 45-X, 67-X, 80-X, 92-X Height and Bulk Districts |
| *Block/Lot:* | 1032 / 003 |
| *Project Sponsor:* | Laurel Heights Partners, LLC<br>c/o: PSKS<br>150 Post Street, Suite 320<br>San Francisco, CA 94108 |
| *Property Owner:* | Laurel Heights Partners, LLC<br>c/o: PSKS<br>150 Post Street, Suite 320<br>San Francisco, CA 94108 |
| *Staff Contact:* | Nicholas Foster, AICP, LEED GA – (415) 575-9167<br>nicholas.foster@sfgov.org |

**RESOLUTION RECOMMENDING THAT THE BOARD OF SUPERVISORS APPROVE A DEVELOPMENT AGREEMENT BETWEEN THE CITY AND COUNTY OF SAN FRANCISCO AND LAUREL HEIGHTS PARTNERS, LLC, FOR CERTAIN REAL PROPERTY LOCATED AT CALIFORNIA STREET AND PRESIDIO AVENUE, COMPRISED OF ASSESSOR'S BLOCK 1032 LOT 003, CONSISTING OF APPROXIMATELY 10.25 ACRES, AND ADOPTING VARIOUS FINDINGS, INCLUDING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN AND PLANNING CODE SECTION 101.1.**

WHEREAS, Chapter 56 of the San Francisco Administrative Code sets forth the procedure by which a request for a development agreement will be processed and approved in the City and County of San Francisco.

WHEREAS, California Government Code Section 65864 et seq. authorizes any city, county, or city and county to enter into an agreement for the development of real property within the jurisdiction of the city, county, or city and county.

WHEREAS, Laurel Heights Partners, LLC ("Project Sponsor") has filed applications with the Planning Department (hereinafter "Department") for a Conditional Use Authorization, Development Agreement, Legislative Amendments, and Environmental Review to allow the Project

Sponsor to construct approximately 1,427,832 gross square feet of new and rehabilitated space at 3333 California Street, Block 1032 Lot 003 (hereinafter "Project Site").

WHEREAS, the Development Agreement would enable the 3333 California Street Project ("Project"). The Project is a new mixed-use development that will include residential, non-residential, open space, child care, and related uses. The Project would redevelop the subject property with a mix of residential, retail, child care, open space, and parking uses. The existing 14,000 gross-square-foot (gsf) annex building, surface parking lots and ramp structures would be demolished, and the existing 455,000 gsf office building ("Center Office Building"), would be partially demolished and adaptively reused for residential uses (as two separate buildings, "Center Building A" and "Center Building B") with up to three stories added to each. The Project would also construct thirteen new buildings, ranging from 4-story duplex townhouses to 6-story apartment buildings, as residential-only buildings ("Masonic"; "Euclid"; "Mayfair"; and the seven "Laurel Duplex" buildings), and mixed-use buildings ("Plaza A"; "Plaza B"; and "Walnut") containing non-residential uses on the ground and second floors. Overall, the Project includes a total of approximately 1,428,000 gsf of new and rehabilitated floor area, comprising: approximately 978,000 gsf of residential floor area (include 744 dwelling units); approximately 35,000 gsf of retail floor area; an approximately 15,000 gsf childcare facility (accommodating approximately 175 children); approximately 400,000 gsf devoted to off-street parking with 857 parking spaces (including approximately 10 car share spaces); and 839 bicycle spaces.

A total of 25% of the Project's dwelling units will be deed-restricted, on-site affordable units designated for low-income senior households. These affordable units will be located in the proposed Walnut Building on California Street and consist of 185 studio and 1-bedroom units for seniors plus 1 on-site manager's unit.

The Project would provide 52 percent of the overall lot area (approximately 233,000 square feet) as grade-level open area, some of which would be public open space and some of which would be private open space exclusively for residents. The Project would include a total of approximately 125,000 square feet (or roughly 2.88 acres) of publicly-accessible landscaped open space with multi-purpose plazas, lawns, and pathways. New public pedestrian walkways would cross the property in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approximately along the line of Walnut Street and in an east-west direction between Laurel Street and Presidio Avenue along the line of Mayfair Drive. The Project would also include streetscape improvements to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Site. These physical improvements to the Site are in service of meeting the goals and objectives of the Better Streets Plan. Specifically, the Project would include the following streetscape and pedestrian improvements: a new at-grade street crossing; sidewalk expansion; enhanced paving; installation of new street trees and street lighting on various public rights-of-way. Some of these improvements require a major encroachment permit from the Department of Public Works and are subject to Board of Supervisors approval.

WHEREAS, the Board will be taking a number of actions in furtherance of the Project, including the adoption of the 3333 California Street Special Use District ("3333 California Street SUD"), which specifies development controls that apply to the SUD, allowing additional (non-residential) permitted uses along California Street, specifies parking for childcare use, affordable housing requirements, and open space requirements; specifies director determination for consistency review and discretionary review controls; extinguishes City Planning Commission Resolution 4109; and amends Zoning Maps SU03 and HT03, reclassifying the height and bulk designation of the site from 40-X to 40-X, 45-X, 67-X, 80-X, and 92-X.

WHEREAS, in furtherance of the Project and the City's role in subsequent approval actions relating to the Project, the City and Laurel Heights Partners, LLC negotiated a development agreement for development of the Project Site, a copy of which is attached as Exhibit K (the "Development Agreement").

WHEREAS, the City has determined that as a result of the development of the Project Site in accordance with the Development Agreement, clear benefits to the public will accrue that could not be obtained through application of existing City ordinances, regulations, and policies, as more particularly described in the Development Agreement.

WHEREAS, the Development Agreement will eliminate uncertainty in the City's land use planning for the Project and secure orderly development of the Project Site.

WHEREAS, the Development Agreement shall be executed by the Director of Planning, subject to prior approval by the Board of Supervisors.

WHEREAS, on September 5, 2019, the Planning Commission ("Commission") reviewed and considered the Final EIR for the 3333 California Street Project ("FEIR") and found the FEIR to be adequate, accurate, and objective, thus reflecting the independent analysis and judgement of the Department and the Commission, and that the summary of comments and responses contained no significant revisions to the Draft EIR, and, by Motion No. XXXXX, certified the FEIR as accurate, complete and in compliance with the California Environmental Quality Act (California Public Resources Code Section 21000 et seq.) ("CEQA"), the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

WHEREAS, on September 5, 2019, the Commission by Motion No. XXXXX approved CEQA Findings, including adoption of a statement of overriding considerations, under Case No. 2015-014028ENV, for approval of the Project, which findings are incorporated by reference as though fully set forth herein.

WHEREAS, the CEQA Findings included adoption of the Mitigation Monitoring and Reporting Program (MMRP) as Exhibit C, which MMRP is hereby incorporated by reference as though fully set forth herein and which requirements are made conditions of this approval.

WHEREAS, on September 5, 2019, by Motion No. XXXXX, the Commission adopted findings in connection with its consideration of, among other things, the adoption of amendments to zoning text and map, as well as adoption of the 3333 California Street SUD, under CEQA, the State CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code and made certain findings in connection therewith, regarding the Project's consistency with the General Plan, Planning Code Section 101.1, and all other approval actions associated with the Project which findings are hereby incorporated herein by this reference as if fully set forth.

**NOW THEREFORE BE IT RESOLVED**, that the Commission has reviewed and considered the FEIR and record as a whole, and finds that the FEIR is adequate for its use as the decision-making body for the action taken herein and incorporates the CEQA Findings contained in Motion No. XXXXXX, including the statement of overriding considerations and the MMRP, by this reference thereto as though set forth in this Resolution;

**AND BE IT FURTHER RESOLVED,** that the Commission recommends approval of the Development Agreement, in substantially the form attached hereto as Exhibit K, subject to any additions and modifications that may be made by the Board of Supervisors.

**AND BE IT FURTHER RESOLVED,** that the Commission finds that the application, public notice, Planning Commission hearing, and Planning Director reporting requirements regarding the Development Agreement negotiations contained in Administrative Code Chapter 56 have been substantially satisfied in light of the meetings held for the last two years, the public hearings by the Planning Department staff at the Planning Commission, the provision of required public notices, and the information contained in the Director's Report.

**AND BE IT FURTHER RESOLVED**, that the Commission finds that the Development Agreement is consistent with the General Plan and the eight priority policies in Planning Code section 101.1 for the reasons set forth in Resolution XXXXX, and incorporated herein by reference.

**AND BE IT FURTHER RESOLVED**, that the Commission authorizes the Planning Director to take such actions and make such changes as deemed necessary and appropriate to implement this Commission's recommendation of approval and to incorporate recommendations or changes from other City agencies and/or the Board of Supervisors, provided that such changes do not materially increase any obligations of the City or materially decrease any benefits to the City contained in the Development Agreement attached as Exhibit K.

I hereby certify that the Planning Commission ADOPTED the foregoing Resolution on September 5, 2019.

Jonas P. Ionin
Commission Secretary

AYES: NOES:

ABSENT:

ADOPTED:

**BOARD of SUPERVISORS**

**City Hall**
**1 Dr. Carlton B. Goodlett Place, Room 244**
**San Francisco 94102-4689**
**Tel. No. 554-5184**
**Fax No. 554-5163**
**TDD/TTY No. 554-5227**

August 5, 2019

Planning Commission
Attn: Jonas Ionin
1650 Mission Street, Ste. 400
San Francisco, CA 94103

Dear Commissioners:

On July 30, 2019, Supervisor Stefani submitted the following proposed legislation:

**File No. 190844**

**Ordinance amending the Planning Code to add Section 249.86 to create the 3333 California Street Special Use District and amending Sectional Maps SU03 and HT03 of the Zoning Map; and making environmental findings, and findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1.**

**File No. 190845**

**Ordinance approving a Development Agreement between the City and County of San Francisco and Laurel Heights Partners, LLC, a Delaware limited liability company, for the development of an approximately 10.25-acre site located at California Street at Presidio Avenue with various public benefits, including 25% affordable housing, a child care center comprised of approximately 14,665 square feet, and approximately 4.47 acres of open space; making findings under the California Environmental Quality Act, findings of conformity with the General Plan, and the eight priority policies of Planning Code, Section 101.1(b); approving certain development impact fees for the project, and waiving certain Planning Code fees and requirements; and confirming compliance with or waiving certain provisions of Administrative Code, Chapter 56, and ratifying certain actions taken in connection therewith, as defined herein.**

The proposed ordinances are being transmitted pursuant to Planning Code, Section 302(b), for public hearing and recommendation. The ordinances are pending before the Land Use and Transportation Committee and will be scheduled for hearing upon receipt of your response.

Angela Calvillo, Clerk of the Board

By: Erica Major, Assistant Clerk
Land Use and Transportation Committee

c: John Rahaim, Director
Scott Sanchez, Acting Deputy Zoning Administrator
Corey Teague, Zoning Administrator
Lisa Gibson, Environmental Review Officer
Devyani Jain, Deputy Environmental Review Officer
AnMarie Rodgers, Director of Citywide Planning
Dan Sider, Director of Executive Programs
Aaron Starr, Manager of Legislative Affairs
Joy Navarrete, Environmental Planning
Don Lewis, Environmental Planning

[Development Agreement - Laurel Heights Partners, LLC - 3333 California Street Project - California Street at Presidio Avenue]

**Ordinance approving a Development Agreement between the City and County of San Francisco and Laurel Heights Partners, LLC, a Delaware limited liability company, for the development of an approximately 10.25-acre site located at California Street at Presidio Avenue with various public benefits, including 25% affordable housing, a child care center comprised of approximately 14,665 square feet, and approximately 4.47 acres of open space; making findings under the California Environmental Quality Act, findings of conformity with the General Plan, and the eight priority policies of Planning Code, Section 101.1(b); approving certain development impact fees for the project, and waiving certain Planning Code fees and requirements; and confirming compliance with or waiving certain provisions of Administrative Code, Chapter 56, and ratifying certain actions taken in connection therewith, as defined herein.**

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
**Additions to Codes** are in *single-underline italics Times New Roman font*.
**Deletions to Codes** are in ~~*strikethrough italics Times New Roman font*~~.
**Board amendment additions** are in double-underlined Arial font.
**Board amendment deletions** are in ~~strikethrough Arial font~~.
**Asterisks (* * * *)** indicate the omission of unchanged Code subsections or parts of tables.

Be it ordained by the People of the City and County of San Francisco:

Section 1. Project Findings.

The Board of Supervisors makes the following findings:

(a) California Government Code Section 65864 et seq. authorizes any city, county, or city and county to enter into an agreement for the development of real property within the jurisdiction of the city, county, or city and county.

///

(b) Chapter 56 of the San Francisco Administrative Code ("Chapter 56") sets forth certain procedures for the processing and approval of development agreements in the City and County of San Francisco (the "City").

(c) Laurel Heights Partners, LLC, a Delaware limited liability company ("Developer") owns and operates an approximately 10.25-acre site bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to the southeast, Euclid Avenue to the south, and Laurel Street and Mayfair Drive to the west, currently composed of an approximately 455,000 gross square foot office building, an approximately 14,000 gross square foot annex building, surface and subsurface parking areas, and approximately 165,200 square feet of landscaping or landscaped open space (the "Project Site").

(d) On _____, 2019, Developer filed an application with the City's Planning Department for approval of a development agreement relating to the Project Site (the "Development Agreement") under Chapter 56. A copy of the Development Agreement is on file with the Clerk of the Board in File No. _____.

(e) The Developer proposes a mixed use development that will include residential, non- residential, open space, child care, and related uses (the "Project"). Specifically, the Project includes (1) approximately 744 residential units, including not less than 185 on site affordable senior residential units, (2) approximately 34,496 square feet of retail/restaurant/commercial use in buildings along California Street, (4) 10 below-grade parking garages with approximately 857 parking spaces, (5) an approximately 14,665 gross square foot space for child care use, and (6) approximately 56,730 square feet of privately owned, publicly accessible open space required under Planning Code Section 135, approximately 70,396 square feet of additional privately owned, publicly accessible open space, and approximately 41,288 square feet of private open space, all as more particularly described in the Development Agreement.

(f) While the Development Agreement is between the City, acting primarily through the Planning Department, and Developer, other City agencies retain a role in reviewing and issuing certain later approvals for the Project. Later approvals include approval of final maps and street improvement permits. As a result, affected City agencies have consented to the Development Agreement.

(g) The Project is anticipated to generate an annual average of approximately 675 construction jobs, and on completion, an approximate $10 million annual increase in property taxes and approximately $15 million in development impact fees (including transportation, housing linkages, and school fees). In addition to the significant housing, jobs, urban revitalization, and economic benefits to the City from the Project, the City has determined that development of the Project under the Development Agreement will provide additional benefits to the public that could not be obtained through application of existing City ordinances, regulations, and policies. Additional public benefits to the City from the Project include (1) on-site affordable housing that exceeds the amount otherwise required and will equal twenty five percent (25%) of the total number of proposed housing units for the Project; (2) workforce obligations, including significant training, employment and economic development opportunities as part of the development and operation of the Project; (3) construction and maintenance of the publicly accessible privately owned open space, totaling approximately 2.92 acres; (4) street improvements, some of which will be maintained by the Developer at no cost to the City; (5) an approximately 14,665 square foot child care center, including an outdoor activity area, capable of accommodating at least 175 children, with 10% of the maximum number of permitted slots to be provided to children in low-income households; (6) a Transportation Demand Plan under Planning Code Section 169.3(e)(2) that implements 75% of applicable target points rather than the 50% standard otherwise required for the Project; and (7) a $1,055,000 payment towards an auxiliary water supply system that will

service the Project (the "AWSS Community Benefit Fee").

(h) Concurrently with this ordinance, the Board is taking a number of actions in furtherance of the Project, as generally described in the Development Agreement, including Exhibit E to the Development Agreement.

Section 2. CEQA Findings.

On _____, by Motion No. _____, the Planning Commission certified as adequate, accurate and complete the Final Environmental Impact Report ("FEIR") for the Project pursuant to the California Environmental Quality Act (California Public Resources Code Section 21000 et seq.) ("CEQA"). A copy of Planning Commission Motion No. _____ is on file with the Clerk of the Board of Supervisors in File No. _____. Also on _____, by Motion No. _____, the Planning Commission adopted findings, including a rejection of alternatives and a statement of overriding considerations (the "CEQA Findings") and a Mitigation Monitoring and Reporting Program ("MMRP"). These Motions are on file with the Clerk of the Board of Supervisors in File No. _____. In accordance with the actions contemplated herein, this Board has reviewed the FEIR and related documents, and adopts as its own and incorporates by reference as though fully set forth herein the CEQA Findings, including the statement of overriding considerations, and the MMRP.

Section 3. General Plan and Planning Code Section 101.1 (b) Findings.

(a) The Board of Supervisors finds that the Development Agreement will serve the public necessity, convenience, and general welfare for the reasons set forth in Planning Commission Resolution No. _____ and incorporates those reasons herein by reference.

(b) The Board of Supervisors finds that the Development Agreement is in conformity with the General Plan and the eight priority policies of Planning Code Section 101.1 for the reasons set forth in Planning Commission Resolution No. _____. The Board hereby adopts the findings set forth in Planning Commission Resolution No. _____ and incorporates those

findings herein by reference.

Section 4. Development Agreement.

(a) The Board of Supervisors approves all of the terms and conditions of the Development Agreement in substantially the form on file with the Clerk of the Board of Supervisors in File No. _____.

(b) The Board of Supervisors approves and authorizes the execution, delivery, and performance by the City of the Development Agreement as follows: (1) the Director of Planning and (other City officials listed thereon) are authorized to execute and deliver the Development Agreement and consents thereto, and (2) the Director of Planning and other applicable City officials are authorized to take all actions reasonably necessary or prudent to perform the City's obligations under the Development Agreement in accordance with the terms of the Development Agreement. The Director of Planning, at his or her discretion and in consultation with the City Attorney, is authorized to enter into any additions, amendments, or other modifications to the Development Agreement that the Director of Planning determines are in the best interests of the City and that do not materially increase the obligations or liabilities of the City or materially decrease the benefits to the City as provided in the Development Agreement.

(c) The Board of Supervisors authorizes the Controller to accept any payments made by the Developer under the Development Agreement.

Section 5. Development Impact Fees and Planning Code Conformity

(a) For the Project, the Board of Supervisors approves the development impact fees as set forth in the Development Agreement and waives any inconsistent provision in Planning Code Article 4.

(b) For the Project, the Board of Supervisors approves the child care facility and affordable housing requirements as set forth in the Development Agreement and waives the

requirements of Planning Code Section 414A, Section 415.5, Section 415.6(e), Section 415.6(f), and Section 415.7.

Section 6. City Administrative Code Conformity.

The Development Agreement shall prevail if there is any conflict between the Development Agreement and Chapter 56, and without limiting the generality of the foregoing clause, for purposes of the Development Agreement only, the provisions of Chapter 56 are waived or its provisions deemed satisfied as follows:

(a) Laurel Heights Partners, LLC shall constitute a permitted "Applicant/Developer" for purposes of Chapter 56, Section 56.3(b).

(b) The Project comprises approximately 10.25 acres and is the type of large multi-phase and/or mixed-use development contemplated by the City Administrative Code and therefore is satisfies the provisions of Chapter 56, Section 56.3(g).

(c) The provisions of the Development Agreement, including its attached Workforce Agreement, apply and satisfy the requirements of City Administrative Code Chapter 14B, Section 14B.20 and Chapter 56, Section 56.7(c).

(d) The provisions of the Development Agreement regarding any amendment or termination, including those relating to "Material Change," shall apply in lieu of the provisions of Chapter 56, Section 56.15.

(e) The provisions of Chapter 56, Section 56.20 have been satisfied by the Memorandum of Understanding between Developer and the Mayor's Office of Economic and Workforce Development for the reimbursement of City costs, a copy of which is on file with the Clerk of the Board of Supervisors in File No. _____.

Section 7. Chapter 56 Waiver; Ratification.

(a) In connection with the Development Agreement, the Board of Supervisors finds that the requirements of Chapter 56, as modified hereby, have been substantially complied

with and waives any procedural or other requirements of Chapter 56 if and to the extent to which they have not been strictly complied.

(b) All actions taken by City officials in preparing and submitting the Development Agreement to the Board of Supervisors for review and consideration are hereby ratified and confirmed, and the Board of Supervisors hereby authorizes all subsequent action to be taken by City officials consistent with this ordinance.

Section 8. Effective and Operative Date.

This ordinance shall become effective 30 days from the date of passage. This ordinance shall become operative only on (and no rights or duties are affected until) the later of (a) 30 days from the date of its passage, or (b) the date that Ordinance _____, Ordinance _____, and Ordinance _____ have become effective. Copies of said Ordinances are on file with the Clerk of the Board of Supervisors in File No. _____.

APPROVED AS TO FORM:
DENNIS J. HERRERA, City Attorney

By: _____
Carol Wong
Deputy City Attorney
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FILE NO. 190845

# LEGISLATIVE DIGEST

[Development Agreement Amendment - Laurel Heights Partners, LLC - 3333 California Street Project - California Street at Presidio Avenue]

**Ordinance approving a Development Agreement between the City and County of San Francisco and Laurel Heights Partners, LLC, a Delaware limited liability company, for the development of an approximately 10.25-acre site located at California Street at Presidio Avenue with various public benefits, including 25% affordable housing, a child care center comprised of approximately 14,665 square feet, and approximately 4.47 acres of open space; making findings under the California Environmental Quality Act, findings of conformity with the General Plan, and the eight priority policies of Planning Code, Section 101.1(b); approving certain development impact fees for the project, and waiving certain Planning Code fees and requirements; and confirming compliance with or waiving certain provisions of Administrative Code, Chapter 56, and ratifying certain actions taken in connection therewith, as defined herein.**

## Background Information

California Government Code sections 65864 et seq. (the “Development Agreement Statute”) and San Francisco Administrative Code Chapter 56 (“Chapter 56”) authorize the City to enter into a development agreement regarding the development of real property. There are no amendments to existing law.

## Proposed Amendment

Laurel Heights Partners, LLC, a Delaware limited liability company ("Developer") has proposed a mixed-use development project (“Project”) for the approximately 10.25-acre site bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to the southeast, Euclid Avenue to the south, and Laurel Street and Mayfair Drive to the west. The Project includes converting an existing office building into two residential buildings, constructing 13 new buildings, and developing open space to result in approximately 744 residential units, including 185 on site affordable senior residential units, approximately 34,496 square feet for retail/restaurant/commercial use, 10 below-grade parking garages with approximately 857 parking spaces, an approximately 14,665 gross square foot space for child care use, approximately 41,288 square feet of private open space, and approximately 127,126 square feet of privately owned, publicly accessible open space that will include public pathways through the site and an existing open space at Euclid Avenue.

City staff has negotiated a development agreement with Developer for a term of 15 years. Under the development agreement, Developer will attain the vested right to develop the Project in return for specified community benefits, including the affordable housing, public open space, child care facility, transportation, street improvements, auxiliary water supply

system contribution, and workforce commitments made by Developer. Approval of the ordinance would adopt certain environmental findings, allow City staff to enter into the development agreement, and waive specified provisions of the Administrative Code and Planning Code for the Project.

By separate legislation, the Board is considering a number of other actions in furtherance of the Project, including the creation of a special use district and amendments to the City's Planning Code, Height Map and Zoning Map, and approving a major encroachment permit.

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# EXHIBIT C:

# Mitigation Monitoring and Reporting Program (MMRP)

| FINAL MITIGATION MONITORING AND REPORTING PROGRAM FOR<br>3333 California Street Mixed-Use Project<br>(Includes Text for Adopted Mitigation Measures and Improvement Measures) | | | | |
|---|---|---|---|---|
| **MEASURES ADOPTED AS CONDITIONS OF APPROVAL** | **Responsibility for Implementation** | **Mitigation Schedule** | **Monitoring/Reporting Responsibility** | **Monitoring Actions**<br>**Schedule and Verification of Compliance** |
| **MITIGATION MEASURES** | | | | |
| ***Cultural Resources (Historic Architectural Resources) Mitigation Measures*** | | | | |
| **Mitigation Measure M-CR-1a: Documentation of Historical Resource**<br>Prior to issuance of demolition or site permits, the project sponsor shall undertake Historic American Building/Historic American Landscape Survey-like (HABS/HALS-like) documentation of the building and associated landscape features. The documentation shall be undertaken by a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History, History, or Architecture (as appropriate) to prepare written and photographic documentation of 3333 California Street. The specific scope of the documentation shall be reviewed and approved by the Planning Department but shall include the following elements:<br>**Measured Drawings** – A set of measured drawings shall be prepared that depict the existing size, scale, and dimension of the historic resource. Planning Department Preservation staff will accept the original architectural drawings or an as-built set of architectural drawings (e.g., plans, sections, elevations). Planning Department Preservation staff will assist the consultant in determining the appropriate level of measured drawings;<br>**Historic American Buildings/Historic American Landscape Survey-Level Photographs** – Either Historic American Buildings/Historic American Landscape Survey (HABS/HALS) standard large-format or digital photography shall be used. The scope of the digital photographs shall be reviewed by Planning Department Preservation staff for concurrence, and all digital photography shall be conducted according to the latest National Park Service (NPS) standards. The photography shall be undertaken by a qualified professional with demonstrated experience in HABS/HALS photography. | Project sponsor to retain qualified professional consultant.<br>Consultant to prepare documentation.<br>Planning Department shall review, request revisions if appropriate, and ultimately approve documentation.<br>Project sponsor to conduct outreach to identify other interested repositories under the direction of Planning Department Preservation staff. | Prior to issuance of any demolition or site permit for the affected historic resource at 3333 California Street, the qualified professional consultant to submit documentation package per HABS / HAER / HALS Guidelines for review by Planning Department.<br>Prior to issuance of any demolition or site permit for the affected historic resource at 3333 California Street, project sponsor to transmit documentation to the History Room in SF Library, San Francisco Architectural Heritage, and NWIC. | The qualified professional consultant to submit draft and final documentation prepared pursuant to HABS/HAER/HALS Guidelines to Planning Department for review and approval.<br>Following approval of documentation by Planning Department and prior to the start of construction, project sponsor to transmit documentation to the SF History Center in SF Library, Planning Department, and NWIC. | Considered complete when project sponsor transmits documentation to the History Room in SF Library, San Francisco Architectural Heritage, and NWIC as well as any other repositories, if applicable, as identified and agreed with during the outreach process. |

| FINAL MITIGATION MONITORING AND REPORTING PROGRAM FOR<br>3333 California Street Mixed-Use Project<br>(Includes Text for Adopted Mitigation Measures and Improvement Measures) | | | | |
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| **MEASURES ADOPTED AS CONDITIONS OF APPROVAL** | **Responsibility for Implementation** | **Mitigation Schedule** | **Monitoring/Reporting Responsibility** | **Monitoring Actions**<br>**Schedule and Verification of Compliance** |
| Photograph views for the data set shall include contextual views; views of each side of the building and interior views, including any original interior features, where possible; oblique views of the building; and detail views of character-defining features, including landscape elements.<br><br>All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included in the data set.<br><br>**HABS/HALS Historical Report** – A written historical narrative and report shall be provided in accordance with the HABS/HALS Historical Report Guidelines. The written history shall follow an outline format that begins with a statement of significance supported by the development of the architectural and historical context in which the structure was built and subsequently evolved. The report shall also include architectural description and bibliographic information.<br><br>**Video Recordation** – Video recordation shall be undertaken before demolition or site permits are issued. The project sponsor shall undertake video documentation of the affected historical resource and its setting. The documentation shall be conducted by a professional videographer, one with experience recording architectural resources. The documentation shall be narrated by a qualified professional who meets the standards for history, architectural history, or architecture (as appropriate) set forth by the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations Part 61). The documentation shall include as much information as possible—using visuals in combination with narration—about the materials, construction methods, current condition, historic use, and historic context of the historical resource. This mitigation measure would supplement the traditional HABS/HALS documentation, and would enhance the collection of reference materials that would be available to the public and inform future research.<br><br>**Softcover Book** – A Print-on-Demand softcover book shall be produced that includes the content from the historical report, historical photographs, HABS/HALS photography, measured drawings, and field notes. The Print-on-Demand book shall be made available to the public for distribution. | | | | |

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| The project sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, San Francisco Architectural Heritage, the Planning Department, and the Northwest Information Center. The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested repositories. All documentation will be reviewed and approved by the Planning Department's Preservation staff before any demolition or site permit is granted for the affected historical resource. | | | | |
| **Mitigation Measure M-CR-1b: Interpretation of the Historical Resource**<br>The project sponsor shall facilitate the development of an interpretive program focused on the history of the project site. The interpretive program should be developed and implemented by a qualified professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, such as a museum or exhibit curator. This program shall be initially outlined in a proposal for an interpretive plan subject to review and approval by Planning Department Preservation staff. The proposal shall include the proposed format and location of the interpretive content, as well as high-quality graphics and written narratives. The proposal prepared by the qualified consultant describing the general parameters of the interpretive program shall be approved by Planning Department Preservation staff prior to issuance of the architectural addendum to the site permit. The detailed content, media and other characteristics of such interpretive program shall be approved by Planning Department Preservation staff prior to issuance of a Temporary Certificate of Occupancy.<br>The interpretative program shall include but not be limited to the installation of permanent on-site interpretive displays or screens in publicly accessible locations. Historical photographs, including some of the large-format photographs required by Mitigation Measure M-CR-1a, may be used to illustrate the site's history.<br>The primary goal is to educate visitors and future residents about the property's historical themes, associations, and lost contributing features within broader historical, social, and physical landscape contexts. These themes would include but not be limited to the subject property's historic | Project sponsor and their qualified professional to select materials from 3333 California Street building to display.<br>Project sponsor to establish location(s), media, and characteristics of the display.<br>Project sponsor and their qualified professional to prepare display. | Prior to issuance of architectural addendum to the site permit, the general parameters of the interpretive program shall be approved by Planning Department Preservation staff.<br>Prior to any demolition or removal activities, selection of interpretative materials to occur.<br>Interpretive program shall be approved by Planning Department prior to the issuance of the first Temporary Certificate of Occupancy and updated for each construction phase, if needed. | The qualified professional to submit interpretive materials to Planning Department for approval.<br>Project sponsor to report to Planning Department when display is completed. | Considered complete when Planning Department approve the interpretive program for all construction phases and when the interpretive program is installed. |

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| significance as a Midcentury Modern corporate campus designed by Edward B. Page with a landscape designed by Eckbo, Royston & Williams. The interpretive program should be developed in coordination with the archaeological program, which would likely include interpretation of the subject property's inclusion in the larger site of California Registered Landmark 760, Former Site of Laurel Hill Cemetery. | | | | |
| ***Cultural Resources (Archaeological Resources) Mitigation Measures*** | | | | |
| **Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting**<br>Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the project on buried historical or prehistoric resources. The project sponsor shall retain the services of an archaeological consultant from rotation of the Department Qualified Archaeological Consultants List maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archaeologist to obtain the names and contact information for the next three archaeological consultants on the qualified archaeological consultants list. The archaeological consultant shall undertake an archaeological testing program as specified in the Archaeological Research Design and Treatment Plan and outlined below. In addition, the consultant shall be available to conduct an archaeological monitoring program, as required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or testing programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines section 15064.5 (a) and (c). | Project sponsor to retain qualified professional archaeologist from the pool of archaeological consultants maintained by the Planning Department. | Prior to issuance of site permits and prior to commencement of demolition and soil-disturbing activities for each construction phase, submittal of all plans and reports for approval by the ERO. | The archaeological consultant shall undertake an archaeological testing program as specified herein. (See below regarding archaeological consultant's reports). | Considered complete when project sponsor retains a qualified professional archaeological consultant, and archaeological consultant has a scope approved by the ERO for the archaeological testing program. |

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| Consultation with Descendant Communities<br>On discovery of an archaeological site[1] associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group, an appropriate representative[2] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archaeological field investigations of the site and to consult with the ERO regarding appropriate archaeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archaeological site per Mitigation Measure M-CR-2b (below). A copy of the Final Archaeological Resources Report shall be provided to the representative of the descendant group. | Project sponsor/archaeological consultant. | Upon discovery of an archaeological site associated with descendant groups, and for the duration of the archaeological investigation of the associated site. | Project sponsor/archaeological consultant shall contact the ERO and appropriate descendant group representative upon discovery of an archaeological site. | |
| Archaeological Testing Program<br>The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP) that tiers off the Archaeological Research Design and Treatment Plan. 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 an historical resource under CEQA. | Project sponsor and archaeological consultant at the direction of the ERO. | Prior to any excavation, site preparation or construction an ATP for such phase is to be submitted to and approved by the ERO. | Archaeological consultant to undertake ATP in consultation with ERO. | Considered complete upon submittal of Final Archaeological Resources Report. |
| 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 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:<br>A) The project shall be redesigned so as to avoid any adverse effect on | Project sponsor and archaeological consultant in consultation with the ERO. | At the completion of the archaeological testing program. | Archaeological consultant to submit results of testing. Based on findings, the project sponsor and archaeological consultant, in consultation with ERO, to determine the final steps. | |

[1] The term "archaeological site" is intended here to minimally include any archaeological deposit, feature, burial, or evidence of burial.

[2] An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

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| the significant archaeological resource; or<br>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<br>If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program (AMP) shall be implemented, the AMP would minimally include the following provisions:<br>• The archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. A single AMP or multiple AMPs may be produced to address project phasing. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context. The archaeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource;<br>• The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with project archaeological consultant, determined that project construction activities could have no effects on significant archaeological deposits; and<br>• The archaeological monitor shall record and be authorized to collect | Project sponsor and archaeological consultant in consultation with the ERO. | Project sponsor, archaeological consultant, and ERO shall meet prior to commencement of soils-disturbing activities for each construction phase. If ERO determines that archaeological monitoring is necessary, monitor throughout all soils-disturbing activities for each construction phase | If required, archaeological consultant to prepare AMP in consultation with the ERO.<br>Project sponsor, archaeological consultant, archaeological monitor, and project sponsor's contractors shall implement the AMP, if required by the ERO | Considered complete on approval of AMP by ERO; submittal of report regarding findings of AMP. |

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| soil samples and artifactual/ecofactual material as warranted for analysis.<br>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 activities and 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, pile driving activity that may affect the archaeological resource shall be suspended 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. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and present the findings of this assessment to the ERO. 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:<br>A) The project shall be redesigned so as to avoid any adverse effect on the significant archaeological resource; or<br>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. | | | | |
| Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO. | Project sponsor and project archaeological consultant. | After completion of the approved archaeological monitoring program | Submit report on findings of AMP | |
| <u>Archaeological Data Recovery Program</u><br>If the ERO, in consultation with the archaeological consultant, determines that an archaeological data recovery program shall be implemented based on the presence of a significant resource, the archaeological data recovery program shall be conducted in accord with an archaeological data recovery plan (ADRP). No archaeological data recovery shall be undertaken without the prior approval of the ERO or the Planning Department archaeologist. The | Project sponsor and archaeological consultant in consultation with the ERO. | If there is a determination by the ERO that an ADRP is required. | If required, archaeological consultant to prepare an ADRP in consultation with the ERO. | Considered complete on approval of the FARR by ERO. |

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| archaeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. 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 applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, shall be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.<br>The scope of the ADRP shall include the following elements:<br>• *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.<br>• *Cataloguing and Laboratory Analysis*. Description of selected cataloguing system and artifact analysis procedures.<br>• *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.<br>• *Interpretive Program.* Consideration of an onsite/offsite public interpretive program during the course of the archaeological data recovery program.<br>• *Security Measures.* Recommended security measures to protect the archaeological resource from vandalism, looting, and non-intentionally damaging activities.<br>• *Final Report.* Description of proposed report format and distribution of results.<br>*Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. | | | | |

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| Human Remains and Associated or Unassociated Funerary Objects<br>The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the ERO and the Medical Examiner of the City and County of San Francisco, and in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC), which shall appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The project sponsor and ERO shall make all reasonable efforts to develop a burial agreement with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archaeological consultant shall retain possession of the remains and associated or unassociated funerary objects until completion of any such analyses, after which the remains and associated and unassociated funerary objects shall be reinterred or curated as specified in the agreement. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. However, if the ERO, project sponsor and MLD are unable to reach an agreement on scientific treatment of the remains and associated and unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.<br>Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity will additionally follow protocols laid out in the Archaeological Research Design | Project sponsor and archaeological consultant shall notify the San Francisco Medical Examiner and if applicable, Native American Heritage Commission who will appoint a Most Likely Descendent. Project sponsor, ERO, and the Most Likely Descendent shall make all reasonable efforts to develop a burial agreement. | In the event human remains and/or funerary objects are encountered project sponsor's construction contractor to immediately contact archaeological consultant and ERO. | Archaeological consultant/ archaeological monitor/project sponsor or contractor to contact San Francisco Medical Examiner and ERO and implement regulatory requirements, if applicable, regarding discovery of Native American human remains and associated/unassociated funerary objects. | Considered complete on notification of the San Francisco Medical Examiner, ERO, and NAHC, if necessary, and completion of burial agreement and/or analysis. |

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| and Treatment Plan, the ATP, and any agreement established between the project sponsor, Medical Examiner and the ERO. | | | | |
| Final Archaeological Resources Report<br>The archaeological consultant shall submit a Final Archaeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archaeological resource shall be provided in a separate removable insert within the FARR. The FARR may be submitted at the conclusion of all construction activities associated with the project. | Project sponsor and archaeological consultant in consultation with ERO. | If applicable, after completion of archaeological data recovery, inventorying, analysis and interpretation. | If applicable, archaeological consultant to submit a FARR to ERO for approval. | Considered complete upon approval of Final Archaeological Resources Report by ERO and distribution of FARR as directed by ERO. |
| Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA Department of Parks and Recreation [DPR] 523 series) and/or documentation for nomination to the National Register of Historic Places (National register)/California Register of Historical Resources (California register). In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above. | Archaeological consultant at the direction of the ERO. | If applicable, upon approval of Final Archaeological Resources Report by ERO. | Once approved, archaeological consultant to distribute FARR and provide written certification to ERO that required FARR distribution has been completed. | |
| **Mitigation Measure M-CR-2b: Interpretation**<br>Based on a reasonable presumption that archaeological resources may be present within the project site, and to the extent that the potential significance of some such resources is premised on the California register Criteria 1 (Events), 2 (Persons), and/or 3 (Design/Construction), the following measure shall be undertaken to avoid any potentially significant adverse effect from the project on buried historical resources if significant archaeological resources are discovered.<br>The project sponsor shall implement an approved program for interpretation of significant archaeological resources. The project sponsor shall retain the | Project sponsor and archaeological consultant at the direction of the ERO. | Prior to issuance of final certificate of occupancy. | Archaeological consultant to develop program for post-recovery interpretation of resources. All plans and recommendations for interpretation by the archaeological consultant shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until deemed final by the | Considered complete upon installation of approved interpretation program, if required. |

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| services of a qualified archaeological consultant from the rotational qualified archaeological consultant list maintained by the Planning Department archaeologist having expertise in California urban historical and prehistoric archaeology. The archaeological consultant shall develop a feasible, resource-specific program for post-recovery interpretation of resources. The particular program for interpretation of artifacts that are encountered within the project site will depend upon the results of the data recovery program and will be the subject of continued discussion between the ERO, consulting archaeologist, and the project sponsor. Such a program may include, but is not limited to, any of the following (as outlined in the Archaeological Research Design and Treatment Plan): lectures, exhibits, websites, video documentaries, and preservation and display of archaeological materials. To the extent feasible, the interpretive program shall be part of a larger, coordinated public interpretation strategy for the project area.<br>The archaeological consultant's work shall be conducted at the direction of the ERO, and in consultation with the project sponsor. All plans and recommendations for interpretation by the consultant shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. | | | ERO. The ERO to approve final interpretation program. Project sponsor to implement an approved interpretation program. | |
| **Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program**<br>If the Environmental Review Officer (ERO) determines that a significant archaeological resource is present, and if in consultation with the affiliated Native American tribal representatives, the ERO determines that the resource constitutes a tribal cultural resource (TCR) and that the resource could be adversely affected by the proposed project, the proposed project shall be redesigned so as to avoid any adverse effect on the significant tribal cultural resource, if feasible. | Project sponsor at the direction of the ERO. | For the duration of soil-disturbing activities throughout all construction phases. | Project sponsor shall contact the ERO and appropriate Native American tribal representative upon discovery of an archaeological resource that constitutes a TCR. | Considered complete upon installation of approved interpretation program, if required. |
| If the ERO, in consultation with the affiliated Native American tribal representatives and the project sponsor, determines that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the project sponsor shall implement an interpretive program of the TCR in consultation with affiliated tribal representatives. An interpretive plan produced in consultation with the ERO and affiliated tribal representatives, at a minimum, | Project sponsor in consultation with the ERO. | Prior to issuance of final certificate of occupancy. | A qualified consultant, the project sponsor, a Native American tribal representative, and the ERO shall collaborate on the development of a feasible, resource-specific program for post-recovery | |

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| and approved by the ERO would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of those displays or installation, the producers or artists of the displays or installation, and a long- term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists, oral histories with local Native Americans, artifacts displays and interpretation, and educational panels or other informational displays. | | | interpretation of resources. The interpretive plan shall be submitted first and directly to the ERO for review and comment, and shall be considered a draft report subject to revision until deemed final by the ERO. The ERO to approve final interpretation program. Project sponsor to implement an approved interpretation program. | |
| ***Transportation and Circulation Mitigation Measures*** | | | | |
| **Mitigation Measure M-TR-2: Reduce Retail Parking Supply**<br>The proposed project or project variant shall provide retail parking in an amount not to exceed the existing neighborhood rate of 1.55 by 38 percent (or 2.14 spaces per 1,000 gross square feet). | Project sponsor or qualified consultant to develop a draft parking plan to achieve the required retail parking rate. | Prior to approval of the Conditional Use/PUD application. | The project sponsor or qualified consultant to provide a draft parking program to the Planning Department for review and approval. | Considered complete upon review and approval of the parking reduction plan by the Planning Department. |
| **Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity**<br>Based on an evaluation of the transit ridership generated by the proposed project or project variant, monitoring of transit capacity utilization for the 43 Masonic route shall be initiated when the first phase of development has been completed and occupied.<br>The transit monitoring phase shall involve the following steps.<br>• The project sponsor shall fund a transit capacity study to be reviewed and approved by the SFMTA. The project sponsor shall obtain current ridership on the 43 Masonic route from SFMTA and an assessment of the capacity utilization shall be conducted at the 43 Masonic route's maximum load point for weekday a.m. peak hour conditions. | Project sponsor or qualified consultant at the direction of the SFMTA shall prepare a transit capacity study to determine whether capacity utilization exceeds 85 percent for the 43 Masonic route.<br>If so, then SFMTA will determine whether adding bus(es) or other | Baseline study conducted prior to the issuance of the first Certificate of Occupancy of the first phase of development, and subsequent ridership study after the first phase of the development is occupied.<br>No studies shall be required if fair-share contribution is paid. | SFMTA to review the study and determine if the capacity utilization of the 43 Masonic line at its maximum load point exceeds 85 percent as measured at the completion of any individual project phase.<br>If so, and the SFMTA has committed to implement M-TR-4, the project sponsor shall provide the fair share contribution subject to the limits stated in M-TR-4 to | Considered complete upon payment of fair – share contribution or review and approval of the transit capacity study by SFMTA, if applicable and payment of fair-share contribution. If SFMTA determines one or |

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| • If the capacity utilization exceeds 85 percent, a fair share contribution payment shall be made to SFMTA by the project sponsor, calculated in a Transit Mitigation Agreement, to contribute to the cost of providing additional bus service or otherwise improving service on the 43 Masonic route.<br>The fair share contribution as documented in EIR Appendix D shall not exceed the following amounts across all phases. Payment of the following fair share contribution levels would mitigate the impacts of the estimated transit ridership added by full development of the proposed project or project variant.<br>• Proposed Project – $182,227<br>• Project Variant – $218,390<br>These amounts shall be increased by consumer price index per year plus a one-time escalation of 0.5 percent.<br>SFMTA will determine whether adding bus(es) or other measures are more desirable to increase capacity along the route and will use the funds provided by the project sponsor to implement the most desirable measure, which may include, but is not limited to, the following:<br>1. Instead of adding more buses to a congested route, increase travel speeds along the route, which would allow for buses to move faster, thus increasing efficiency and reliability. In this case, the project sponsor's fair share contribution may be used to fund a study to identify appropriate and feasible improvements and/or implement a portion of the improvements that would increase travel speeds enough to increase capacity along the bus route. Such improvements could include transit only lanes, transit signal priority, and transit boarding improvements.<br>2. Increase capacity along the corridor by adding a new Muni service route in this area. If this option is selected, the project sponsor's fair share contribution may fund the purchase of the new vehicles.<br>If the capacity utilization with the proposed project or project variant based on SFMTA's ridership data is less than 85 percent after a particular phase of the proposed project or project variant is completed and occupied, then the project | measures are more desirable to increase capacity along the route and will use the funds provided by the project sponsor to implement the most desirable measure | | capital costs for SFMTA to implement one of the designated capacity enhancement measures. | more fair-share payments is required, considered complete upon payment of the final fair-share payment. |

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| sponsor's fair share payment shall be $0 and the process shall repeat at the subsequent phase. Each subsequent fair share calculation shall take account of amounts paid for prior phases, to ensure that payments are not duplicative for the same transit rider impacts. | | | | |
| ***Noise and Vibration Mitigation Measures*** | | | | |
| **Mitigation Measure M-NO-1: Construction Noise Control Measures**<br>The project sponsor shall implement a project-specific Noise Control Plan that has been prepared by a qualified acoustical consultant and approved by the Planning Department. The Noise Control Plan may include, but is not limited to, the following construction noise control measures. Implementation of applicable construction noise control measures shall apply to all phases of the construction period.<br>• Muffle and maintain all equipment used on site. All internal combustion engine driven equipment shall be fitted with mufflers that are in good working condition.<br>• Position stationary noise sources, such as temporary generators and pumps, as far from nearby receptors as possible, within temporary enclosures and shielded by barriers (which could reduce construction noise by as much as 5 dB) or other measures, to the extent feasible.<br>• Use "quiet" models of air compressors and other stationary equipment where such technology exists.<br>• Prohibit unnecessary idling of internal combustion engines.<br>• Impact tools (e.g., jack hammers, pavement breakers, rock drills) used for project construction shall be "quiet" gasoline-powered compressors or electrically powered compressors, and electric rather than gasoline- or diesel-powered engines shall be used to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be | Project sponsor and construction contractor shall prepare and implement Noise Control Plan. | Draft Noise Control Plan to be submitted to Planning Department and Department of Public Health prior to issuance of the first building permit or other permit that allows ground disturbance.<br>Draft construction-noise monitoring program to be submitted to the Planning Department and Department of Public Health prior to start of excavation of all construction phases, prior to building construction of the Euclid and Masonic buildings, and the Laurel Duplexes and Mayfair Building. | Planning Department and Department of Public Health shall review and approve Noise Control Plan and construction-noise monitoring programs.<br>Project sponsor, qualified consultant, and/or construction contractor(s) to prepare a weekly noise monitoring log which shall be made available to the Planning Department when requested. Any weekly report that includes an exceedance or for a period during which a complaint is received shall be submitted to the Development Performance Coordinator within 3 business days following the week in which the exceedance or complaint occurred.<br>Project sponsor shall notify the Planning Department Development Performance Coordinator of any night noise permit requests when submitted and any emergency/unanticipated activity causing noise with potential to exceed standard as soon as possible. | Project sponsor, qualified consultant, and/or construction contractor(s) to submit final noise monitoring report to the Planning Department Development Performance Coordinator at the completion of each construction phase.<br>Considered complete at the completion of project construction and submittal of final noise monitoring reports. |

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| used, which could achieve a reduction of 5 dBA. Quieter equipment shall be used when feasible, such as drills rather than impact equipment.<br>• Clearly post allowable construction hours (i.e., 7 a.m. to 8 p.m.) on signs around the project site through the duration of construction.<br>• During the excavation component of all construction phases, during building construction (framing of structure and major exterior work) of the Euclid and Masonic buildings, the Laurel Duplexes, and Mayfair Building, prepare and implement a daytime construction-noise monitoring program (e.g., 7 a.m. to 7 p.m. during weekdays, and 7 a.m. to 3 p.m. on Saturdays and all other times that excavation or major exterior construction of the identified buildings occurs). Three monitoring stations shall be required to provide continuous noise monitoring at the nearest potentially impacted receptors to the south (along Euclid Avenue), to the west (along Laurel Street), and to the north (along California Street). Selection of the three monitoring locations shall be coordinated between the Planning Department, construction contractor, and ultimately the affected residential property owners. The program shall be set up to alert the Construction Manager or other designated person(s) when noise levels exceed allowable limits (10 dBA above established ambient levels). If noise levels are found to exceed applicable noise limits due to construction-related activities, corrective action shall be taken, such as halting or moving specific construction activities, fixing faulty or poorly operating equipment, and installing portable barriers.<br>• Designate a Construction Manager who shall:<br>o Clearly post his/her name and phone number(s) on signs visible during each phase of the construction program.<br>o Notify area residents of construction activities, schedules, and impacts.<br>o Receive and act on complaints about construction noise disturbances. | | | | |

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| o Determine the cause(s) and implement remedial measures as necessary to alleviate potentially significant problems related to construction noise<br>o Request night noise permits from the San Francisco Department of Building Inspection (DBI) if any activity, including deliveries or staging, is anticipated outside of work hours that has the potential to exceed noise standards. If such activity is required in response to an emergency or other unanticipated conditions, night noise permits shall be requested as soon as feasible for any ongoing response activities.<br>o Notify the Planning Department's Development Performance Coordinator at the time that night noise permits are requested or as soon as possible after emergency/unanticipated activity causing noise with the potential to exceed noise standards has occurred.<br><u>Plan Review, Implementation, and Reporting</u><br>The Noise Control Plan shall be reviewed and approved by the San Francisco Department of Public Health and Planning Department prior to implementation. Noise monitoring shall be completed by a qualified noise consultant.<br>A noise monitoring log report shall be prepared by the Construction Manager or other designated person(s) on a weekly basis and shall be made available to the Planning Department when requested. The log shall include any complaints received, whether in connection with an exceedance or not, as well as any complaints received through calls to 311 or DBI if the contractor is made aware of them (for example, via a DBI notice, inspection, or investigation). Any weekly report that includes an exceedance or for a period during which a complaint is received should be submitted to the Development Performance Coordinator within 3 business days following the week in which the exceedance or complaint occurred. A report also shall be submitted to the Planning Department Development Performance Coordinator at the completion of each construction phase. The report shall document noise levels, exceedances of threshold levels, if reported, and corrective action(s) taken. | | | | |

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| **Mitigation Measure M-NO-2: Vibration Monitoring Program for SF Fire Credit Union Building**<br>Prior to excavation activities along California Street, including for the Walnut Building and California Street Garage, a detailed vibration assessment and monitoring plan shall be completed to ensure that construction activities and equipment are selected and designed to ensure groundborne vibration levels at the SF Fire Credit Union do not exceed levels protective of the structural integrity of the building. | Project sponsor to retain a qualified consultant to prepare a detailed vibration assessment and monitoring plan. | The detailed vibration assessment and monitoring plan is to be submitted to Planning Department prior to issuance of demolition or site permits for Walnut Building and California Street Garage. | Planning Department to approve vibration assessment and monitoring plan.<br>Project sponsor, qualified consultant, and/or construction contractor(s) to submit weekly reports during excavation, foundation and exterior construction activities to the Planning Department Development Performance Coordinator, and Department of Building Inspection upon request. | Considered complete at the completion of Walnut Building and California Street Garage excavation and submittal of final vibration monitoring report to the Planning Department. |
| The project contractor shall:<br>• Retain the services of a qualified structural engineer or vibration consultant to prepare a pre-construction building assessment and vibration monitoring plan of the SF Fire Credit Union building.<br>• Prior to excavation activities for the Walnut Building and the California Street Garage, perform inspection of the SF Fire Credit Union building to document existing building conditions with written and photographic descriptions of the existing condition of visible exteriors and in interior locations upon permission of the owner. The assessment shall determine specific locations to be monitored and include annotated drawings to locate digital photo locations, survey markers, and/or other monitoring devices to measure vibrations. Based on the construction program for the proposed project or project variant and the condition of the SF Fire Credit Union building, the structural engineer and/or vibration consultant shall develop a vibration monitoring plan to protect the SF Fire Credit Union building. The pre-construction assessment and vibration monitoring plan shall be submitted to the Planning Department prior to issuance of construction permits for excavation for the Walnut Building and the California Street Garage. | Project sponsor to retain a qualified structural engineer or vibration consultant to carry out pre-construction assessment. | Prior to excavation activities for the Walnut Building and California Street Garage, the qualified consultant shall perform pre-construction inspection of the SF Fire Credit Union building. | Planning Department shall review and approve pre-construction assessment and vibration monitoring plan. | |

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| • Inform the SF Fire Credit Union of upcoming construction activities that may generate high levels of vibration, including excavator use that may occur within 15 feet of this building (thereby providing a 7-foot protective buffer to the 8-foot distance where damage may occur).<br>• Perform vibration monitoring at the SF Fire Credit Union building during excavation activities for the Walnut Building and the California Street Garage when operating heavy equipment (i.e., excavators) within 15 feet of the building foundation. Vibration monitoring shall be conducted on a daily basis, as needed, when heavy equipment operates within 15 feet of the building foundation. When vibration levels exceed allowable threshold the Construction Manager, structural engineer, or other designated person(s) shall be alerted.<br>• Should the measured vibration levels at the SF Fire Credit Union building during excavation for the Walnut Building and the California Street Garage exceed 0.5 PPV (in/sec) at any time, or if damage to the SF Fire Credit Union building is observed, construction personnel shall immediately cease excavation and implement vibration control measures such as adjustment of excavation methods to reduce vibration of soil or use of equipment that generates lower levels of vibration. Examples of equipment that may generate lower levels of vibration may include smaller sized back-hoes.<br>• If damage to the SF Fire Credit Union building occurs, the building shall be remediated to its pre-construction condition at the conclusion of ground-disturbing activity, as shown in the pre-construction assessment, with the consent of the building owner.<br>**Plan Review, Implementation, and Reporting**<br>The Detailed Vibration Assessment Plan shall be reviewed and approved by the San Francisco Planning Department prior to implementation. Vibration measurements shall be completed by a qualified structural engineer or vibration consultant. | | | | |

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| A vibration monitoring log report is to be prepared by the Construction Manager or other designated person(s) on a weekly basis during excavation for the Walnut Building and California Street Garage, and shall be made available to the Planning Department Development Performance Coordinator and building department when requested. A final report on the vibration monitoring shall be submitted to the Planning Department following completion of Walnut Building and California Street Garage excavation and prior to the issuance of a Certificate of Occupancy. The report shall document vibration levels, exceedances of the threshold level, if reported, and corrective action(s) taken. | | | | |
| **Mitigation Measure M-NO-3: Stationary Equipment Noise Controls**<br>Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered vent openings, and location of vent openings away from adjacent residential uses.<br>After completing installation of the HVAC equipment but before receipt of the Final Certificate of Occupancy for each building, the project sponsor shall conduct noise measurements to ensure that the noise generated by stationary equipment complies with section 2909 (a) and (d) of the San Francisco Noise Ordinance. No Final Certificate of Occupancy shall be issued for any building until the standards in the Noise Ordinance are shown to be met for that building. | Project sponsor and construction contractor(s) shall implement noise attenuation measures and conduct noise measurements identified in M-NO-3. | Prior to issuance of building permit, incorporate practices identified in M-NO-3 into the project construction plans.<br>Before receipt of the Final Certificate of Occupancy for each building, the project sponsor shall conduct noise measurements. | Project sponsor to provide copies of project construction plans to Planning Department that show incorporation of practices identified.<br>Before receipt of the Final Certificate of Occupancy for each building, the project sponsor shall submit noise measurements results to the Planning Department Development Performance Coordinator. The noise measurement results from the stationary equipment shall demonstrate compliance with sections 2909 (a) and (d) of the San Francisco Noise Ordinance. | Considered complete upon submittal of project construction plans incorporating identified practices and noise measurements results demonstrating compliance with the San Francisco Noise Ordinance. |
| ***Biological Resources Mitigation Measures*** | | | | |
| **Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas**<br>Nesting birds and their nests shall be protected during construction by implementation of the following measures for each construction phase: | Project sponsor and qualified biologist shall | Vegetation/tree removal activities shall be | Before each construction phase.<br>If qualified biologist proposes to | Considered complete upon |

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| a. To the extent feasible, conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities which may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15).<br>b. If construction during the bird nesting season cannot be fully avoided, a qualified wildlife biologist* shall conduct pre-construction nesting surveys within 14 days prior to the start of construction or demolition at areas that have not been previously disturbed by project activities or after any construction breaks of 14 days or more. Surveys shall be performed for suitable habitat within 250 feet of the project site in order to locate any active nests of common bird species and within 500 feet of the project site to locate any active raptor (birds of prey) nests.<br>c. If active nests are located during the preconstruction nesting bird surveys, a qualified biologist shall evaluate if the schedule of construction activities could affect the active nests and if so, the following measures would apply:<br>i. If construction is not likely to affect the active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis considering the particular construction activity, duration, proximity to the nest, and physical barriers which may screen activity from the nest. The qualified biologist may revise his/her determination at any time during the nesting season in coordination with the Planning Department.<br>ii. If it is determined that construction may affect the active nest, the qualified biologist shall establish a no-disturbance buffer around the nest(s) and all project work shall halt | implement measures to protect nesting birds and their nests. | conducted during the non-breeding season (i.e., August 16 through January 14), OR preconstruction surveys shall be conducted for work scheduled during the breeding season (January 15 through August 15).<br>The preconstruction survey shall be conducted within 14 days prior to the start of work or after any construction breaks of 14 days or more during the bird nesting season (January 15 through August 15) | modify nest buffer distances, Planning Department shall review and approve in coordination with California Department of Fish and Wildlife before the buffer distances are reduced. | completion of preconstruction nesting bird surveys or completion of vegetation removal and grading activities outside of the bird breeding season. |

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| within the buffer until a qualified biologist determines the nest is no longer in use. Typically, these buffer distances are 250 feet for passerines and 500 feet for raptors; however, the buffers may be adjusted if an obstruction, such as a building, is within line-of-sight between the nest and construction.<br>iii. Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be done at the discretion of the qualified biologist and in coordination with the Planning Department, who would notify CDFW. Necessary actions to remove or relocate an active nest(s) shall be coordinated with the Planning Department and approved by CDFW.<br>iv. Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no-disturbance buffer(s) shall halt until the nest occupants have fledged.<br>v. Any birds that begin nesting within the project area and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels, so exclusion zones around nests may be reduced or eliminated in these cases as determined by the qualified biologist in coordination with the Planning Department, who would notify CDFW. Work may proceed around these active nests as long as the nests and their occupants are not directly impacted.<br>d. In the event inactive nests are observed within or adjacent to the project site at any time throughout the year, any removal or relocation of the inactive nests shall be at the discretion of the qualified biologist in coordination with the Planning Department, who would notify and seek approval from the CDFW, as appropriate. Work may proceed around these inactive nests. | | | | |

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| * Typical experience requirements for a "qualified biologist" include a minimum of four years of academic training and professional experience in biological sciences and related resource management activities, and a minimum of two years of experience conducting surveys for each species that may be present within the project area. | | | | |
| ***Geology and Soils Mitigation Measures*** | | | | |
| **Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources.**<br>Before the start of any drilling or excavation activities, the project sponsor shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology, who is experienced in on-site construction worker training. The qualified paleontologist shall train all construction personnel who are involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils that are likely to be seen during construction, and proper notification procedures should fossils be encountered. If potential vertebrate fossils are discovered by construction crews, all earthwork or other types of ground disturbance within 50 feet of the find shall stop immediately and the monitor shall notify the Environmental Review Officer. The fossil should be protected by an "exclusion zone" (an area approximately five feet around the discovery that is marked with caution tape to prevent damage to the fossil). Work shall not resume until a qualified professional paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the qualified paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. The qualified paleontologist may also propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, and currently accepted scientific practice, and shall be subject to review and approval by the Environmental Review Officer. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection [e.g., | Project sponsor to retain appropriately qualified paleontologist to conduct training for construction personnel and to review procedures for Stop Work notices for inadvertent discoveries.<br>Project sponsor and construction contractor(s) to report any fossils encountered. | Prior to and during any excavation, site preparation or soil disturbance for each construction phase.<br>ERO to approve training materials and ensure notification procedures are up to date. | The project sponsor's paleontological consultant shall notify the ERO immediately if work should stop, as indicated, and consult with the qualified paleontologist to develop recommendations for monitoring, treatment, and salvage, as needed. | Considered complete upon completion of ground-disturbing activities, if no paleontological resources are encountered, or upon completion of recovery or report preparation as directed by the ERO. |

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| the University of California Museum of Paleontology], and may also include preparation of a report for publication describing the finds. The Planning Department shall ensure that information on the nature, location, and depth of all finds is readily available to the scientific community through university curation or other appropriate means. | | | | |
| **IMPROVEMENT MEASURES FOR THE 3333 CALIFORNIA STREET MIXED USE PROJECT** (*Improvement measures are not required under CEQA. The EIR identifies Improvement Measures to avoid or reduce the less-than-significant impacts of the proposed project or project variant. The decision-makers may adopt these Improvement Measures as conditions of approval.*) | | | | |
| ***Transportation and Circulation Improvement Measures*** | | | | |
| **Improvement Measure I-TR-1: Project Construction Updates**<br>To minimize construction impacts on access for nearby residences, institutions, and businesses, the project sponsor should provide nearby residences and adjacent businesses with regularly updated information regarding construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel or parking lane closures, and sidewalk closures via a newsletter and/or website. | Project sponsor and project construction contractor(s). | Implement measure throughout all phases of construction. | Project sponsor and project construction contractor(s) to provide documentation regarding compliance with Improvement Measure I-TR-1 to Planning Department. | Considered complete at the completion of project construction. |
| **Improvement Measure I-TR-3: Driveway Queue Abatement**<br>It will be the responsibility of the owner/operator of the proposed parking garage to ensure that recurring vehicle queues do not occur on the public right-of-way. A vehicle queue is defined as one or more vehicles (destined to the parking facility) blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.<br>If a recurring queue occurs, the owner/operator of the parking facility will employ abatement methods as needed to abate the queue. Appropriate abatement methods will vary depending on the characteristics and causes of the recurring queue, as well as the characteristics of the parking facility, the street(s) to which the facility connects, and the associated land uses.<br>Suggested abatement methods include but are not limited to the following: redesign of facility to improve vehicle circulation and/or on-site queue capacity; ingress/egress restrictions, such as limiting access to right-in/right-out; employment of parking attendants; installation of "LOT FULL" signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of parking occupancy sensors and signage directing | Project sponsor/ building management representative and Planning Department. | Ongoing during building occupancy. | Project sponsor/building management representative to ensure that recurring vehicle queues do not occur adjacent to the project site.<br>Planning Department shall notify the project sponsor/ building management representative in writing if recurring queues are suspected. Project sponsor/building management representative to hire a qualified transportation consultant to evaluate the conditions at the site for no less than 7 days. If the Planning Department determines that a recurring queue does exist, the | Ongoing during building occupancy. |

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| drivers to available spaces; transportation demand management strategies such as customer/employee shuttles, delivery services; and/or parking demand management strategies such as parking time limits, paid parking, time-of-day parking surcharge, or validated parking.<br>If the Planning Director, or his or her designee, suspects that a recurring queue is present, the department will notify the property owner in writing. Upon request, the owner/operator will hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant will prepare a monitoring report to be submitted to the department for review. If the department determines that a recurring queue does exist, the facility owner/operator will have 90 days from the date of the written determination to abate the queue. | | | project sponsor/building management representative shall have 90 days from the date of the written determination to abate the queue. | |
| **Improvement Measure I-TR-9a: Schedule and Coordinate Deliveries**<br>Per Planning Code section 169.5, the project will maintain a transportation demand management (TDM) coordinator.[3] The project's TDM coordinator will work with delivery providers and building tenants to schedule and coordinate loading activities to ensure that any freight loading/service vehicles can be accommodated either in the proposed on-street or on-site/off-street loading spaces. Loading and moving activities will be minimized during peak periods and spread across the day, thereby reducing activity during the peak hour for loading. The TDM coordinator will work with tenants to find opportunities to consolidate deliveries and reduce the need for peak period deliveries whenever possible. Deliveries will be scheduled to minimize loading activities during peak periods and reduce potential for conflicts with traffic, transit, bicyclists, and pedestrians on the surrounding street network. Freight loading/service vehicles will be monitored and actively discouraged from parking illegally or obstructing traffic, transit, bicycle, or pedestrian flow along the project frontages. | Project sponsor/ building management representative/ TDM coordinator. | Prior to issuance of certificates of occupancy for new buildings.<br>Implementation of this measure is ongoing, after building occupancy. | The project sponsor shall provide documentation to the Planning Department regarding procedures to implement this improvement measure. | Ongoing during building occupancy. |
| **Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed**<br>After completion of the proposed project or project variant, the project sponsor will conduct a utilization study of commercial and passenger loading spaces. If | Project sponsor/ building management representative to | After one year of operation of the proposed project or project variant, conduct | The project sponsor shall provide documentation to the Planning Department regarding procedures | Considered complete upon review and |

[3] The project sponsor of a development project subject to the requirements of planning code section 169 must designate a TDM coordinator. The TDM coordinator may be an employee for the development project (e.g., property manager) or the project sponsor may contract with a third-party provider(s) (e.g., transportation brokerage services as required for certain projects pursuant to planning code section 163). The TDM coordinator shall be delegated authority to coordinate and implement the TDM Plan.

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|---|---|---|---|---|
| **MEASURES ADOPTED AS CONDITIONS OF APPROVAL** | **Responsibility for Implementation** | **Mitigation Schedule** | **Monitoring/Reporting Responsibility** | **Monitoring Actions**<br>**Schedule and Verification of Compliance** |
| the result of the study indicates that fewer than 15 percent of the loading spaces (e.g., 1 space) are available during the peak loading period, the project sponsor will implement loading management strategies and/or provide additional or expanded loading supply to meet the loading demand.<br>Additional loading strategies could include (but are not limited to):<br>• Expanding efforts to coordinate with parcel delivery companies to schedule deliveries during off-peak hours<br>• Installing delivery supportive amenities such as lock boxes and unassisted delivery systems to allow delivery personnel access and enable off-peak hour deliveries<br>• Coordinating delivery services across buildings to enable the delivery of several buildings' packages to a single location<br>• Requiring deliveries to the retail and restaurant components of the proposed project or project variant to occur during early morning or late evening hours<br>• Reserving on-street parking spaces for smaller delivery vehicles through the SFMTA Temporary Signage Program | conduct a loading utilization study with an approach reviewed and approved by Planning transportation staff. | loading utilization study. | to implement this improvement measure. | approval of the loading utilization study by the planning department. If Planning determines one or more loading strategies is/are recommended, considered complete upon implementation of loading management strategies. |

# EXHIBIT D:

# LAND USE DATA

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

# Land Use Information

PROJECT ADDRESS: 3333 CALIFORNIA ST
RECORD NO.: 2015-014028CUA

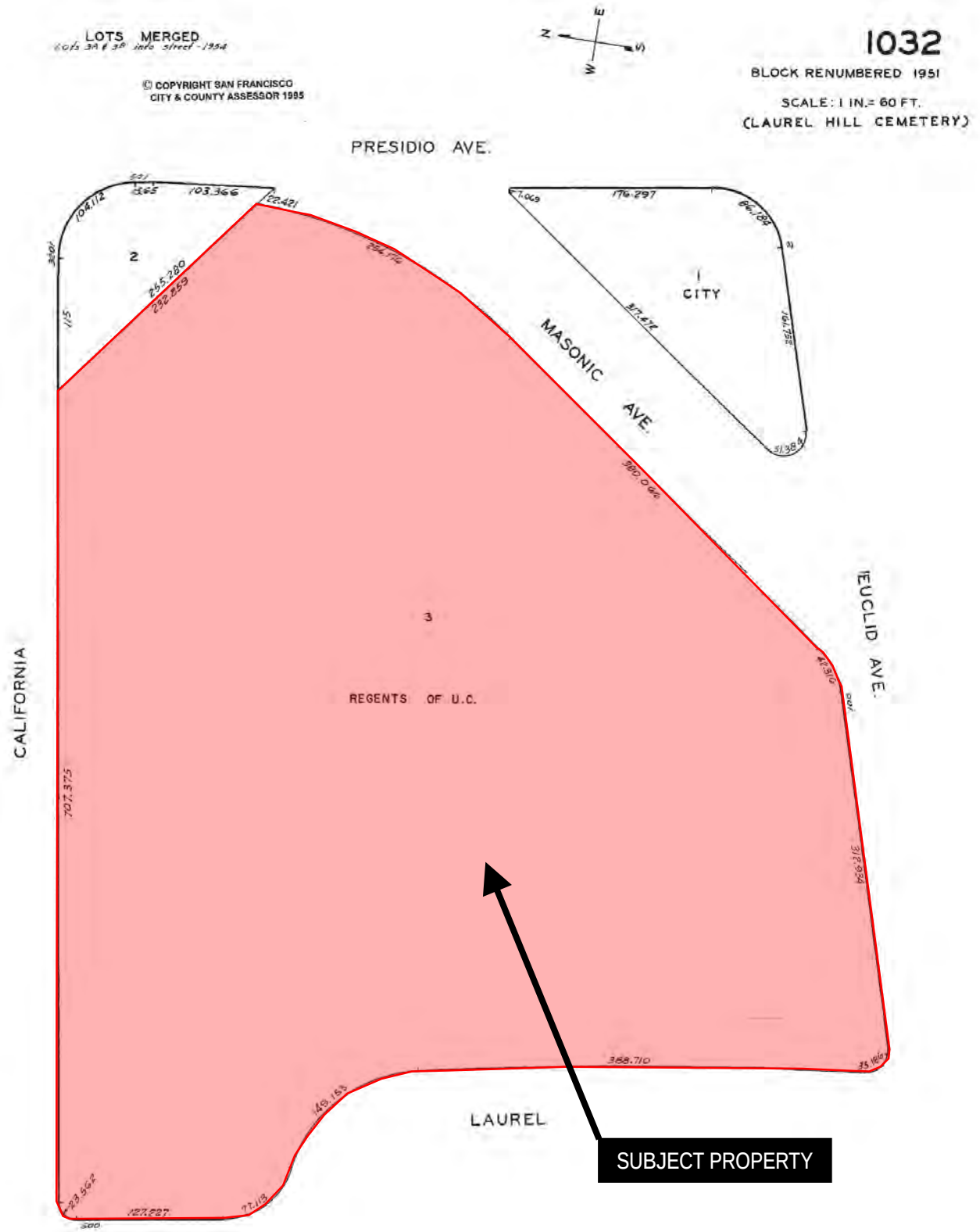
| | EXISTING | PROPOSED | NET NEW |
|---|---|---|---|
| **GROSS SQUARE FOOTAGE (GSF)** | | | |
| Parking GSF | 93,000 | 401,234 | 401,234 |
| Residential GSF | 0 | 977,437 | 977,437 |
| Retail/Commercial GSF | 0 | 34,496 | 34,496 |
| Office GSF | 364,500 | 0 | 0 |
| Child Care GSF | 11,500 | 14,665 | 14,665 |
| Usable Open Space | 103,800 | 97,640 | 97,640 |
| Public Open Space | 34,300 | 127,126 | 127,126 |
| Other ( ) | 0 | 0 | 0 |
| TOTAL GSF (excluding Open Space) | 469,000 | 1,427,832 | 1,427,832 |
| | EXISTING | NET NEW | **TOTALS** |
| **PROJECT FEATURES (Units or Amounts)** | | | |
| Dwelling Units - Affordable | 0 | 186 | 186 |
| Dwelling Units - Market Rate | 0 | 558 | 558 |
| Dwelling Units - Total | 0 | 744 | 744 |
| Hotel Rooms | 0 | 0 | 0 |
| Number of Buildings | 2 | 13 | 15 |
| Number of Stories | 1-5 | 2-3 | 4-7 |
| Parking Spaces | 543 | 314 | 857 |
| Loading Spaces | 5 | 1 | 6 |
| Bicycle Spaces | 15 | 824 | 839 |
| Car Share Spaces | 5 | 5 | 10 |
| Other ( ) | | | |

| | EXISTING | PROPOSED | NET NEW |
|---|---|---|---|
| **LAND USE - RESIDENTIAL** | | | |
| Studio Units | 0 | 27 | 27 |
| One Bedroom Units | 0 | 392 | 392 |
| Two Bedroom Units | 0 | 195 | 195 |
| Three Bedroom (or +) Units | 0 | 130 | 130 |
| Group Housing - Rooms | 0 | 0 | 0 |
| Group Housing - Beds | 0 | 0 | 0 |
| SRO Units | 0 | 0 | 0 |
| Micro Units | 0 | 0 | 0 |
| Accessory Dwelling Units | 0 | 0 | 0 |

# EXHIBIT E:

# MAPS AND CONTEXT PHOTOS

# Parcel Map




Conditional Use Authorization
**Case No. 2015-014028CUA**
3333 California Street Mixed-Use Project

# Zoning Map




Conditional Use Authorization
**Case No. 2015-014028CUA**
3333 California Street Mixed-Use Project

SAN FRANCISCO
**PLANNING DEPARTMENT**

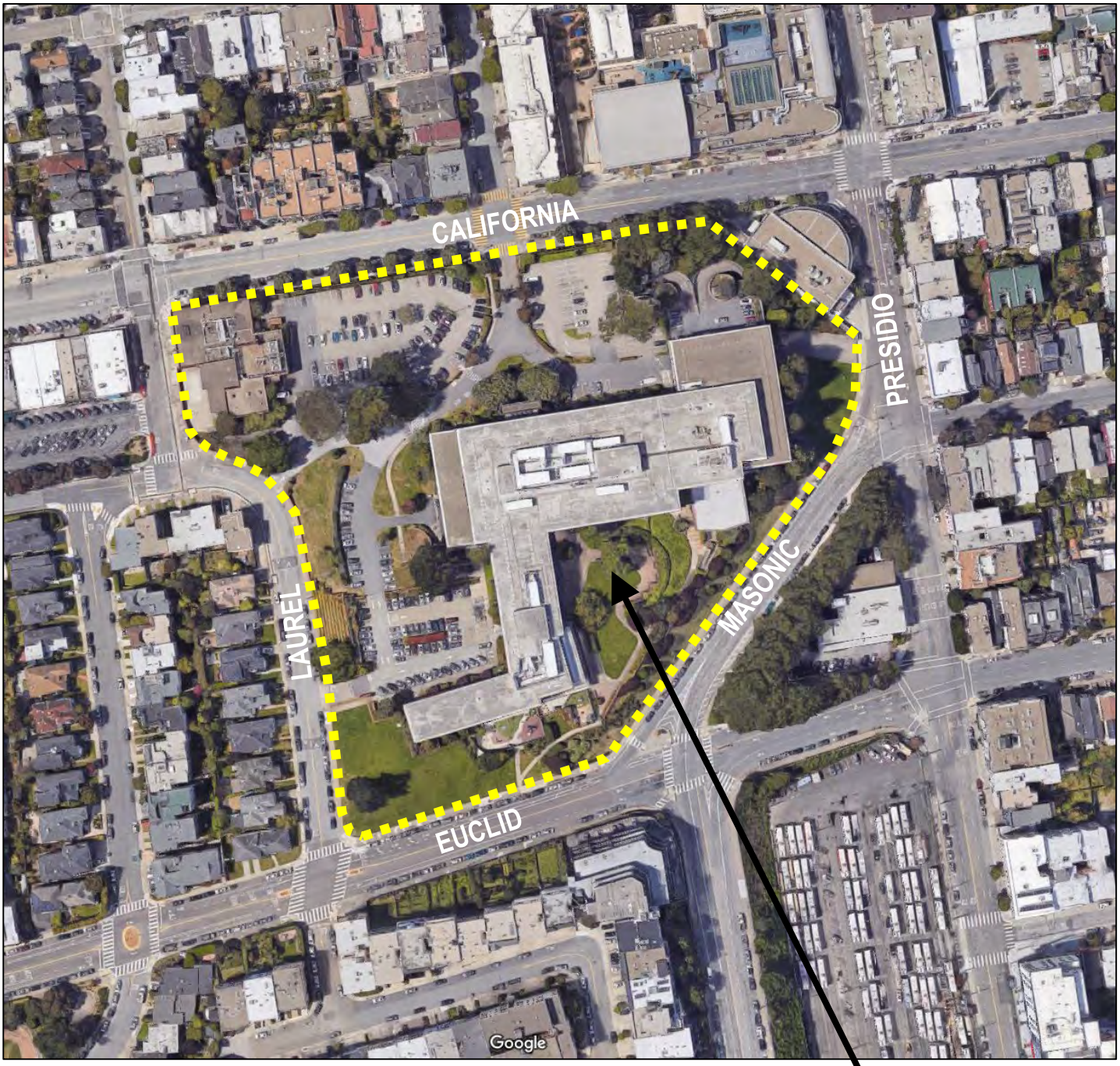
# Height and Bulk Map




Conditional Use Authorization
**Case No. 2015-014028CUA**
3333 California Street Mixed-Use Project

SAN FRANCISCO
**PLANNING DEPARTMENT**

# Aerial Photos




Aerial view of Project Site.

# Aerial Photos




Aerial view of Project Site.

SUBJECT PROPERTY

# Aerial Photos




Aerial view of Project Site.

SUBJECT PROPERTY

# Site Photos



View of Project Site (from corner of California/Laurel).




View of Project Site (from Laurel Street).

# Site Photos




View of Project Site (from corner of Laurel/Euclid).



View of Project Site (from Euclid).

# Site Photos




View of Project Site (from corner of Euclid/Masonic).




View of Project Site (from corner of California/Walnut).

# Site Photos



View on Project Site (looking north towards Walnut Street).



View on Project Site (looking west towards Laurel Street).

# PROJECT APPLICATIONS + DOCUMENTS

PRADO GROUP

August 19, 2019

Mr. Nick Foster
Senior Planner, City of San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: 3333 California Street, San Francisco, CA - Case # 2015-014028CUA

Mr. Foster:

As you know, on July 30, 2019, Supervisor Stefani introduced an ordinance to create a special use district and an ordinance for the project's proposed development agreement both of which pertain to the project variant. Per your request, we are providing this letter to confirm that the project sponsor is requesting that only the project variant for the subject project be brought forward to the planning commission for approval.

As you know, the City requested a higher density alternative to our initial design in their PPA response to our project, dated July 14, 2016. The project sponsor responded by providing a 744-unit project variant, maximizing the residential density on the site per the Planning Code's Planned Unit Development (PUD) provisions. This variant provided an alternate plan which replaced the 49,999 GSF Walnut Office Building with a 186-unit Walnut Residential Building. The 186-unit building is proposed as a 100% senior affordable housing project. This establishes 25% of the total units in the project as affordable.

Details of the higher density plan were also requested in the December 21, 2016 NOPDR letter from environmental planning in response to our initial March 29, 2016 EEA submittal and citing the July 14, 2016 PPA City response. The project sponsor provided the variant design in our update to the EEA, dated March 6, 2017. The Notice of Preparation of an EIR and Notice of Public Scoping Meeting, published September 20, 2017, described the project variant and indicated that the project variant would be studied in the Planning Department's Initial Study and EIR. The Initial Study, published April 25, 2018, analyzed the project variant, as did the Draft EIR, published November 7, 2018. Throughout the entirety of the CEQA process for 3333 California Street, the Planning Department has thoroughly analyzed the project variant.

Thank you for your time on this project. If you have any further requests, please do not hesitate to reach out to Don Bragg (SVP, Development) directly at 415.395.0880 or dbragg@pradogroup.com.

Respectfully submitted,

**Laurel Heights Partners LLC, a Delaware limited liability company**
By: 3333 California LP, a Delaware limited partnership, its Manager
By: PSKS LH LLC, a Delaware limited liability company, its General Partner
By: Prado LH LLC, a California limited liability company, its Manager

By: _____
Name: Daniel J. Safier
Title: Manager

cc: Don Bragg (Prado Group), Gregg Miller (CPDB)

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

August 7, 2019

Laurel Heights Partners, LLC
c/o: PSKS
150 Post Street Suite 320
San Francisco, California 94108

CASE NO. **2015-014028PRJ**
ADDRESS: **3333 California Street**
BLOCK/ LOT: **1032/003**

Dear Laurel Heights Partners, LLC:

The Planning Department has reviewed a supplemental shadow analysis (prepared by 'Previson Design', dated November 3, 2017) that you submitted for the above-referenced project for compliance with Section 295 of the Planning Code, which restricts structures over 40 feet in height from casting new shadow on properties under the jurisdiction of the Recreation and Park Commission. A previous shadow fan prepared by the Planning Department indicated that new shadow could potentially be cast by the proposed project on **Laurel Hill Playground** and **Presidio Heights Playground**, all properties within the jurisdiction of the Recreation and Park Commission. It should be noted that the shadow fan did not account for the precise articulation of the envelope of the proposed project, nor did it account for shading from existing buildings.

After reviewing and analyzing the aforementioned supplemental analysis, the Planning Department concurs with the analysis in that no net new shadow will be cast upon **Laurel Hill Playground** and **Presidio Heights Playground** because shadows are already cast by the existing surrounding buildings during times the Project would shade the park. The Project would not result in any net new shading.

Therefore, the project has been determined to be in compliance with Planning Code Section 295 and will not require any additional shadow analysis as the project is currently proposed. However, please be aware that if changes are made to the project that would add additional massing or height to the project, additional shadow analysis may be necessary.

If you have any questions, please contact me at (415) 575-8722 or seema.adina@sfgov.org.

Sincerely,

Seema Adina
Current Planning

CC (via email):
Nicholas Foster, Planning Department
Julie Moore, Environmental Planning
Stacy Bradley, Recreation and Park Department

# EXHIBIT F:

# PUBLIC CORRESPONDENCE

| | |
|---|---|
| **From:** | john nulty |
| **To:** | Melgar, Myrna (CPC); Koppel, Joel (CPC); Fung, Frank (CPC); richhillissf@gmail.com; Johnson, Milicent (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC) |
| **Cc:** | Ionin, Jonas (CPC); Foster, Nicholas (CPC) |
| **Subject:** | 333 California |
| **Date:** | Wednesday, August 14, 2019 5:31:32 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioner,

3333 California Street

RE: Case # 2015-014028

The former Fireman's Fund Insurance Company property on 10.2 acres has been bought by a private for-profit developer. The developer seeks variances and changes to current open space the neighborhood enjoys. Also the project sponsor want to take 10-15 years to built 15 buildings and add retail to an existing. West of location Laurel Village, east City Center and other retail in the immediate area.

We oppose this project impacts to the neighborhood including 4 stories of underground parking, variances, conditional use authorization being sought that change this neighborhood.

Sincerely,

Tenant Association Coalition of San Francisco

# EXHIBIT G:

# PROJECT SPONSOR BRIEF

# (FORTHCOMING)

# EXHIBIT H:

# INCLUSIONARY AFFORDABLE HOUSING AFFIDAVIT

AFFIDAVIT

# COMPLIANCE WITH THE INCLUSIONARY AFFORDABLE HOUSING PROGRAM

PLANNING CODE SECTION 415, 417 & 419

SAN FRANCISCO PLANNING DEPARTMENT
1650 MISSION STREET, SUITE 400
SAN FRANCISCO, CA 94103-2479
MAIN: (415) 558-6378 SFPLANNING.ORG

August 21, 2019
*Date*

I, Daniel J. Safier,
do hereby declare as follows:

A The subject property is located at (address and block/lot):

3333 California Street
*Address*

1032/003
*Block / Lot*

The subject property is located within the following Zoning District:

RM-1
*Zoning District*

40-X
*Height and Bulk District*

*Special Use District, if applicable*

Is the subject property located in the SOMA NCT, North of Market Residential SUD, or Mission Area Plan?
☐ Yes ☒ No

B The proposed project at the above address is subject to the *Inclusionary Affordable Housing Program*, Planning Code Section 415 and 419 et seq.

The Planning Case Number and/or Building Permit Number is:

2015-014028CUA
*Planning Case Number*

N/A
*Building Permit Number*

This project requires the following approval:

☒ Planning Commission approval (e.g. Conditional Use Authorization, Large Project Authorization)
☐ Zoning Administrator approval (e.g. Variance)
☐ This project is principally permitted.

The Current Planner assigned to my project within the Planning Department is:

Nicholas Foster
*Planner Name*

A complete Environmental Evaluation Application or Project Application was accepted on:

March 29, 2016
*Date*

The project contains 744 total dwelling units and/or group housing rooms.

This project is exempt from the *Inclusionary Affordable Housing Program* because:
☐ This project is 100% affordable.
☐ This project is 100% student housing.

Is this project in an UMU Zoning District within the Eastern Neighborhoods Plan Area?
☐ Yes _____ ☒ No
*( If yes, please indicate Affordable Housing Tier)*

Is this project a HOME-SF Project?
☐ Yes _____ ☒ No
*( If yes, please indicate HOME-SF Tier)*

Is this project an Analyzed or Individually Requested State Density Bonus Project?
☐ Yes ☒ No

**C** Please indicate the tenure of the project.

☐ **Ownership.** If affordable housing units are provided on-site or off-site, all affordable units will be sold as ownership units and will remain as ownership units for the life of the project. The applicable fee rate is the ownership fee rate.

☒ **Rental.** If affordable housing units are provided on-site or off-site, all affordable units will be rental units and will remain rental untis for the life of the project. The applicable fee fate is the rental fee rate.

**D** This project will comply with the Inclusionary Affordable Housing Program by:

☐ Payment of the Affordable Housing Fee prior to the first construction document issuance (Planning Code Section 415.5)

☒ On-site Affordable Housing Alternative (Planning Code Sections 415.6)

☐ Off-site Affordable Housing Alternative (Planning Code Sections 415.7)

☐ Combination of payment of the Affordable Housing Fee and the construction of on-site or off-site units
(Planning Code Section 415.5 - required for Individually Requested State Density Bonus Projects)

☐ Eastern Neighborhoods Alternate Affordable Housing Fee (Planning Code Section 417)

☐ Land Dedication (Planning Code Section 419)

The applicable inclusionary rate is:

25%, per Development Agreement Exhibit D

*On-site, off-site or fee rate as a percentage*

If the method of compliance is the payment of the Affordable Housing Fee pursuant to Planning Code Section 415.5, please indicate the total residential gross floor area in the project.

*Residential Gross Floor Area*

**E** The Project Sponsor acknowledges that any change which results in the reduction of the number of on-site affordable units following the project approval shall require public notice for a hearing and approval by the Planning Commission.

**F** The Project Sponsor acknowledges that failure to sell or rent the affordable units or to eliminate the on-site or off-site affordable units at any time will require the Project Sponsor to:

(1) Inform the Planning Department and the Mayor's Office of Housing and Community Development and, if applicable, fill out a new affidavit;

(2) Record a new Notice of Special Restrictions; and

(3) Pay the Affordable Housing Fee plus applicable interest (using the fee schedule in place at the time that the units are converted from ownership to rental units) and any applicable penalties by law.

**G** The Project Sponsor acknowledges that in the event that one or more rental units in the principal project become ownership units, the Project Sponsor shall notifiy the Planning Department of the conversion, and shall either reimburse the City the proportional amount of the Inclusionary Affordable Housing Fee equivalent to the then-current requirement for ownership units, or provide additional on-site or off-site affordable units equivalent to the then-current requirements for ownership units.

**I** For projects with over 25 units and with EEA's accepted between January 1, 2013 and January 12 2016, in the event that the Project Sponsor does not procure a building or site permit for construction of the principal project before December 7, 2018, rental projects will be subject to the on-site rate in effect for the Zoning District in 2017, generally 18% or 20%.

**J** For projects with EEA's/PRJ's accepted on or after January 12 2016, in the event that the Project Sponsor does not procure a building or site permit for construction of the principal project within 30 months of the Project's approval, the Project shall comply with the Inclusionary Affordable Housing Requirements applicable thereafter at the time the Sponsor is issued a site or building permit.

**K** If a Project Sponsor elects to completely or partially satisfy their Inclusionary Housing requirement by paying the Affordable Housing Fee, the Sponsor must pay the fee in full sum to the Development Fee Collection Unit at the Department of Building Inspection for use by the Mayor's Office of Housing prior to the issuance of the first construction document.

## UNIT MIX TABLES

| Number of All Units in PRINCIPAL PROJECT: | | | | | |
|---|---|---|---|---|---|
| **TOTAL UNITS:** 744 | SRO / Group Housing: 0 | Studios: JR: 27 | One-Bedroom Units: 392 | Two-Bedroom Units: 195 | Three (or more) Bedroom Units: 130 |

*If you selected the On-site, Off-Site, or Combination Alternative, please fill out the applicable section below. The On-Site Affordable Housing Alternative is required for HOME-SF Projects pursuant to Planning Code Section 206.4. State Density Bonus Projects that have submitted an Environmental Evaluation Application prior to January 12, 2016 must select the On-Site Affordable Housing Alternative. State Density Bonus Projects that have submitted an Environmental Evaluation Application on or after to January 12, 2016 must select the Combination Affordable Housing Alternative to record the required fee on the density bonus pursuant to Planning Code Section 415.3. If the Project includes the demolition, conversion, or removal of any qualifying affordable units, please complete the Affordable Unit Replacement Section.*

☒ **On-site Affordable Housing Alternative** (Planning Code Section 415.6, 419.3, or 206.4): 25 % of the unit total.

| Number of Affordable Units to be Located ON-SITE: | | | | | |
|---|---|---|---|---|---|
| **TOTAL UNITS:** 186 | SRO / Group Housing: 0 | Studios: 0 | One-Bedroom Units: 185 | Two-Bedroom Units: 1 (Mgr Unit) | Three (or more) Bedroom Units: 0 |

| | | | |
|---|---|---|---|
| **LOW-INCOME** | Number of Affordable Units | % of Total Units | AMI Level |
| **MODERATE-INCOME** | Number of Affordable Units: 186 | % of Total Units: 25 | AMI Level: Max 80%, average 59% |
| **MIDDLE-INCOME** | Number of Affordable Units | % of Total Units | AMI Level |

Development Agreement Exhibit D (Affordable Housing Program) contains additional details about these units and the overall affordable housing program.

☐ **Off-site Affordable Housing Alternative** (Planning Code Section 415.7 or 419.3): ____ % of the unit total.

| Number of Affordable Units to be Located OFF-SITE: | | | | | |
|---|---|---|---|---|---|
| **TOTAL UNITS:** | SRO / Group Housing: | Studios: | One-Bedroom Units: | Two-Bedroom Units: | Three (or more) Bedroom Units: |

| | | |
|---|---|---|
| Area of Dwellings in Principal Project (in sq. feet): | Off-Site Project Address: | |
| Area of Dwellings in Off-Site Project (in sq. feet): | | |
| Off-Site Block/Lot(s): | Motion No. for Off-Site Project (if applicable): | Number of Market-Rate Units in the Off-site Project: |

| | | | |
|---|---|---|---|
| **AMI LEVELS:** | Number of Affordable Units | % of Total Units | AMI Level |
| | Number of Affordable Units | % of Total Units | AMI Level |
| | Number of Affordable Units | % of Total Units | AMI Level |

## UNIT MIX TABLES: CONTINUED

☐ **Combination** of payment of a **fee, on-site affordable units**, or **off-site affordable units** with the following distribution:

*Indicate what percent of each option will be implemented (from 0% to 99%) and the number of on-site and/or off-site below market rate units for rent and/or for sale.*

1. On-Site ☐ % of affordable housing requirement.

If the project is a State Density Bonus Project, please enter "100%" for the on-site requirement field and complete the Density Bonus section below.

| **Number of Affordable Units to be Located ON-SITE:** | | | | | |
|---|---|---|---|---|---|
| **TOTAL UNITS:** | SRO / Group Housing: | Studios: | One-Bedroom Units: | Two-Bedroom Units: | Three (or more) Bedroom Units: |
| | | | | | |

2. Off-Site ☐ % of affordable housing requirement.

| **Number of Affordable Units to be Located OFF-SITE:** | | | | | |
|---|---|---|---|---|---|
| **TOTAL UNITS:** | SRO / Group Housing: | Studios: | One-Bedroom Units: | Two-Bedroom Units: | Three (or more) Bedroom Units: |
| | | | | | |
| Area of Dwellings in Principal Project (in sq. feet): | | Off-Site Project Address: | | | |
| Area of Dwellings in Off-Site Project (in sq. feet): | | | | | |
| Off-Site Block/Lot(s): | | Motion No. for Off-Site Project (if applicable): | | Number of Market-Rate Units in the Off-site Project: | |

| **Income Levels for On-Site or Off-Site Units in Combination Projects:** | | | |
|---|---|---|---|
| **AMI LEVELS:** | Number of Affordable Units | % of Total Units | AMI Level |
| **AMI LEVELS:** | Number of Affordable Units | % of Total Units | AMI Level |
| **AMI LEVELS:** | Number of Affordable Units | % of Total Units | AMI Level |

3. Fee ☐ % of affordable housing requirement.

**Is this Project a State Density Bonus Project?** ☐ Yes ☒ No

If yes, please indicate the bonus percentage, up to 35% _____, and the number of bonus units and the bonus amount of residentail gross floor area (if applicable) _____

I acknowledge that Planning Code Section 415.4 requires that the Inclusionary Fee be charged on the bonus units or the bonus residential floor area.

| **Affordable Unit Replacement: Existing Number of Affordable Units to be Demolished, Converted, or Removed for the Project** | | | | | |
|---|---|---|---|---|---|
| **TOTAL UNITS:** | SRO / Group Housing: | Studios: | One-Bedroom Units: | Two-Bedroom Units: | Three (or more) Bedroom Units: |
| | | | | | |

This project will replace the affordable units to be demolished, converted, or removed using the following method:

- ☐ On-site Affordable Housing Alternative
- ☐ Payment of the Affordable Housing Fee prior to the first construction document issuance
- ☐ Off-site Affordable Housing Alternative (Section 415.7)
- ☐ Combination of payment of the Affordable Housing Fee and the construction of on-site or off-site units (Section 415.5)

## Contact Information and Declaration of Sponsor of PRINCIPAL PROJECT

Laurel Heights Partners LLC

*Company Name*

Daniel J. Safier

*Name (Print) of Contact Person*

150 Post Street, Suite 320

*Address*

San Francisco, CA 94108

*City, State, Zip*

415-395-0880

*Phone / Fax*

dsafier@pradogroup.com

*Email*

I am a duly authorized agent or owner of the subject property. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. I hereby declare that the information herein is accurate to the best of my knowledge and that I intend to satisfy the requirements of Planning Code Section 415 as indicated above.

**Sign Here**

*Signature:*

*Name (Print), Title:*

Daniel J. Safier, Manager

Executed on this day in:

*Location:*

San Francisco, California

*Date:*

August 21, 2019

## Contact Information and Declaration of Sponsor of OFF-SITE PROJECT ( *If Different* )

*Company Name*

*Name (Print) of Contact Person*

*Address*

*City, State, Zip*

*Phone / Fax*

*Email*

I hereby declare that the information herein is accurate to the best of my knowledge and that I intend to satisfy the requirements of Planning Code Section 415 as indicated above.

**Sign Here**

*Signature:*

*Name (Print),*

# EXHIBIT I:

# ANTI-DISCRIMINATORY HOUSING AFFIDAVIT

## SUPPLEMENTAL INFORMATION FOR

# Anti-Discriminatory Housing Policy

### 1. Owner/Applicant Information

PROPERTY OWNER'S NAME:
Laurel Heights Partners, LLC

PROPERTY OWNER'S ADDRESS:
c/o PSKS, 150 Post Street, Suite 320, San Francisc

TELEPHONE:
(415) 395.0880

EMAIL:
dbragg@pradogroup.com

APPLICANT'S NAME:
Same as Above ☑

APPLICANT'S ADDRESS:

TELEPHONE:
( )

EMAIL:

CONTACT FOR PROJECT INFORMATION:
Applicant
Same as Above ☑

ADDRESS:

TELEPHONE:
( )

EMAIL:

COMMUNITY LIAISON FOR PROJECT (PLEASE REPORT CHANGES TO THE ZONING ADMINISTRATOR):
Applicant
Same as Above ☑

ADDRESS:

TELEPHONE:
( )

EMAIL:

### 2. Location and Project Description

STREET ADDRESS OF PROJECT:
3333 California Street

ZIP CODE:
94118

CROSS STREETS:
California Street, Laurel Street, Presidio Avenue, Euclid Avenue, Masonic Avenue

ASSESSORS BLOCK/LOT:
1032 / 003

ZONING DISTRICT:
RM-1

HEIGHT/BULK DISTRICT:
40-X

PROJECT TYPE: (Please check all that apply)
- ☑ New Construction
- ☑ Demolition
- ☐ Alteration
- ☐ Other:

EXISTING DWELLING UNITS:
0

PROPOSED DWELLING UNITS:
744

NET INCREASE:
744

# Compliance with the Anti-Discriminatory Housing Policy

1. **Does the applicant or sponsor, including the applicant or sponsor's parent company, subsidiary, or any other business or entity with an ownership share of at least 30% of the applicant's company, engage in the business of developing real estate, owning properties, or leasing or selling individual dwelling units in States or jurisdictions outside of California?** ☐ YES ☒ NO

   1a. If yes, in which States? _____

   _____

   1b. If yes, does the applicant or sponsor, as defined above, have policies in individual States that prohibit discrimination based on sexual orientation and gender identity in the sale, lease, or financing of any dwelling units enforced on every property in the State or States where the applicant or sponsor has an ownership or financial interest? ☐ YES ☐ NO

   1c. If yes, does the applicant or sponsor, as defined above, have a national policy that prohibits discrimination based on sexual orientation and gender identity in the sale, lease, or financing of any dwelling units enforced on every property in the United States where the applicant or sponsor has an ownership or financial interest in property? ☐ YES ☐ NO

   *If the answer to 1b and/or 1c is yes, please provide a copy of that policy or policies as part of the supplemental information packet to the Planning Department.*

Human Rights Commission contact information
**hrc.info@sfgov.org or (415)252-2500**

# Applicant's Affidavit

Under penalty of perjury the following declarations are made:
a: The undersigned is the owner or authorized agent of the owner of this property.
b: The information presented is true and correct to the best of my knowledge.
c: Other information or applications may be required.

Signature: _____ Date: August 21, 2019

Print name, and indicate whether owner, or authorized agent:

Daniel J. Safier, Manager

Owner / Authorized Agent (circle one)

## PLANNING DEPARTMENT USE ONLY

PLANNING DEPARTMENT VERIFICATION:

☐ Anti-Discriminatory Housing Policy Form is **Complete**

☐ Anti-Discriminatory Housing Policy Form is **Incomplete**

Notification of Incomplete Information made:

To: _____ Date: _____

| BUILDING PERMIT NUMBER(S): | DATE FILED: |
|---|---|
| | |
| | |
| **RECORD NUMBER:** | **DATE FILED:** |
| | |

VERIFIED BY PLANNER:

Signature: _____ Date: _____

Printed Name: _____ Phone: _____

| ROUTED TO HRC: | DATE: |
|---|---|
| ☐ Emailed to: _____ | |

# EXHIBIT J: FIRST SOURCE HIRING AFFIDAVIT

SAN FRANCISCO
PLANNING
DEPARTMENT

# AFFIDAVIT FOR FIRST SOURCE HIRING PROGRAM
# Administrative Code Chapter 83

1650 Mission Street, Suite 400 • San Francisco CA 94103-2479 • 415.558.6378 • http://www.sfplanning.org

## Section 1: Project Information

| PROJECT ADDRESS | BLOCK/LOT(S) |
|---|---|
| 3333 California Street | 1032/003 |

| BUILDING PERMIT APPLICATION NO. | CASE NO. (IF APPLICABLE) | MOTION NO. (IF APPLICABLE) |
|---|---|---|
| N/A | 2015-014028CUA | |

| PROJECT SPONSOR | MAIN CONTACT | PHONE |
|---|---|---|
| Laurel Heights Partners LLC | Don Bragg | 415-395-0880 |

| ADDRESS | |
|---|---|
| c/o PSKS, 150 Post Street, Suite 320 | |
| CITY, STATE, ZIP | EMAIL |
| San Francisco, CA 94108 | dbragg@pradogroup.com |

| ESTIMATED RESIDENTIAL UNITS | ESTIMATED SQ FT COMMERCIAL SPACE | ESTIMATED HEIGHT/FLOORS | ESTIMATED CONSTRUCTION COST |
|---|---|---|---|
| 744 | 49,161 | 4-7 stories | |

| ANTICIPATED START DATE |
|---|
| 2020 |

## Section 2: First Source Hiring Program Verification

CHECK ALL BOXES APPLICABLE TO THIS PROJECT

- ☐ Project is wholly Residential
- ☐ Project is wholly Commercial
- ☒ Project is Mixed Use

- ☒ A: The project consists of ten (10) or more residential units;
- ☒ B: The project consists of 25,000 square feet or more gross commercial floor area.
- ☐ C: Neither 1A nor 1B apply.

NOTES:

- If you checked **C**, this project is NOT subject to the First Source Hiring Program. Sign Section 4: Declaration of Sponsor of Project and submit to the Planning Department.
- If you checked **A or B**, your project IS subject to the First Source Hiring Program. Please complete the reverse of this document, sign, and submit to the Planning Department prior to any Planning Commission hearing. If principally permitted, Planning Department approval of the Site Permit is required for all projects subject to Administrative Code Chapter 83.
- For questions, please contact OEWD's CityBuild program at CityBuild@sfgov.org or (415) 701-4848. For more information about the First Source Hiring Program visit *www.workforcedevelopmentsf.org*
- If the project is subject to the First Source Hiring Program, you are required to execute a Memorandum of Understanding (MOU) with OEWD's CityBuild program prior to receiving construction permits from Department of Building Inspection.

*Continued...*

## Section 3: First Source Hiring Program – Workforce Projection

**Per Section 83.11 of Administrative Code Chapter 83, it is the developer's responsibility to complete the following information to the best of their knowledge.**

Provide the estimated number of employees from each construction trade to be used on the project, indicating how many are entry and/or apprentice level as well as the anticipated wage for these positions.

*Check the anticipated trade(s) and provide accompanying information (Select all that apply):*

| TRADE/CRAFT | ANTICIPATED JOURNEYMAN WAGE | # APPRENTICE POSITIONS | # TOTAL POSITIONS |
|---|---|---|---|
| Abatement Laborer | | | TBD |
| Boilermaker | | | TBD |
| Bricklayer | | | TBD |
| Carpenter | | | TBD |
| Cement Mason | | | TBD |
| Drywaller/ Latherer | | | TBD |
| Electrician | | | TBD |
| Elevator Constructor | | | TBD |
| Floor Coverer | | | TBD |
| Glazier | | | TBD |
| Heat & Frost Insulator | | | TBD |
| Ironworker | | | TBD |
| | | **TOTAL:** | TBD |

| TRADE/CRAFT | ANTICIPATED JOURNEYMAN WAGE | # APPRENTICE POSITIONS | # TOTAL POSITIONS |
|---|---|---|---|
| Laborer | | | TBD |
| Operating Engineer | | | TBD |
| Painter | | | TBD |
| Pile Driver | | | TBD |
| Plasterer | | | TBD |
| Plumber and Pipefitter | | | TBD |
| Roofer/Water proofer | | | TBD |
| Sheet Metal Worker | | | TBD |
| Sprinkler Fitter | | | TBD |
| Taper | | | TBD |
| Tile Layer/ Finisher | | | TBD |
| Other: | | | TBD |
| | | **TOTAL:** | TBD |

| | YES | NO |
|---|---|---|
| 1. Will the anticipated employee compensation by trade be consistent with area Prevailing Wage? | ☒ | ☐ |
| 2. Will the awarded contractor(s) participate in an apprenticeship program approved by the State of California's Department of Industrial Relations? | ☐ | ☐ |
| 3. Will hiring and retention goals for apprentices be established? | ☐ | ☐ |
| 4. What is the estimated number of local residents to be hired? | | |

All persons performing labor in construction of the Streetscape Improvements and the Publicly Accessible Private Improvements to be paid prevailing wages, pursuant to Section 4.6 of the Development Agreement.

Regarding questions 2 and 3, contractor(s) will be required to provide an estimate of apprentice level positions for each Workforce Building and coordinate with CityBuild regarding all available apprentice level positions per Development Agreement Exhibit I (Workforce Agreement), in a manner not inconsistent with any relevant Collective Bargaining Agreement(s).

Regarding question 4, LBE participation goal to be established per terms of Development Agreement Exhibit I.

## Section 4: Declaration of Sponsor of Principal Project

| PRINT NAME AND TITLE OF AUTHORIZED REPRESENTATIVE | EMAIL | PHONE NUMBER |
|---|---|---|
| Daniel J. Safier, Manager | dsafier@pvalogroup.com | 415.395.0880 |

**I HEREBY DECLARE THAT THE INFORMATION PROVIDED HEREIN IS ACCURATE TO THE BEST OF MY KNOWLEDGE AND THAT I COORDINATED WITH OEWD'S CITYBUILD PROGRAM TO SATISFY THE REQUIREMENTS OF ADMINISTRATIVE CODE CHAPTER 83.**

(SIGNATURE OF AUTHORIZED REPRESENTATIVE) August 21, 2019 (DATE)

**FOR PLANNING DEPARTMENT STAFF ONLY:** PLEASE EMAIL AN ELECTRONIC COPY OF THE COMPLETED AFFIDAVIT FOR FIRST SOURCE HIRING PROGRAM TO OEWD'S CITYBUILD PROGRAM AT CITYBUILD@SFGOV.ORG

Cc: Office of Economic and Workforce Development, CityBuild
**Address:** 1 South Van Ness 5th Floor San Francisco, CA 94103 **Phone:** 415-701-4848
**Website:** *www.workforcedevelopmentsf.org* **Email:** *CityBuild@sfgov.org*

# EXHIBIT K:

# DEVELOPMENT AGREEMENT (DA), DA APPLICATION, DIRECTOR'S REPORT ON DA

August 9, 2019

San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94103-2479
Attn: John Rahaim, Director

Re: Laurel Heights Partners LLC Application for Development Agreement, Administrative Code § 56.4

**3333 California Street, Block/Lot: 1032-003, CASE NUMBER #: 2015-014028CUA**

Dear Director Rahaim:

Pursuant to San Francisco Administrative Code Section 56.4, Laurel Heights Partners LLC ("LHP") submits this letter application for a Development Agreement ("DA") with respect to the mixed-use project at 3333 California Street (the "Project").

LHP has had extensive discussions with City departments and the community about the DA's proposed public benefits. Those discussions led to the following proposed community benefits, which meet or exceed those required by existing ordinances and regulations governing the approval of the Project.

In exchange for the following substantial public benefits, the DA will provide LHP with two primary benefits, a 15-year vesting period and the ability to phase the project:

- Increased Number of Units; Increased Affordable Housing – 25%.

  Recognizing the City's pressing need for housing – affordable and market rate: (1) increase the total number of residential units for the Project from the 558 residential units initially proposed to 744 residential units; (2) in the Walnut Building, construct 185 studio and one-bedroom affordable residential units for seniors (plus one manager's unit), constituting 25% of the Project's units (an 86% increase in the required number of affordable units); (3) LHP has agreed to partner with a non-profit housing partner to develop, own and operate the affordable housing project; and (4) LHP has agreed to secure and provide the required funding for predevelopment costs and gap financing to complete the senior affordable housing units. The senior affordable housing units will be deed-restricted to be affordable to qualified senior households with an average income not more than 59% of MOHCD AMI.

- Open Space.

  The Project will provide approximately 236,000 square feet of landscaped or open space, which includes approximately 127,126 square feet of privately owned, public open space, more than 73,000 square feet of which will be in excess of the open space requirements under Section 135 the Planning Code. As part of the open space, the Project will provide a new network of publicly accessible ground-level pathways through the Project's site,

thereby weaving the site into the neighborhood's fabric. All of the open space will be built, operated, and maintained at no cost to the City.

- Streetscape Improvements.

  The Project will strengthen pedestrian safety by constructing extended corner bulb-outs at three locations, Presidio Ave/Masonic Ave/Pine Street, Euclid Ave/Masonic Ave and Mayfair Drive/Laurel Street. These extended bulb-outs will include new street trees, bike parking, stairs and landings, and landscaped planters, all of which will be built, operated and maintained at no cost to the City.

- On-site Childcare.

  The Project will include an approximately 14,665 square foot on-site Childcare that will have the capacity to enroll approximately 175 children, and will be available to the general public.

- AWSS.

  The Project will contribute over $1 million dollars to expand the reach of the Auxiliary Water Supply System or "AWSS" (a high-pressure water system that provides additional water pressure and volume to the SF Fire Department for firefighting) to California Street.

- Transportation Demand Management Plan (75%).

  The Project is required to comply with 50% of the TDM Plan target points but has agreed to increase that goal to 75% of the TDM Plan target points. The Project includes additional TDM measures, including an increased number of bicycle parking spaces, bicycle maintenance services and a fleet of bicycles available to the residents. The Project has also included additional supportive amenities for deliveries, temporary storage for laundry, groceries and packages.

- Workforce.

  The Project will comply with various workforce requirements, including first source hiring and Local Business Enterprise requirements.

Respectfully submitted,

**Laurel Heights Partners LLC, a Delaware limited liability company**
150 Post Street, Suite 320
San Francisco, CA 94108

*By: The Prado Group, Inc., a California corporation*

*By:* _____
*Name: Don Bragg*
*Title: Senior Vice President & Director of Development*

cc: Nick Foster, San Francisco Planning Department
Leigh Lutenski, Mayor's Office of Economic & Workforce Development

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

| | |
|---|---|
| **DATE:** | **August 12, 2019** |
| **TO:** | **Members of the San Francisco Board of Supervisors**<br>**Members of the San Francisco Planning Commission** |
| **FROM:** | **John Rahaim, Planning Director** |
| **DATE:** | **3333 California Street Development Agreement**<br>**Summary of the draft agreement and negotiations** |

Chapter 56 of the San Francisco Administrative Code sets forth the procedure by which any request for a Development Agreement (DA) will be processed and approved by the City and County of San Francisco. Administrative Code Section 56.10(a) states that the Planning Director shall prepare a report on DA negotiations between the applicant and the City, and that report must be disclosed to the Planning Commission and the Board of Supervisors no later than 20 days prior to the first hearing on the DA. The report must also be made available for public review.

The report must include, for each negotiation session between the applicant and the City: (1) attendance list; (2) summary of the topics discussed; and (3) a notation as to any terms and conditions of the DA agreed upon between the applicant and the City.

Below is the Planning Director's report on the negotiation sessions for the DA between Laurel Heights Partners LLC (Developer) and the city, written in accordance with San Francisco Administrative Code Section 56.10(a).

If you have any questions or concerns, please contact Planning Department staff, Nicholas Foster at (415) 575-9167 or nicholas.foster@sfgov.org.

SAN FRANCISCO
PLANNING DEPARTMENT

1650 Mission St.
Suite 400
San Francisco,
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| **DATE:** | **August 12, 2019** |
| **TO:** | **Members of the San Francisco Board of Supervisors**<br>**Members of the San Francisco Planning Commission** |
| **FROM:** | **John Rahaim, Planning Director** |
| **DATE:** | **3333 California Street Development Agreement**<br>**Summary of the draft agreement and negotiations** |

**Director's Report Regarding 3333 California Development Agreement Negotiations**

**1. Introduction.**

Chapter 56 of the San Francisco Administrative Code sets forth the procedure by which any request for a Development Agreement (DA) will be processed and approved by the City and County of San Francisco. This report is being written in accordance with San Francisco Administrative Code Section 56.10(a).

Laurel Heights Partners LLC is the owner of a site bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west, on Assessor's Block 1032 and Lot 003 (District 2). The project proposes to adaptively reuse the existing office building, which would be divided into two separate buildings and converted to residential use. Overall, the project includes approximately 1,427,832 gross square feet of new and rehabilitated space, comprising approximately 977,437 gross square feet of residential floor area with approximately 744 dwelling units. 25% of the proposed project's units will be deed-restricted, on-site affordable units designated for low-income senior households. These affordable units will be located in the proposed Walnut Building on California Street and consist of 185 studios and 1-bedrooms for seniors plus one (1) on-site manager's unit. The project includes approximately 34,496 gross square feet of retail floor area and an approximately 14,665 gross-square-foot child care center use that will become an approximately 175-seat child care facility. The proposed project would provide approximately 857 off-street parking spaces (including approximately 10 car share spaces), approximately 762 Class One bicycle spaces, and 77 Class Two bicycle spaces. These proposed uses would be located in 13 new buildings (known as Plaza A, Plaza B, Walnut, Mayfair, Laurel Townhomes, Euclid and Masonic) and in the adaptively reused office building (known as Center A and Center B). The project would include 2.92 acres of publicly accessible landscaped open space with multi-purpose plazas, lawns, pathways and streetscape improvements, which will provide the public with new open space amenities and improve pedestrian connectivity and safety through the neighborhood.

Laurel Heights Partners LLC filed an application with the City's Department of Planning for approval of a Development Agreement for the Project Site under Administrative Code Chapter 56. Laurel Heights Partners LLC also filed applications with the Planning Department for (1) Zoning Map Amendment under Planning Code Section 302; (2) Planning Code Text Amendment to create the 3333 California Street Special Use District, Planning Code Section 249.86; (3) Conditional Use Authorization, including Planned Unit

Development under Planning Code Sections 303 and 304; (4) Transportation Demand Management Application, pursuant to Planning Code Section 169; and a (5) General Plan Referral for improvements within public rights-of-way, pursuant to San Francisco Charter Section 4.105 and Sections 2A.52 and 2A.53 of the San Francisco Administrative Code.

**2. Development Agreement Negotiations.**

The City's Planning Department and Mayor's Office of Economic and Workforce Development ("OEWD") have negotiated a Development Agreement for the Project. The parties began negotiations in 2017. Copies of the drafts of the Development Agreement that were exchanged between the parties can be found in the file of the City Department of Planning at 1650 Mission Street. These exchanged drafts reflect the items under negotiation throughout the process. Without limiting the foregoing, we note that the negotiations between the parties included the following meetings:

1) August 18, 2017. Meeting to discuss general outline of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Kanishka Karunaratne (Board of Supervisors), Dan Safier (Laurel Heights Partners, LLC), Dan Kingsley (Laurel), Don Bragg (Laurel), Cindy Park (Laurel), Pam Duffy (Coblentz Patch Duffy & Bass, LLC), and Gregg Miller (Coblentz). No agreements reached.

2) March 9, 2018. Meeting to discuss general terms of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Dan Safier (Laurel), Dan Kingsley (Laurel), Don Bragg (Laurel), Cindy Park (Laurel), Will Hu (Laurel), and Jeremy Bachrach (Laurel). No agreements reached.

3) April 26, 2018. Meeting to discuss general terms of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), Lisa Congdon (Laurel), and Gregg Miller (Coblentz). No agreements reached.

4) June 8, 2018. Meeting to discuss general terms of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Dan Kingsley (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

5) July 27, 2018. Meeting to discuss general terms of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Dan Kingsley (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

6) August 7, 2018. Meeting to discuss outline and exhibits of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Carol Wong (CAO), Audrey Pearson (CAO), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

7) August 10, 2018. Meeting to discuss general terms of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Dan Kingsley (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

8) September 14, 2018. Meeting to discuss general terms of the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Dan Kingsley (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

9) November 16, 2018. Meeting to discuss general terms of the Development Agreement, including the Affordable Housing Plan. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Dan Kingsley (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

10) December 4, 2018. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

11) December 10, 2018. Meeting to discuss terms of the Transportation Demand Management Plan for the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Carli Paine (SFMTA), Don Bragg (Laurel), Jing Ng (Laurel), Lisa Congdon (Laurel), and Cindy Park (Laurel). No agreements reached.

12) December 18, 2018. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

13) January 9, 2019. Meeting to discuss terms of the AWSS Community Benefit Fee for the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Carol Wong (CAO), Olivia Scanlon (SFFD), Anthony Rivera (SFFD), Brandy Batelaan (SFPUC), Thomas Birmingham (SFPUC), Don Bragg (Laurel), Jing Ng (Laurel), Lisa Congdon (Laurel), Eric Girod (BKF Consultants), Don Fields (ARS Code Consultants), and Gregg Miller (Coblentz). No agreements reached.

14) January 11, 2019. Meeting to discuss general terms of the Development Agreement, including Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Dan Kingsley (Laurel), Don

Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

15) January 15, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

16) February 12, 2019. Meeting to discuss Development Agreement exhibits, including the Open Space Plan. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

17) February 26, 2019. Meeting to discuss terms of the Workforce Agreement for the Development Agreement. Attendees included, Leigh Lutenski (OEWD), Carol Wong (CAO), Ian Fernando (CMD), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

18) February 26, 2019. Meeting to discuss Development Agreement exhibits, including the Open Space Plan. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

19) March 8, 2019. Meeting to discuss general terms of the Development Agreement, including the Affordable Housing Plan. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

20) March 26, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

21) April 9, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), Jing Ng (Laurel), and Gregg Miller (Coblentz). No agreements reached.

22) April 19, 2019. Meeting to discuss general terms of the Development Agreement, including the Affordable Housing Plan. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Don Bragg (Laurel), Jing Ng (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). No agreements reached.

23) April 23, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

24) May 7, 2019. Meeting to discuss Development Agreement exhibits, including the Affordable Housing Plan. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

25) May 21, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

26) June 4, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

27) June 11, 2019. Meeting to discuss Development Agreement exhibits, including the Workforce Agreement. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

28) June 14, 2019. Meeting to discuss general terms of the Development Agreement, including the Affordable Housing Plan. Attendees included, Leigh Lutenski (OEWD), Ken Rich (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Dan Safier (Laurel), Don Bragg (Laurel), Cindy Park (Laurel), and Gregg Miller (Coblentz). Tentative agreement reached.

29) June 25, 2019. Meeting to discuss Development Agreement exhibits and schedule of public benefits. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

30) July 9, 2019. Meeting to discuss Development Agreement exhibits and schedule of public benefits. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

31) July 16, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). No agreements reached.

32) July 23, 2019. Meeting to discuss Development Agreement exhibits. Attendees included, Leigh Lutenski (OEWD), Iowayna Pena (OEWD), Carol Wong (City Attorney's Office), Don Bragg (Laurel), and Gregg Miller (Coblentz). Tentative agreement reached.

**3. Conclusion.**

We believe that both parties negotiated in good faith and the end result is a project that, if constructed, will benefit the City.

This summary is prepared for information purposes only, and is not intended to change, supplant, or be used in the interpretation of, any provision of the Development Agreement. For any specific question or

interpretation, or for any additional detail, reference should be made to the Development Agreement itself. I and my staff, as well as the Mayor's Office of Economic and Workforce Development and the City Attorney's Office, are available to answer any questions that you may have regarding the Development Agreement or the negotiation process.

RECORDING REQUESTED BY
CLERK OF THE BOARD OF SUPERVISORS
OF THE CITY AND COUNTY OF SAN FRANCISCO

AND WHEN RECORDED MAIL TO:

Angela Calvillo
Clerk of the Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

(Exempt from Recording Fees Pursuant to
Government Code Section 27383)

# DEVELOPMENT AGREEMENT

## BY AND BETWEEN

## THE CITY AND COUNTY OF SAN FRANCISCO

## AND LAUREL HEIGHTS PARTNERS, LLC

## FOR PROPERTY LOCATED AT 3333 CALIFORNIA STREET

Block 1032 Lot 003

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**DEVELOPMENT AGREEMENT**

**BY AND BETWEEN**

**THE CITY AND COUNTY OF SAN FRANCISCO**

**AND LAUREL HEIGHTS PARTNERS, LLC**

THIS DEVELOPMENT AGREEMENT dated for reference purposes only as of this ____ day of _____, 2019, is by and between the CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation (the "**City**"), acting by and through its Planning Department, and LAUREL HEIGHTS PARTNERS, LLC, a Delaware limited liability company ("**Developer**"), pursuant to the authority of Section 65864 *et seq.* of the California Government Code and Chapter 56 of the Administrative Code. The City and Developer are also sometimes referred to individually as a "**Party**" and together as the "**Parties**". Capitalized terms not defined when introduced shall have the meanings given in Article 1.

## RECITALS

This Agreement is made with reference to the following facts:

A. Developer is the owner of an irregularly-shaped parcel comprised of approximately 10.25 acres (approximately 446,468 square feet), generally bounded by California Street, Laurel Street, Euclid Avenue, Masonic Avenue, and Presidio Avenue, and further described on Exhibit A (the "**Project Site**"). The Project Site is improved with (i) a four-story, approximately 455,000 gross square foot office building with a three-level, partially below-grade garage that has 212 parking spaces and approximately 12,500 gross square feet of storage space, (ii) a one-story, approximately 14,000 gross square foot annex building with building facilities and plant operations, office space for physical plant engineers, and unused laboratory space, (iii) 2 circular garage ramp structures, (iv) 3 surface parking lots that collectively have 331 parking spaces, and (v) approximately 165,200 square feet of landscaping or landscaped open space.

B. The Developer proposes a mixed use development that will include on-site affordable units and that will include residential, retail, open space, parking, child care and related uses (the "**Project**"). Specifically, the Project includes (i) up to approximately 744 residential units consisting of a mix of market rate and on-site BMR Units, including 185 on-site senior affordable housing units (plus one (1) manager's unit), (ii) approximately 34,496 square feet for retail/restaurant/commercial use, (iii) 10 below-grade parking garages with approximately 857

parking spaces, (iv) an approximately 14,665 square foot space for child care use, and (v) approximately 236,000 square feet of landscaped or open space, which includes approximately 125,226 square feet of privately owned, public open space, more than 71,000 square feet of which is in excess of the open space requirements under the Code, all as more particularly described on Exhibit B.

C. The Project is anticipated to generate an annual average of approximately 675 construction jobs during construction and, upon completion, approximately 200 net new permanent on-site jobs, an approximate $10 million annual increase in property taxes, and approximately $15 million in development impact fees (including transportation, housing linkages, and school fees).

D. In order to strengthen the public planning process, encourage private participation in comprehensive planning, and reduce the economic risk of development, the Legislature of the State of California adopted Government Code Section 65864 *et seq.* (the "**Development Agreement Statute**"), which authorizes the City to enter into a development agreement with any person having a legal or equitable interest in real property regarding the development of such property. Pursuant to Government Code Section 65865, the City adopted Chapter 56 of the Administrative Code ("**Chapter 56**") establishing procedures and requirements for entering into a development agreement pursuant to the Development Agreement Statute. The Parties are entering into this Agreement in accordance with the Development Agreement Statute and Chapter 56.

E. In addition to the significant housing, jobs, and economic benefits to the City from the Project, the City has determined that as a result of the development of the Project in accordance with this Agreement and the Special Use District and the Planned Unit Development approvals attached at Exhibit M, additional clear benefits to the public will accrue that could not be obtained through application of existing City ordinances, regulations, and policies. Major additional public benefits to the City from the Project include: (i) an increase in affordable housing that exceeds amounts otherwise required and will equal approximately twenty-five percent (25%) of the total number of housing units for the Project, serving senior households with incomes below 80% of MOHCD AMI with an overall average of not more than 59% of MOCHD AMI; (ii) construction and maintenance of the Publicly Accessible Private Improvements (as defined in Section 1) for a total of approximately 125,226 square feet of public useable open area; (iii) transportation demand management measures that exceed the level otherwise required; (iv) the Child Care Program (as

defined in Section 1); (v) workforce obligations; and (vi) the Streetscape Improvements (as defined in Section 1).

F. It is the intent of the Parties that all acts referred to in this Agreement shall be accomplished in a way as to fully comply with the California Environmental Quality Act (California Public Resources Code Section 21000 *et seq.*; "**CEQA**"), the CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 *et seq.*); "**CEQA Guidelines**"), the Development Agreement Statute, Chapter 56, the Planning Code, the Enacting Ordinances and all other applicable Laws in effect as of the Effective Date. This Agreement does not limit the City's obligation to comply with applicable environmental Laws, including CEQA, before taking any discretionary action regarding the Project, or the Developer's obligation to comply with all applicable Laws in connection with the development of the Project.

G. The Final Environmental Impact Report ("**FEIR**") prepared for the Project and certified by the Planning Commission on _____, 2019, together with the CEQA findings (the "**CEQA Findings**") and the Mitigation Measures adopted concurrently therewith and set forth in the MMRP, comply with CEQA, the CEQA Guidelines, and Chapter 31 of the Administrative Code. The FEIR thoroughly analyzes the Project and the Mitigation Measures were designed to mitigate significant impacts to the extent they are susceptible to feasible mitigation. On _____, 20__, the Board of Supervisors, in Motion No. [_____], affirmed the decisions of the Planning Commission to certify the FEIR. The information in the FEIR and the CEQA Findings were considered by the City in connection with approval of this Agreement.

H. On _____, 20__, the Planning Commission held a public hearing on this Agreement and the Project, duly noticed and conducted under the Development Agreement Statute and Chapter 56. Following the public hearing, the Planning Commission adopted the CEQA findings and determined among other things that the FEIR thoroughly analyzes the Project and the Mitigation Measures are designed to mitigate significant impacts to the extent they are susceptible to a feasible mitigation, and further determined that the Project and this Agreement will, as a whole, and taken in their entirety, continue to be consistent with the objectives, policies, general land uses and programs specified in the General Plan, as amended, and the policies set forth in Section 101.1 of the Planning Code (together the "**General Plan Consistency Findings**"). The information in the FEIR and the CEQA Findings has been considered by the City in connection with this Agreement.

I. On _____, the Board of Supervisors, having received the Planning Commission's recommendations, held a public hearing on this Agreement pursuant to the Development Agreement Statute and Chapter 56. Following the public hearing, the Board made the CEQA Findings required by CEQA, incorporating by reference the General Plan Consistency Findings.

J. On _____, the Board adopted Ordinance No. [_____], amending the Planning Code, the Zoning Map, and the Height Map, Ordinance No. [_____], approving this Agreement (File No. [_____]), and authorizing the Planning Director to execute this Agreement on behalf of the City, and Ordinance No. _____, approving a street encroachment permit and associated encroachment permit and maintenance agreement for the Project (collectively, the "**Enacting Ordinances**"). The Enacting Ordinances took effect on _____.

Now therefore, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

## AGREEMENT

### 1. DEFINITIONS

In addition to the definitions set forth in the above preamble paragraph, Recitals and elsewhere in this Agreement, the following definitions shall apply to this Agreement:

1.1 "**Administrative Code**" means the San Francisco Administrative Code.

1.2 "**Agreement**" means this Development Agreement, the Exhibits and Schedules that have been expressly incorporated herein, and any amendments thereto.

1.3 "**AMI**" means the unadjusted median income levels derived from the U.S. Department of Housing and Urban Development on an annual basis for the San Francisco area, adjusted solely for household size, but not high housing cost area.

1.4 "**Annual Review Date**" has the meaning set forth in Section 8.1.

1.5 "**Applicable Laws**" has the meaning set forth in Section 5.2 (where not capitalized, "applicable Law" has its plain meaning and refers to Laws as otherwise defined herein).

1.6 "**Approvals**" means the City approvals, entitlements, and permits listed on Exhibit E, including any Later Approvals at the time and to the extent they are included pursuant to Section 5.1.

1.7 "**Assignment and Assumption Agreement**" has the meaning set forth in Section 12.2.

1.8 "**Associated Community Benefit**" is defined in Section 4.1.

1.9 "**AWSS Community Benefit Fee**" is defined in Schedule 2.

1.10 "**BMR Units**" has the meaning set forth in the Housing Program.

1.11 "**Board of Supervisors**" or "**Board**" means the Board of Supervisors of the City and County of San Francisco.

1.12 "**Building**" or "**Buildings**" means each of the existing, modified and new buildings on the Project Site, as described in the Project description attached as Exhibit B.

1.13 "**California Plaza**" is described in Section 1.a of Exhibit C.

1.14 "**CEQA**" has the meaning set forth in Recital F.

1.15 "**CEQA Findings**" has the meaning set forth in Recital G.

1.16 "**CEQA Guidelines**" has the meaning set forth in Recital F.

1.17 "**Chapter 56**" has the meaning set forth in Recital D.

1.18 "**Child Care Program**" means the child care facility program attached as Exhibit L.

1.19 "**City**" means the City as defined in the opening paragraph of this Agreement. Unless the context or text specifically provides otherwise, references to the City means the City acting by and through the Planning Director or, as necessary, the Planning Commission or the Board of Supervisors.

1.20 "**City Agency**" or "**City Agencies**" means the City departments, agencies, boards, commissions, and bureaus that execute or consent to this Agreement, or are controlled by persons or commissions that have executed or consented to this Agreement, that have subdivision or other permit, entitlement or approval authority or jurisdiction over development of the Project or any improvement located on or off the Project Site, including, without limitation, the City Administrator, Planning Department, MOHCD, OEWD, SFMTA, PW, DBI, together with any successor City agency, department, board, or commission. Nothing in this Agreement shall affect the jurisdiction under the City's Charter of a City department that has not approved or consented to this Agreement in connection with the issuance of a Later Approval. The City actions and proceedings subject to this Agreement shall be through the Planning Department, as well as affected City Agencies (and when required by applicable Law, the Board of Supervisors).

1.21 "**City Attorney's Office**" means the Office of the City Attorney of the City and County of San Francisco.

1.22 "**City Costs**" means the actual and reasonable costs incurred by a City Agency in preparing, adopting or amending this Agreement, in performing its obligations or defending its actions under this Agreement or otherwise contemplated by this Agreement, as determined on a time and materials basis, including reasonable attorneys' fees and costs but excluding work, hearings, costs or other activities contemplated or covered by Processing Fees; provided, however, City Costs shall not include any costs incurred by a City Agency in connection with a City Default or which are payable by the City under Section 9.6 when Developer is the prevailing party.

1.23 "**City Parties**" has the meaning set forth in Section 4.7.

1.24 "**City Report**" has the meaning set forth in Section 8.2.2.

1.25 "**City-Wide**" means all real property within the territorial limits of the City and County of San Francisco, not including any property owned or controlled by the United States or by the State of California and therefore not subject to City regulation.

1.26 "**CMA**" is defined in Section 12.1.

1.27 "**Commence Construction**", "**Commenced Construction**" or "**Commencement of Construction**" means groundbreaking in connection with the commencement of physical construction of the applicable Building foundation, but specifically excluding the demolition or partial demolition of existing structures.

1.28 "**Community Benefits**" has the meaning set forth in Section 4.1.

1.29 "**Community Benefits Linkages and Impact Fees Schedule**" means the schedule attached to this Agreement as Schedule 1.

1.30 "**Community Benefits Program**" has the meaning set forth in Section 4.1.1.

1.31 "**Costa Hawkins Act**" has the meaning set forth in Exhibit D.

1.32 "**Cypress Square**" is described in Section 1.b of Exhibit C.

1.33 "**Cypress Stairs**" are described in Section 1.b of Exhibit C.

1.34 "**Default**" has the meaning set forth in Section 9.3.

1.35 "**DBI**" means the Department of Building Inspection of the City and County of San Francisco.

1.36 "**Developer**" has the meaning set forth in the opening paragraph of this Agreement, and shall also include (i) any Transferee as to the applicable Transferred Property, and (ii) any Mortgagee or assignee thereof that acquires title to any Foreclosed Property but only as to such Foreclosed Property.

1.37 "**Development Agreement Statute**" has the meaning set forth in Recital D, as in effect as of the Effective Date.

1.38 "**Development Parcel**" means a parcel within the Project Site on which a Building or other improvements will be constructed, as set forth in a Subdivision Map.

1.39 "**Effective Date**" has the meaning set forth in Section 2.1.

1.40 "**Enacting Ordinances**" has the meaning set forth in Recital J.

1.41 "**Euclid Green**" is described in Section 1.h of Exhibit C.

1.42 "**Excusable Delay**" has the meaning set forth in Section 11.5.2.

1.43 "**Existing Mortgage**" means the deed of trust recorded in the Official Records of San Francisco County on March 30, 2018 as Instrument Nos. 2018-K595916-00 and 2018-K595918-00, including all modification thereto.

1.44 "**Existing Standards**" has the meaning set forth in Section 5.2.

1.45 "**Existing Uses**" means all existing lawful uses of the existing Buildings and improvements (and including, without limitation, pre-existing, non-conforming uses under the Planning Code) on the Project Site as of the Effective Date, as the same may be modified by the Approvals and any Later Approvals.

1.46 "**Federal or State Law Exception**" has the meaning set forth in Section 5.8.1.

1.47 "**FEIR**" has the meaning set forth in Recital G.

1.48 "**Finally Granted**" means (i) any and all applicable appeal periods for the filing of any administrative or judicial appeal challenging the issuance or effectiveness of any of the Approvals, this Agreement or the FEIR shall have expired and no such appeal shall have been filed, or if such an administrative or judicial appeal is filed, the Approvals, this Agreement or the FEIR, as applicable, shall have been upheld by a final decision in each such appeal without adverse effect on the applicable Approval, this Agreement or the FEIR and the entry of a final judgment, order or ruling upholding the applicable Approval, this Agreement or the FEIR and (ii) if a referendum petition relating to this Agreement is timely and duly circulated and filed, certified as

valid and the City holds an election, the date the election results on the ballot measure are certified by the Board of Supervisors in the manner provided by the Elections Code reflecting the final defeat or rejection of the referendum.

1.49 "**First Construction Document**" shall be as defined in San Francisco Building Code Section 107A.13.1(a)(8).

1.50 "**Foreclosed Property**" is defined in Section 10.5.

1.51 "**General Plan Consistency Findings**" has the meaning set forth in Recital H.

1.52 "**Gross Floor Area**" has the meaning set forth in the Planning Code as of the applicable date of determination of such area.

1.53 "**Housing Program**" means the Affordable Housing Program attached as Exhibit D.

1.54 "**Impact Fees and Exactions**" means any fees, contributions, special taxes, exactions, impositions, and dedications charged by the City, whether as of the date of this Agreement or at any time thereafter during the Term, in connection with the development of Projects, including but not limited to transportation and transit fees, child care requirements or in-lieu fees, dedications, housing (including affordable housing) requirements or fees, dedication or reservation requirements, and obligations for on-or off-site improvements. Impact Fees and Exactions shall not include the Mitigation Measures, Processing Fees, taxes or special assessments or school district fees, SFPUC Capacity Charges, and any fees, taxes, assessments, and impositions imposed by any Non-City Agency, all of which shall be due and payable by Developer as and when due in accordance with applicable Laws.

1.55 "**Later Approval**" means any other land use approvals, entitlements, or permits from the City or any City Agency, other than the Approvals, that are consistent with the Approvals and necessary or advisable for the implementation of the Project, including without limitation, demolition permits, grading permits, site permits, building permits, lot line adjustments, sewer and water connection permits, major and minor encroachment permits, street and sidewalk modifications, street improvement permits, permits to alter, certificates of occupancy, transit stop relocation permits, Subdivision Maps, improvement plans, lot mergers, and lot line adjustments. A Later Approval shall also include any amendment to the foregoing land use approvals,

entitlements, or permits, or any amendment to the Approvals that are sought by Developer and approved by the City in accordance with the standards set forth in this Agreement.

1.56 "**Law(s)**" means the Constitution and laws of the United States, the Constitution and laws of the State of California, the laws of the City and County of San Francisco, and any codes, statutes, rules, regulations, or executive mandates thereunder, and any State or Federal court decision (including any order, injunction or writ) thereunder. The term "**Laws**" shall refer to any or all Laws as the context may require.

1.57 "**Law Adverse to City**" is defined in Section 5.8.4.

1.58 "**Law Adverse to Developer**" is defined in Section 5.8.4.

1.59 "**Life of the Project**" shall mean, for each Building that is constructed on the Project Site under this Agreement, the life of that Building.

1.60 "**Litigation Extension**" has the meaning set forth in Section 11.5.1.

1.61 "**Losses**" has the meaning set forth in Section 4.7.

1.62 "**Material Change**" means any modification that (a) would materially alter the rights, benefits or obligations of the City or Developer under this Agreement, (b) is not consistent with the Project SUD or a planned unit development authorization made under the Project SUD, (c) extends the Term, (d) changes the uses of the Project Site from those described in this Agreement, (e) decreases the Community Benefits, (f) increases the maximum height, density, bulk or size of the Project (except to the extent permitted under the Project SUD or a planned unit development authorization for the Project), (g) increases parking ratios, or (h) reduces the Impact Fees and Exactions.

1.63 "**Mayfair Walk**" is described in Section 1.c of Exhibit C.

1.64 "**Mitigation Measures**" means the mitigation measures (as defined by CEQA) applicable to the Project as set forth in the MMRP or that are necessary to mitigate adverse environmental impacts identified through the CEQA process as part of a Later Approval.

1.65 "**MMRP**" means that certain mitigation monitoring and reporting program attached as Exhibit F.

1.66 "**MOHCD**" means the Mayor's Office of Housing and Community Development.

1.67 "**MOHCD AMI**" is defined in Exhibit D (Affordable Housing Program).

1.68 "**Mortgage**" means a mortgage, deed of trust or other lien on all or part of the Project Site to secure an obligation made by the applicable property owner, including the Existing Mortgage.

1.69 "**Mortgagee**" means (i) any mortgagee or beneficiary under a Mortgage, and (ii) a person or entity that obtains title to all or part of the Project Site as a result of foreclosure proceedings or conveyance or other action in lieu thereof, or other remedial action.

1.70 "**Municipal Code**" means the San Francisco Municipal Code. All references to any part of the Municipal Code in this Agreement shall mean that part of the Municipal Code in effect on the Effective Date, as the Municipal Code may be modified by changes and updates that are adopted from time to time in accordance with Section 5.4 or by permitted New City Laws as set forth in Section 5.6.

1.71 "**New City Laws**" has the meaning set forth in Section 5.6.

1.72 "**Non-City Agency**" means Federal, State, and local governmental agencies that are independent of the City and not parties to this Agreement.

1.73 "**Non-City Approval**" means any permits, agreements, or entitlements from Non-City Agencies as may be necessary for the development of the Project.

1.74 "**OEWD**" means the San Francisco Office of Economic and Workforce Development.

1.75 "**Official Records**" means the official real estate records of the City and County of San Francisco, as maintained by the City's Assessor-Recorder's Office.

1.76 "**Party**" and "**Parties**" has the meaning set forth in the opening paragraph of this Agreement and shall also include any party that becomes a party to this Agreement, such as a Transferee (each during its period of ownership of all or part of the Project Site).

1.77 "**Pine Street Steps**" are described in Section 1.e of Exhibit C.

1.78 "**Planning Code**" means the San Francisco Planning Code.

1.79 "**Planning Commission**" means the Planning Commission of the City and County of San Francisco.

1.80 "**Planning Department**" means the Planning Department of the City and County of San Francisco.

1.81 "**Planning Director**" means the Director of Planning of the City and County of San Francisco.

1.82 "**Presidio Overlook**" is described in Section 1.d of Exhibit C.

1.83 "**Processing Fees**" means the standard fee imposed by the City upon the submission of an application for a permit or approval, which is not an Impact Fee or Exaction, in accordance with the City practice on a City-Wide basis.

1.84 "**Project**" means the project as described in Recital B, Exhibit B, and the Approvals, including, without limitation, the Project variant and Project alternatives described in the Project SUD, together with Developer's rights and obligations under this Agreement.

1.85 "**Project Site**" has the meaning set forth in Recital A, and as more particularly described in Exhibit A.

1.86 "**Project SUD**" means Planning Code Section 249.[___] as adopted by the Board in Ordinance No. [_____].

1.87 "**Public Health and Safety Exception**" has the meaning set forth in Section 5.8.1.

1.88 "**Publicly Accessible Private Improvements**" means the privately-owned and publicly-accessible California Plaza, Cypress Square, Cypress Stairs, Mayfair Walk, Presidio Overlook, Pine Street Steps, Walnut Walk North, Walnut Walk South, Walnut Drive and Walnut Court, and Euclid Green, all as further described and depicted in Exhibit C, Exhibit C-1, and Schedule 1 and which exceeds the Required Open Space for the Project.

1.89 "**PW**" means San Francisco Public Works.

1.90 "**Required Open Space**" has the meaning given such term in Section 102 of the Planning Code.

1.91 "**SFMTA**" means the San Francisco Municipal Transportation Agency.

1.92 "**SFPUC**" means the San Francisco Public Utilities Commission.

1.93 "**SFPUC Capacity Charges**" means all water and sewer capacity and connection fees and charges payable to the SFPUC, as and when due in accordance with the applicable City requirements.

1.94 "**Streetscape Improvements**" means the following improvements, all as further described and depicted in Exhibit C, Exhibit C-1, and Schedule 1: (i) reconfiguring portions of the curb lines at Presidio Avenue and Masonic Avenue; (ii) reconfiguring the triangular-shaped pedestrian island and the right-most travel lane for southbound traffic on Presidio Avenue merging onto Masonic and incorporating it into the Pine Street Steps, (iii) reconfiguring the triangular-

shaped pedestrian island and the right-most travel lane for southbound traffic on Masonic Avenue merging onto Euclid Avenue and incorporating it into Walnut Walk South (iv) constructing corner bulb-outs on the west side of the Masonic Avenue/Presidio Avenue/Pine Street intersection, the northeast corner of Laurel Street/Mayfair Drive, the southwest corner of the California Street/Laurel Street intersection, the southeast and southwest corners of the California Street/Walnut Street intersection, and the northeast corner of the Laurel Street/Euclid Avenue intersection; (v) installing a continental crosswalk crossing Presidio Avenue to Pine Street and an eastside crosswalk at the three-way intersection at Laurel Street crossing Mayfair Drive; and (vi) widening sidewalks on portions of Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street.

1.95 "**Subdivision Code**" means the San Francisco Subdivision Code.

1.96 "**Subdivision Map**" means any map that Developer submits for the Project Site with respect to the Project under the Subdivision Map Act and the Subdivision Code, which may include, but not be limited to, tentative or vesting tentative subdivision maps, final or vesting final subdivision maps and any tentative or final parcel map, or transfer map, including phased final maps to the extent authorized under an approved tentative subdivision map, but excluding the Tentative Map.

1.97 "**Subdivision Map Act**" means the California Subdivision Map Act, California Government Code Section 66410 *et seq.*

1.98 "**Tentative Map**" means the tentative map for the Project Site approved by PW on _____, 2019.

1.99 "**Term**" has the meaning set forth in Section 2.2.

1.100 "**Third-Party Challenge**" means any administrative, legal or equitable action or proceeding instituted by any party other than the City or Developer challenging the validity or performance of any provision of this Agreement, the Project, the Approvals or Later Approvals, the adoption or certification of the FEIR or other actions taken pursuant to CEQA, or other approvals under Laws relating to the Project, any action taken by the City or Developer in furtherance of this Agreement, or any combination thereof relating to the Project or any portion thereof.

1.101 "**Transfer**," "**Transferee**" **and** "**Transferred Property**" have the meanings set forth in Section 12.1, and in all events excludes (1) a transfer of ownership or

membership interests in Developer or any Transferee, (2) grants of easement or of occupancy rights for existing or completed Buildings or other improvements (including, without limitation, space leases in Buildings), and (3) the placement of a Mortgage on the Project Site.

1.102 "**Transportation Demand Management**" benefits are described in Exhibit J.

1.103 "**Vested Elements**" has the meaning set forth in Section 5.1.

1.104 "**Walnut Walk North**" is described in Section 1.f of Exhibit C.

1.105 "**Walnut Walk South**" is described in Section 1.f of Exhibit C.

1.106 "**Workforce Agreement**" means the Workforce Agreement attached as Exhibit I.

## 2. EFFECTIVE DATE; TERM

2.1 Effective Date. This Agreement shall take effect upon the later of (i) the full execution and delivery of this Agreement by the Parties and (ii) the date the Enacting Ordinances are effective and operative ("**Effective Date**").

2.2 Term. The term of this Agreement shall commence upon the Effective Date and shall continue in full force and effect for fifteen (15) years thereafter unless extended or earlier terminated as provided herein ("**Term**"); provided, however, that (i) the Term shall be extended for each day of a Litigation Extension and (ii) Developer shall have the right to terminate this Agreement with respect to a Development Parcel upon completion of the Building within that Development Parcel and the Associated Community Benefits for that Building, as set forth in Section 7.1. The term of any conditional use permit or planned unit development shall be for the longer of the Term (as it relates to the applicable parcel) or the term otherwise allowed under the conditional use or planned unit development approval, as applicable. The term of the Tentative Map and any Subdivision Map shall be for the longer of the Term (as it relates to the applicable parcel) or the term otherwise allowed under the Subdivision Map Act.

## 3. GENERAL RIGHTS AND OBLIGATIONS

3.1 Development of the Project. Developer shall have the vested right to develop the Project in accordance with and subject to the provisions of this Agreement, and the City shall consider and process all Later Approvals for development of the Project in accordance with and subject to the provisions of this Agreement. The Parties acknowledge that Developer (i) has obtained all Approvals from the City required to Commence Construction of the Project, other

than any required Later Approvals, and (ii) may proceed in accordance with this Agreement with the construction and, upon completion, use and occupancy of the Project as a matter of right, subject to the attainment of any required Later Approvals and any Non-City Approvals.

3.2 Workforce. Developer shall require project sponsors, contractors, consultants, subcontractors and subconsultants, as applicable, to undertake workforce development activities in accordance with the Workforce Agreement attached as Exhibit I.

**4. PUBLIC BENEFITS; DEVELOPER OBLIGATIONS AND CONDITIONS TO DEVELOPER'S PERFORMANCE**

4.1 Community Benefits Exceed Those Required by Existing Ordinances and Regulations. The Parties acknowledge and agree that the development of the Project in accordance with this Agreement provides a number of public benefits to the City beyond those achievable through existing Laws, including, but not limited to, those set forth in this Article 4 (the "**Community Benefits**"). The City acknowledges and agrees that a number of the Community Benefits would not be otherwise achievable without the express agreement of Developer under this Agreement. Developer acknowledges and agrees that, as a result of the benefits to Developer under this Agreement, Developer has received good and valuable consideration for its provision of the Community Benefits, and the City would not be willing to enter into this Agreement without the Community Benefits. Payment or delivery of each of the Community Benefits is tied to a specific Building or the number of constructed residential units as described in the Community Benefits Linkages and Impact Fees Schedule attached as Schedule 1 to this Agreement or as described elsewhere in this Agreement (each, an "**Associated Community Benefit**"). Upon Developer's Commencement of Construction of a Building, the Associated Community Benefits tied to that Building shall survive the expiration or termination of this Agreement to the date of completion of the Associated Community Benefit. Time is of the essence with respect to the completion of the Associated Community Benefits.

4.1.1 Community Benefits. Developer shall provide the following Community Benefits (collectively, the "**Community Benefits Program**") at the times specified in the Community Benefits Linkages and Impact Fees Schedule:

(a) the Publicly Accessible Private Improvements, as further described in Exhibit C, Exhibit C-1, Exhibit C-2 and Schedule 1;

(b) the Streetscape Improvements, as further described in, Exhibit C, Exhibit C-1 and Schedule 1;

(c) the Housing Program benefits, as further described in Exhibit D and Schedule 1;

(d) the AWSS Community Benefit Fee as further described in Schedule 2;

(e) the Workforce Agreement benefits, as further described in Exhibit I;

(f) the Transportation Demand Management benefits, as further described in Exhibit J; and

(g) the Child Care Program benefits, as further described in Exhibit L.

4.2 Conditions to Performance of Community Benefits. Developer's obligation to perform each Associated Community Benefit tied to a specific Building is expressly conditioned upon each and all of the following conditions precedent:

(a) All Approvals for the applicable Building to which the Associated Community Benefit is tied shall have been Finally Granted;

(b) Developer shall have obtained all Later Approvals necessary to Commence Construction of the applicable Building to which the Associated Community Benefit is tied, and the same shall have been Finally Granted, except to the extent that such Later Approvals have not been obtained or Finally Granted due to the failure of Developer to timely initiate and then diligently and in good faith pursue such Later Approvals. Whenever this Agreement requires completion of an Associated Community Benefit at or before the completion of or receipt of first certificate of occupancy for a Building, the City may withhold a certificate of occupancy for that Building until the required Associated Community Benefit is completed except as otherwise expressly set forth in Exhibit C, Exhibit D, Exhibit L, Schedule 1 or elsewhere in this Agreement or any Approvals; and

(c) Developer shall have Commenced Construction of the Building to which the Associated Community Benefit applies.

4.3 No Additional CEQA Review Required; Reliance on FEIR for Future Discretionary Approvals. The Parties acknowledge that the FEIR prepared for the Project

complies with CEQA. The Parties further acknowledge that (a) the FEIR contains a thorough analysis of the Project and possible alternatives, (b) the Mitigation Measures have been adopted to eliminate or reduce to an acceptable level certain adverse environmental impacts of the Project, and (c) the Board of Supervisors adopted CEQA Findings, including a statement of overriding considerations in connection with the Approvals, pursuant to CEQA Guidelines Section 15093, for those significant impacts that could not be mitigated to a less than significant level. Accordingly, the City does not intend to conduct any further environmental review or mitigation under CEQA for any aspect of the Project vested under this Agreement. The City shall rely on the FEIR, to the greatest extent possible in accordance with applicable Laws, in all future discretionary actions related to the Project; provided, however, that nothing shall prevent or limit the discretion of the City to conduct additional environmental review in connection with any Later Approvals to the extent that such additional environmental review is required by applicable Laws, including CEQA.

4.3.1 Compliance with CEQA Mitigation Measures. Developer shall comply with all Mitigation Measures imposed as applicable to the Project except for any Mitigation Measures that are expressly identified as the responsibility of a different party or entity. Without limiting the foregoing, Developer shall be responsible for the completion of all Mitigation Measures identified as the responsibility of the "owner" or the "project sponsor". The Parties expressly acknowledge that the FEIR and the associated MMRP are intended to be used in connection with each of the Later Approvals to the extent appropriate and permitted under applicable Law. Nothing in this Agreement shall limit the ability of the City to impose conditions on any new, discretionary permit resulting from Material Changes as such conditions are determined by the City to be necessary to mitigate adverse environmental impacts identified through the CEQA process and associated with the Material Changes or otherwise to address significant environmental impacts as defined by CEQA created by an approval or permit; provided, however, any such conditions must be in accordance with applicable Law.

4.4 Nondiscrimination. In the performance of this Agreement, Developer agrees not to discriminate against any employee, City employee working with Developer's contractor or subcontractor, applicant for employment with such contractor or subcontractor, or against any person seeking accommodations, advantages, facilities, privileges, services, or membership in all business, social, or other establishments or organizations, on the basis of the

fact or perception of a person's race, color, creed, religion, national origin, ancestry, age, height, weight, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or Acquired Immune Deficiency Syndrome or HIV status (AIDS/HIV status), or association with members of such protected classes, or in retaliation for opposition to discrimination against such classes.

4.5 City Cost Recovery.

4.5.1 Developer shall timely pay to the City all Impact Fees and Exactions applicable to the Project or the Project Site as set forth in Section 5.7.

4.5.2 Developer shall timely pay to the City all Processing Fees applicable to the processing or review of applications for the Approvals and Later Approvals.

4.5.3 Developer shall pay to the City all City Costs incurred in connection with the drafting and negotiation of this Agreement, defending the Approvals and Later Approvals, and in processing and issuing any Later Approvals or administering this Agreement (except for the costs that are covered by Processing Fees), within sixty (60) days following receipt of a written invoice complying with Section 4.5.4 from the City.

4.5.4 OEWD shall provide Developer on a quarterly basis (or such alternative period as agreed to by the Parties) a reasonably detailed statement showing costs incurred by OEWD, the City Agencies and the City Attorney's Office, including the hourly rates for each City staff member at that time, the total number of hours spent by each City staff member during the invoice period, any additional costs incurred by the City Agencies and a brief non-confidential description of the work completed (provided, for the City Attorney's Office, the billing statement will be reviewed and approved by OEWD but the cover invoice forwarded to Developer will not include a description of the work). OEWD will use reasonable efforts to provide an accounting of time and costs from the City Attorney's Office and each City Agency in each invoice; provided, however, if OEWD is unable to provide an accounting from one or more of such parties, then OEWD may send an invoice to Developer that does not include the charges of such party or parties without losing any right to include such charges in a future or supplemental invoice but subject to the eighteen (18) month deadline set forth below in this Section 4.5.4. Developer's obligation to pay the City Costs shall survive the termination of this Agreement. Developer shall have no obligation to reimburse the City for any City Cost that is not invoiced to Developer within eighteen (18) months from the date the City Cost was incurred. The City will maintain records, in

reasonable detail, with respect to any City Costs and upon written request of Developer, and to the extent not confidential, shall make such records available for inspection by Developer.

4.5.5 If Developer in good faith disputes any portion of an invoice, then within sixty (60) days following receipt of the invoice Developer shall provide notice of the amount disputed and the reason for the dispute, and the Parties shall use good faith efforts to reconcile the dispute as soon as practicable. Developer shall have no right to withhold the disputed amount. If any dispute is not resolved within ninety (90) days following Developer's notice to the City of the dispute, Developer may pursue all remedies at law or in equity to recover the disputed amount.

4.6 Prevailing Wages. Developer agrees that all persons performing labor in the construction of the Streetscape Improvements and the Publicly Accessible Private Improvements shall be paid not less than the highest prevailing rate of wages for the labor so performed consistent with the requirements of Section 6.22(e) of the Administrative Code, shall be subject to the same hours and working conditions, and shall receive the same benefits as in each case are provided for similar work performed in San Francisco, California, and Developer shall include this requirement in any construction contract entered into by Developer for any such improvements. Upon request, Developer and its contractors will provide to City any workforce payroll records as needed to confirm compliance with this Section. Without limiting the foregoing, Developer shall comply with all applicable state law requirements relating to the payment of prevailing wages, and to the extent there is any difference between the requirements of such state law requirements and Section 6.22(e) of the Administrative Code, the stricter requirements shall apply to the construction of the Streetscape Improvements and the Publicly Accessible Private Improvements.

4.7 Indemnification of City. Developer shall indemnify, reimburse, and hold harmless the City and its officers, agents and employees (the "**City Parties**") from and, if requested, shall defend them against any and all loss, cost, damage, injury, liability, and claims ("**Losses**") arising or resulting directly or indirectly from (i) any third party claim arising from a Default by Developer under this Agreement, (ii) Developer's failure to comply with any Approval, Later Approval or Non-City Approval, (iii) the failure of any improvements constructed pursuant to the Approvals or Later Approvals to comply with any Federal or State Laws, the Existing Standards or any permitted New City Laws, (iv) any accident, bodily injury, death, personal injury, or loss of or damage to property occurring on the Project Site (or the public right of way adjacent

to the Project Site) in connection with the construction by Developer or its agents or contractors of any improvements pursuant to the Approvals, Later Approvals or this Agreement, (v) a Third-Party Challenge instituted against the City or any of the City Parties, (vi) any dispute between Developer, its contractors or subcontractors relating to the construction of any part of the Project, and (vii) any dispute between Developer and any Transferee or any subsequent owner of any of the Project Site relating to any assignment of this Agreement or the obligations that run with the land, or any dispute between Developer and any Transferee or other person relating to which party is responsible for performing certain obligations under this Agreement, each regardless of the negligence of and regardless of whether liability without fault is imposed or sought to be imposed on the City or any of the City Parties, except to the extent that any of the foregoing indemnification obligations is void or otherwise unenforceable under applicable Law, and except to the extent such Loss is the result of the negligence or willful misconduct of the City Parties. The foregoing indemnity shall include, without limitation, reasonable attorneys' fees and costs and the City's reasonable cost of investigating any claims against the City or the City Parties. All indemnifications set forth in this Agreement shall survive the expiration or termination of this Agreement, to the extent such indemnification obligation arose from an event occurring before the expiration or termination of this Agreement. To the extent the indemnifications relate to Developer's obligations that survive the expiration or termination of this Agreement, the indemnifications shall survive for the term of the applicable obligation plus four (4) years.

## 5. VESTING AND CITY OBLIGATIONS

5.1 Vested Rights. By the Approvals, the City has made a policy decision that the Project, as described in and as may be modified in accordance with the Approvals, is in the best interests of the City and promotes the public health, safety and welfare. Developer shall have the vested right to develop the Project as set forth in this Agreement and the Project SUD, including without limitation with the following vested elements: the locations and numbers of Buildings proposed, the land uses, height and bulk limits, including the maximum density, intensity and gross square footages, the permitted uses, the provisions for open space, vehicular access, and parking (collectively, the "**Vested Elements**"; provided the Existing Uses on the Project Site shall also be included as Vested Elements). The Vested Elements are subject to and shall be governed by Applicable Laws. The expiration of any building permit or Approval shall not limit the Vested Elements, and Developer shall have the right to seek and obtain subsequent building permits or

approvals, including Later Approvals, at any time during the Term, any of which shall be governed by Applicable Laws. Each Later Approval, once granted, shall be deemed an Approval for purposes of this Section 5.1.

5.2 Existing Standards. The City shall process, consider, and review all Later Approvals in accordance with (i) the Approvals, (ii) the San Francisco General Plan, the Municipal Code (including the Subdivision Code), and all other applicable City policies, rules and regulations, as each of the foregoing is in effect on the Effective Date ("**Existing Standards**"), as the same may be amended or updated in accordance with Section 5.4 or with permitted New City Laws as set forth in Section 5.6, (iii) California and Federal law, as applicable, and (iv) this Agreement (collectively, "**Applicable Laws**"). The Enacting Ordinances contain express waivers and amendments to Chapter 56 consistent with this Development Agreement.

5.2.1 No Implied Waiver of Codes. Nothing in this Agreement constitutes an implied waiver or exemption of the Subdivision Code or the Public Works Code. For any waiver or exemption, Developer shall comply with the City's existing processes to seek any necessary waivers or exemptions. The City's failure to enforce any part of the Subdivision Code or Public Works Code shall not be deemed a waiver of its right to do so thereafter, but it shall not override the Approvals standards set forth in Sections 5.2, 5.3, and 5.4.

5.2.2 General Plan Consistency Findings. The Parties acknowledge the Project is consistent with the City's General Plan and the General Plan Consistency Findings are intended to support all Later Approvals that are consistent with the Approvals. To the maximum extent practicable, the Planning Department shall rely exclusively on the General Plan Consistency Findings when processing and reviewing all Later Approvals, including proposed Subdivision Maps and any other actions related to the Project requiring General Plan determinations; provided Developer acknowledges that the General Plan Consistency Findings do not limit the City's discretion in connection with any Later Approval that (a) requires new or revised General Plan consistency findings because of Material Changes or amendments to any of the Approvals or (b) is analyzed in the context of a future General Plan amendment that is a non-conflicting New City Law.

5.3 Criteria for Later Approvals. Developer shall be responsible for obtaining all required Later Approvals before the start of any construction and timely providing project schedules to OEWD as described in Exhibit K. The City, in granting the Approvals and vesting

the Project through this Agreement, is limiting its future discretion with respect to Later Approvals to the extent that they are consistent with the Approvals and this Agreement. The City shall not disapprove applications for Later Approvals based upon an item or element that is consistent with the Approvals, and shall consider all such applications in accordance with its customary practices (subject to the requirements of this Agreement). Subject to the requirements of this Agreement, the City shall not impose any new condition for a Later Approval that conflicts with the Approvals except when such condition is necessary to bring the Later Approval into compliance with Applicable Laws. For any part of a Later Approval request that has not been previously reviewed or considered by the applicable City Agency (such as additional details or plans), the City Agency shall exercise its discretion consistent with the Municipal Code and the Approvals and otherwise in accordance with the City's customary practice (but subject to the requirements of this Agreement). Nothing in this Agreement shall preclude the City from applying New City Laws for any development not within the definition of the "Project" under this Agreement.

5.4 Strict Building Code Compliance.

5.4.1 City-Wide Building Codes. Notwithstanding anything in this Agreement to the contrary, except as otherwise provided in Section 5.4.2, when considering any application for a Later Approval, the City or the applicable City Agency shall apply the then-applicable provisions, requirements, rules, or regulations (including any applicable exceptions) that are contained in the San Francisco Building Codes, including the Public Works Code (which includes the Stormwater Management Ordinance), Subdivision Code, Mechanical Code, Electrical Code, Housing Code, Plumbing Code, Fire Code, or other uniform construction codes applicable on a City-Wide basis.

5.4.2 Sidewalks, Streets and Infrastructure. By entering into this Agreement, the City's Board of Supervisors and the City Agencies have reviewed and approved (i) the Streetscape Improvements and the Publicly Accessible Private Improvements, including sidewalk, pathway, street widths, and general right of way configurations with respect to location and relationship of major elements, curbs, bicycle facilities, parking, loading areas, and landscaping, including the general location and number of new Street Trees (as defined in San Francisco Public Works Code Section 802) and the removal of certain existing Street Trees and Significant Trees (as defined in San Francisco Public Works Code Section 810A), as set forth in the Approvals described in Exhibit E (including the plans incorporated in such Approvals) and the

Project SUD, as consistent with the City's central policy objective to ensure street safety for all users while maintaining adequate clearances, including for fire apparatus vehicles. No City Agency with jurisdiction may object to a Later Approval for any of the Buildings, Streetscape Improvements, or Publicly Accessible Private Improvements due to the proposed width of a sidewalk, pathway, or street, unless such objection is based upon the applicable City Agency's reserved authority to review engineering design for compliance with Applicable Laws or other authority under State law. In the case of such objection, then within five (5) business days of the objection being raised (whether raised formally or informally), representatives from Developer, PW, the Planning Department and the objecting City Agency shall meet and confer in good faith to attempt to find a mutually satisfactory resolution to the objection. If the matter is not resolved within fourteen (14) days following the objection, then the Planning Director shall notify the Clerk of the Board of Supervisors and the members of the Board of Supervisors' Land Use and Transportation Committee. The City Agencies and Developer agree to act in good faith to resolve the matter quickly and in a manner that does not conflict with the City policy, Approvals, this Agreement, or applicable Law. For purposes of this Section, "engineering design" shall mean professional engineering work as set forth in the Professional Engineers Act, California Business and Professions Code Sections 6700 *et seq.*

5.5 Denial of a Later Approval. If the City denies any application for a Later Approval that implements a Building, such denial must be consistent with Applicable Laws, and the City must specify in writing the reasons for such denial and shall suggest modifications required for approval of the application. Any such specified modifications shall be consistent with Applicable Laws and City staff shall approve the application if it is subsequently resubmitted for City review and corrects or mitigates, to the City's reasonable satisfaction, the stated reasons for the earlier denial in a manner that is consistent and compliant with Applicable Laws and does not include new or additional information or materials that give the City a reason to object to the application under the standards set forth in this Agreement.

5.6 New City Laws. All future changes to Existing Standards and any other Laws, plans or policies adopted by the City or adopted by voter initiative after the Effective Date ("**New City Laws**") shall apply to the Project and the Project Site except to the extent they conflict with this Agreement or the terms and conditions of the Approvals. In the event of such a conflict, the terms of this Agreement and the Approvals shall prevail, subject to the terms of Section 5.8.

5.6.1 New City Laws shall be deemed to conflict with this Agreement and the Approvals if they:

(a) limit or reduce the density or intensity of the Project, or any part thereof, or otherwise require any reduction in the square footage or number of proposed Buildings or change the location of proposed Buildings or change or reduce other improvements from that permitted under the Approvals;

(b) limit or reduce the height or bulk of the Project, or any part thereof, or otherwise require any reduction in the height or bulk of individual Buildings or other improvements that are part of the Project under the Approvals;

(c) limit, reduce or change the location of vehicular access, parking or loading for the Project from that permitted under the Approvals;

(d) limit any land uses for the Project from that permitted under the Approvals or the Existing Uses;

(e) change or limit the Approvals or Existing Uses;

(f) materially delay, limit or control the rate, timing, phasing, or sequencing of the Project, including the demolition of existing buildings at the Project Site, except as expressly set forth in this Agreement;

(g) require the issuance of permits or approvals for the Project by the City other than those required under the Existing Standards, except for (i) permits or approvals that are required on a City-Wide basis, relate to the construction of improvements, and do not prevent construction of the applicable aspects of the Project that would be subject to such permits or approvals as and when intended by this Agreement or (ii) permits that replace (but do not expand the scope or purpose of) existing permits;

(h) limit or control the availability of public utilities, services or facilities, or any privileges or rights to public utilities, services, or facilities for the Project;

(i) materially and adversely limit the processing or procuring of applications and approvals of Later Approvals that are consistent with Approvals;

(j) increase the percentage of required affordable or BMR Units, change the AMI percentage levels for the affordable housing pricing or income eligibility, change the requirements regarding unit size or unit type, control or limit homeowner association or common area dues or amenity charges, or place restrictions on the right to alienate, transfer or

otherwise dispose of property, or increase the amount or change the configuration of required open space for the Project;

(k) designate any existing tree on the Project Site as a Landmark Tree (as defined in San Francisco Public Works Code Section 802) if such designation would interfere with the construction of the Project; or

(l) impose new or modified Impact Fees and Exactions on the Project that are expressly prohibited in Section 5.7.2.

5.6.2 Developer shall have the right, from time to time and at any time, to file Subdivision Map applications (including phased final map applications and development-specific condominium map or plan applications) with respect to some or all of the Project Site and subdivide (including reconfiguring or merging parcels, subject to Developer's obligations under the Housing Program and the Child Care Program) the Project Site as may be necessary or desirable in order to develop a particular part of the Project as shown generally in Exhibit B-1. The specific boundaries of Development Parcels shall be set by Developer and approved by the City during the subdivision process. Nothing in this Agreement shall authorize Developer to subdivide or use any of the Project Site for purposes of sale, lease or financing in any manner that conflicts with the Subdivision Map Act or with the Subdivision Code. Nothing in this Agreement shall prevent the City from enacting or adopting changes in the methods and procedures for processing subdivision and parcel maps so long as such changes do not conflict with the provisions of this Agreement or with the Approvals. Prior to recording any final Subdivision Map with respect to the Project, Developer shall cause any then-existing Mortgagee to provide its authorized signature on such final Subdivision Map (or any other written approval permitted under Applicable Law), which shall include consent and acknowledgement of the BMR Units requirements with specified AMI levels for the life of the Project, in accordance with this Agreement.

5.7 Fees and Exactions.

5.7.1 Generally. The Project shall only be subject to the Processing Fees and Impact Fees and Exactions as set forth in this Section 5.7, and the City shall not impose any new Processing Fees or Impact Fees and Exactions on the development of the Project or impose new conditions or requirements for the right to develop the Project (including required contributions of land, public amenities or services) except as set forth in this Agreement. The Parties acknowledge that the provisions contained in this Section 5.7 are intended to implement

the intent of the Parties that Developer have the right to develop the Project pursuant to specified and known criteria and rules, and that the City receive the benefits which will be conferred as a result of such development without abridging the right of the City to act in accordance with its powers, duties and obligations, except as specifically provided in this Agreement.

5.7.2 Impact Fees and Exactions. During the Term, as extended by any Litigation Extensions, no Impact Fees and Exactions shall apply to the Project or components thereof except for (i) those Impact Fees and Exactions specifically set forth on Schedule 1, Schedule 2, Exhibit D and Exhibit L, (ii) the SFPUC Capacity Charges, (iii) New City Laws that do not conflict with this Agreement as set forth in Section 5.6, and (iv) as expressly set forth below in this Section. The Impact Fees and Exactions and SFPUC Capacity Charges shall be calculated and determined at the time payable in accordance with the City requirements on that date, and the parties acknowledge and agree that the Impact Fees and Exactions shall be subject to the Planning Department's final confirmation once the applicable final land uses and Gross Floor Area are determined. Accordingly, Developer shall be subject to any increase or decrease in the fee amount payable and any changes in methodology of calculation (e.g., use of a different index to calculate annual increases) but will not be subject to any new types of Impact Fees and Exactions or modification to existing Impact Fees and Exactions after the Effective Date except as described in Section 5.6 and this Section. Developer agrees that any new or reduced impact fee or exaction enacted after the Effective Date that (i) is of City-Wide applicability (e.g., applies to all retail development in the City), (ii) does not pertain to affordable housing, open space or community improvements (for which this Agreement reflects the required Developer contributions), and (iii) would otherwise apply to the Project, shall apply to the Project or the applicable portion thereof.

5.7.3 Processing Fees. Developer shall pay all Processing Fees in effect, on a City-Wide basis, at the time that Developer applies for a Later Approval for which such Processing Fee is payable in connection with the applicable part of the Project.

5.8 Changes in Federal or State Laws.

5.8.1 City's Exceptions. Notwithstanding any provision in this Agreement to the contrary, each City Agency having jurisdiction over the Project shall exercise its discretion under this Agreement in a manner that is consistent with the public health and safety and shall at all times retain its respective authority to take any action that is necessary to protect

the physical health and safety of the public (the "**Public Health and Safety Exception**") or reasonably calculated and narrowly drawn to comply with applicable changes in Federal or State Law affecting the physical environment (the "**Federal or State Law Exception**"), including the authority to condition or deny a Later Approval or to adopt a new Law applicable to the Project so long as such condition or denial or new regulation (i)(a) is limited solely to addressing a specific and identifiable issue in each case required to protect the physical health and safety of the public, or (b) is required to comply with a Federal or State Law and in each case not for independent discretionary policy reasons that are inconsistent with the Approvals or this Agreement and (ii) is applicable on a City-Wide basis to the same or similarly situated uses and applied in an equitable and non-discriminatory manner. Developer retains the right to dispute any City reliance on the Public Health and Safety Exception or the Federal or State Law Exception. If the Parties are not able to reach agreement on such dispute following a reasonable meet and confer period, then Developer or City may seek judicial relief with respect to the matter.

5.8.2 Changes in Federal or State Laws. If Federal or State Laws issued, enacted, promulgated, adopted, passed, approved, made, implemented, amended, or interpreted after the Effective Date have gone into effect and (i) preclude or prevent compliance with one or more provisions of the Approvals or this Agreement, or (ii) materially and adversely affect Developer's or the City's rights, benefits or obligations under this Agreement, then such provisions of this Agreement shall be modified or suspended as may be necessary to comply with such Federal or State Law. In such event, this Agreement shall be modified only to the extent necessary or required to comply with such Law, subject to the provisions of Section 5.8.4, as applicable.

5.8.3 Changes to Development Agreement Statute. This Agreement has been entered into in reliance upon the provisions of the Development Agreement Statute. No amendment of or addition to the Development Agreement Statute that would affect the interpretation or enforceability of this Agreement or increase the obligations or diminish the development rights of Developer hereunder, or increase the obligations or diminish the benefits to the City hereunder shall be applicable to this Agreement unless such amendment or addition is specifically required by Law or is mandated by a court of competent jurisdiction. If such amendment or change is permissive rather than mandatory, this Agreement shall not be affected.

5.8.4 Effect on Agreement. If any of the modifications, amendments or additions described in this Section 5.8 would materially and adversely affect the construction,

development, use, operation, or occupancy of the Project as currently contemplated by the Approvals, or any material portion thereof, such that the Project, or the applicable portion thereof, becomes economically infeasible (a "**Law Adverse to Developer**"), then Developer shall notify the City and propose amendments or solutions that would maintain the benefit of the bargain (that is this Agreement) for both Parties. If any of the modifications, amendments or additions described in Section 5.8 would materially and adversely affect or limit the Community Benefits (a "**Law Adverse to the City**"), then the City shall notify Developer and propose amendments or solutions that would maintain the benefit of the bargain (that is this Agreement) for both Parties. Upon receipt of a notice under this Section 5.8.4, the Parties agree to meet and confer in good faith for a period of not less than ninety (90) days in an attempt to resolve the issue. If the Parties cannot resolve the issue in ninety (90) days or such longer period as may be agreed to by the Parties, then the Parties shall mutually select a mediator at JAMS in San Francisco for nonbinding mediation for a period of not less than thirty (30) days. If the Parties remain unable to resolve the issue following such mediation, then either party shall have the right to seek available remedies at law or in equity to maintain the benefit of the bargain or alternatively to seek termination of this Agreement if the benefit of the bargain cannot be maintained in light of the Law Adverse to Developer or Law Adverse to the City.

5.9 No Action to Impede Approvals. Except and only as required under Section 5.8, the City shall take no action under this Agreement nor impose any condition on the Project that would conflict with this Agreement or the Approvals. An action taken or condition imposed shall be deemed to be in conflict with this Agreement or the Approvals if such actions or conditions result in the occurrence of one or more of the circumstances identified in Section 5.6.1.

5.10 Estoppel Certificates. Developer may, at any time, and from time to time, deliver notice to the Planning Director requesting that the Planning Director certify to Developer, a potential Transferee, or a potential lender to Developer, in writing that to the best of the Planning Director's knowledge: (i) this Agreement is in full force and effect and a binding obligation of the Parties; (ii) this Agreement has not been amended or modified, and if so amended or modified, identifying the amendments or modifications and stating their date and providing a copy or referring to the recording information; (iii) Developer is not in Default in the performance of its obligations under this Agreement, or if in Default, to describe therein the nature and amount of any such Defaults; and (iv) the findings of the City with respect to the most recent annual review

performed pursuant to Section 8. The Planning Director, acting on behalf of the City, shall execute and return such certificate within twenty (20) days following receipt of the request.

5.11 Existing, Continuing Uses and Interim Uses. The Parties acknowledge that the Existing Uses are lawfully authorized uses and may continue as such uses may be modified by the Project, provided that any modification thereof not a component of or contemplated by the Project is subject to Planning Code Section 178 and the applicable provisions of Section 5. Developer may install interim or temporary uses on the Project Site, which uses must be consistent with those uses allowed under the Project Site's zoning, the Approvals, the Project SUD, or any planned unit development authorization granted under the Project SUD, as applicable.

5.12 Taxes. Nothing in this Agreement limits the City's ability to impose new or increased taxes or special assessments, or any equivalent or substitute tax or assessment, provided (i) the City shall not institute, on its own initiative, proceedings for any new or increased special tax or special assessment for a land-secured financing district (including the special taxes under the Mello-Roos Community Facilities Act of 1982 (Government Code Section 53311 *et seq.*) but not including business improvement districts or community benefit districts formed by a vote of the affected property owners) that includes the Project Site unless the new district is City-Wide or Developer gives its prior written consent to or requests such proceedings, and (ii) no such tax or assessment shall be targeted or directed at the Project, including, without limitation, any tax or assessment targeted solely at all or any part of the Project Site. Nothing in the foregoing prevents the City from imposing any tax or assessment against the Project Site, or any portion thereof, that is enacted in accordance with Law and applies to all similarly-situated property on a City-Wide basis.

## 6. NO DEVELOPMENT OBLIGATION

There is no requirement under this Agreement that Developer initiate or complete development of the Project, or any portion thereof. There is also no requirement that development be initiated or completed within any period of time or in any particular order, subject to the requirement to complete Associated Community Benefits for each Building (or for any market rate residential unit in excess of three hundred eighty-six (386), as applicable) commenced by Developer as set forth in Section 4.1. The development of the Project is subject to numerous factors that are not within the control of Developer or the City, such as availability of financing, interest rates, access to capital, and similar factors. In *Pardee Construction Co. v. City of*

*Camarillo*, 37 Cal.3d 465 (1984), the California Supreme Court ruled that the failure of the parties therein to provide for the timing of development resulted in a later adopted initiative restricting the timing of development and controlling the parties' agreement. It is the intent of the Parties to avoid such a result by acknowledging and providing for the timing of development of the Project in the manner set forth herein. Accordingly, the Parties agree that except as expressly set forth in this Agreement and any express construction dates set forth in a Later Approval, (i) Developer shall have the right to develop the Project in such order and at such rate and at such times as Developer deems appropriate within the exercise of its subjective business judgment, (ii) such a right is consistent with the intent, purpose and understanding of the Parties to this Agreement, and (iii) without such a right, Developer's development of the Project would be subject to the uncertainties sought to be avoided by the Development Agreement Statute, Chapter 56 and this Agreement.

**7. MUTUAL OBLIGATIONS**

7.1 Notice of Completion, Revocation or Termination. Within thirty (30) days after any early revocation or termination of this Agreement (as to all or any part of the Project Site), the Parties agree to execute a written statement acknowledging such revocation or termination, signed by the appropriate agents of the City and Developer, and record such instrument in the Official Records. In addition, within thirty (30) days after Developer's request, when a Building and all of the Associated Community Benefits tied to that Building have been completed, the City and Developer shall execute and record a notice of completion in the form attached as Exhibit G for the applicable Building property.

7.2 General Cooperation; Agreement to Cooperate. The Parties agree to cooperate with one another to expeditiously implement the Project in accordance with the Approvals, any Later Approvals and this Agreement, and to undertake and complete all actions or proceedings reasonably necessary or appropriate to ensure that the objectives of this Agreement, the Approvals and any Later Approvals are implemented. Except for ordinary administrative costs of the City, nothing in this Agreement obligates the City to spend any sums of money or incur any costs other than City Costs or costs that Developer reimburses through the payment of Processing Fees. The Parties agree that the Planning Department will act as the City's lead agency to facilitate coordinated City review of applications for the Project.

7.3 Third-Party Challenge. Developer shall assist and cooperate with the City at Developer's own expense in connection with any Third-Party Challenge. The City Attorney's Office may use its own legal staff or outside counsel in connection with defense of the Third-Party Challenge, at the City Attorney's sole discretion. Developer shall reimburse the City for its actual costs in defense of the action or proceeding, including but not limited to the time and expenses of the City Attorney's Office (at the non-discounted rates then charged by the City Attorney's Office) and any consultants; provided, however, Developer shall have the right to monthly invoices for all such costs.

7.3.1 To the extent that any such action or proceeding challenges or a judgment is entered limiting Developer's right to proceed with the Project or any material portion thereof under this Agreement (whether the Project commenced or not), including the City's actions taken pursuant to CEQA, Developer may elect to terminate this Agreement. Upon any such termination (or, upon the entry of a judgment terminating this Agreement, if earlier), the City and Developer shall jointly seek to have the Third-Party Challenge dismissed and Developer shall have no obligation to reimburse City defense costs that are incurred after the dismissal (other than, in the case of a partial termination by Developer, any defense costs with respect to the remaining portions of the Project). Notwithstanding the foregoing, if Developer conveys or transfers some but not all of the Project, or a party takes title to Foreclosed Property constituting only a portion of the Project, and, therefore, there is more than one party that assumes obligations of "Developer" under this Agreement, then only the Party holding the interest in such portion of the Project shall have the right to terminate this Agreement as to such portion of the Project (and only as to such portion), and no termination of this Agreement by such Party as to such Party's portion of the Project shall effect a termination of this Agreement as to any other portion of the Project.

7.3.2 The filing of any Third Party Challenge shall not delay or stop the development, processing or construction of the Project or the issuance of Later Approvals unless the third party obtains a court order preventing the activity.

7.4 Good Faith and Fair Dealing. The Parties shall cooperate with each other and act in good faith in complying with the provisions of this Agreement and implementing the Approvals and any Later Approvals.

7.5 Other Necessary Acts. Each Party shall use good faith efforts to take such further actions as may be reasonably necessary to carry out this Agreement, the Approvals and any

Later Approvals, in accordance with the terms of this Agreement (and subject to all applicable Laws) in order to provide and secure to each Party the full and complete enjoyment of its rights and privileges hereunder.

## 8. PERIODIC REVIEW OF DEVELOPER'S COMPLIANCE

8.1 Annual Review. Pursuant to Section 65865.1 of the Development Agreement Statute and Section 56.17 of the Administrative Code (as of the Effective Date), at the beginning of the second week of each January following final adoption of this Agreement and for so long as the Agreement is in effect (the "**Annual Review Date**"), the Planning Director shall commence a review to ascertain whether Developer has, in good faith, complied with the Agreement. The failure to commence such review in January in any calendar year shall not waive the Planning Director's right to do so later in the calendar year. The Planning Director may elect to forego an annual review if no significant construction work occurred on the Project Site during that year, or if such review is otherwise not deemed necessary.

8.2 Review Procedure. In conducting the required initial and annual reviews of Developer's compliance with this Agreement, the Planning Director shall follow the process set forth in this Section 8.2.

8.2.1 Required Information from Developer. Within sixty (60) days following request by the Planning Director, Developer shall provide a letter to the Planning Director explaining, with appropriate backup documentation, Developer's compliance with this Agreement for the preceding calendar year, including, but not limited to, compliance with the requirements regarding Community Benefits. The burden of proof, by substantial evidence, of compliance is upon Developer. The Planning Director shall post a copy of Developer's submittals on the Planning Department's website.

8.2.2 City Report. Within sixty (60) days after Developer submits such letter, the Planning Director shall review the information submitted by Developer and all other available evidence regarding Developer's compliance with this Agreement, and shall consult with applicable City Agencies as appropriate. All such available evidence, including final staff reports, shall, upon receipt by the City, be made available as soon as possible to Developer. The Planning Director shall notify Developer in writing whether Developer has complied with the terms of this Agreement (the "**City Report**"), and post the City Report on the Planning Department's website. If the Planning Director finds Developer not in compliance with this Agreement, then the City may

pursue available rights and remedies in accordance with this Agreement and Chapter 56. The City's failure to initiate or to timely complete the annual review shall not be a Default and shall not be deemed to be a waiver of the right to do so at a later date. All costs incurred by the City under this Section shall be included in the City Costs.

8.2.3 Effect on Transferees. If a Developer has effected a Transfer so that its interest in the Project Site is divided among multiple Developers at the time of an annual review, then that annual review shall be conducted separately with respect to each Developer, each Developer shall submit the materials required by this Article 8 with respect to the portion of the Project Site owned by such Developer, and the City review process will proceed as one for the whole Project. Notwithstanding the foregoing, the Planning Commission and Board of Supervisors shall make its determinations and take its action separately with respect to each Developer pursuant to Chapter 56. If there are multiple Developers and the Board of Supervisors terminates, modifies or takes such other actions as may be specified in Chapter 56 and this Agreement in connection with a determination that a Developer has not complied with the terms and conditions of this Agreement, such action by the Planning Director, Planning Commission, or Board of Supervisors shall be effective only as to the Party to whom the determination is made and the portions of the Project Site in which such Party has an interest. In other words, even when the review process is bundled for multiple Developers, any action determination of noncompliance or default will be made only against the defaulting Party and not against any of the other Developers.

8.2.4 Default. The rights and powers of the City under this Section 8.2 are in addition to, and shall not limit, the rights of the City to terminate or take other action under this Agreement on account of a Default by Developer.

## 9. ENFORCEMENT OF AGREEMENT; DEFAULT; REMEDIES

9.1 Enforcement. As of the date of this Agreement, the only Parties to this Agreement are the City and Developer. Except as expressly set forth in this Agreement (for successors, Transferees and Mortgagees), this Agreement is not intended, and shall not be construed, to benefit or be enforceable by any other person or entity whatsoever.

9.2 Meet and Confer Process. Before sending a notice of default in accordance with Section 9.3, the Party which may assert that the other Party has failed to perform or fulfill its obligations under this Agreement shall first attempt to meet and confer with the other Party to discuss the alleged failure and shall permit such Party a reasonable period, but not less than ten

(10) days, to respond to or cure such alleged failure; provided, however, the meet and confer process shall not be required (i) for any failure to pay amounts due and owing under this Agreement, or (ii) if a delay in sending a notice pursuant to Section 9.3 would impair, prejudice or otherwise adversely affect a Party or its rights under this Agreement. The Party asserting such failure shall request that such meeting and conference occur within three (3) business days following the request and if, despite the good faith efforts of the requesting Party, such meeting has not occurred within seven (7) business days of such request, then such Party shall be deemed to have satisfied the requirements of this Section and may proceed in accordance with the issuance of a notice of default under Section 9.3.

9.3 Default. The following shall constitute a "**Default**" under this Agreement: (i) the failure to make any payment within sixty (60) days following notice that such payment was not made when due and demand for compliance; and (ii) the failure to perform or fulfill any other material term, provision, obligation, or covenant of this Agreement and the continuation of such failure for a period of sixty (60) days following notice and demand for compliance. Notwithstanding the foregoing, if a failure can be cured but the cure cannot reasonably be completed within sixty (60) days, then it shall not be considered a Default if a cure is commenced within said 60-day period and diligently prosecuted to completion thereafter. Any notice of default given by a Party shall specify the nature of the alleged failure and, where appropriate, the manner in which said failure satisfactorily may be cured (if at all). Notwithstanding any other provision in this Agreement to the contrary, if Developer conveys or transfers some but not all of the Project or a party takes title to Foreclosed Property constituting only a portion of the Project, and, therefore there is more than one Party that assumes obligations of "Developer" under this Agreement, there shall be no cross-default between the separate Parties that assumed Developer obligations. Accordingly, a default by one "Developer" shall not be a Default by any other "Developer" that owns or controls a different portion of the Project Site.

9.4 Remedies.

9.4.1 Specific Performance. Subject to, and as limited by, the provisions of Sections 9.4.3, 9.4.4, and 9.5, in the event of a Default, the remedies available to a Party shall include specific performance of this Agreement in addition to any other remedy available at law or in equity.

9.4.2 Termination. Subject to the limitation set forth in Section 9.4.4, in

the event of a Default, the non-defaulting Party may elect to terminate this Agreement by sending a notice of termination to the other Party, which notice of termination shall state the Default. Any such termination shall be effective upon the date set forth in the notice of termination, which shall in no event be earlier than sixty (60) days following delivery of the notice. Consistent with Sections 9.3 and 12.3, there are no cross-defaults under this Agreement, and therefore if there is more than one "Developer" (as it relates to different parts of the Project Site), then any termination of this Agreement for Default will be limited to the Developer that sent or received the termination notice.

9.4.3 Limited Damages. The Parties have determined that except as set forth in this Section 9.4.3, (i) monetary damages are generally inappropriate, (ii) it would be extremely difficult and impractical to fix or determine the actual damages suffered by a Party as a result of a Default hereunder, and (iii) equitable remedies and remedies at law, not including damages but including specific performance and termination, are particularly appropriate remedies for enforcement of this Agreement. Consequently, Developer agrees that the City shall not be liable to Developer for damages under this Agreement, and the City agrees that Developer shall not be liable to the City for damages under this Agreement, and each covenants not to sue the other for or claim any damages under this Agreement and expressly waives its right to recover damages under this Agreement, except as follows: (1) either Party shall have the right to recover actual damages only (and not consequential, punitive or special damages, each of which is hereby expressly waived) for a Party's failure to pay sums to the other Party as and when due under this Agreement, (2) the City shall have the right to recover actual damages for Developer's failure to make any payment due under any indemnity in this Agreement, (3) to the extent a court of competent jurisdiction determines that specific performance is not an available remedy with respect to an unperformed Associated Community Benefit, the City shall have the right to monetary damages equal to the costs that the City incurs or will incur to complete the Associated Community Benefit as determined by the court, (4) either Party shall have the right to recover reasonable attorneys' fees and costs as set forth in Section 9.6, and (5) the City shall have the right to administrative penalties or liquidated damages if and only to the extent expressly stated in an Exhibit to this Agreement or in the applicable portion of the San Francisco Municipal Code incorporated into this Agreement. For purposes of the foregoing, "**actual damages**" means the actual amount of the sum due and owing under this Agreement, with interest as provided by Law,

together with such judgment collection activities as may be ordered by the judgment, and no additional sums.

9.4.4 City Processing/Certificates of Occupancy. The City shall not be required to process any requests for approval or take other actions under this Agreement during any period in which payments due the City from Developer are past due; provided, however, if Developer has conveyed or transferred some but not all of the Project or a party takes title to Foreclosed Property constituting only a portion of the Project, and, therefore, there is more than one party that assumes obligations of "Developer" under this Agreement, then the City shall continue to process requests and take other actions as to the other portions of the Project so long as the applicable Developer as to those portions is current on payments due the City. The City shall have the right to withhold a final certificate of occupancy for a Building until all of the Associated Community Benefits tied to that Building have been completed. For a Building to be deemed completed, Developer shall have completed all of the streetscape and open space improvements described in Exhibit C and Exhibit J, or a Later Approval, for that Building; provided, if the City issues a final certificate of occupancy before such items are completed, then Developer shall promptly complete such items following issuance.

9.5 Time Limits; Waiver; Remedies Cumulative. Failure by a Party to insist upon the strict or timely performance of any of the provisions of this Agreement by the other Party, irrespective of the length of time for which such failure continues, shall not constitute a waiver of such Party's right to demand strict compliance by such other Party in the future. No waiver by a Party of any condition or failure of performance, including a Default, shall be effective or binding upon such Party unless made in writing by such Party, and no such waiver shall be implied from any omission by a Party to take any action with respect to such failure. No express written waiver shall affect any other condition, action or inaction, or cover any other period of time, other than any condition, action or inaction and/or period of time specified in such express waiver. One or more written waivers under any provision of this Agreement shall not be deemed to be a waiver of any subsequent condition, action or inaction, and the performance of the same or any other term or provision contained in this Agreement. Nothing in this Agreement shall limit or waive any other right or remedy available to a Party to seek injunctive relief or other expedited judicial and/or administrative relief to prevent irreparable harm.

9.6 Attorneys' Fees. Should legal action be brought by either Party against the

other for a Default under this Agreement or to enforce any provision herein, the prevailing Party in such action shall be entitled to recover its reasonable attorneys' fees and costs. For purposes of this Agreement, "**reasonable attorneys' fees and costs**" means the reasonable fees and expenses of counsel to the Party, which may include printing, duplicating and other expenses, air freight charges, hiring of experts and consultants, and fees billed for law clerks, paralegals, librarians, and others not admitted to the bar but performing services under the supervision of an attorney. The term "**reasonable attorneys' fees and costs**" shall also include, without limitation, all such reasonable fees and expenses incurred with respect to appeals, mediation, arbitrations, and bankruptcy proceedings, and whether or not any action is brought with respect to the matter for which such fees and costs were incurred. For the purposes of this Agreement, the reasonable fees of attorneys of City Attorney's Office shall be based on the fees regularly charged by private attorneys with the equivalent number of years of experience in the subject matter area of the Law for which the City Attorney's Office's services were rendered who practice in the City of San Francisco in law firms with approximately the same number of attorneys as employed by the Office of the City Attorney.

## 10. FINANCING; RIGHTS OF MORTGAGEES

10.1 Developer's Right to Mortgage. Nothing in this Agreement limits the right of Developer to mortgage or otherwise encumber all or any portion of the Project Site for the benefit of any Mortgagee as security for one or more loans. Developer represents that, as of the Effective Date, there are no Mortgages on the Project Site other than the Existing Mortgage. Prior to commencing construction under the First Construction Document for the Project, Developer shall cause the Existing Mortgage, if then still in effect, and any other then-existing Mortgage(s), to be subordinated to this Agreement.

10.2 Mortgagee Not Obligated to Construct. Notwithstanding any of the provisions of this Agreement (except as set forth in this Section and Section 10.5), a Mortgagee, including any Mortgagee who obtains title to the Project Site or any part thereof as a result of foreclosure proceedings, conveyance or other action in lieu thereof, or other remedial action shall in no way be obligated by the provisions of this Agreement to construct or complete the Project or any part thereof or to guarantee such construction or completion. The foregoing provisions shall not be applicable to any party who, after a foreclosure, conveyance or other action in lieu thereof, or other remedial action obtains title to some or all of the Project Site from or through the

Mortgagee, or any other purchaser at a foreclosure sale other than the Mortgagee itself, on which certain Associated Community Benefits must be completed as set forth in Section 4.1. Nothing in this Section or any other Section or provision of this Agreement shall be deemed or construed to permit or authorize any Mortgagee or any other person or entity to devote the Project Site or any part thereof to any uses other than uses consistent with this Agreement and the Approvals, and nothing in this Section shall be deemed to give any Mortgagee or any other person or entity the right to construct any improvements under this Agreement (other than as set forth above for required Community Benefits or as needed to conserve or protect improvements or construction already made) unless or until such person or entity assumes Developer's obligations under this Agreement.

10.3 Copy of Notice of Default and Notice of Failure to Cure to Mortgagee. Whenever the City shall deliver any notice or demand to the Developer with respect to any breach or default by the Developer in its obligations under this Agreement, the City shall at the same time forward a copy of such notice or demand to each Mortgagee having a Mortgage on the real property which is the subject of the breach or default who has previously made a written request to the City therefor, at the last address of such Mortgagee specified by such Mortgagee in such notice. In addition, if such breach or default remains uncured for the period permitted with respect thereto under this Agreement, the City shall deliver a notice of such failure to cure such breach or default to each such Mortgagee at such applicable address. A delay or failure by the City to provide such notice required by this Section shall extend for the number of days until notice is given, the time allowed to the Mortgagee for cure. In accordance with Section 2924b of the California Civil Code, the City requests that a copy of any notice of default and a copy of any notice of sale under any Mortgage be mailed to the City at the address for notices under this Agreement. Any Mortgagee relying on the protections set forth in this Article 10 shall send to the City a copy of any notice of default and notice of sale.

10.4 Mortgagee's Option to Cure Defaults. After receiving any notice of failure to cure referred to in Section 10.3, each Mortgagee shall have the right, at its option, to commence within the same period as the Developer to remedy or cause to be remedied any Default, plus an additional period of: (a) sixty (60) days to cure a monetary Default; and (b) one hundred twenty (120) days to cure a non-monetary event of default which is susceptible of cure by the Mortgagee without obtaining title to the applicable property. If an event of default is not cured within the

applicable cure period, the City nonetheless shall refrain from exercising any of its remedies with respect to the event of default if, within the Mortgagee's applicable cure period: (i) the Mortgagee notifies the City that it intends to proceed with due diligence to foreclose the Mortgage or otherwise obtain title to the subject property; and (ii) the Mortgagee commences foreclosure proceedings within sixty (60) days after giving such notice, and thereafter diligently pursues such foreclosure to completion; and (iii) after obtaining title, the Mortgagee diligently proceeds to cure those events of default: (A) which are required to be cured by the Mortgagee and are susceptible of cure by the Mortgagee, and (B) of which the Mortgagee has been given notice by the City. Any such Mortgagee or Transferee of a Mortgagee who shall properly complete the improvements relating to the Project Site or applicable part thereof shall be entitled, upon written request made to the Agency, to a Certificate of Completion.

10.5 Mortgagee's Obligations with Respect to the Property. Notwithstanding anything to the contrary in this Agreement, no Mortgagee shall have any obligations or other liabilities under this Agreement unless and until it acquires title by any method to all or some portion of the Project Site (referred to hereafter as "**Foreclosed Property**"). A Mortgagee that, by foreclosure under a Mortgage, acquires title to any Foreclosed Property shall take title subject to all of the terms and conditions of this Agreement, to the extent applicable to the Foreclosed Property, including any claims for payment or performance of obligations which are due as a condition to enjoying the benefits of this Agreement and shall have all of the rights and obligations of Developer under this Agreement as to the applicable Foreclosed Property, including completion of the Associated Community Benefits under Section 4.1. Upon the occurrence and continuation of an uncured default by a Mortgagee or Transferee in the performance of any of the obligations to be performed by such Mortgagee or Transferee pursuant to this Agreement, the City shall be afforded all its remedies for such uncured default as provided in this Agreement.

10.6 No Impairment of Mortgage. No default by Developer under this Agreement shall invalidate or defeat the lien of any Mortgagee. No foreclosure of any Mortgage or other lien shall defeat, diminish, render invalid or unenforceable or otherwise impair Developer's rights or obligations under this Agreement or constitute a default under this Agreement.

10.7 Cured Defaults. Upon the curing of any event of default by any Mortgagee within the time provided in this Article 10 the City's right to pursue any remedies with respect to

the cured event of default shall terminate.

## 11. AMENDMENT; TERMINATION; EXTENSION OF TERM

11.1 Amendment or Termination. This Agreement may only be amended with the mutual written consent of the City and Developer; provided, however, that following a Transfer, the City and Developer or any Transferee may amend this Agreement as it affects Developer or the Transferee and the portion of the Project Site owned by Developer or the Transferee without affecting other portions of the Project Site or other Transferees. Other than upon the expiration of the Term and except as provided in Sections 2.2, 7.3, 9.4.2, and 11.2, this Agreement may only be terminated with the mutual written consent of the Parties. Any amendment to this Agreement that does not constitute a Material Change may be agreed to by the Planning Director (and, to the extent it affects any rights or obligations of a City department, with the approval of that City department). Any amendment that is a Material Change will require the approval of the Planning Director, the Planning Commission and the Board of Supervisors (and, to the extent it affects any rights or obligations of a City department, after consultation with that City Department). The determination of whether a proposed change constitutes a Material Change shall be made, on City's behalf, by the Planning Director following consultation with the City Attorney and any affected City Agency.

11.2 Early Termination Rights. Developer shall, upon thirty (30) days prior notice to the City, have the right, in its sole and absolute discretion, to terminate this Agreement in its entirety at any time if Developer does not Commence Construction on any part of the Project Site by the date which is five (5) years following the Effective Date as such five (5) year date may be extended by any Litigation Extension. Thereafter, the City shall, upon sixty (60) days prior notice to Developer, have the right, in its sole and absolute discretion, to terminate this Agreement if the Developer has not Commenced Construction; provided Developer can prevent any such termination by the City by providing to the City notice, within the above sixty (60) day period, of Developer's intent to start construction and the Developer thereafter Commences Construction within one hundred twenty (120) days following delivery of Developer's notice to the City, or, if unable to actually Commence Construction within said time period, demonstrates reasonable, good faith and continuing efforts to Commence Construction, such as by pursuing all necessary Later Approvals, and thereafter promptly Commences Construction upon receipt of the Later Approvals.

11.3 Termination and Vesting. Any termination under this Agreement shall

concurrently effect a termination of the Approvals with respect to the terminated portion of the Project Site, except as to any Approval pertaining to a Building that has Commenced Construction in reliance thereon. In the event of any termination of this Agreement by Developer resulting from a Default by the City and except to the extent prevented by such City Default, Developer's obligation to complete the Associated Community Benefits shall continue as to the Building that has Commenced Construction and all relevant and applicable provisions of this Agreement shall be deemed to be in effect as such provisions are reasonably necessary in the construction, interpretation or enforcement to this Agreement as to any such surviving obligations. The City's and Developer's rights and obligations under this Section 11.3 shall survive the termination of this Agreement.

11.4 Amendment Exemptions. No issuance of a Later Approval, or amendment of an Approval or Later Approval, shall by itself require an amendment to this Agreement. And no change to the Project that is permitted under the Project SUD or a planned unit development authorization issued under the Project SUD shall by itself require an amendment to this Agreement. Upon issuance or approval, any such matter shall be deemed to be incorporated automatically into the Project and vested under this Agreement (subject to any conditions set forth in the amendment or Later Approval). Notwithstanding the foregoing, if there is any direct conflict between the terms of this Agreement and a Later Approval, or between this Agreement and any amendment to an Approval or Later Approval, then the Parties shall concurrently amend this Agreement (subject to all necessary approvals in accordance with this Agreement) in order to ensure the terms of this Agreement are consistent with the proposed Later Approval or the proposed amendment to an Approval or Later Approval. The Planning Department and the Planning Commission, as applicable, shall have the right to approve changes to the Project as described in the Exhibits in keeping with its customary practices and the Project SUD, and any such changes shall not be deemed to conflict with or require an amendment to this Agreement or the Approvals so long as they do not constitute a Material Change. If the Parties fail to amend this Agreement as set forth above when required, however, then the terms of this Agreement shall prevail over any Later Approval or any amendment to an Approval or Later Approval that conflicts with this Agreement.

11.5 Extension Due to Legal Action or Referendum; Excusable Delay.

11.5.1 Litigation and Referendum Extension. If any litigation is filed challenging this Agreement or any of the Approvals described on Exhibit E (the "**Initial**

**Approvals**") and it directly or indirectly delays this Agreement or such Initial Approval, or if this Agreement or any of the Initial Approvals is suspended pending the outcome of an electoral vote on a referendum, then the Term of this Agreement and the effectiveness of the Initial Approvals (starting from the date of the initial grant of the Initial Approval) shall be extended for the number of days equal to the period starting from the commencement of the litigation or the suspension to the end of such litigation or suspension (a "**Litigation Extension**"). The Parties shall document the start and end of a Litigation Extension in writing within thirty (30) days from the applicable dates.

11.5.2 "**Excusable Delay**" means the occurrence of an event beyond a Party's reasonable control which causes such Party's performance of an obligation to be delayed, interrupted or prevented, including, but not limited to: changes in Federal or State Laws; strikes or the substantial interruption of work because of labor disputes; inability to obtain materials; freight embargoes; civil commotion, war or acts of terrorism; inclement weather, fire, floods, earthquakes, or other acts of God; epidemics or quarantine restrictions; litigation; unforeseen site conditions (including archaeological resources or the presence of hazardous materials); or the failure of any governmental agency, public utility or communication service provider to issue a permit, authorization, consent or approval required to permit construction within the standard or customary time period for such issuing authority following Developer's submittal of a complete application for such permit, authorization, consent or approval, together with any required materials. Excusable Delay shall not include delays resulting from failure to obtain financing or have adequate funds, changes in market conditions, or the rejection of permit, authorization or approval requests based upon Developer's failure to satisfy the substantive requirements for the permit, authorization or approval request. In the event of Excusable Delay, the Parties agree that (i) the time periods for performance of the delayed Party's obligations impacted by the Excusable Delay shall be strictly limited to the period of such delay, interruption or prevention and the delayed Party shall, to the extent commercially reasonable, act diligently and in good faith to remove the cause of the Excusable Delay or otherwise complete the delayed obligation, and (ii) following the Excusable Delay, a Party shall have all rights and remedies available under this Agreement, if the obligation is not completed within the time period as extended by the Excusable Delay. If an event which may lead to an Excusable Delay occurs, the delayed Party shall notify the other Party in writing of such occurrence as soon as possible after becoming aware that such event may result in

an Excusable Delay, and the manner in which such occurrence is likely to substantially interfere with the ability of the delayed Party to perform under this Agreement.

## 12. TRANSFER OR ASSIGNMENT; RELEASE; CONSTRUCTIVE NOTICE

12.1 Permitted Transfer of this Agreement. At any time, Developer shall have the right to convey, assign or transfer all of its right, title and interest in and to all or part of the Project Site (a "**Transfer**") to a party (including any Mortgagee) without the City's consent, provided that it also transfers to such party (the "**Transferee**") all of its interest, rights or obligations under this Agreement with respect to such portion of the Project Site together with any portion required to complete the Associated Community Benefits for such portion (the "**Transferred Property**"). Developer shall not, by Transfer, separate a portion of the Project Site from the Associated Community Benefits tied to that portion of the Project Site without the prior written consent of the Planning Director. Notwithstanding anything to the contrary in this Agreement, if Developer Transfers one or more parcels such that there are separate Developers within the Project Site, then the obligation to perform and complete the Associated Community Benefits for a Building shall be the sole responsibility of the applicable Developer (*i.e.,* the person or entity that is the Developer for the Development Parcel on which the Building is located); provided, however, that any ongoing obligations (such as open space operation and maintenance) may be transferred to a residential, commercial or other management association ("**CMA**") on commercially reasonable terms so long as the CMA has the financial capacity and ability to perform the obligations so transferred.

12.2 Notice of Transfer. Developer shall provide not less than ten (10) days' notice to the City before any proposed Transfer of its interests, rights and obligations under this Agreement, together with a copy of the assignment and assumption agreement for that parcel (the "**Assignment and Assumption Agreement**"). The Assignment and Assumption Agreement shall be in recordable form, in substantially the form attached as Exhibit H (including the indemnifications, the agreement and covenant not to challenge the enforceability of this Agreement, and not to sue the City for disputes between Developer and any Transferee) and any material changes to the attached form will be subject to the review and approval of the Director of Planning, not to be unreasonably withheld or delayed. The Director of Planning shall use good faith efforts to complete such review and grant or withhold approval within thirty (30) days after the Director of Planning's receipt of such material changes. Notwithstanding the foregoing, any

Transfer of Community Benefit obligations to a CMA as set forth in Section 12.1 shall not require the transfer of land or any other real property interests to the CMA.

12.3 Release of Liability. Upon recordation of any Assignment and Assumption Agreement (following the City's approval of any material changes thereto if required pursuant to Section 12.2 above), the assignor shall be released from any prospective liability or obligation under this Agreement related to the Transferred Property, as specified in the Assignment and Assumption Agreement, and the assignee/Transferee shall be deemed to be "**Developer**" under this Agreement with all rights and obligations related thereto with respect to the Transferred Property. Notwithstanding anything to the contrary contained in this Agreement, if a Transferee Defaults under this Agreement, such default shall not constitute a Default by Developer or any other Transferee with respect to any other portion of the Project Site and shall not entitle the City to terminate or modify this Agreement with respect to such other portion of the Project Site, except as otherwise provided herein. Additionally, the annual review provided by Section 8 shall be conducted separately as to Developer and each Transferee and only as to those obligations that Developer or such Transferee has under this Agreement.

12.4 Responsibility for Performance. The City is entitled to enforce each and every such obligation assumed by each Transferee directly against the Transferee as if the Transferee were an original signatory to this Agreement with respect to such obligation. Accordingly, in any action by the City against a Transferee to enforce an obligation assumed by the Transferee, the Transferee shall not assert as a defense against the City's enforcement of performance of such obligation that such obligation (i) is attributable to Developer's breach of any duty or obligation to the Transferee arising out of the Transfer or the Assignment and Assumption Agreement or any other agreement or transaction between Developer and the Transferee, or (ii) relates to the period before the Transfer. The foregoing notwithstanding, the Parties acknowledge and agree that a failure to complete a Mitigation Measure may, if not completed, delay or prevent a different party's ability to start or complete a specific Building or improvement under this Agreement if and to the extent the completion of the Mitigation Measure is a condition to the other party's right to proceed, as specifically described in the Mitigation Measure, and Developer and all Transferees assume this risk.

12.5 Constructive Notice. Every person or entity who now or hereafter owns or acquires any right, title or interest in or to any portion of the Project Site is, and shall be,

constructively deemed to have consented to every provision contained herein, whether or not any reference to this Agreement is contained in the instrument by which such person acquired an interest in the Project Site. Every person or entity who now or hereafter owns or acquires any right, title or interest in or to any portion of the Project Site and undertakes any development activities at the Project Site, is, and shall be, constructively deemed to have consented and agreed to, and is obligated by all of the terms and conditions of this Agreement (as such terms and conditions apply to the Project Site or applicable portion thereof), whether or not any reference to this Agreement is contained in the instrument by which such person acquired an interest in the Project Site.

12.6 Rights of Developer. The provisions in this Section 12 shall not be deemed to prohibit or otherwise restrict Developer from (i) granting easements or licenses to facilitate development of the Project Site, (ii) encumbering the Project Site or any portion of the improvements thereon by any Mortgage, (iii) granting an occupancy leasehold interest in portions of the Project Site, (iv) entering into a joint venture agreement or similar partnership agreement to fulfill its obligations under this Agreement, or (v) transferring all or a portion of the Project Site pursuant to a foreclosure, conveyance in lieu of foreclosure, or other remedial action in connection with a Mortgage, and none of the foregoing shall constitute a Transfer for which the City's consent is required.

## 13. DEVELOPER REPRESENTATIONS AND WARRANTIES

13.1 Interest of Developer; Due Organization and Standing. Developer represents that it is the sole owner of the Project Site, with the right and authority to enter into this Agreement. Developer is a limited liability company, duly organized and validly existing and in good standing under the Laws of the State of Delaware. Developer has all requisite power to own its property and authority to conduct its business as presently conducted. Developer represents and warrants that there is no Mortgage, existing lien or encumbrance recorded against the Project Site that, upon foreclosure or the exercise of remedies, would permit the beneficiary of the Mortgage, lien or encumbrance to eliminate or wipe out the obligations set forth in this Agreement that run with applicable land.

13.2 No Inability to Perform; Valid Execution. Developer represents and warrants that it is not a party to any other agreement that would conflict with Developer's obligations under this Agreement and it has no knowledge of any inability to perform its

obligations under this Agreement. The execution and delivery of this Agreement and the agreements contemplated hereby by Developer have been duly and validly authorized by all necessary action. This Agreement will be a legal, valid and binding obligation of Developer, enforceable against Developer in accordance with its terms.

13.3 Conflict of Interest. Through its execution of this Agreement, Developer acknowledges that it is familiar with the provisions of Section 15.103 of the City's Charter, Article III, Chapter 2 of the City's Campaign and Governmental Conduct Code, and Section 87100 *et seq.* and Section 1090 *et seq.* of the California Government Code, and certifies that it does not know of any facts which constitute a violation of said provisions and agrees that it will immediately notify the City if it becomes aware of any such fact during the Term.

13.4 Notification of Limitations on Contributions. Through its execution of this Agreement, Developer acknowledges that it is familiar with Section 1.126 of the San Francisco Campaign and Governmental Conduct Code, which prohibits any person who contracts with the City, whenever such transaction would require approval by a City elective officer or the board on which that City elective officer serves, from making any campaign contribution to (1) the City elective officer, (2) a candidate for the office held by such individual, or (3) a committee controlled by such individual or candidate, at any time from the commencement of negotiations for the contract until the later of either the termination of negotiations for that contract or twelve (12) months after the date that contract is approved. San Francisco Ethics Commission Regulation 1.126-1 provides that negotiations are commenced when a prospective contractor first communicates with a City officer or employee about the possibility of obtaining a specific contract. This communication may occur in person, by telephone or in writing, and may be initiated by the prospective contractor or a City officer or employee. Negotiations are completed when a contract is finalized and signed by the City and the contractor. Negotiations are terminated when the City and/or the prospective contractor end the negotiation process before a final decision is made to award the contract.

Developer acknowledges that (i) the prohibition on contributions applies to Developer, each member of Developer's board of directors, Developer's chief executive officer, chief financial officer and chief operating officer, any person with an ownership interest of more than ten percent (10%) in Developer, any subcontractor listed in the contract, and any committee that is sponsored or controlled by Developer, and (ii) within thirty (30) days of the submission of

a proposal for the contract, the City department seeking to enter into the contract must notify the Ethics Commission of the parties and any subcontractor to the contract. Additionally, Developer certifies it has informed each of the persons described in the preceding sentence of the prohibitions contained in Section 1.126 by the time it submitted a proposal for the contract to the City, and has provided the names of the persons required to be informed to the City department seeking to enter into that contract within thirty (30) days of submitting its contract proposal to the City department receiving that submittal, and acknowledges the City department receiving that submittal was required to notify the Ethics Commission of those persons.

13.5 Other Documents. To the current, actual knowledge of Dan Safier, after reasonable inquiry, no document furnished by Developer to the City with its application for this Agreement nor this Agreement contains any untrue statement of material fact or omits a material fact necessary to make the statements contained therein, or herein, not misleading under the circumstances under which any such statement shall have been made.

13.6 No Bankruptcy. Developer represents and warrants to the City that Developer has neither filed nor is the subject of any filing of a petition under the federal bankruptcy law or any federal or state insolvency laws or Laws for composition of indebtedness or for the reorganization of debtors, and, to the best of Developer's knowledge, no such filing is threatened.

## 14. MISCELLANEOUS PROVISIONS

14.1 Entire Agreement. This Agreement, including the preamble paragraph, Recitals and Exhibits, and the agreements between the Parties specifically referenced in this Agreement, constitutes the entire agreement between the Parties with respect to the subject matter contained herein.

14.2 Incorporation of Exhibits. Except for the Approvals which are listed solely for the convenience of the Parties, each Exhibit to this Agreement is incorporated herein and made a part hereof as if set forth in full. Each reference to an Exhibit in this Agreement shall mean that Exhibit as it may be updated or amended from time to time in accordance with the terms of this Agreement.

14.3 Binding Covenants; Run With the Land. Pursuant to Section 65868 of the Development Agreement Statute, from and after recordation of this Agreement, all of the provisions, agreements, rights, powers, standards, terms, covenants and obligations contained in this Agreement shall be binding upon the Parties and, subject to the provisions of this Agreement,

including without limitation Section 12, their respective heirs, successors (by merger, consolidation, or otherwise) and assigns, and all persons or entities acquiring the Project Site, any lot, parcel or any portion thereof, or any interest therein, whether by sale, operation of law, or in any manner whatsoever, and shall inure to the benefit of the Parties and their respective heirs, successors (by merger, consolidation or otherwise) and assigns. Subject to the provisions of this Agreement, including without limitation Section 12, all provisions of this Agreement shall be enforceable during the Term as equitable servitudes and constitute covenants and benefits running with the land pursuant to applicable Law, including but not limited to California Civil Code Section 1468.

14.4 Applicable Law and Venue. This Agreement has been executed and delivered in and shall be interpreted, construed, and enforced in accordance with the Laws of the State of California. All rights and obligations of the Parties under this Agreement are to be performed in the City and County of San Francisco, and the City and County of San Francisco shall be the venue for any legal action or proceeding that may be brought, or arise out of, in connection with or by reason of this Agreement.

14.5 Construction of Agreement. The Parties have mutually negotiated the terms and conditions of this Agreement and its terms and provisions have been reviewed and revised by legal counsel for both the City and Developer. Accordingly, no presumption or rule that ambiguities shall be construed against the drafting Party shall apply to the interpretation or enforcement of this Agreement. Language in this Agreement shall be construed as a whole and in accordance with its true meaning. The captions of the paragraphs and subparagraphs of this Agreement are for convenience only and shall not be considered or referred to in resolving questions of construction. Each reference in this Agreement to this Agreement or any of the Approvals shall be deemed to refer to this Agreement or the Approvals as amended from time to time pursuant to the provisions of this Agreement, whether or not the particular reference refers to such possible amendment. In the event of a conflict between the provisions of this Agreement and Chapter 56, the provisions of this Agreement will govern and control.

14.6 Project Is a Private Undertaking; No Joint Venture or Partnership. The development proposed to be undertaken by Developer on the Project Site is a private development. The City has no interest in, responsibility for, or duty to third persons concerning any of said improvements. Developer shall exercise full dominion and control over the Project Site, subject

only to the limitations and obligations of Developer contained in this Agreement. Nothing contained in this Agreement, or in any document executed in connection with this Agreement, shall be construed as creating a joint venture or partnership between the City and Developer. Neither Party is acting as the agent of the other Party in any respect hereunder. Developer is not a state or governmental actor with respect to any activity conducted by Developer hereunder.

14.7 Recordation. Pursuant to the Development Agreement Statute and Chapter 56, the Clerk of the Board of Supervisors shall have a copy of this Agreement recorded in the Official Records within ten (10) days after the Effective Date of this Agreement or any amendment thereto, with costs to be borne by Developer.

14.8 Obligations Not Dischargeable in Bankruptcy. Developer's obligations under this Agreement are not dischargeable in bankruptcy.

14.9 Survival. Following expiration of the Term, this Agreement shall be deemed terminated and of no further force and effect except for any provision which, by its express terms, survive the expiration or termination of this Agreement.

14.10 Signature in Counterparts. This Agreement may be executed in duplicate counterpart originals, each of which is deemed to be an original, and all of which when taken together shall constitute one and the same instrument.

14.11 Notices. Any notice or communication required or authorized by this Agreement shall be in writing and may be delivered personally or by registered mail, return receipt requested. Notice, whether given by personal delivery or registered mail, shall be deemed to have been given and received upon the actual receipt by any of the addressees designated below as the person to whom notices are to be sent. Either Party to this Agreement may at any time, upon notice to the other Party, designate any other person or address in substitution of the person and address to which such notice or communication shall be given. Such notices or communications shall be given to the Parties at their addresses set forth below:

To City: John Rahaim
Director of Planning
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, California 94102

with a copy to:

Dennis J. Herrera, Esq.
City Attorney
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Attn: Real Estate/Finance, 3333 California Project

To Developer: c/o The Prado Group, Inc.
150 Post Street, Suite 320
San Francisco, CA 94108
Attn: Dan Safier

14.12 Limitations on Actions. Pursuant to Section 56.19 of the Administrative Code, any decision of the Board of Supervisors made pursuant to Chapter 56 shall be final. Any court action or proceeding to attack, review, set aside, void, or annul any final decision or determination by the Board of Supervisors shall be commenced within ninety (90) days after such decision or determination is final and effective. Any court action or proceeding to attack, review, set aside, void or annul any final decision by (i) the Planning Director made pursuant to Administrative Code Section 56.15(d)(3) or (ii) the Planning Commission pursuant to Administrative Code Section 56.17(e) shall be commenced within ninety (90) days after said decision is final.

14.13 Severability. Except as is otherwise specifically provided for in this Agreement with respect to any Laws which conflict with this Agreement, if any term, provision, covenant, or condition of this Agreement is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remaining provisions of this Agreement shall continue in full force and effect unless enforcement of the remaining portions of this Agreement would be unreasonable or grossly inequitable under all the circumstances or would frustrate the purposes of this Agreement.

14.14 MacBride Principles. The City urges companies doing business in Northern Ireland to move toward resolving employment inequities and encourages them to abide by the MacBride Principles as expressed in San Francisco Administrative Code Section 12F.1 *et seq.* The City also urges San Francisco companies to do business with corporations that abide by the MacBride Principles. Developer acknowledges that it has read and understands the above statement of the City concerning doing business in Northern Ireland.

14.15 Tropical Hardwood and Virgin Redwood. The City urges companies not to import, purchase, obtain or use for any purpose, any tropical hardwood, tropical hardwood wood

product, virgin redwood, or virgin redwood wood product, except as expressly permitted by the application of Sections 802(b) and 803(b) of the San Francisco Environment Code.

14.16 Sunshine. Developer understands and agrees that under the City's Sunshine Ordinance (Administrative Code, Chapter 67) and the California Public Records Act (California Government Code Section 250 *et seq.*), this Agreement and any and all records, information, and materials submitted to the City hereunder are public records subject to public disclosure. To the extent that Developer in good faith believes that any financial materials reasonably requested by the City constitutes a trade secret or confidential proprietary information protected from disclosure under the Sunshine Ordinance and other Laws, Developer shall mark any such materials as such. When a City official or employee receives a request for information that has been so marked or designated, the City may request further evidence or explanation from Developer. If the City determines that the information does not constitute a trade secret or proprietary information protected from disclosure, the City shall notify Developer of that conclusion and that the information will be released by a specified date in order to provide Developer an opportunity to obtain a court order prohibiting disclosure.

14.17 Non-Liability of City Officials and Others. Notwithstanding anything to the contrary in this Agreement, no individual board member, director, commissioner, officer, employee, official or agent of City or other City Parties shall be personally liable to Developer, its successors and assigns, in the event of any Default by City, or for any amount which may become due to Developer, its successors and assigns, under this Agreement.

14.18 Non-Liability of Developer Officers and Others. Notwithstanding anything to the contrary in this Agreement, no individual board member, director, officer, employee, official, partner, employee, or agent of Developer or any affiliate of Developer shall be personally liable to City, its successors and assigns, in the event of any Default by Developer, or for any amount which may become due to City, its successors and assigns, under this Agreement.

14.19 No Third Party Beneficiaries. There are no third party beneficiaries to this Agreement.

[REMAINDER OF PAGE INTENTIONALLY BLANK]

IN WITNESS WHEREOF, the Parties hereto have executed this Agreement as of the day and year first above written.

CITY:

CITY AND COUNTY OF SAN FRANCISCO,
a municipal corporation

By: _____
John Rahaim
Director of Planning

Approved as to form:

DENNIS J. HERRERA, City Attorney

By: _____
Carol Wong, Deputy City Attorney

RECOMMENDED:

By: _____
[Name]
Director, MOHCD

By: _____
Mohammed Nuru
Director of Public Works

Approved on _____, 20__
Board of Supervisors Ordinance No. ___

DEVELOPER:

LAUREL HEIGHTS PARTNERS LLC,
a Delaware limited liability company

By: 3333 California LP,
a Delaware limited partnership,
its Manager

By: PSKS LH LLC,
a Delaware limited liability company,
its General Partner

By: Prado LH LLC,

a California limited liability company,
its Manager

By: _____
Name: Dan Safier
Title: Manager

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )
County of San Francisco )

On _____, before me, _____, a Notary Public, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )
County of San Francisco )

On _____, before me, _____, a Notary Public, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

# Exhibit A

## Project Site Legal Description

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF SAN FRANCISCO, IN THE COUNTY OF SAN FRANCISCO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

BEGINNING at a point on the Southerly line of California Street, said point being the Easterly extremity of the curve with a 15 foot radius joining the Easterly line of Laurel Street with the Southerly line of California Street, as shown on "Map of Laurel Heights, filed July 28, 1947, in Map Book "P", at Pages 55 and 56, Official Records of the City and County of San Francisco; running thence North 80°54' East 707.375 feet along the Southerly line of California Street to the Southwesterly boundary of the property of the Standard Oil Company of California; thence South 52°36' 29.74 seconds East along said boundary 232.860 feet; thence Southwesterly along the arc of a curve to the right whose tangent deflects 54°14' 30.74 seconds to the right from the preceding course, radius 425 feet, central angle 34°15'59", a distance of 254.176 feet; thence South 35°54' West tangent to the preceding curve 380.066 feet; thence Southwesterly along the arc of a curve to the right, tangent to the preceding course, radius 65 feet, central angle 37°18' a distance of 42.316 feet to tangency with the Northwesterly line of Euclid Avenue; thence South 73°12' West along said line of Euclid Avenue 312.934 feet; thence leaving said line of Euclid Avenue, and running Southwesterly, Westerly, and Northwesterly along the arc of a curve to the right, tangent to the preceding course, radius 20 feet, central angle 100°48' 01.51", a distance of 35.186 feet; thence Northwesterly along the arc of a reverse curve to the left, parallel to and concentric with and radially distant 6 feet Northeasterly from the Northeasterly line of Laurel Street, as shown on said map of Laurel Heights, radius 4033 feet, central angle 5°31' 20.27", a distance of 388.710 feet; thence Northwesterly along the arc of a compound curve to the left, radius 120 feet, central angle 71°12' 55.45", a distance of 149.153 feet; thence Northwesterly along the arc of a reverse curve to the right, radius 60 feet, central angle 73°38' 14.21', a distance of 77.113 feet to tangency with the Easterly line of Laurel Street; thence North 9°06' West along said line of Laurel Street 127.290 feet to the beginning of the above mentioned curve joining the Easterly line of Laurel Street with Southerly line of California Street; thence Northwesterly, Northerly, and Northeasterly along the arc of a curve to the right, radius 15 feet 90°00', a distance of 23.562 feet to tangency with the Southerly line of California Street and the point of beginning.

APN: **Lot 003, Block 1032**

# Exhibit B

## Project Description

The Project Site is an approximately 446,490-square-foot, or 10.25-acre, parcel bounded by California Street to the north, Presidio Avenue to the east, Masonic Avenue to southeast, Euclid Avenue to the south, and Laurel Street/Mayfair Drive to the west, at the southern edge of San Francisco's Presidio Heights neighborhood in the northwest portion of San Francisco. The project sponsor, Laurel Heights Partners, LLC, owns the site and temporarily leases it to the Regents of the University of California, which uses the Project Site for its University of California San Francisco (UCSF) Laurel Heights Campus. The Project Site does not include the San Francisco Fireman's Credit Union (now called the SF Fire Credit Union) at the southwest corner of California Street and Presidio Avenue, which is on a separate parcel.

The Project Site is currently used as office and related research, child care, and parking. It is developed with a four-story, approximately 455,000-gross-square-foot office building including a three-level, 212-space, an approximately 93,000-gross-square-foot partially below-grade parking garage at the center of the site; a one-story, approximately 14,000-gross-square-foot annex building at the corner of California and Laurel streets; three surface parking lots with a total of 331 spaces connected by internal roadways; two circular garage ramp structures leading to below-grade parking levels; and landscaping or landscaped open space for the USCF Laurel Heights Campus occupants.

The proposed project includes approximately **1,427,832** gross square feet of new and rehabilitated space, comprising approximately **977,437** gross square feet of residential floor area with approximately **744** dwelling units; approximately **34,496** gross square feet of retail floor area; and an approximately **14,665** gross-square-foot child care center use. The proposed project would provide approximately **857** off-street parking spaces (including approximately 10 car share spaces), approximately **762** Class One bicycle spaces, and **77** Class Two bicycle spaces. These proposed uses would be located in 13 new buildings (known as Plaza A, Plaza B, Walnut, Mayfair, Laurel Townhomes, Euclid and Masonic) and in the adaptively reused office building (known as Center A and Center B), which would be divided into two separate buildings and converted to residential use.

**25% of the proposed project's units will be deed-restricted, on-site affordable units designated for low-income senior households.** These affordable units will be located in the proposed Walnut Building on California Street and consist of 185 studios and 1-bedrooms for seniors plus one (1) on-site manager's unit. The Walnut Building would also include an approximately **175-seat child care facility**, including a contiguous outdoor activity area. The project includes approximately **34,496 square feet of neighborhood-serving retail** located in the buildings fronting onto California Street (Plaza A, Plaza B and the Walnut Building). This retail

corridor is aligned with the existing Laurel Village shopping center on California Street and will be designed to enhance the retail offerings for the neighborhood.

The proposed project would contain approximately 52 percent of the overall lot area (approximately 236,000 square feet – excluding green roofs) as open area, with portions to be developed with a combination of public open space, common open space (some of which would be open to the public) and private open space for residents. The proposed project would include **2.87 acres of publicly accessible landscaped open space** with multi-purpose plazas, lawns, pathways and streetscape improvements as further described in Exhibit C, which will provide the public with new open space amenities and improve pedestrian connectivity and safety through the neighborhood.

The Project's circulation and open space plan includes multiple new public entrances into and through the Site in order to integrate the Site with the surrounding neighborhood and street network The proposed north-south pedestrian connection (Walnut Walk) and the proposed east-west pedestrian connection (Mayfair Walk) would be open to the public and would provide the primary points of access to other publicly accessible common open spaces, plazas, squares, and vista points within the Project Site. The proposed Walnut Walk would align with Walnut Street to the north and the intersection of Euclid and Masonic to the south, incorporating the site into the surrounding street grid.

# Exhibit B-1

## Project Site Plan



# Exhibit C

## Project Open Space

The Project would provide the following open space, substantially in accordance with Attachment C-1, Attachment C-2, Attachment C-3, and Schedule 1 to the Agreement:

1. Publicly Accessible Private Improvements. The Project would include the construction, operation, and maintenance of the Publicly Accessible Private Improvements, which is comprised of approximately 2.87 acres of open space (1.63 acres of which exceed the Planning Code open space requirements that would otherwise apply for the Project) developed as follows:
    a. California Plaza: An approximately 4,290 square foot plaza adjacent to California Street and the Plaza A and B retail uses. California Plaza will be improved with a combination of quality hardscape, planters and seating elements adjacent to the City sidewalk and designed to comply with the City's Better Streets policies.
    b. Cypress Square and Stairs: Cypress Stairs (approximately 1,255 sq. ft.) are one of several pedestrian access points into the Project and would connect pedestrians from California Street to Cypress Square and the network of internal public open spaces throughout the Project Site. There will also be ADA access from California Street to Cypress Square adjacent to the Cypress Stairs. Cypress Square would be an approximately 12,052 square foot south-facing plaza that would retain the existing mature and healthy Cypress trees identified in the landscape plan. It would include hardscaped walkways and a central, paved open plaza area with wood decking, seating and landscaping.
    c. Mayfair Walk: Mayfair Walk (approximately 30,685 sq. ft.) is the Project's main east-west pedestrian connector that will stitch the site back into the adjacent neighborhood's urban fabric with publicly-accessible landscaped pathways. The Walk includes a connection to Mayfair Drive/Laurel Street to the west with seating, stairs and landscaping, including the retention of existing mature and healthy oak trees and the addition of new trees as identified in the landscape plan. The Walk would include a hardscape pathway with landscaped borders and access to ground floor residential units. The Walk would connect with the ADA-accessible Pine Street Stairs to Presidio Avenue to the east.
    d. Presidio Overlook: At the east side of the Project Site atop Pine Street Stairs, the Presidio Overlook will provide scenic views of downtown San Francisco for the public and ADA and stair access to Presidio Avenue. The Overlook will consist of approximately 10,450 square feet of open space and would include a large terrace with trees, planters and seating. The Overlook would act as an interconnection and scenic area between the east portion of the Mayfair Walk and the Pine Street Stairs.

e. Pine Street Steps: The Pine Street Steps would be approximately 7,015 square feet and are inspired by California's indigenous biodiversity and include a grove of mature existing and new Redwood trees. They have been designed to provide the public with an ADA-accessible connection from the east side of the Project Site to the west.

f. Walnut Walk North and Walnut Walk South: Walnut Walk would consist of a total of approximately 23,730 square feet of open space and will be the Project's main north-south public pedestrian access. Walnut Walk would run through the center of the Project Site from California Street (via Walnut Court) to the Masonic and Euclid Avenue intersection, helping to stitch the site back into the neighborhood's urban fabric. Walnut Walk would be a pedestrian pathway with a network of landscaped open spaces and seating.

g. Walnut Drive and Walnut Court: Walnut Drive and Walnut Court would consist of approximately 17,825 square feet of open space and would include tree-lined hardscape pedestrian walkways on either side of Walnut Drive leading into Walnut Court, which would include a tree-lined vehicular turnaround plaza with a tree feature at the center. The drive and court areas would provide direct access to California Street, Mayfair Walk and Walnut Walk.

h. Euclid Green: The new green lawn at the corner of Euclid and Laurel would provide the public with views of downtown San Francisco to the east, and views of the Golden Gate Bridge to the northwest. Euclid Green will consist of approximately 18,004 square feet of open space at the southwest corner of the Project at Laurel Street and Euclid Avenue. The existing green lawn will be renovated and maintained as a large, naturally sloping lawn with plantings and a direct access to the sidewalks on Euclid Avenue and Laurel Street.

The Publicly Accessible Private Improvements will be privately owned but accessible to the public on the terms described in Attachment C-2 and Attachment C-3. The Publicly Accessible Private Improvements would be provided substantially as depicted in Attachment C-1, constructed in accordance with the terms of Attachment C-2 and Schedule 1, and operated and maintained on the terms of Attachment C-2 and Attachment C-3.

2. Streetscape Improvements. The Project would include the streetscape improvements depicted in Attachment C-1 to enhance the safety of, and strengthen the network of, existing sidewalks and street crossings that abut the Project Site including Presidio Avenue, Masonic Avenue, Euclid Avenue, Laurel Street, Mayfair Street and California Street.

3. Provision of Required Open Space. The amount and phasing of private and/or common usable open space for the residential uses on the Project shall be governed by the Approvals.

# Exhibit C-1

## Open Space Plan



# Exhibit C-2

## Regulations Regarding Access and Maintenance of Publicly Accessible Private Improvements

These Regulations Regarding Access and Maintenance of Publicly Accessible Private Improvements (these "Regulations") shall govern the use, maintenance, and operation of each completed Publicly Accessible Private Improvement (each, a "Publicly Accessible Private Improvement" and collectively, the "Publicly Accessible Private Improvements") as defined in Section 1 of this Agreement. The Publicly Accessible Private Improvements are the open spaces proposed for the Project that are privately owned, but will remain accessible to the public, as described in this Exhibit, and include California Plaza, Cypress Stairs, Cypress Square, Euclid Green, Mayfair Walk those portions of the Pine Street Steps that are privately owned, Presidio Overlook, Walnut Drive and Walnut Court, Walnut Walk North, and Walnut Walk South.

1. Permitted Uses. Upon completion of a Publicly Accessible Private Improvement in accordance with this Agreement, Developer shall make that Publicly Accessible Private Improvement available for the use, enjoyment and benefit of the public for open space and recreational purposes in accordance with these Regulations, including, without limitation, (i) quiet contemplation and rest without the use of audible electronic devices (although headphones are permitted), (ii) pedestrian access through the Project Site from one Project Site boundary to the others (bicycles, scooters, skateboards and the like to be walked, not ridden on site for safety reasons), and (iii) short term use of designated seating areas (excluding planter walls and/or landscaped areas). These Regulations do not require Developer to make its Publicly Accessible Private Improvement available to the public for more than open space and recreational purposes.

2. Prohibited Use. The following shall be prohibited in any Publicly Accessible Private Improvement, (i) smoking of any form, including cigarettes, cigars, pipes, e-cigarettes and smokeless cigarettes (including tobacco or other controlled substances), (ii) consumption or possession of open alcoholic beverages (unless permitted by special permit), (iii) camping or sleeping, (iv) climbing or affixing items to trees, other landscaping, furniture or infrastructure, (v) disorderly conduct, as defined in Article 4 of the City's Park Code, as amended from time to time, (vi) building fires or cooking (unless permitted by special permit), (vii) peddling or vending merchandise (unless permitted by special permit), (viii) temporary structures or installations (unless permitted by special permit), (ix) littering or dumping of waste, (x) removal of plants, soil, furniture, or other facilities of the open space, (xi) graffiti or the damage or destruction of property, and (xii) amplified sound. Developer may limit off-leash animals to designated areas but shall permit leashed animals, including leashed service animals, in the Publicly Accessible Private Improvements. Organized sporting events are not permitted in the Publicly Accessible Private Improvements due to their slope and limited size. However, active recreation (e.g., kicking a soccer ball or

throwing a football) among groups of up to four (4) people shall be permitted on Euclid Green provided it does not endanger other users of Euclid Green. Developer may use a completed Publicly Accessible Private Improvement for temporary construction staging related to adjacent development on the Project Site (during which time the subject Publicly Accessible Private Improvement shall not be used by the public) to the extent that such construction is contemplated under, and performed in accordance with, this Agreement, the Approvals, and any Later Approvals.

3. No Discrimination. Developer shall not discriminate against or segregate any person, or group of persons, on account of the basis of fact or perception of a person's race, color, creed, religion, national origin, ancestry, age, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or acquired immune deficiency syndrome, HIV status, weight, height, medical condition, or association with members of any of the foregoing classes, in the use, occupancy, tenure, or enjoyment of a Publicly Accessible Private Improvement.

4. Maintenance Standard. Each Publicly Accessible Private Improvement shall be operated, managed, and maintained in a clean and safe condition in accordance with the anticipated and foreseeable use thereof.

5. Temporary Closure. Developer shall have the right, without obtaining the prior consent of the City or any other person or entity, to temporarily close a Publicly Accessible Private Improvement to the public from time to time for one of the following two reasons. In each instance, such temporary closure shall continue for as long as Developer reasonably deems necessary to address either of the circumstances below:

    a. Emergency; Public Safety. In the event of an emergency or danger to the public health or safety created from whatever cause (including, but not limited to, flood, storm, fire, earthquake, explosion, accident, criminal activity, riot, civil disturbances, civil unrest, unlawful assembly, or loitering). Developer may temporarily close a Publicly Accessible Private Improvement (or affected portions thereof) in any manner deemed necessary or desirable to promote public safety, security, and the protection of persons and property.

    b. Maintenance and Repairs. Developer may temporarily close a Publicly Accessible Private Improvement (or affected portions thereof) in order to make any repairs or perform any maintenance as Developer, in its reasonable discretion, deems necessary or desirable to repair, maintain, or operate that Publicly Accessible Private Improvement; provided such closure may not impede emergency vehicle access.

6. Operation of the Publicly Accessible Private Improvements. Operation of each Publicly Accessible Private Improvement shall be subject to the additional requirements of this Paragraph.

    a. Hours of Operation. Each Publicly Accessible Private Improvement shall be open and accessible to the public seven (7) days per week during the daylight hours (or 30 minutes prior to sunset) (the "Operating Hours"), unless reduced hours are (i) approved in writing by the City, (ii) otherwise expressly provided for in this Agreement (including, without limitation, Paragraphs 4 and 5(b) of these Regulations), or (iii) reasonably imposed by Developer, with the City's reasonable consent, to address security concerns. None of the Publicly Accessible Private Improvements shall be closed to the public during Operating Hours for special events. No person shall enter, remain, stay, or loiter in a Publicly Accessible Private Improvement when it is closed to the public, except persons authorized in conjunction with a temporary closure, authorized service and maintenance personnel, or an authorized resident, guest or employee of the project.

Signs. Developer shall post signs at the major public entrances to each of its Publicly Accessible Private Improvement, indicating that it is a privately-owned public open space ("POPOS") in accordance with all laws and signage requirements. The signs, at a minimum, shall indicate the public right to use the space in accordance with these Regulations, setting forth the applicable regulations imposed by these Regulations, hours of operation, and a telephone number to call regarding security, management or other inquiries.

7. Permissive Use. Developer may post at each entrance to each of its Publicly Accessible Private Improvement, or at intervals of not more than 200 feet along the boundary, signs reading substantially as follows: "Right to pass by permission, and subject to control of owner: Section 1008, Civil Code." Notwithstanding the posting of any such sign, no use by the public nor any person of any portion of the Publicly Accessible Private Improvement for any purpose or period of time shall be construed, interpreted, or deemed to create any rights or interests to or in the Publicly Accessible Private Improvement other than the rights and interests expressly granted in this Agreement. The right of the public or any person to make any use whatsoever of a Publicly Accessible Private Improvement or any portion thereof is not meant to be an implied dedication for the benefit of, or to create any rights or interests in, any third parties.

8. Arrest or Removal of Persons. Developer shall have the right (but not the obligation) to use all lawful means to effect the removal of any person or persons who creates a public nuisance or causes safety concerns for the occupants or neighbors of the Project, or who otherwise violates the applicable rules and regulations, or who commits any crime including, without limitation, infractions or misdemeanors, in or around a Publicly

Accessible Private Improvements. To the extent permitted by law, Developer may prohibit members of the public who have repeatedly broken the Regulations in any material respect from entering the Publicly Accessible Private Improvements, and if such person enters a Publicly Accessible Private Improvement, may ask such person to leave the Publicly Accessible Private Improvement. Developer shall have the right to exercise its power and authority as owner consistent with other publicly accessible but privately-owned areas in the City, such as other privately owned public open space.

9. Project Security During Period of Non-Access. Developer shall have the right to block entrances to install and operate security devices and to maintain security personnel in and around the Publicly Accessible Private Improvements to prevent the entry of persons or vehicles during the time periods when public access to a Publicly Accessible Private Improvement or any portion thereof is restricted or not permitted. Subject to the access requirements for City's emergency vehicles, as described in the Subdivision Map, and Developer's obligations under Applicable Law, Developer shall have a right to install permanent architectural features that serve as security devices such as gates, fences and bollards, and close such devices during non-operating hours or during periods of closure as identified in these Regulations. Design of such devices shall be subject to approval by the San Francisco Planning Department which shall not be unreasonably withheld and subject to any permits required under Applicable Law. Such design review by the San Francisco Planning Department shall not be construed as a change in entitlement and shall not be subject to a planning application or require a separate entitlement. It shall not be unreasonable for the Planning Department to withhold its consent if any such devices would impede emergency access that may be required under Applicable Law or in the Approvals. Nothing shall restrict Developer's right to install security cameras and monitoring devices anywhere on the Project.

10. Removal of Obstructions. Developer shall have the right to remove and dispose of, in any lawful manner it deems appropriate, any object or thing left or deposited on a Publicly Accessible Private Improvement deemed to be an obstruction, interference, or restriction of use of that Publicly Accessible Private Improvement for the purposes set forth in this Agreement, including, but not limited to, personal belongings or equipment in a Publicly Accessible Private Improvement during hours when public access is not allowed pursuant to these Regulations.

11. Temporary Structures. Subject to Developer's right to use a Publicly Accessible Private Improvement for temporary construction staging related to adjacent development as set forth in Paragraph 1 of these Regulations, no trailer, tent, shack, or other outbuilding, or structure of a temporary character, shall be used on any portion of the Publicly Accessible Private Improvements at any time during Operating Hours, either temporarily or permanently.

**Exhibit C-3**

**Public Access Declaration**
[Under review and discussion]

WHEN RECORDED MAIL TO:

Real Estate Division
City and County of San Francisco
25 Van Ness Avenue, Suite 400
San Francisco, CA 94102
Attn: Director of Property [to be confirmed]

The undersigned hereby declares this instrument to be exempt from Recording Fees (Govt. Code § 27383) and from Documentary Transfer Tax (CA Rev. & Tax. Code § 11922 and SF Bus. and Tax Reg. Code § 1105)

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

3333 California Street
APN 1032-003

DECLARATION OF PUBLIC ACCESS COVENANTS AND RESTRICTIONS

This Declaration of Public Access Covenants and Restrictions ("**Declaration**") is made as of _____, 2019, by LAUREL HEIGHTS PARTNERS, LLC, a Delaware limited liability company ("**Declarant**"), in favor of the CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation ("**City**").

RECITALS

A. Declarant owns an irregularly-shaped parcel in the City and County of San Francisco comprised of approximately 10.25 acres (approximately 446,468 square feet), generally bounded by California Street, Laurel Street, Euclid Avenue, Masonic Avenue, and Presidio Avenue, and further described in the attached Exhibit A (the "**Project Site**").

B. Declarant intends to redevelop the Project Site as a large mixed-use development that will include residential, retail, commercial, child care, open space, parking, and related uses (the "**Project**"), under a Development Agreement between Declarant and City dated _____, 2019 (the "**Development Agreement**"), approved by the City's Board of Supervisors by Ordinance No. _____ on November __, 2019, a Special Use District approved by the City's Board of Supervisors by Ordinance No. _____ on November __, 2019, amendments to the City's Planning Code, Zoning Map, and Height Map adopted by the Board of Supervisors under Ordinance No. _____ on November __, 2019, and a street

encroachment permit and associated encroachment permit and maintenance agreement approved by the Board of Supervisors by Ordinance No. _____ on November __, 2019.

C. Declarant's proposed Project buildings (each a "**Building**") are described in the attached Exhibit B-1 and depicted in the attached Exhibit B-2. As part of the Project and pursuant to the Development Agreement, if Declarant constructs any Building during the term of the Development Agreement ("**DA Term**"), Declarant will develop certain publicly-accessible open spaces on the Project Site and operate and maintain such open space in accordance on the terms and conditions of this Declaration.

AGREEMENT

Now, therefore, in consideration of the City's approval and execution of the Development Agreement, Declarant declares as follows on behalf of itself and all future owners of the Project Site:

1. Construction.

(a) Timing. If Declarant constructs any Building during the DA Term, Declarant shall build the applicable Publicly Accessible Private Improvements (as defined in the attached Exhibit C) specified in the attached Exhibit C in compliance with the requirements of the Development Agreement.

(b) Conceptual Plans; Changes. If Declarant is obligated to construct a Publicly Accessible Private Improvement pursuant to Section 1(a) above, then Declarant shall construct that Publicly Accessible Private Improvement substantially as described in the conceptual plans dated _____, and stamped as Exhibit ___ in the City's Planning Department docket for Case No. _____, as such plans may be modified pursuant to conditions of approval for the Project adopted by the City's Planning Commission on September ____, 2019 (the "**Conceptual Plans**"). The improvements described in the Conceptual Plans, as may be modified pursuant to this subsection (b), are referred to herein as the "**Open Space Improvements**". Declarant shall have the right to modify and/or update the Conceptual Plans from time to time as it may determine in its sole business judgment, subject to the provisions of the following paragraph and provided further that any such modifications shall be subject to review and approval by the City acting in its regulatory capacity with respect to permit issuance, if applicable.

If, prior to completion of the Open Space Improvements for a Publicly Accessible Private Improvement, Declarant wishes to apply for any permits for improvements to a Publicly Accessible Private Improvement that materially differ from the Conceptual Plans or would materially and adversely impact the public's ability to access or use that Publicly Accessible Private Improvement for the Permitted Uses (as defined in Section 4) (a "**Construction Modification**"), Declarant shall provide a copy of such plans to the City's Director of Planning (or successor City officer, if applicable) (the "**Planning Director**"). Any proposed Construction Modification shall be subject to the approval of the Planning Director, which may be withheld in his or her reasonable discretion. Declarant agrees it shall be reasonable for the Planning Director

to withhold such approval if she or he determines the proposed Construction Modification does not meet the regulatory requirements or standards for the affected area.

2. Maintenance and Modifications. Following the completion of the Open Space Improvements for a Publicly Accessible Private Improvement, Declarant shall maintain that Publicly Accessible Private Improvement in a clean and litter-free condition, and shall maintain the Open Space Improvements in that Publicly Accessible Private Improvement in good condition for the life of the last remaining Building at the Project Site. Notwithstanding the foregoing, after the substantial completion of the Open Space Improvements for a Publicly Accessible Private Improvement, Declarant shall have the right to modify, renovate, replace and/or update the Open Space Improvements or other improvements installed in a Publicly Accessible Private Improvement (each, "Change") subject to the provisions of this Declaration. Before submitting any permit application for a Change that would or could materially and adversely impact the public's ability to access or use any Publicly Accessible Private Improvement for the Permitted Use (each, "Material Change"), Declarant shall provide a copy of the plans to be submitted with such permit application to the Planning Director. All Material Changes are subject to the approval of the Planning Director, which approval may be withheld in his or her reasonable discretion. If the Planning Director fails to respond to an initial written request for approval to a proposed Material Change within sixty (60) days of receiving the initial request, Declarant shall send a second notice of the request, with a statement that failure to respond within twenty (20) days to the second notice will result in a deemed approval of the proposed Material Change. The Director's failure to respond to the second notice within twenty (20) days of receiving the second notice shall be deemed a City approval of the Material Change described in the notices.

In addition to the foregoing paragraph, Declarant shall give the Planning Director at least thirty (30) days advance notice of any proposed Change that is not a Material Change if the hard cost of such proposed modification is anticipated to exceed the Threshold Amount (defined as follows), but the Planning Director shall have no consent rights with respect to such modification. The "Threshold Amount" means an amount equal to One Hundred Thousand Dollars ($100,000), which shall be increased by three percent (3%) on each anniversary of the recordation of this Declaration in the Official Records of San Francisco County.

3. City Regulatory Approvals. Prior to commencing the construction or maintenance of any Open Space Improvements, Changes, or Material Changes, Declarant shall obtain all City approvals Declarant is required to obtain from City for such activities in its regulatory capacity.

4. Use; Operation. On substantial completion of the Open Space Improvements for a Publicly Accessible Private Improvement, Declarant shall maintain and make that Publicly Accessible Private Improvement available for the use, enjoyment and benefit of the public for open space and recreational purposes (the "**Permitted Public Use**") in accordance with the regulations attached as Exhibit D ("**Regulations**"). If Declarant closes any Publicly Accessible Private Improvement pursuant to Section 5 of the Regulations, Declarant shall keep a record of such closure for at least two (2) years and shall provide a copy of such record to the City's Planning Director on request.

5. Notice and Cure Rights. Except as provided in this Section, City shall provide written notice to the Declarant of any actual or alleged violation of the covenants or restrictions set forth

in this Declaration before taking any enforcement action. Such notices shall be given to Declarant at the address last furnished to the City. Declarant shall have (i) a period of five (5) business days after receipt of such notice to cure any violation in making a Publicly Accessible Private Improvement available for the Permitted Public Use as required in this Declaration ("**Public Access Violations**") and (ii) a period of thirty (30) days after receipt of such notice to cure any other violation, provided that if the violation is not capable of cure within such 30-day period, Declarant shall have such additional time as shall be reasonably required to complete a cure as long as Declarant promptly undertakes action to commence the cure within the 30-day period and thereafter diligently prosecutes the same to completion. The time in which Declarant may cure is herein called the "**Declarant Cure Period**," and except for any Public Access Violations, City shall not exercise any legal or equitable remedies during the Declarant Cure Period (or the Lender Cure Period, as defined in Section 6 below) as long as Declarant (or any applicable Lender, as defined in Section 6 below) is diligently pursuing such cure. Notwithstanding anything to the contrary herein, in no event shall the Declarant Cure Period exceed six (6) months.

Any notices required or permitted to be given under this Declaration shall be in writing and shall be delivered (a) in person, (b) by certified mail, postage prepaid, return receipt requested, or (c) by U.S. Express Mail or commercial overnight courier that guarantees next day delivery and provides a receipt, and such notices shall be addressed as follows, or such other address as either party may from time to time specify in writing to the other party:

| | |
|---|---|
| Declarant: | c/o The Prado Group, Inc.<br>150 Post Street, Suite 320<br>San Francisco, CA 94108<br>Attn: Dan Safier |
| City: | Planning Director [to be confirmed]<br>City and County of San Francisco<br>1650 Mission Street, Suite 400<br>San Francisco, CA 94103 |
| with a copy to: | Real Estate Division<br>City and County of San Francisco<br>25 Van Ness Avenue, Suite 400<br>San Francisco, CA 94102<br>Attn: Director of Property |
| and to: | Office of the City Attorney<br>City Hall, Room 234<br>1 Dr. Carlton B. Goodlett Place<br>San Francisco, CA 94102<br>Attn: Real Estate/Finance Team |

6. Lender Notice and Cure Rights. As long as any deed of trust encumbering any portion of the Project Site made in good faith and for value (each, an "**Encumbrance**") shall remain unsatisfied of record, the City shall give to the beneficiary of such Encumbrance (each, a "**Lender**") a copy of each notice the City gives to Declarant from time to time of the occurrence

of a violation under this Declaration if that Lender has given to the City a written request for such notices. Copies of such notices shall be given to any requesting Lender at the address that requesting Lender last furnished to the City. Nothing in this Section shall be construed to mean that City must provide a Lender with a copy of any Self-Help Notices (as defined in Section 7 below).

Each Lender shall have the right, but not the obligation, to do any act or thing required of Declarant hereunder, and to do any act or thing which may be necessary and proper to be done in the performance and observance of the agreements, covenants and conditions hereof; provided, however, that no such action shall constitute an assumption by such Lender of the obligations of Declarant under this Declaration. In the case of any notice of violation given by the City to Declarant, the Lender shall have the same concurrent cure periods as are given Declarant under this Declaration for remedying a default or causing it to be remedied and, except in the event of a Public Access Violation, if prior to the expiration of the applicable cure period specified in Section 5 above, a Lender gives City written notice that it intends to undertake the curing of such default or to cause the same to be cured, and then proceeds with all due diligence to do so, Lender shall have, in each case, an additional period of thirty (30) days (or, except for a default relating to the payment of money, such longer period as reasonably necessary) as long as Lender commences cure within such thirty (30) day period and diligently proceeds to completion) after the later to occur of (i) the expiration of such cure period, or (ii) the date that the City has served such notice of default upon Lender, and the City shall accept such performance by or at the instance of the Lender as if the same had been made by Declarant. The time in which Lender may cure is herein called the "**Lender Cure Period**". Notwithstanding anything to the contrary herein, in no event shall the additional Lender Cure Period exceed six (6) months beyond the applicable Declarant Cure Period.

7. Enforcement. Declarant acknowledges that its failure to construct the Open Space Improvements for any Publicly Accessible Private Improvement in a timely manner or to properly maintain or operate them as required in this Declaration will cause irreparable harm to the City and that the City will not have an adequate remedy at law for such breach. Accordingly, City shall be entitled to specific performance or injunctive or other equitable relief by reason of such breach. City may, in its sole discretion, rely on this Declaration to enforce any of the covenants or restrictions hereunder. City, but not the general public, shall have all rights and remedies available at law or in equity in order to enforce the covenants and restrictions set forth in this Declaration. All rights and remedies available to City under this Declaration or at law or in equity shall be cumulative and not alternative, and invocation of any such right or remedy shall not constitute a waiver or election of remedies with respect to any other available right or remedy. If there is any breach of the covenants or restrictions hereunder, City shall be entitled to recover all attorneys' fees and costs in connection with City's enforcement activities and actions.

If Declarant fails to maintain a Publicly Accessible Private Improvement in the manner required in this Declaration, and Declarant fails to timely cure such failure pursuant to Section 5 above and no Lender cures such failure pursuant to Section 6 above, City shall further have the right, at its sole option, to remedy such failure at Declarant's expense by providing Declarant with ten (10) days' prior written notice of City's intention to cure such failure (a "**Self-Help Notice**"). Such action by City shall not be construed as a waiver of such default or any rights or remedies of

City, and nothing herein shall imply any duty of City to do any act that Declarant is obligated to perform. Declarant shall reimburse City for all of its costs and expenses, including without limitation, reasonable attorneys' fees, in remedying or attempting to remedy such failure, within thirty (30) days' of receiving City's invoice for such costs and expenses, together with documentation reasonably evidencing such costs and expenses. If Declarant fails to timely reimburse City for such costs and expenses, City shall have the right to record a notice of such unpaid costs and expenses against record title to the legal parcel on which the Publicly Accessible Private Improvement is located and the legal parcel of each Building to which such Publicly Accessible Private Improvement is associated, as described in the attached Exhibit C. At City's request, Declarant shall provide security in a form and amount satisfactory to City to City to ensure Declarant's prompt reimbursement of any amounts owed by Declarant to City pursuant to this Section.

8. Priority of Lien. No violation or breach of any provision of this Declaration shall impair, defeat or invalidate the lien of any Encumbrance, but all provisions hereof shall thereafter be binding upon and effective against any owner whose title is derived through foreclosure of any Encumbrance or acceptance of any deed in lieu of foreclosure.

9. No Waiver. No waiver by City of any violation under this Declaration shall be effective or binding unless and to the extent expressly made in writing by City, and no such waiver may be implied from any failure by City to take action with respect to such violation. No express written waiver of any violation shall constitute a waiver of any subsequent violation in the performance of the same or any other provision of this Declaration.

10. Compliance With Laws. Declarant shall comply with all laws, statutes, ordinances, rules, and regulations of federal, state and local authorities (including, without limitation, City laws of general applicability) having jurisdiction over the Project Site, now in force or hereafter adopted with respect to its use, in the performance of its obligations under this Declaration; provided, however, such compliance obligation as to City laws shall be subject to the terms and conditions of Section 5.6 of the Development Agreement during the DA Term.

11. Litigation Expenses. If City brings an action or proceeding (including any cross-complaint, counterclaim, or third-party claim) against Declarant or the then-owner(s) of the Project Site by reason of a default, or otherwise arising out of this Declaration, the prevailing party in such action or proceeding shall be entitled to its costs and expenses of suit, including, but not limited to, reasonable attorneys' fees, which shall be payable whether or not such action is prosecuted to judgment. "Prevailing Party" shall include, without limitation, a party who dismisses an action for recovery hereunder in exchange for payment of the sums allegedly due, performance of covenants allegedly breached, or consideration substantially equal to the relief sought in the action. Attorneys' fees under this Section shall include attorneys' fees on any appeal, and, in addition, a party entitled to attorneys' fees shall be entitled to all other reasonable costs and expenses incurred in connection with such action. For purposes of this Declaration, reasonable fees of attorneys of City's Office of City Attorney shall be based on the fees regularly charged by private attorneys with an equivalent number of hours of professional experience in the subject matter area of the law for which City's services were rendered who practice in the City and County of San Francisco,

in law firms with approximately the same number of attorneys as employed by the Office of City Attorney.

12. Binding on Successors; No Merger. This Declaration and the covenants and restrictions set forth herein constitute restrictions and covenants running with the land and shall bind and burden Declarant, in its capacity as owner of the Project Site, and each successor owner and occupier of the Project Site. Declarant may transfer its obligations under this Declaration to a residential, commercial or other management association for the Project Site, but shall remain ultimately responsible for Declarant's rights and obligations under this Declaration; provided, however, that the rights and obligations to a specific Publicly Accessible Private Improvement shall be limited to the owner of the legal parcel on which such Publicly Accessible Private Improvement is located and the owner of the legal parcel of each Building to which such Publicly Accessible Private Improvement is associated, as set forth in Exhibit C.

13. Severability. Should any provision or portion hereof be declared invalid or in conflict with any law, the validity of all remaining provisions shall remain unaffected an in full force and effect.

14. Time. Time is of the essence of this Declaration and each and every part hereof.

15. Term; Amendment. This Declaration shall be effective on the date it is recorded in the Official Records of San Francisco County, shall continue as to each Publicly Accessible Private Improvement and its Open Space Improvements for the life of each Building to which they are specifically associated as set forth in Exhibit C; provided, however, that if this Declaration terminates as to only a portion of Walnut Walk North or Walnut Walk South or a portion of Mayfair Walk, the then owner of the legal parcel to the Building to which such portion had been associated shall provide a reasonable connection across such legal parcel to provide for continued public pedestrian access between the remaining portions of Walnut Walk North and Walnut Walk South or the remaining portions of Mayfair Walk, as applicable. [To be discussed if this should include the Pine Street Steps, Walnut Court and Walnut Drive] Notwithstanding anything to the contrary in the foregoing sentence, if Declarant does not build any Building at the Project Site during the DA Term, this Declaration shall automatically terminate on the expiration of the DA Term. This Declaration may be amended or otherwise modified only in a writing signed and acknowledged by Declarant (or its successors in interest to any fee interest of the Project Site) and City.

16. Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the State of California.

[REMAINDER OF PAGE INTENTIONALLY BLANK]

IN WITNESS WHEREOF, Declarant and City have executed this Declaration as of the date first written above.

**DECLARANT**: LAUREL HEIGHTS PARTNERS LLC,
a Delaware limited liability company

By: 3333 California LP,
a Delaware limited partnership,
its Manager

By: PSKS LH LLC,
a Delaware limited liability company,
its General Partner

By: Prado LH LLC,
a California limited liability company,
its Manager

By: _____
Name: Dan Safier
Title: Manager

**CITY**: CITY AND COUNTY OF SAN FRANCISCO,
a municipal corporation

By: _____

APPROVED AS TO FORM:

DENNIS J. HERRERA,
City Attorney

By: _____
Carol Wong
Deputy City Attorney

**A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.**

State of California )
) ss
County of San Francisco )

On _____, before me, _____, a notary public in and for said State, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____ (Seal)

**A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.**

State of California )
) ss
County of San Francisco )

On _____, before me, _____, a notary public in and for said State, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____ (Seal)

# EXHIBIT A

## Legal Description of Project Site

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF SAN FRANCISCO, IN THE COUNTY OF SAN FRANCISCO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

BEGINNING at a point on the Southerly line of California Street, said point being the Easterly extremity of the curve with a 15 foot radius joining the Easterly line of Laurel Street with the Southerly line of California Street, as shown on "Map of Laurel Heights, filed July 28, 1947, in Map Book "P", at Pages 55 and 56, Official Records of the City and County of San Francisco; running thence North 80°54' East 707.375 feet along the Southerly line of California Street to the Southwesterly boundary of the property of the Standard Oil Company of California; thence South 52°36' 29.74 seconds East along said boundary 232.860 feet; thence Southwesterly along the arc of a curve to the right whose tangent deflects 54°14' 30.74 seconds to the right from the preceding course, radius 425 feet, central angle 34°15'59", a distance of 254.176 feet; thence South 35°54' West tangent to the preceding curve 380.066 feet; thence Southwesterly along the arc of a curve to the right, tangent to the preceding course, radius 65 feet, central angle 37°18' a distance of 42.316 feet to tangency with the Northwesterly line of Euclid Avenue; thence South 73°12' West along said line of Euclid Avenue 312.934 feet; thence leaving said line of Euclid Avenue, and running Southwesterly, Westerly, and Northwesterly along the arc of a curve to the right, tangent to the preceding course, radius 20 feet, central angle 100°48' 01.51", a distance of 35.186 feet; thence Northwesterly along the arc of a reverse curve to the left, parallel to and concentric with and radially distant 6 feet Northeasterly from the Northeasterly line of Laurel Street, as shown on said map of Laurel Heights, radius 4033 feet, central angle 5°31' 20.27", a distance of 388.710 feet; thence Northwesterly along the arc of a compound curve to the left, radius 120 feet, central angle 71°12' 55.45", a distance of 149.153 feet; thence Northwesterly along the arc of a reverse curve to the right, radius 60 feet, central angle 73°38' 14.21', a distance of 77.113 feet to tangency with the Easterly line of Laurel Street; thence North 9°06' West along said line of Laurel Street 127.290 feet to the beginning of the above mentioned curve joining the Easterly line of Laurel Street with Southerly line of California Street; thence Northwesterly, Northerly, and Northeasterly along the arc of a curve to the right, radius 15 feet 90°00', a distance of 23.562 feet to tangency with the Southerly line of California Street and the point of beginning.

APN: **Lot 003, Block 1032**

EXHIBIT B-1

Description of Buildings

[to be attached]

EXHIBIT B-2

Depiction of Buildings and Publicly Accessible Private Improvements



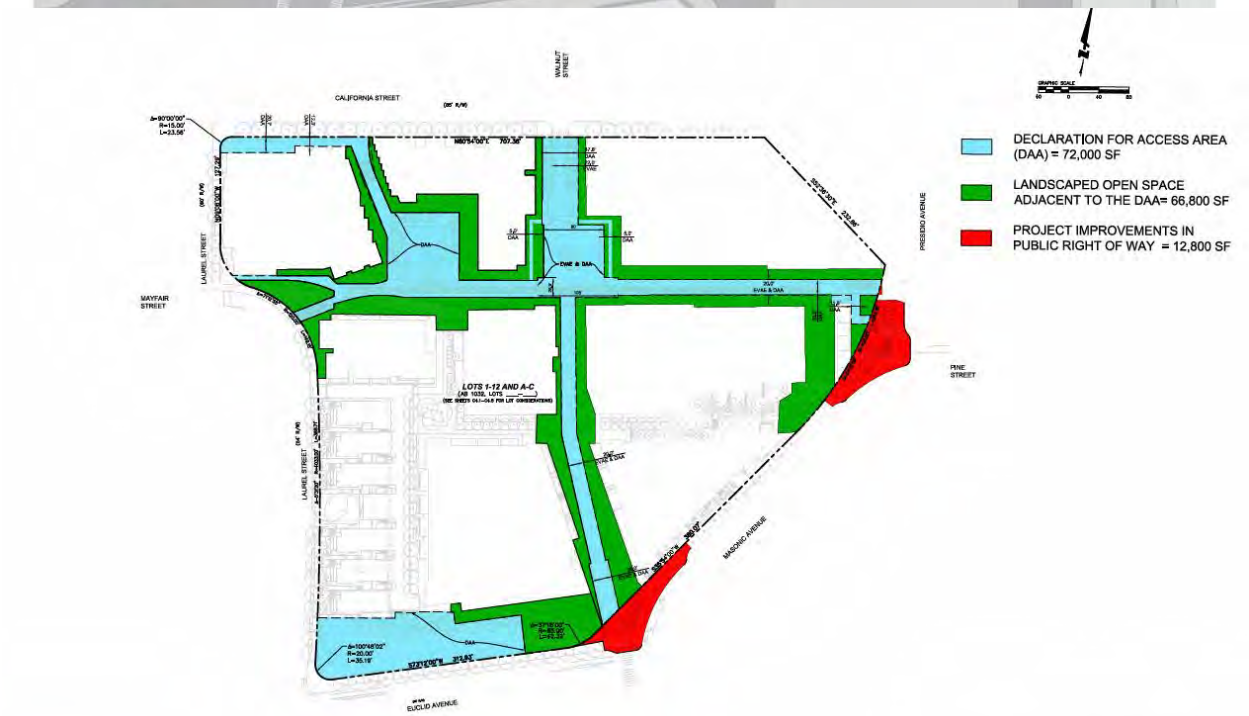



EXHIBIT C

Completion Schedule

Declarant's obligation to construct a Publicly Accessible Private Improvement (as defined below) shall be as follows:

1. Description of Publicly Accessible Private Improvements. Each of the following shall be a "**Publicly Accessible Private Improvement**" and shall collectively be the "**Publicly Accessible Private Improvements**":

a. California Plaza: An approximately 4,290 square foot plaza adjacent to California Street, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of a combination of quality hardscape, planters and seating elements that are adjacent to the abutting public sidewalk and designed to comply with the City's Better Streets policies.

b. Cypress Square: An approximately 12,052 square foot south-facing plaza that will connect to Cypress Stairs and Mayfair Walk, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of the existing mature and healthy Cypress trees identified in the landscape plan attached as _____ (the "**Landscape Plan**"), hardscaped walkways, and a central, paved open plaza area with wood decking, seating and landscaping.

c. Cypress Stairs: An approximately 1,255 square foot pedestrian walkway that will connect pedestrians from California Street to Cypress Square, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of stairs with landscaped planters along the edges.

d. Euclid Green: An approximately 18,004 square foot open space with direct access to the sidewalks on Euclid Avenue and Laurel Street, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of a large, naturally sloping lawn with plantings.

e. Mayfair Walk: An approximately 30,605 square foot east-west pedestrian connector that will connect to Mayfair Drive/Laurel Street to the west and the ADA-accessible Pine Street Stairs to Presidio Avenue to the east, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of an approximately twenty foot (20') wide hardscape pathway with landscaped borders and access to ground floor residential units, seating, stairs, landscaping, and the retained mature and healthy oak trees and new trees identified in the Landscape Plan.

f. Presidio Overlook: An approximately 10,450 square foot open space atop Pine Street Stairs that will be an interconnection and scenic area between the east portion of the Mayfair Walk and the Pine Street Stairs, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of a terrace with trees, planters, and seating.

g. Pine Street Steps: An approximately 7,015 square foot pedestrian walkway that will connect the Presidio Overlook to Pine Street and Masonic Avenue, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of stairs with landscaped planters along the edges. .

h. Walnut Drive and Walnut Court: Approximately 17,825 square feet of open space that will provide direct access to California Street, Mayfair Walk and Walnut Walk, located in the general area depicted in the attached Exhibit B-2. The Walnut Drive improvements will consist of a hardscaped roadway with tree-lined hardscape pedestrian walkways on either side of the paved area, and the Walnut Court improvements will consist of a tree-lined hardscaped vehicular turnaround plaza with a tree feature at the center.

i. Walnut Walk North: Approximately 6,880 square feet of open space that will run through the center of the Project Site from Walnut Court to the southern boundary of the future legal parcels created for Plaza Building A and Plaza Building B, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of an approximately twenty foot (20') wide hardscaped pedestrian pathway with a network of landscaped open spaces and seating. Once Walnut Walk North and Walnut Walk South are completed, they will collectively create the main north-south public pedestrian connection through the Project Site between Masonic and Euclid Avenue to Walnut Court.

j. Walnut Walk South: Approximately 16,850 square feet of open space that will run through the center of the Project Site from the southern boundary of the future legal parcels created for Plaza Building A and Plaza Building B and the intersection at Masonic Avenue and Euclid Avenue, located in the general area depicted in the attached Exhibit B-2. The improvements will consist of an approximately twenty foot (20') wide hardscaped pedestrian pathway with a network of landscaped open spaces and seating. Once Walnut Walk North and Walnut Walk South are completed, they will collectively create the main north-south public pedestrian connection through the Project Site between Masonic and Euclid Avenue to Walnut Court.

k. Alternative Pedestrian Access Paths: Any path constructed under Section 4 below.

2. Installation Schedule. An "**Occupancy Certificate**" means a certificate of occupancy, including any temporary certificate of occupancy. Subject to Section 3 below, Declarant shall complete the construction of the Publicly Accessible Private Improvements as follows:

a. California Plaza. Declarant shall complete construction of California Plaza before the issuance of an Occupancy Certificate (as defined below) for any non-retail portion of the Plaza A Building, which is described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2. Once completed, California Plaza shall be associated with the Plaza A Building.

b. Cypress Square. Declarant shall complete construction of Cypress Square before the issuance of an Occupancy Certificate for any non-retail portion of the Plaza B Building, which is described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2. Once completed, Cypress Square shall be associated with the Plaza B Building.

c. Cypress Stairs. Declarant shall complete construction of the Cypress Stairs before the issuance of an Occupancy Certificate for any non-retail portion of the later of the Plaza A Building or the Plaza B Building. Once completed, Cypress Stairs shall be associated with the Plaza A Building and the Plaza B Building.

d. Euclid Green. Declarant shall complete construction of Euclid Green before the issuance of an Occupancy Certificate for the Project's final Building; provided, however, that if the Declarant receives an Occupancy Certificate for any Building without completing all proposed Buildings during the DA Term, then Euclid Green shall be completed by the end of the DA Term. Once completed, Euclid Green shall be associated with the Euclid Building or, if the Euclid Building has not been constructed, it shall be associated with the legal parcel of the constructed Building that is closest to Euclid Green on the expiration of the DA Term. For purposes of the foregoing sentence, if the closest constructed Building to Euclid Green is one of the Laurel Townhomes, as described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2, then Euclid Green shall be associated with the parcels for each of the constructed Laurel Townhomes.

e. Mayfair Walk. Declarant shall complete construction of Mayfair Walk in the following segments:

i. The segment adjacent to the Mayfair Building (described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2) and the Plaza A Building must be completed before the issuance of an Occupancy Certificate for any non-retail portion of the later of Mayfair Building or the Plaza A Building. Once completed, such segment shall be associated with the Mayfair Building and the Plaza A Building.

ii. The segment adjacent to the Mayfair Building and the Plaza A Building must be completed before the issuance of an Occupancy Certificate for any non-retail portion of the later of Mayfair Building or Plaza A Building. Once completed, such segment shall be associated with the Mayfair Building and the Plaza A Building.

iii. The segment adjacent to the Plaza B Building and the Center A Building (described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2) must be completed before the issuance of an the Occupancy Certificate for any non-retail portion of the later of the Plaza B Building or the Center A Building, and the completion of the Center B Building, as applicable. Once completed, such segment shall be associated with the Plaza B Building and the Center A Building.

f. Pine Street Steps. Declarant shall complete construction of the Pine Street Steps before the issuance of an Occupancy Certificate for any non-retail portion of the Center Building B. Once completed, the Pine Street Steps shall be associated with Center Building B.

g. Presidio Overlook. Declarant shall complete construction of the Presidio Overlook before the issuance of an Occupancy Certificate for any non-retail portion of the Center Building B. Once completed, Presidio Overlook shall be associated with Center Building B.

h. Walnut Drive and Walnut Court. Declarant shall complete construction of Walnut Drive and Walnut Court before the later to occur of the issuance of an Occupancy Certificate for any non-retail portion of the Plaza B Building or the Walnut Affordable Housing Building (described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2). Once completed, Walnut Drive and Walnut Court shall be associated with the Plaza B Building and the Walnut Affordable Housing Building.

i. Walnut Walk North. Declarant shall complete construction of Walnut Walk North before the later to occur of the issuance of an Occupancy Certificate for any non-retail portion of the Center A Building or the Center B Building. Once completed, Walnut Walk North shall be associated with the Center A Building and the Center B Building

j. Walnut Walk South. Declarant shall complete construction of Walnut Walk South before the later to occur of the issuance of an Occupancy Certificate for any non-retail portion of the Euclid Building (described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2) or the Masonic Building (described on the attached Exhibit B-1 and depicted on the attached Exhibit B-2). Once completed, Walnut Walk South shall be associated with the Euclid Building and the Masonic Building.

3. Delayed Completion. Notwithstanding anything to the contrary in Section 2 above, if Declarant wishes to receive the first Occupancy Certificate for the non-retail portion of any of the buildings described in Section 2 above before completing its associated Publicly Accessible Private Improvement, Declarant may complete that associated Publicly Accessible Private Improvement at a later time by providing to the City, prior to issuance of the first Occupancy Certificate for any non-retail portion of that building, a surety performance bond or other security in form acceptable to the City and in an amount equal to 100% of the reasonably estimated cost to complete that Publicly Accessible Private Improvement as required in this Declaration, and shall diligently and continuously pursue that Publicly Accessible Private Improvement to completion following which such bond will be released.

4. Alternative Pedestrian Access. If Declarant receives an Occupancy Certificate for any Building without completing all proposed Buildings during the DA Term that would otherwise require the completion of Walnut Walk North, Walnut Walk South, and Mayfair Walk as described above, then Declarant, in conjunction with the Planning Department, shall design an alternative plan for pedestrian access that seeks to achieve similar pedestrian access and widths as Walnut Walk North, Walnut Walk South, and Mayfair Walk, but takes into account then then-current on-site conditions, including locations of improvements and the Project Site's topography, and the Declarant shall construct such alternative plan improvements prior to the end of the DA Term. On their substantial completion, such alternative plan improvements shall be Open Space Improvements and the portion of the Project Site improved with such alternative plan improvements shall be a Publicly Accessible Private Improvement.

EXHIBIT D

Regulations Regarding Access and Maintenance of Publicly Accessible Private Improvements

These Regulations Regarding Access and Maintenance of Publicly Accessible Private Improvements (these "Regulations") shall govern the use, maintenance, and operation of each completed Publicly Accessible Private Improvement as defined in the attached Exhibit C.

1. Permitted Uses. Upon completion of a Publicly Accessible Private Improvement in accordance with this Declaration, Declarant shall make that Publicly Accessible Private Improvement available for the use, enjoyment and benefit of the public for open space and recreational purposes in accordance with these Regulations, including, without limitation, (i) quiet contemplation and rest without the use of audible electronic devices (although headphones are permitted), (ii) pedestrian access through the Project Site from one Project Site boundary to the others (bicycles, scooters, skateboards and the like to be walked, not ridden on site for safety reasons), and (iii) short term use of designated seating areas (excluding planter walls and/or landscaped areas). These Regulations do not require Declarant to make its Publicly Accessible Private Improvement available to the public for more than open space and recreational purposes.

2. Prohibited Use. The following shall be prohibited in any Publicly Accessible Private Improvement, (i) smoking of any form, including cigarettes, cigars, pipes, e-cigarettes and smokeless cigarettes (including tobacco or other controlled substances), (ii) consumption or possession of open alcoholic beverages (unless permitted by special permit), (iii) camping or sleeping, (iv) climbing or affixing items to trees, other landscaping, furniture or infrastructure, (v) disorderly conduct, as defined in Article 4 of the City's Park Code, as amended from time to time, (vi) building fires or cooking (unless permitted by special permit), (vii) peddling or vending merchandise (unless permitted by special permit), (viii) temporary structures or installations (unless permitted by special permit), (ix) littering or dumping of waste, (x) removal of plants, soil, furniture, or other facilities of the open space, (xi) graffiti or the damage or destruction of property, and (xii) amplified sound. Declarant may limit off-leash animals to designated areas but shall permit leashed animals, including leashed service animals, in the Publicly Accessible Private Improvements. Organized sporting events are not permitted in the Publicly Accessible Private Improvements due to their slope and limited size. However, active recreation (e.g., kicking a soccer ball or throwing a football) among groups of up to four (4) people shall be permitted on Euclid Green provided it does not endanger other users of Euclid Green. Declarant may use a completed Publicly Accessible Private Improvement for temporary construction staging related to adjacent development on the Project Site (during which time the subject Publicly Accessible Private Improvement shall not be used by the public) to the extent that such construction is contemplated under, and performed in accordance with, the Development Agreement, the Approvals (as defined in the Development Agreement), and any Later Approvals (as defined in the Development Agreement).

3. No Discrimination. Declarant shall not discriminate against or segregate any person, or group of persons, on account of the basis of fact or perception of a person's race, color,

creed, religion, national origin, ancestry, age, sex, sexual orientation, gender identity, domestic partner status, marital status, disability or acquired immune deficiency syndrome, HIV status, weight, height, medical condition, or association with members of any of the foregoing classes, in the use, occupancy, tenure, or enjoyment of a Publicly Accessible Private Improvement.

4. Maintenance Standard. Each Publicly Accessible Private Improvement shall be operated, managed, and maintained in a clean and safe condition in accordance with the anticipated and foreseeable use thereof.

5. Temporary Closure. Declarant shall have the right, without obtaining the prior consent of the City or any other person or entity, to temporarily close a Publicly Accessible Private Improvement to the public from time to time for one of the following two reasons. In each instance, such temporary closure shall continue for as long as Declarant reasonably deems necessary to address either of the circumstances below:

   a. Emergency; Public Safety. In the event of an emergency or danger to the public health or safety created from whatever cause (including, but not limited to, flood, storm, fire, earthquake, explosion, accident, criminal activity, riot, civil disturbances, civil unrest, unlawful assembly, or loitering). Declarant may temporarily close a Publicly Accessible Private Improvement (or affected portions thereof) in any manner deemed necessary or desirable to promote public safety, security, and the protection of persons and property.

   b. Maintenance and Repairs. Declarant may temporarily close a Publicly Accessible Private Improvement (or affected portions thereof) in order to make any repairs or perform any maintenance as Declarant, in its reasonable discretion, deems necessary or desirable to repair, maintain, or operate that Publicly Accessible Private Improvement; provided such closure may not impede emergency vehicle access.

6. Operation of the Publicly Accessible Private Improvement. Each Publicly Accessible Private Improvement shall be open and accessible to the public seven (7) days per week during the daylight hours (or 30 minutes prior to sunset) (the "Operating Hours"), unless reduced hours are (i) approved in writing by the City, (ii) otherwise expressly provided for in this Declaration (including, without limitation, Paragraphs 4 and 5(b) of these Regulations), or (iii) reasonably imposed by Declarant, with the City's reasonable consent, to address security concerns. None of the Publicly Accessible Private Improvements shall be closed to the public during Operating Hours for special events. No person shall enter, remain, stay, or loiter in a Publicly Accessible Private Improvement when it is closed to the public, except persons authorized in conjunction with a temporary closure, authorized service and maintenance personnel, or an authorized resident, guest or employee of the project.

7. Signs. Declarant shall post signs at the major public entrances to each Publicly Accessible Private Improvement, indicating that it is a privately-owned public open space in accordance with all laws and signage requirements. The signs, at a minimum, shall indicate the public right to use the space in accordance with these Regulations, setting

forth the applicable regulations imposed by these Regulations, hours of operation, and a telephone number to call regarding security, management or other inquiries. [To be discussed additional details needed to ensure visibility/ legibility of signs]

8. Permissive Use. Declarant may post at each entrance to each Publicly Accessible Private Improvement, or at intervals of not more than 200 feet along the boundary, signs reading substantially as follows: "Right to pass by permission, and subject to control of owner: Section 1008, Civil Code." Notwithstanding the posting of any such sign, no use by the public nor any person of any portion of the Publicly Accessible Private Improvement for any purpose or period of time shall be construed, interpreted, or deemed to create any rights or interests to or in the Publicly Accessible Private Improvement other than the rights and interests expressly granted in this Declaration. The right of the public or any person to make any use whatsoever of a Publicly Accessible Private Improvement or any portion thereof is not meant to be an implied dedication for the benefit of, or to create any rights or interests in, any third parties.

9. Arrest or Removal of Persons. Declarant shall have the right (but not the obligation) to use all lawful means to effect the removal of any person or persons who creates a public nuisance or causes safety concerns for the occupants or neighbors of the Project, or who otherwise violates the applicable rules and regulations, or who commits any crime including, without limitation, infractions or misdemeanors, in or around a Publicly Accessible Private Improvements. To the extent permitted by law, Declarant may prohibit members of the public who have repeatedly broken the Regulations in any material respect from entering the Publicly Accessible Private Improvements, and if such person enters a Publicly Accessible Private Improvement, may ask such person to leave the Publicly Accessible Private Improvement. Declarant shall have the right to exercise its power and authority as owner consistent with other publicly accessible but privately-owned areas in the City, such as other privately owned public open space.

10. Project Security During Period of Non-Access. Declarant shall have the right to block entrances to install and operate security devices and to maintain security personnel in and around the Publicly Accessible Private Improvements to prevent the entry of persons or vehicles during the time periods when public access to a Publicly Accessible Private Improvement or any portion thereof is restricted or not permitted. Subject to the access requirements for City's emergency vehicles, as described in the Subdivision Map, and Declarant's obligations under Applicable Law, Declarant shall have a right to install permanent architectural features that serve as security devices such as gates, fences and bollards, and close such devices during non-operating hours or during periods of closure as identified in these Regulations. Design of such devices shall be subject to approval by the San Francisco Planning Department which shall not be unreasonably withheld and subject to any permits required under Applicable Law. Such design review by the San Francisco Planning Department shall not be construed as a change in entitlement and shall not be subject to a planning application or require a separate entitlement. It shall not be unreasonable for the Planning Department to withhold its consent if any such devices would impede emergency access that may be required under Applicable Law or in the Approvals. Nothing shall restrict Declarant's right to install security cameras and monitoring devices anywhere on the Project.

11. Removal of Obstructions. Declarant shall have the right to remove and dispose of, in any lawful manner it deems appropriate, any object or thing left or deposited on a Publicly Accessible Private Improvement deemed to be an obstruction, interference, or restriction of use of that Publicly Accessible Private Improvement for the purposes set forth in this Declaration, including, but not limited to, personal belongings or equipment in a Publicly Accessible Private Improvement during hours when public access is not allowed pursuant to these Regulations.

12. Temporary Structures. Subject to Declarant's right to use a Publicly Accessible Private Improvement for temporary construction staging related to adjacent development as set forth in Paragraph 1 of these Regulations, no trailer, tent, shack, or other outbuilding, or structure of a temporary character, shall be used on any portion of the Publicly Accessible Private Improvements at any time during Operating Hours, either temporarily or permanently.

# Exhibit D

## Affordable Housing Program

This Exhibit D describes the affordable housing program for the Project (the "**Housing Plan**"). All initially-capitalized, undefined terms used in this Exhibit D shall have the meanings given to them in the Development Agreement to which it is attached.

Recognizing the City's pressing need for housing – market rate and affordable - the Developer has agreed to (1) increase the total number of residential units for the Project from the 558 residential units initially proposed to 744 residential units; (2) construct 185 studio and one-bedroom affordable residential units for Senior Households at the Project Site (the "**BMR Units**") in order to make 25% of the Project residential units affordable, rather than the Section 415 (as defined below) requirement of providing 18% on-site affordable residential units or paying the City in-lieu affordable housing fees, together with 1 Manager Unit (as defined below); and (3) fund all predevelopment costs and gap financing required to complete the BMR Units.

The BMR Units will be deed-restricted to be affordable to qualified senior households with an average income not more than 59% of MOHCD AMI (as defined below) and will be constructed before the Developer can receive a CofO (as defined below) on more than three hundred eighty-six (386) Market Rate Units (as defined below).

1. Definitions.

"**Adjustment Date**" means each anniversary of the Effective Date.

"**Affordable Housing Developer**" means Mercy Housing California, a non-profit California corporation, or any other non-profit affordable housing developer with experience developing and operating affordable housing in San Francisco.

"**Affordable Rent**" means a monthly rental charge for a BMR Unit (including the Utility Allowance applicable to the Household Size of such BMR Unit but excluding parking charges if a Parking Space is allocated to such BMR Unit) that does not exceed thirty percent (30%) of the maximum MOHCD AMI permitted for such BMR Unit, based on Household Size.

"**Approved Legal Description**" means a legal description of the Walnut Land that substantially conforms to the depiction attached as Attachment D-1 and is approved by the City's Director of Property and the MOHCD Director.

"**CofO**" means a first certificate of occupancy issued by City's Department of Building Inspection, including any temporary certificate of occupancy.

"**CPI Increase**" means, for the first Adjustment Date, the difference between the published CPI Index in effect at the time of the first Adjustment Date and the published CPI Index in effect at the time of the Effective Date. For each following Adjustment Date, the "CPI Increase" means the difference between the published CPI Index in effect at the time of an

applicable Adjustment Date and the published CPI Index in effect at the time of the immediately-preceding Adjustment Date.

"**CPI Index**" means the Consumer Price Index for All Urban Consumers (base years 1982-1984 = 100) for the San Francisco-Oakland-San Jose area, published by the United States Department of Labor, Bureau of Labor Statistics or, if the Consumer Price Index is discontinued or revised during the Term, such other government index or computation with which it is replaced shall be used in order to obtain substantially the same result as would be obtained if the Consumer Price Index had not been discontinued or revised.

"**Development Agreement**" shall mean the body of the Development Agreement to which this Housing Plan is attached.

"**Development Fee Deferral Surcharge Rate**" means an amount determined by DBI under Building Code Section 107A.13.3.2.

"**First Construction Document**" shall be as defined in San Francisco Building Code Section 107A.13.1(a)(8).

"**Fair Market Value**" shall have the meaning given such term in Attachment D-2.

"**Household**" means one or more related or unrelated individuals who live together or intend to live together in a Senior Unit as their primary dwelling.

"**Household Size**" means the number of persons in a Household as calculated under the MOHCD Manual.

"**Housing Entity**" means a limited partnership with the Affordable Housing Developer (or a subsidiary entity owned or controlled by Affordable Housing Developer) as the general partner.

"**HUD**" means the United States Department of Housing and Urban Development, or any successor agency.

"**LIHTC**" means the federal low income housing tax credit 4% program.

"**Manager Unit**" means the 2-bedroom unit for the Walnut Affordable Housing Building manager.

"**Market Rate Unit**" means any Project Site residential unit that is not a BMR Unit.

"**MOHCD AMI**" means median income as published annually by MOHCD, which is derived from the income limits determined by HUD for the San Francisco area, adjusted solely for household size but not high housing cost area. If HUD ceases to publish such data for 18 or more months, MOHCD and the Housing Entity will make good faith efforts to agree on other publicly available and credible substitute data for MOHCD AMI.

"**MOHCD Director**" means the Director of the Mayor's Office of Housing and Community Development.

"**MOHCD Manual**" means the City and County of San Francisco Inclusionary Affordable Housing Program Monitoring and Procedures Manual, as published by MOHCD and as updated from time to time.

"**Outside Date**" means the 12th anniversary of the Effective Date.

"**Ownership Gap Fee**" means an amount equal to (i) the Gross Floor Area (as defined in Planning Code Section 401) for an applicable ownership Market Rate Unit multiplied by (ii) an amount equal to, at the time of calculation, (A) [*insert an amount equal to MOHCD's published under Planning Code Section 415.5(b)(2) as of the effective date of the BOS legislation approving the Development Agreement, currently $199.50 per square foot of Gross Floor Area of residential use*], which shall be adjusted each anniversary of the Effective Date by the CPI Increase multiplied by (B) the lower of (1) [*insert an amount equal to Planning Code Section 415.5 percentage for ownership units as of the effective date of the BOS legislation approving the Development Agreement*] and (2) the percentage of off-site affordable ownership units that would otherwise be used for the Project if calculated under Planning Code Section 415.5(b).

"**Parking Space**" means a parking space assigned to a Senior Unit.

"**Property Covenants**" is defined in Section 2.A.

"**Rental Gap Fee**" means an amount equal to (i) the Gross Floor Area (as defined in Planning Code Section 401) for an applicable rental Market Rate Unit multiplied by (ii) an amount equal to, at the time of calculation, (A) [*insert an amount equal to MOHCD's published under Planning Code Section 415.5(b)(2) as of the effective date of the BOS legislation approving the Development Agreement, currently $199.50 per square foot of Gross Floor Area of residential use*], which shall be adjusted each anniversary of the Effective Date by the CPI Increase, multiplied by (B) the lower of (1) [*insert an amount equal to Planning Code Section 415.5 percentage for rental units as of the effective date of the BOS legislation approving the Development Agreement*] and (2) the percentage of off-site affordable rental units that would otherwise be used for the Project if calculated under Planning Code Section 415.5(b).

"**Section 415**" means the City's Inclusionary Affordable Housing Program (Planning Code Sections 415 and 415.1 through 415.11), as amended from time to time.

"**Senior Households**" means a household that is 62 years old or older, or as otherwise defined by the requirements of any funding source used to construct or operate the Walnut Affordable Housing Building.

"**Substantially Completed**" means, with respect to any Senior Unit, the issuance of a CofO for that Senior Unit.

"**Tax Credit Closing**" means the date by which the Housing Entity has received (i) an LIHTC allocation for the Walnut Affordable Housing Building and (ii) all financing needed to commence and complete the construction of the Walnut Affordable Housing Building.

"**Title Policy**" is defined in Section 4.F.

"**Utility Allowance**" means a dollar amount determined in a manner acceptable to the California Tax Credit Allocation Committee, which may include an amount published periodically by the San Francisco Housing Authority or successor based on standards established by HUD, for the cost of basic utilities for households, adjusted for Household Size. If both the San Francisco Housing Authority and HUD cease publishing a Utility Allowance, then Developer may use another publicly available and credible dollar amount approved by MOHCD.

"**Walnut Affordable Housing Building**" is defined in Section 2.A.

"**Walnut Child Care Parcel**" is defined in Section 2.A.

"**Walnut Housing Parcel**" is defined in Section 2.A.

"**Walnut Retail Parcel**" is defined in Section 2.A.

"**Walnut Land**" is defined in Section 2.A.

2. Walnut Affordable Housing Building

A. Description. The 185 BMR Units and the Manager Unit will all be located in a single residential building (the "**Walnut Affordable Housing Building**") that will be located within a condominium parcel (the "**Walnut Housing Parcel**") on the portion of the Project Site depicted as the "Walnut Land" on Attachment D-1 (the "**Walnut Land**"). The Walnut Affordable Housing Building will be comprised only of the BMR Units, the Manager Unit (which shall only be occupied by the Walnut Affordable Housing Building manager or, to the extent permitted under law, other property management staff), and the common and parking area for the BMR Units and Manager Unit. A condominium parcel for retail uses (the "**Walnut Retail Parcel**") and a condominium parcel for child care uses (the "**Walnut Child Care Parcel**") will also be located on the Walnut Land. The Walnut Housing Parcel, the Walnut Retail Parcel, and the Walnut Child Care Parcel will be created through a final map prepared under the Tentative Map as required in the Subdivision Map.

Before obtaining a First Construction Document for any portion of the Project or transferring the Walnut Land or the Walnut Housing Parcel to the Housing Entity, the Developer shall obtain legal descriptions for the Walnut Housing Parcel and the Walnut Child Care Parcel that are reasonably acceptable to City, cause the Walnut Land to be made a separate legal parcel, and record a declaration of restrictions (in a form approved by City and using such approved legal descriptions) that limits the use of the Walnut Housing Parcel to the construction and operation of the Walnut Affordable Housing Building and the Walnut Child Care Parcel to the construction and operation of a child care facility. In connection with the development of the Project, Developer shall have the right to enter into commercially reasonable licenses, easements, covenants, conditions and restrictions, reciprocal easement agreements, and similar agreements that affect the Walnut Housing Parcel to the extent necessary for the use or operation of any portion of the Walnut Housing Parcel (each, a "**Property Covenant**"); provided, however, that (i) Developer shall deliver the final version of each proposed Property Covenant to the MOHCD Director at least thirty (30) days before it is fully executed or recorded in the

Official Records of San Francisco County and (ii) all maintenance, repair, replacement and installation costs to be paid under a Property Covenant for the common area benefitting the Walnut Retail Parcel, the Walnut Housing Parcel, and the Walnut Child Care Parcel shall be proportionately allocated to the owners of the Walnut Retail Parcel, the Walnut Housing Parcel, and the Walnut Child Care Parcel based on the relative size of their respective parcel or any other commercially reasonable allocation that is approved in advance by the MOHCD Director, which approval shall not be unreasonably withheld.

B. Housing Entity. Before commencing the construction of the Project's first Market Rate Unit, the Housing Entity will be formed and the Developer will contribute the Walnut Housing Parcel (subject to the requirements of the Development Agreement) to the Housing Entity. As a non-profit affordable housing developer and operator, the Affordable Housing Developer will operate the Walnut Affordable Housing Building to only serve Senior Households with incomes below 80% of MOHCD AMI, with an overall average of not more than 59% of MOHCD AMI.

C. Financing. The Housing Entity will structure equity and debt financing for construction, and the Developer will fund all predevelopment costs and gap financing required to complete the construction, of the Walnut Affordable Housing Building. The Housing Entity will seek LIHTC and City-issued tax-exempt bond financing for construction. The Developer or the Housing Entity may apply to the following state funding programs for constructing the Walnut Affordable Housing Building without the City's prior written consent: the Multifamily Housing Program (MHP) and the Infill Infrastructure Grant Program (IIG). At the time of such application, the Developer or the Housing Entity shall provide the MOHCD Director with written notification of such application and a commitment that the award of such funding would lower the average MOHCD AMI for the Walnut Affordable Housing Building. Neither the Developer nor the Housing Entity can seek other federal or other state resources for constructing the Walnut Affordable Housing Building without the prior written consent of the MOHCD Director, which consent may be withheld if the award of such funding would not result in a lower average MOHCD AMI for the Walnut Affordable Housing Building or applying for the proposed funding would compete with the application of a MOHCD-supported project. A failure to obtain LIHTC, MHP, IIG, or non-competitive federal or state resources for constructing the Walnut Affordable Housing Building shall not decrease the Developer's affordable housing or other obligations under the Development Agreement. City has no obligation to provide any funding for the Walnut Affordable Housing Building. Developer may collaborate with other entities to obtain additional funding sources to the extent that those sources contribute to the feasibility, production speed, or increase the affordability of the Walnut Affordable Housing Building

D. Project Phasing. The Developer may not obtain CofO for more than three hundred eighty-six (386) Market Rate Units until DBI issues a CofO for the Walnut Affordable Housing Building. In addition, the Developer must obtain a CofO for the Walnut Affordable Housing Building before the expiration of the Term.

E. Equivalency. The Walnut Affordable Housing Building shall be substantially equivalent to the Project's other multi-unit residential buildings in exterior appearance and overall quality of construction. All BMR Units must be wired for telephone, cable, and internet

access and have substantially equivalent interior features and amenities (e.g. balconies, outdoor patios, number of bathrooms) as the studio and 1-bedroom rental Market Rate Units. Equivalency shall be guided by the MOHCD Manual as applicable to this Housing Plan, except that the terms set forth in the Development Agreement (including this Housing Plan) shall prevail (including the parties' agreement that all BMR Units will be studio or 1-bedroom residential units located in the Walnut Affordable Housing Building).

F. Rental; Affordability. The initial rental and re-rental of the BMR Units shall comply with the lottery preferences and other provisions utilized by MOHCD under the MOHCD's Housing Preferences and Lottery Procedures Manual, as published by MOHCD and as each may be updated from time to time, to the extent permitted by law, and the reporting and monitoring requirements of the MOHCD Manual, to the extent permitted by law. The BMR Units must be provided at Affordable Rents and in accordance with the rent requirements in the MOHCD Manual and MOHCD's Hold Harmless Policy for MOHCD's Income Limits and Maximum Rents, effective as of May 3, 2019, as may be updated from time to time. The Developer or the Housing Entity shall record affordability and leasing restrictions that are senior to any financing documents and remain in effect for the life of the Walnut Affordable Housing Building against each of the BMR Units, in a form and priority approved by MOHCD, before their occupancy. The Housing Entity shall carry appropriate insurance to allow for the reconstruction of the Walnut Affordable Housing Building if there is any damage or casualty.

G. Outreach. Given the Project's Site's location, the Parties desire that, to the greatest extent permitted by MOHCD's then-applicable policies and procedures, pre-marketing and marketing programs for BMR Units target residents of Supervisorial District 2 and/or residents residing within three-quarter (0.75) miles of the Project Site. In addition, the Parties desire that residents of District 2 and residents residing within three-quarter (0.75) miles of the Project Site be given the maximum neighborhood preference for leasing of BMR Units permitted under MOHCD's then-applicable policies and procedures.

H. Planning Code Section 415. Except for Planning Code Section 415.6(a)-(f), (h) and (i), the Parties shall implement affordable housing requirements for the Walnut Affordable Housing Building that incorporate the provisions of Planning Code Section 415 and the MOHCD Manual. The following changes shall be deemed to conflict with the Development Agreement and therefore shall not apply to the Project: (i) any increase in the required number or percentage of affordable housing units beyond what is required by the Development Agreement; and (ii) any change in the minimum or maximum AMI percentage levels for the affordable housing pricing or income eligibility. The Parties acknowledge and agree that MOHCD will monitor and enforce the requirements applicable to BMR Units under this Housing Plan in accordance with Planning Code Section 415.9, except that all references to Section 415 will be deemed to refer to the requirements under this Housing Plan. To the extent there are implementation issues that have not been addressed in this Housing Plan, then the provisions of Section 415 and the MOHCD Manual shall govern and control such issues.

3. Fees. Before obtaining a First Construction Document for any portion of the Project, the parties shall select a mutually-agreeable third-party escrow (the "**Escrow Account**") to hold and disburse the Rental Gap Fees and Ownership Gap Fees under the requirements of this Housing Plan. Subject to the last sentence of this Section, for each Market Rate Unit the Developer

commences to construct before the Tax Credit Closing, the Developer shall, at its sole election, either deposit an amount equal to the Rental Gap Fee or Ownership Gap Fee, as applicable, for that unit in the Escrow Account before obtaining a First Construction Document for that unit, or deposit an amount equal to the Rental Gap Fee or Ownership Gap Fee, as applicable, for that unit and the Development Fee Deferral Surcharge for such Rental Gap Fee or Ownership Gap Fee (as calculated by DBI at the time of the Developer deposits such Rental Gap Fee or Ownership Gap Fee) in the Escrow Account between obtaining the First Construction Document and the CofO for that unit.

At any time within thirty (30) days after Developer's written request (accompanied by reasonable supporting materials), City shall authorize the release of funds from the Escrow Account to reimburse Developer for reasonable and customary Walnut Affordable Housing Building pre-development costs incurred prior to the Tax Credit Closing, such as, but not limited to, design drawings, schematic drawings, and commercially reasonable costs for financing that expedites the construction of the Walnut Affordable Housing Building. If the Tax Credit Closing occurs, all remaining funds in the Escrow Account needed to finance the construction of the Walnut Affordable Housing Building shall be disbursed to pay construction and development costs that are approved by the Walnut Affordable Housing Building construction lender at the time such costs are due and payable. If the Developer provides reasonable documentation to City that there are excess Escrow Account funds that are not required to finance the construction of the Walnut Affordable Housing Building, such excess Escrow Account funds shall be disbursed to the Developer.

If the Tax Credit Closing does not occur by the Outside Date, subject to extension for any applicable Excusable Delay, then City shall have the right to receive the Escrow Account funds by delivering written notice to the Escrow Account holder any time after the Outside Date for deposit in City's Citywide Affordable Housing Fund established in San Francisco Administrative Code Section 10.100-49. Within three (3) business days of receiving such written notice, the Escrow Account holder shall deliver the funds to the address specified by the MOHCD Director.

4. Transfer of Walnut Land to City.

A. Transfer Notice. If the Tax Credit Closing does not occur by the Outside Date, subject to extension for any applicable Excusable Delay, and construction of any Building occurs during the Term, then City shall have the right to acquire, and Developer agrees to transfer to the City, fee ownership of the Walnut Land pursuant to the form of grant deed (the "**Grant Deed**") attached as Attachment D-3, with the Approved Legal Description attached to it as Exhibit A. City shall have the right to exercise its right to acquire the Walnut Land by giving Developer, between the Outside Date and the last day of the Term, written notice of the City's request to acquire the Walnut Land pursuant to this Section (the "**Transfer Notice**"). If City receives the Walnut Land pursuant to this Section, and Developer later obtains all financing needed to commence and complete construction of retail improvements on the Walnut Retail Parcel (or child care improvements on the Walnut Child Care Parcel) prior to City's receipt of a First Construction Document for the Walnut Affordable Housing Building, City shall transfer fee ownership of the Walnut Retail Parcel or the Walnut Child Care Parcel, as applicable, to Developer within ten (10) business days of Developer's receipt of a First Construction Document for such improvements.

B. Developer's Representations. Developer represents that it has the full right to make the commitments set forth in this Section without the consent or approval of any third party (or, if required, Developer has obtained all necessary consents and approvals).

C. Subordination; Condition of Title. The rights of any Mortgagee secured by a Mortgage that encumbers all or part of the Walnut Land shall be subordinate to the City's rights under this Housing Plan. The City accepts the condition of the Walnut Land's title subject only to the matters described on the attached Attachment D-4, any additional matter that is approved in writing by the MOHCD Director in his or her sole and absolute discretion, and any Property Covenant that complies with the requirements of Section 2.A above. Developer further agrees to deliver the Walnut Land to the City generally in the condition that it is in on the Effective Date, provided it shall be free of all tenants and occupants. The Developer agrees that all contracts entered into by the Developer relating to the Walnut Land shall be terminated by Developer, at no cost to City, on or before the transfer unless the City agrees to assume the same.

D. Cooperation. The Developer agrees to cooperate with City and to take all such actions as may be needed to promptly transfer the Walnut Land to City as set forth in this Section. To secure the Developer's obligations under this Section, before obtaining a First Construction Document for any portion of the Project or transferring the Walnut Land or the Walnut Housing Parcel to the Housing Entity, the Developer shall deliver a duly executed and acknowledged deed of trust to the City in substantially the form attached as Attachment D-5, with the Approved Legal Description attached to it as Exhibit A. City shall have the right to record the deed of trust in the Official Records of San Francisco County. There will be no conditions or City obligations relative to the Developer's transfer of the Walnut Land to City, and the form of any other transfer documents other than the Grant Deed needed to transfer fee ownership of the Walnut Land to City in the manner contemplated in this Section (collectively, the "**Transfer Documents**") will be subject to the reasonable approval of the Director of Property and the MOHCD Director, following consultation with the City Attorney's Office. By approving the Development Agreement, the City's Board of Supervisors authorizes the City's Director of Property and the MOHCD Director to enter into the Transfer Documents, if any, without additional action by City's Board of Supervisors as long as the Transfer Documents are consistent with the terms outlined in this Section.

E. Costs and Fees. The Developer shall pay (1) all actual costs incurred by the City relating to the negotiation of Transfer Documents, if any, and all transfer taxes, recording fees, and escrow fees, and (2) the premium for the CLTA Title Policy. The Developer shall further indemnify the City for all costs and losses, including reasonable attorney's fees and costs, resulting from (i) any claim with respect to the Walnut Land relating to the period before the transfer of the Walnut Land to City, (ii) any contest to the Developer's right to transfer the Walnut Land as contemplated by this Section, and (iii) any failure by the Developer to satisfy the requirements of this Section. This indemnification shall survive the transfer of the Walnut Land to City.

F. Closing. The Developer shall have a period of 60 days after Developer's receipt of the Transfer Notice (the "**Closing Period**") to (i) provide to City a CLTA policy of title

insurance, insuring City's fee interest in the Walnut Land in an amount equal to the fair market value of the Walnut Land, as reasonably determined by City, with only the exceptions permitted under Section 4.C above (the "**Title Policy**"), and (ii) to execute and deliver the Grant Deed and the Transfer Documents, if any, to City. Within 7 days after the City's receipt of the Title Policy, the duly executed and acknowledged Grant Deed, and, if any, the Transfer Documents, duly executed and acknowledged as applicable, City shall execute and return one (1) fully executed original of any Transfer Document to the Developer.

G. City's Remedies. If the Developer fails to transfer the Walnut Land to City in accordance with this Section, then City shall have the right to specific performance to compel the transfer of the Walnut Land to City in accordance with this Section or to exercise its rights under the Deed of Trust to foreclose and take title to the Walnut Land. Following any specific performance to transfer the Walnut Land to City or any foreclosure of the Walnut Land by City under the Deed of Trust, Developer's obligations under this Section shall be satisfied; provided if the Developer is not able to transfer the Walnut Land to City in the condition required by this Section (a "**Condition Preventing Transfer**"), then City, as its sole remedy for a Condition Preventing Transfer, shall instead accept an in lieu payment in the amount of Fair Market Value. City's exercise of its remedy for a Condition Preventing Transfer shall be by delivering written notice of such exercise to Developer, with a statement explaining the basis for the determination that the Walnut Land cannot be transferred in accordance with this Section. If City delivers such notice, the Developer shall pay City an in lieu payment in the amount of Fair Market Value made within 60 days following the determination of the Fair Market Value. Any failure by Developer to make such in lieu payment when due shall accrue interest at 10% per annum from the date it is due until paid.

H. Fulfillment of Developer's Obligations. On City's receipt of (i) fee ownership of the Walnut Land through an action for specific performance or foreclosure under the Deed of Trust or a payment of an in lieu payment due to a Condition Preventing Transfer, and (ii) the funds deposited in the Escrow Account as required in Section 3 above, City shall have no further rights or remedies under the Development Agreement resulting from Developer's failure to timely commence or complete construction of the Walnut Affordable Housing Building. If the Developer obtains a First Construction Document for any Market Rate Unit after the Outside Date, nothing in the foregoing sentence shall limit the Developer's obligation to pay the fee calculated under Section 415.5 for such Market Rate Unit.

5. Costa-Hawkins Rental Housing Act

A. Non-Applicability of Costa-Hawkins Act. Chapter 4.3 of the California Government Code directs public agencies to grant concessions and incentives to private developers for the production of housing for lower income households. The Costa-Hawkins Rental Housing Act, California Civil Code Sections 1954.50 et seq. (the "**Costa-Hawkins Act**"), provides for no limitations on the establishment of the initial and all subsequent rental rates for a dwelling unit with a certificate of occupancy issued after February 1, 1995, with exceptions, including an exception for dwelling units constructed pursuant to a contract with a public agency in consideration for a direct financial contribution or any other form of assistance specified in Chapter 4.3 of the California Government Code (Section 1954.52(b)). The Parties agree that the Costa-Hawkins Act does not and in no way shall limit or otherwise affect the restriction of rental

charges for the BMR Units. The Development Agreement falls within the express exception to the Costa-Hawkins Act, Section 1954.52(b) because the Development Agreement is a contract with a public entity in consideration for contributions and other forms of assistance specified in Chapter 4.3 (commencing with Section 65919 of Division 1 of Title 7 of the California Government Code). The City and Developer would not be willing to enter into the Development Agreement without the understanding and agreement that Costa-Hawkins Act provisions set forth in California Civil Code Section 1954.52(a) do not apply to the BMR Units as a result of the exemption set forth in California Civil Code Section 1954.52(b) for the reasons specified above.

B. General Waiver. Developer, on behalf of itself and all of its successors and assigns of all or any portion of the Project Site, agrees not to challenge and expressly waives, now and forever, any and all rights to challenge the requirements of the Development Agreement related to the establishment of the BMR Units under the Costa-Hawkins Act (as the Costa-Hawkins Act may be amended or supplanted from time to time). If and to the extent such general covenants and waivers are not enforceable under Law, the Parties acknowledge and that they are important elements of the consideration for the Development Agreement and the Parties should not have the benefits of the Development Agreement without the burdens of the Development Agreement. Accordingly, if Developer challenges the application of this covenant and waiver, then such breach will be an Event of Default and City shall have the right to terminate the Development Agreement in its entirety.

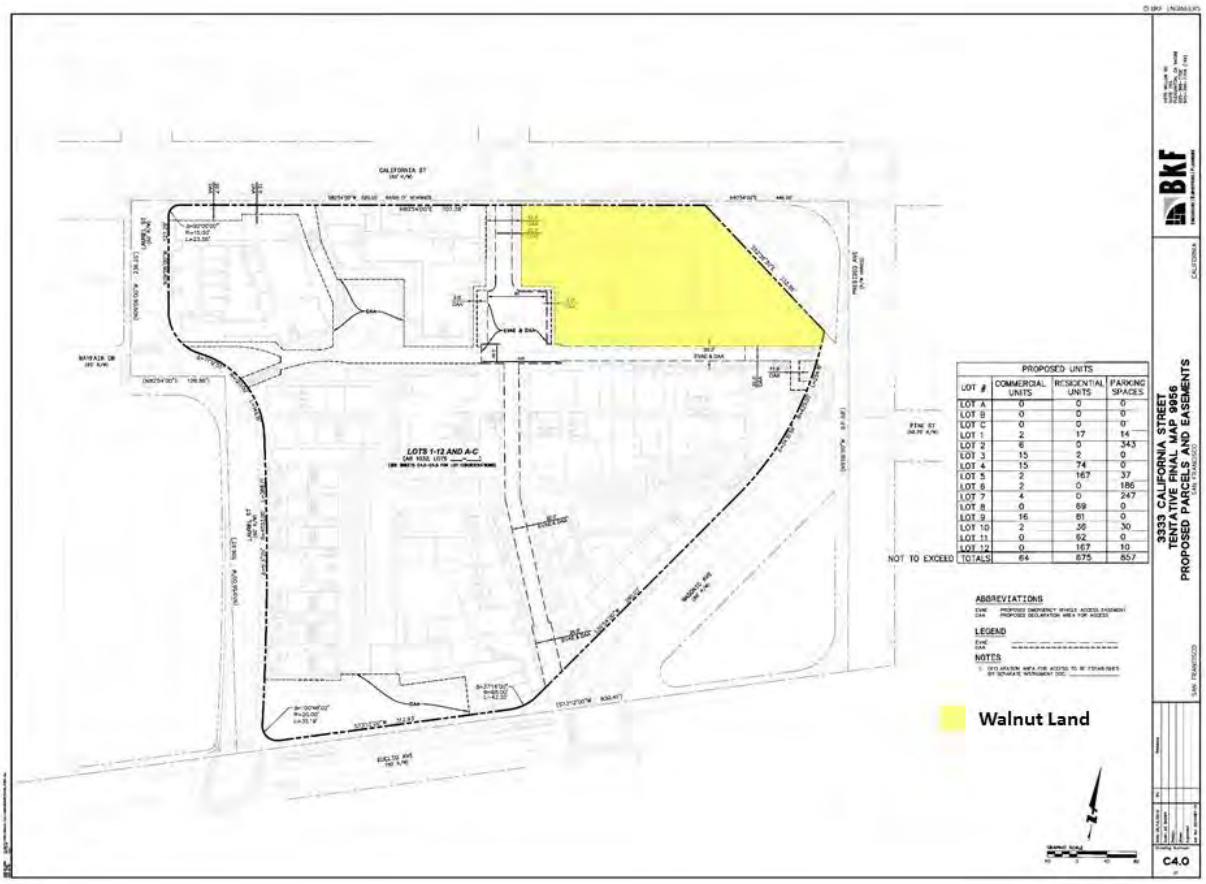
C. Notification. Developer shall notify any potential buyer of all or part of the Project Site of the provisions of this Housing Plan. By acquiring any interest in the Project Site, a buyer agrees to these provisions, and agrees to the specific waiver, releases and indemnifications set forth herein. If Developer fails to notify a buyer of these provisions and a buyer alleges that it is not subject to the requirements of this Housing Plan because it was not made aware of these provisions before it acquired an interest in the Project Site, the Developer shall indemnify and defend the City against any and all claims or losses resulting from such allegation.

6. Nondiscrimination Based on Section 8, Household Size, or Source of Income

For all housing units within the Project Site, Developer shall accept as tenants, on the same basis as all other prospective tenants, persons who are recipients of federal certificates or vouchers for rent subsidies pursuant to the existing program under Section 8 of the Housing Act (42 U.S.C. §1437 et. seq.), or any successor program or similar federal, state or local governmental assistance program. Developer shall not apply selection criteria to Section 8 certificate or voucher holders that are more burdensome than criteria applied to all other prospective tenants. Developer shall not collect security deposits or other deposits from Section 8 certificate or voucher holders in excess of that allowed under the Section 8 program. Developer shall not discriminate against tenant applicants on the basis of legal source of income (e.g., TANF, Section 8 or SSI), and Developer shall consider a prospective tenant's previous rent history of at least one year as evidence of the ability to pay the applicable rent (i.e., ability to pay shall be demonstrated if such a tenant can show that the same percentage or more of the tenant's income has been consistently paid on time for rent in the past as will be required to be paid for the rent applicable to the unit to be occupied, provided that such tenant's expenses have not increased materially).

**Exhibit D-1**

**Depiction of Walnut Land**



# Exhibit D-2

## Appraisal Process

1. Arbitration for Fair Market Value.

1.1 Appointment. Each Party shall appoint one (1) Appraiser (as defined below) within thirty (30) days after City delivers written notice to Developer that the arbitration provisions of this Exhibit have been invoked (the "Initial Selection Period"). Upon selecting its Appraiser, a Party shall promptly notify the other Party in writing of the name of that Appraiser. Each Appraiser selected by a Party under this Section shall be an "Initial Appraiser".

An "Appraiser" shall mean a competent and licensed appraiser who is qualified by training and experience in the City and County of San Francisco and a member in good standing of the Appraisal Institute and designated as a MAI, or, if the Appraisal Institute no longer exists, shall hold the senior professional designation awarded by the most prominent organization of appraisal professionals then awarding such professional designations. An Appraiser may have a prior working relationship with either or both of the Parties, provided that such working relationship shall be disclosed to both Parties. Without limiting the foregoing, an Appraiser shall have at least ten (10) years' experience valuing multi-family residential real estate that is in the City and County of San Francisco and substantially similar product-type to the Walnut Affordable Housing Building (i.e., affordable senior housing and condominium airspace interests or similar property interests such as ground leases) required for the Walnut Affordable Housing Building. If a Party fails to appoint its Appraiser within the Initial Selection Period, the Initial Appraiser appointed by the other Party shall individually determine the Fair Market Value in accordance with the provisions hereof.

1.2 Instruction and Completion. The term "Fair Market Value" shall mean the then current fair market value of the Walnut Land, as determined pursuant to this Exhibit. Each Initial Appraiser will make an independent determination of the Fair Market Value. The following instructions shall govern the preparation and delivery of each appraisal report giving the respective Initial Appraiser's opinion of the Fair Market Value. The Parties may supplement or modify these instructions upon mutual agreement. Each final opinion of value will be stated in a self-contained[1] appraisal report based on a comprehensive study and analysis and setting forth, in detail, all data, analysis, and conclusions necessary and typical of a complete, self-contained appraisal report in compliance with the current version of the Uniform Standards of Professional Appraisal Practice ("USPAP"). The appraisal report will include the Initial Appraiser's final opinion of the Fair Market Value stated as a specific dollar figure. The Walnut Land shall be appraised based on the actual residential project that it is entitled for at the time of Appraisal consistent with the zoning and all conditions on the Walnut Land and assuming that the following apply to the Walnut Land: (i) the Approvals (as such term is defined in the Development Agreement), including, without

[1] As of 2014, USPAP replaced the terminology of "Restricted Use, Summary and Self Contained", and replaced the report content types with two types, "Appraisal Report" and "Restricted Appraisal Report." The reference to "Self Contained" in V, Appraisal Standards, refers to the meaning it had prior to 2014. Also, the reference to "Complete" appraisal has the meaning that it did prior this term being removed officially from USPAP, i.e. essentially that no relevant and applicable valuation approaches or methodologies may be excluded (and the rationale for any approach excluded be provided).

limitation, the applicable conditions of approval and any notices of special restrictions, (ii) the Development Agreement (subject to the eventual expiration thereof), (iii) permitted exceptions to title, (iv) the final subdivision map, (v)covenants, conditions and restrictions, reciprocal easement agreements and similar agreements regarding operation and use of condominium airspace parcels on the Walnut Land, regardless of whether such agreements are then in effect, it being agreed that the Walnut Land will be subject to such agreements in a commercially reasonable form, (v) applicable zoning, (vi) applicable development impact fees, (vii) its then-current "as-is", "where-is" condition, provided the only exceptions to title will be those described in Section 4.C of Exhibit D to the Development Agreement and (viii) such other documents and restrictions that the Parties mutually agree to present to the Initial Appraisers (or the Initial Appraiser if there is only one) during the appraisal process. The Fair Market Value will be determined as if the Walnut Land were served by streets and utilities but otherwise vacant and unimproved by any structures, buildings, improvements, fixtures, additions, alterations, and betterments of whatsoever nature or description. For clarity, it is understood that the Walnut Land valuation shall take into consideration the actual costs and expenses necessary for the improvements to specifically serve the Walnut Land. Each Initial Appraiser will use sales comparisons to estimate value, presented in individual write-up sheets. Each Initial Appraiser shall adhere to USPAP direction pertaining to comparable sales requiring extraordinary verification and weighting considerations. If there is more than one Initial Appraiser, the Initial Appraisers may share and have access to objective information in preparing their appraisals, but they will independently analyze the information in their determination of the Fair Market Value, and neither of the Initial Appraisers shall have access to the appraisal of the other (except for the sharing of objective information contained in such appraisals) until both of the appraisals are submitted in accordance with the provisions of this Section. Neither Party shall communicate with the Initial Appraiser selected by the other Party regarding the instructions contained in this Section before the Initial Appraisers complete their appraisals. If an Initial Appraiser has questions regarding the instructions in this Section, such Initial Appraiser shall use his or her own professional judgment and shall make clear all assumptions upon which his or her professional conclusions are based, including any supplemental instructions or interpretative guidance received from the Party appointing such Initial Appraiser. There shall not be any arbitration or adjudication of the instructions to the Initial Appraisers contained in this Section. Each Initial Appraiser shall complete, sign and submit its written appraisal setting forth the Fair Market Value to the Parties within sixty (60) days after the appointment of the last of the Initial Appraisers (or if only one Initial Appraiser is selected, within sixty (60) days after the expiration of the Initial Selection Period).

If only one Initial Appraiser is selected during the Initial Selection Period, then the Fair Market Value shall be the figure in such Initial Appraiser's appraisal. If two Initial Appraisers are selected during the Initial Selection Period, and the higher appraised Fair Market Value is not more than one hundred ten percent (110%) of the lower appraised Fair Market Value, then the Fair Market Value shall be the average of such two (2) Fair Market Value figures.

1.3 Potential Third Appraiser. If two Initial Appraisers are selected during the Initial Selection Period, and the higher appraised Fair Market Value is more than one hundred ten percent (110%) of the lower appraised Fair Market Value, then the Initial Appraisers shall agree upon and appoint an independent third Appraiser meeting the requirements for an Appraiser specified in Section 1.2 within thirty (30) days after the appraisals of both of the Initial Appraisers have been

submitted to the Parties in accordance with the following procedure. The Initial Appraisers shall inform the Parties of their appointment of the proposed third Appraiser at or before the end of such thirty (30)-day appointment period. Each Party shall have the opportunity to question the proposed third Appraiser, in writing only, as to his or her qualifications, experience, past working relationships with the Parties, and any other matters relevant to the appraisal. Either Party may, by written notice (given within three (3) business days after receiving notice of the selection of the third proposed Appraiser) to the other Party and the Initial Appraisers, raise a good faith objection to the selection of the third proposed Appraiser based on his or her failure to meet the requirements for an Appraiser specified in Section 1.2. In such event, if the Initial Appraisers determine that the objection was made in good faith, the Initial Appraisers shall promptly select another third proposed Appraiser, subject again to the same process for the raising of objections. If neither Party raises a good faith objection to the appointment of the third proposed Appraiser within three (3) business days after receiving notice of his or her appointment, each such Party shall be deemed to have waived any issues or questions relating to the qualifications or independence of the third Appraiser or any other matter relating to the selection of the third Appraiser under this Exhibit. If for any reason the Initial Appraisers do not appoint a third proposed Appraiser within such thirty (30)-day appointment period (or within a ten (10) business days thereafter), then either Party may apply to the Writs and Receivers Department of the Superior Court of the State of California in and for the County of San Francisco for appointment of a third Appraiser meeting the requirements for an Appraiser specified in Section 1.2. If the Court denies or otherwise refuses to act upon such application within sixty (60) days from the date on which the Party first applies to the Court for appointment of the third Appraiser, either Party may apply to the American Arbitration Association, or any similar provider of professional commercial arbitration services, for appointment in accordance with the rules and procedures of such organization of an independent third Appraiser meeting the foregoing qualifications. An Appraiser appointed pursuant to this Section shall be the "Third Appraiser".

1.4 Baseball Appraisal. The Third Appraiser, if any, shall consider the appraisals submitted by the Initial Appraisers, as well as any other relevant written evidence the Third Appraiser may request of either or both of the Initial Appraisers. If either of the Initial Appraisers submits any such evidence to the Third Appraiser, it shall do so only at the request of the Third Appraiser and shall deliver a complete and accurate copy to the other Party and the Initial Appraiser such Party selected, at the same time it submits the same to the Third Appraiser. Neither Party, nor the Initial Appraisers they appoint, shall conduct any ex parte communications with the Third Appraiser regarding the subject matter of the appraisal. Within thirty (30) days after his or her appointment, the Third Appraiser shall select the Fair Market Value determined by one or the other of the Initial Appraisers that is the closer, in the opinion of the Third Appraiser, to the actual Fair Market Value. The determination of the Third Appraiser shall be limited solely to the issue of deciding which of the determinations of the two Initial Appraisers is closest to the actual Fair Market Value. The Third Appraiser shall have no right to propose a middle ground or to modify either of the two appraisals or any provision of this Exhibit.

1.5 Conclusive Determination. Except as provided in California Code of Civil Procedure Section 1286.2 (as the same may be amended from time to time), the determination of the Fair Market Value by the accepted appraisal shall be conclusive, final and binding on the Parties. No Appraiser selected or appointed pursuant to this Exhibit shall have any power to

modify any of the provisions of this Exhibit and must base his or her decision on the definitions, standards, assumptions, instructions and other provisions contained in this Exhibit. Subject to the provisions of this Section, the Parties will cooperate to provide all appropriate information to each Appraiser selected or appointed under this Exhibit. The Appraisers selected or appointed under the provisions of this Exhibit will each produce their determination in writing, supported by the reasons for the determination.

1.6 Fees and Costs; Waiver. Each Party shall bear the fees, costs and expenses of the Initial Appraiser it selects. The fees, costs and expenses of the Third Appraiser, including the fees, costs and expenses in his or her appointment pursuant to this Exhibit, shall be shared equally by the City and Developer.

**Exhibit D-3**

**Form of Deed of Trust**

RECORDING REQUESTED BY CLERK OF THE
BOARD OF SUPERVISORS OF THE CITY AND
COUNTY OF SAN FRANCISCO AND WHEN
RECORDED MAIL TO:

Office of the City Attorney
City Hall Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102
Attn: Land Use Team

Exempt from Recording Fees (CA Govt. Code §27383) and
Documentary Transfer Tax (CA Rev. & Tax Code §11922
and S.F. Bus. & Tax Reg. Code §1105)

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APN: Block ____ Lot _____
Street Address:

DEED OF TRUST

This DEED OF TRUST (this "Deed of Trust") is made as of _____, 2019, among LAUREL HEIGHTS PARTNERS, LLC, a Delaware limited liability company ("Trustor"), whose address is _____, [_____], ("Trustee"), whose address is _____, and THE CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation ("Beneficiary"), whose address is _____, Trustor irrevocably grants, transfers and assigns to Trustee in trust, with power of sale, all of Trustor's right, title and interest in and to that certain property located in the City and County of San Francisco, California, more particularly described in Exhibit A attached hereto and incorporated by reference herein (the "Land"), including, without limitation, all improvements located on the Land ("Improvements"), subject, however, to the termination, re-conveyance and subordination provisions of Section E.6 below. The Land and the Improvements shall be collectively referred to in this Deed of Trust as the "Property". Capitalized terms that are used but not defined herein shall have the meanings given such terms in that certain Development Agreement by and between the City and County of San Francisco and Laurel Heights Partners, LLC, dated _____, 2019, and recorded in the Official Records of San Francisco County as Document No. _____ on _____, 20__ (the "DA").

For the purpose of securing only (1) Trustor's obligation to transfer the Property in accordance with Section 4 of Exhibit D to the DA (the "Transfer Section") as and when required under the Transfer Section, and (2) the performance of each agreement of Trustor incorporated by reference or contained herein or reciting it is so secured (items (1) and (2) above are referred to herein as the "Secured Obligations"). Other than such transfer obligation under the Transfer Section, no other provision of the DA is secured by this Deed of Trust.

A. To protect and maintain the security of this Deed of Trust, Trustor agrees:

1. To appear in and defend any action or proceeding purporting to affect the security hereof or the rights or powers of Beneficiary or Trustee; and to pay all costs and expenses, including cost of evidence of title and attorney's fees in a reasonable sum, in any suit brought by Beneficiary to foreclose this Deed of Trust.

2. To pay all costs, fees and expenses of this Deed of Trust.

3. To pay immediately and without demand all sums expended by Beneficiary or Trustee pursuant to the provisions hereof, with interest from date of expenditure at the maximum rate allowed by law in effect at the date hereof, and to pay for any statement provided for by law in effect at the date hereof regarding the obligation secured hereby any amount demanded by the Beneficiary not to exceed the maximum allowed by law at the time when said statement is demanded.

B. It is mutually agreed that:

1. By accepting payment of any sum secured hereby after its due date, Beneficiary does not waive his or her right either to require prompt payment when due of all other sums so secured or to declare default for failure so to pay.

2. At any time or from time to time, without liability therefor and without notice, upon written request of Beneficiary and presentation of this Deed of Trust, and without affecting the personal liability, if any, of any person for payment of the indebtedness secured hereby, Trustee has the right to reconvey any part of the Property, consent to the making of any map or plat thereof, join in granting any easement thereon, or join in any extension agreement or any agreement subordinating the lien or charge hereof.

3. Upon written request of Beneficiary stating that all actions required under the Transfer Section have been performed, all sums secured hereby have been paid, and upon surrender of this Deed of Trust to Trustee for cancellation and retention or other disposition as Trustee in its sole discretion may choose and upon payment of its fees, Trustee shall reconvey, without warranty, the property then held hereunder. The recitals in such reconveyance of any matters or facts shall be conclusive proof of the truthfulness thereof. The grantee in such reconveyance may be described as "the person or persons legally entitled thereto."

C. The occurrence of any of the following events shall constitute an event of default (a "Default") under this Deed of Trust:

1. Trustor (i) transfers its interest in the Property, or any part of thereof, or any interest in the Property, in any manner other than (a) a transfer to the Housing Entity (as defined in the DA), (b) the grant of a deed of trust or mortgage to any Mortgagee (as defined in the DA) that is subordinate to this Deed of Trust and encumbers all or part of Trustor's interest in the Property, (c) leases entered into in the ordinary course, or (d) Property Covenants (as defined in Section 2.A of Exhibit D of the DA) in accordance with Section 2.A of Exhibit D of the DA or (ii) is divested of its title or any interest in the Property in any manner or way, whether

voluntarily or involuntarily, in each case without the Beneficiary's prior written consent (which consent shall not be unreasonably withheld).

2. Trustor's failure to perform any covenant or obligation of Trustor contained herein, as and when performance is due, and the continuance of such failure for a period of thirty (30) days following written notice thereof from Beneficiary to Trustor; provided, however, that if such failure is not reasonably susceptible of cure within such thirty (30) day period, then, so long as Trustor commences to cure such failure within such thirty (30) day period and continually and diligently pursues such cure and completes such cure within a reasonable period, such failure shall not be a Default.

3. Trustor's becomes insolvent, makes an assignment for the benefit of creditors, or commences or becomes subject to any proceeding under the federal Bankruptcy Code or any other insolvency, receivership, reorganization, arrangement of debt, liquidation or debtor's relief law wherein the Trustor is the debtor.

5. Trustor's fails to transfer the Property in accordance with the Transfer Section, as and when required under the Transfer Section.

D. If any Default occurs, and as long any such Default exists, Beneficiary shall have the right to declare all indebtedness secured hereby to be immediately due and payable, and all such indebtedness shall thereupon become immediately due and payable, without any presentment, demand, protest or notice of any kind, all of which are expressly waived by Trustor, and Beneficiary shall have the following remedies:

1. Beneficiary shall have the right, either in person or by agent, with or without bringing any action or proceeding, or by a receiver appointed by a court and without regard to the adequacy of the security, to enter upon and take possession of the Property, or any part thereof, in its own name or in the name of Trustee, and do any acts which Beneficiary deems necessary or desirable to preserve the value, marketability or rentability of the Property or increase the income therefrom or protect the security hereof, and, with or without taking possession of the Property, to sue for or otherwise collect the rents and profits of the Property, including those past due and unpaid, and apply the same, less costs and expenses of operation and collection, including attorneys' fees, upon any indebtedness secured hereby, all in such order as Beneficiary may determine.

2. Beneficiary shall have the right to commence an action to foreclose this Deed of Trust as a mortgage, appoint a receiver, or specifically enforce any of the covenants hereof.

3. Beneficiary shall have the right to deliver to Trustee a written declaration of default and demand for sale pursuant to the power of sale in this Deed of Trust. If Beneficiary elects to foreclose this Deed of Trust by exercise of the power of sale in this Deed of Trust, Beneficiary shall notify Trustee and shall deposit with Trustee such written notice of default and election to sell and such receipts or evidence of expenditures made and secured hereby as Trustee may require. After the lapse of such time as may then be required by law following the recordation of said notice of default, and notice of sale having been given as then required by law, Trustee, without demand on Trustor, shall sell the Property at the time and place fixed by

Trustee in said notice of sale, as a whole, at public auction to the highest bidder for cash in lawful money of the United States, payable at time of sale. Trustee shall have the right to postpone sale of all or any portion of the Property by public announcement at such time and place of sale, and from time to time thereafter shall have the right to postpone such sale by public announcement at the time fixed by the preceding postponement. Trustee shall deliver to such purchaser its deed conveying the property so sold, but without any covenant or warranty, express or implied. The recitals in such deed of any matters or facts shall be conclusive proof of the truthfulness thereof. Any person, including Trustor, Trustee, or Beneficiary, may purchase at such sale.

4. After deducting all costs, fees and expenses of Trustee and of the trust created under this Deed of Trust ("Trust"), including cost of evidence of title in connection with sale, Trustee shall apply the proceeds of sale to payment of: all sums expended under the terms hereof, not then repaid, with accrued interest at the amount allowed by law in effect at the date hereof; all other sums then secured hereby; and the remainder, if any, to the person or persons legally entitled thereto.

5. Every right, power and remedy granted to Trustee or Beneficiary in this Deed of Trust shall be cumulative and not exclusive, and in addition to all rights, powers and remedies granted at law or in equity or by statute, and each such right, power and remedy may be exercised from time to time and as often and in such order as may be deemed expedient by Trustee or Beneficiary, and the exercise of any such right, power or remedy shall not be deemed a waiver of the right to exercise, at the same time or thereafter, any other right, power or remedy.

6. Trustor hereby requests that a copy of any notice of default and of any notice of sale under this Deed of Trust be mailed to Trustor at the address of Trustor set forth in this Deed of Trust as required by applicable law.

E. It is further mutually agreed that:

1. Beneficiary, or any successor in its rights under the Transfer Section or ownership of any indebtedness secured hereby, has the right to, from time to time, by instrument in writing, substitute a successor or successors to any Trustee named herein or acting hereunder, which instrument, executed by the Beneficiary and duly acknowledged and recorded in the office of the recorder of the county or counties where the Property is situated, shall be conclusive proof of proper substitution of such successor Trustee or Trustees, who shall, without conveyance from the Trustee predecessor, succeed to all its title, estate, rights, powers and duties. Said instrument must contain the name of the original Trustor, Trustee and Beneficiary hereunder, the book and page where this Deed of Trust is recorded and the name and address of the new Trustee.

2. This Deed of Trust applies to, inures to the benefit of, and binds all parties hereto, their heirs, legatees, devisees, administrators, executors, successors, and assigns. In this Deed of Trust, whenever the context so requires, the masculine gender includes the feminine or the neuter, and the singular number includes the plural.

3. The Trustee accepts this Trust when this Deed of Trust, duly executed and acknowledged, is made a public record as provided by law. Trustee is not obligated to notify any

party hereto of pending sale under any other deed of trust or of any action or proceeding in which Trustor, Beneficiary or Trustee shall be a party unless brought by Trustee.

4. A copy of any notice of default and any notice of sale hereunder shall be mailed to Trustor at his address hereinbefore set forth.

5. Trustor shall have no personal liability under this Deed of Trust, and Beneficiary's only recourse against Trustor for the satisfaction of the Secured Obligations shall be Beneficiary's exercise of its rights and remedies with respect to the Property.

6. Immediately prior to the earlier to occur of (i) the Tax Credit Closing (as defined in Exhibit D to the DA) or (ii) the payment of the amounts under subsection G of the Transfer Section following City's election to take such payment, this Deed of Trust automatically shall become null and void without the need for further action by Trustor, Trustee or Beneficiary, and Beneficiary shall cause to be recorded, in the Official Records of the City and County of San Francisco, with respect to the Property a standard form of re-conveyance of deed of trust with respect to this Deed of Trust.

7. This Deed of Trust shall be governed by and construed in accordance with the laws of the State of California.

[*Remainder of Page Intentionally Blank. Signature on Following Page.*]

IN WITNESS WHEREOF, the undersigned has caused this Deed of Trust to be executed and delivered under seal as of the day and year first above written.

LAUREL HEIGHTS PARTNERS, LLC, a
Delaware limited liability company

By: _____

Name: _____

Title: _____

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California )
County of San Francisco )

On _____, before me, _____, a Notary Public, personally appeared _____, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____

Exhibit A

Legal Description of Land

# Exhibit E

## List of Approvals

**Final approval actions by the City and County of San Francisco Board of Supervisors**

1. Ordinance [_____] (File No. [_____]): (1) Approving a Development Agreement between the City and County of San Francisco and Laurel Heights Partners LLC; (2) waiving or modifying certain provisions of the Administrative Code and Planning Code, and approving specific development impact fees; and (3) adopting findings under the California Environmental Quality Act and findings of consistency with the General Plan and Planning Code priority policies.
2. Ordinance [_____] (File No. [_____]): Amending the Planning Code, the Zoning Map, and the Height Map to add the 3333 California Project Special Use District and adopting findings under the California Environmental Quality Act and findings of consistency with the General Plan and Planning Code priority policies.
3. Ordinance [_____] (File No. [_____]): Approving Major Encroachment Permit to Laurel Heights Partners LLC for improvements on _____.

**Final and Related Approval Actions of City and County of San Francisco Planning Commission (referenced by Motion Number "M No." or Resolution Number "R No.")**

1. M No. [_____]: Certifying the Final Environmental Impact Report for the 3333 California Mixed-Use District Project.
2. M No. [_____]: Adopting Findings and Statement of Overriding Considerations under the California Environmental Quality Act.
3. M No. [_____]: Approving a Conditional Use Authorization/Planned Unit Development for the 3333 California Project.
4. R No. [_____]: Recommending to the Board of Supervisors approval of amendments to the Planning Code to establish the 3333 California Project Special Use District and approval of amendments to Sectional Maps SU03 to refer to the 3333 California Project Special Use District and HT03 of the Zoning Map.
5. R No. [_____]: Recommending to the Board of Supervisors approval of a Development Agreement between the City and Laurel Heights Partners LLC.

**Final and Related Approval Actions of City and County of San Francisco Municipal Transportation Agency Board of Directors**

1. Resolution Number [_____] consenting to a Development Agreement between the City and Laurel Heights Partners LLC, including the Transportation Exhibit.

**Final and Related Approval Actions of City and County of San Francisco Public Utilities Commission**

1. Resolution Number [_____] consenting to the AWSS Schedule in the Development Agreement between the City and Laurel Heights Partners LLC.

**Final and Related Approval Actions by San Francisco Public Works**

1. Approval of Tentative Map

**Exhibit F**

**MMRP**

[see attached]

**Exhibit G**

**Notice of Completion and Termination**

| | |
|---|---|
| RECORDING REQUESTED BY AND WHEN RECORDED RETURN TO:<br>_____<br>[address]_____<br>_____<br>_____<br>Attn: _____ | |

(Space above this line reserved for Recorder's use only)

THIS NOTICE OF COMPLETION OF BUILDING AND COMMUNITY BENEFITS (this "Notice") dated for reference purposes only as of this _____ day of _____, 20__, is made by and between the CITY AND COUNTY OF SAN FRANCISCO, a political subdivision and municipal corporation of the State of California (the "City"), acting by and through its Planning Department, and _____, a _____] ("Developer") [*substitute party, if needed*].

1. The City and Developer entered into that certain Development Agreement dated as of _____, 20__ and recorded in the Official Records of the City and County of San Francisco on _____, as Document Number _____ (Book No. ___, Reel No. _____) (the "Development Agreement"). Capitalized terms used in this Notice that are not defined shall have meaning given to such terms in the Development Agreement.

2. Under Section 7.1 of the Development Agreement, when one or more Buildings have been completed and all of the Associated Community Benefits tied to those specific Buildings have also been completed, the City agreed, upon Developer's request, to execute and record a notice of completion as it relates to the applicable Building.

3. The City confirms that the Building known as _____, located on the property described in the attached Exhibit A (the "Affected Property"), together with all of the Associated Community Benefits tied to that Building, have been completed in accordance with the Development Agreement. All parties with an interest in the Affected Property have the right to rely on this Notice.

| | |
|---|---|
| CITY: | Approved as to form: |
| CITY AND COUNTY OF SAN FRANCISCO,<br>a municipal corporation | [DENNIS J. HERRERA], City Attorney |
| By:_____<br>Director of Planning | By:_____<br>Deputy City Attorney |

Exhibit A

[*attach legal description of Affected Property*]

**Exhibit H**

**Form of Assignment and Assumption Agreement**

RECORDING REQUESTED BY
CLERK OF THE BOARD OF SUPERVISORS
OF THE CITY AND COUNTY OF SAN FRANCISCO
(Exempt from Recording Fees
Pursuant to Government Code
Section 27383)

AND WHEN RECORDED MAIL TO:

[Angela Calvillo]
Clerk of the Board of Supervisors
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

**ASSIGNMENT AND ASSUMPTION AGREEMENT**

**RELATIVE TO DEVELOPMENT AGREEMENT FOR [_____]**

THIS ASSIGNMENT AND ASSUMPTION AGREEMENT (hereinafter, the "**Assignment**") is entered into this _____ day of _____, 20__, by and between_____, a _____ ("**Assignor**") and _____, a _____ ("**Assignee**").

**RECITALS**

A. _____, a _____ and the City and County of San Francisco, a political subdivision and municipal corporation of the State of California (the "**City**"), entered into that certain Development Agreement (the "**Development Agreement**") dated as of _____, 20__ for reference purposes, with respect to certain real property owned by Assignor, as such property is more particularly described in the Development Agreement (the "**Project Site**"). The Development Agreement was recorded in the Official Records of the City and County of San Francisco on _____ as Document No. _____.

[*add recital to document any previous transfer of the Transferred Property, with recording information*]

B. The Development Agreement provides that Developer (Assignor) has the right to: (i) Transfer all or a portion of the Project Site, (ii) assign all of its rights, title, interest and obligations under the Development Agreement to a Transferee with respect to the portions of the Project Site transferred to the Transferee, and (iii) upon the recordation of an approved Assignment and Assumption Agreement, to be released from any prospective liability or obligation under the

Development Agreement related to the Transferred Property as set forth in Section ___ of the Development Agreement.

C. Assignor intends to convey certain real property as more particularly identified and described on Exhibit A attached hereto (hereafter the "**Transferred Property**") to Assignee. The Transferred Property is subject to the Development Agreement.

D. Assignor desires to assign and Assignee desires to assume Assignor's right, title, interest, burdens and obligations under the Development Agreement with respect to and as related to the Transferred Property, as more particularly described below.

**ASSIGNMENT AND ASSUMPTION**

NOW, THEREFORE, for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, Assignor and Assignee hereby agree as follows:

1. Defined Terms. Initially capitalized terms used herein and not otherwise defined shall have the meaning ascribed to them in the Development Agreement.

2. Assignment of Development Agreement. Assignor hereby assigns to Assignee, effective as of Assignor's conveyance of the Transferred Property to Assignee, all of the rights, title, interest, burdens and obligations of Assignor under the Development Agreement with respect to the Transferred Property, including any Community Benefits that are tied to Buildings on the Transferred Property. Assignor retains all the rights, title, interest, burdens and obligations under the Development Agreement with respect to all other portions of the Project Site owned by Assignor.

3. Assumption of Development Agreement. Assignee hereby assumes, effective as of Assignor's conveyance of the Transferred Property to Assignee, all of the rights, title, interest, burdens and obligations of Assignor under the Development Agreement with respect to the Transferred Property, including its associated Community Benefits, and agrees to observe and fully perform all the duties and obligations of Assignor under the Development Agreement with respect to the Transferred Property, and to be subject to all the terms and conditions thereof with respect to the Transferred Property. The parties intend that, upon the execution of this Assignment and conveyance of the Transferred Property to Assignee, Assignee shall become the "Developer" under the Development Agreement with respect to the Transferred Property.

4. Reaffirmation of Indemnifications. Assignee hereby consents to and expressly reaffirms any and all indemnifications of the City set forth in the Development Agreement, including without limitation Section ___ of the Development Agreement.

5. Housing Obligations. Assignee has read and understands the obligations set forth in Exhibit __ of the Development Agreement as they relate to the Transferred Property. Without limiting the foregoing, Assignee agrees (1) to the terms and provisions of such Exhibit ___, including the indemnities, waivers and releases set forth therein, and (2) that the Development Agreement falls within the express exception to the Costa-Hawkins Act, Section 1954.52(b) because it is a contract with a public entity in consideration for contributions and other forms of assistance specified in Chapter 4.3 (commencing with Section 65919 of Division 1 of Title 7 of

the California Government Code). Assignee understands that the City would not have been willing to enter into the Development Agreement without the provisions of such Exhibit D.

6. Assignee's Covenants. Assignee hereby covenants and agrees that: (a) Assignee shall not challenge the enforceability of any provision or requirement of the Development Agreement; (b) Assignee shall not sue the City in connection with any and all disputes between Assignor and Assignee arising from this Assignment or the Development Agreement, including any failure to complete all or any part of the Project by any party; and (c) Assignee shall indemnify the City and its officers, agents and employees from, and if requested, shall defend them against any and all Losses resulting directly or indirectly from any dispute between Assignor and Assignee arising from this Assignment or the Development Agreement.

7. Binding on Successors. All of the covenants, terms and conditions set forth herein shall be binding upon and shall inure to the benefit of the parties hereto and their respective heirs, successors and assigns.

8. Notices. The notice address for Assignee under Section ____ of the Development Agreement shall be:

_____
_____
_____
Attn: _____

With copy to:

_____
_____
_____
Attn: _____

8. Counterparts. This Assignment may be executed in as many counterparts as may be deemed necessary and convenient, and by the different parties hereto on separate counterparts, each of which, when so executed, shall be deemed an original, but all such counterparts shall constitute one and the same instrument.

9. Governing Law. This Assignment and the legal relations of the parties hereto shall be governed by and construed and enforced in accordance with the laws of the State of California, without regard to its principles of conflicts of law.

IN WITNESS HEREOF, the parties hereto have executed this Assignment as of the day and year first above written.

**ASSIGNOR:**

[insert signature block]

**ASSIGNEE:**

[insert signature block]

# Exhibit I

## Workforce Agreement

[Under review and discussion]

Developer shall make contributions and require Project Sponsors, Contractors, Consultants, Subcontractors and Subconsultants, as applicable, to undertake activities to support workforce development in the construction of the Project, as set forth in this Exhibit I.[1]

A. First Source Hiring Program.

1. Each Project Sponsor shall, with respect to any building that is included as a Workforce Building[2], (i) include in each Contract for construction work a provision requiring each Contractor to enter into a FSHA Construction Agreement in the form attached hereto as Attachment A before beginning any construction work, and (ii) provide a signed copy thereof to the First Source Hiring Administration ("**FSHA**") and CityBuild within 10 business days of execution. The FSHA Construction Agreement shall be required for the initial construction of each Workforce Building, and (ii) any improvements or alterations that require a Permit, as defined in San Francisco Administrative Code Chapter 83 ("**Chapter 83**"), during the 10 year period following issuance of the first temporary certificate of occupancy for the Workforce Building, except as noted below (the "**Workforce Period**").

2. Each Project Sponsor shall, with respect to each Workforce Building, comply with the requirements of San Francisco Administrative Code Chapter 83 ("**Chapter 83**") and upon entering into leases or other occupancy contracts for commercial space at the Premises that are subject to Chapter 83 with a tenant occupying more than 25,000 square feet in floor area ("**Commercial Tenant**"), will include in each such contract a requirement that the Commercial Tenant enter into a FSHA Operations Agreement in the form attached hereto as Attachment B, and

[1] Any capitalized term used in this Exhibit I, including its attachments, that is not defined herein shall have the meaning given to such term in the Development Agreement.

[2] Any capitalized term used in this Section A that is not defined in Section A or the Development Agreement will have the definition given to such term in Attachment A, including the following terms: Contract, Contractor, Entry Level Positions, Premises, Project Sponsor, Qualified Economically Disadvantaged Individuals for Entry Level Positions, and Workforce Building.

(ii) provide a signed copy thereof to the FSHA within 10 business days of execution. The FSHA Operations Agreement shall be required for the initial Commercial Tenant and for any later Commercial Tenant that occupies all or part of a Workforce Building that is subject to Chapter 83 during the Workforce Period.

3. CityBuild shall represent the FSHA and will provide referrals of Qualified Economically Disadvantaged Individuals for Entry Level Positions on the construction work for each Workforce Building as required under Chapter 83. The FSHA will provide referrals of Qualified Economically Disadvantaged Individuals for the permanent Entry Level Positions located within the Premises where required under Chapter 83.

4. The owners or residents of the individual residential units and any residential Homeowner's Association within the Project shall have no obligations under this Section A and no obligation to enter into a FSHA Construction Agreement or FSHA Operations Agreement.

5. FSHA shall notify any Contractor, Subcontractor and Commercial Tenant, as applicable, in writing, with a copy to Project Sponsor, of any alleged breach on the part of that entity of its obligations under Chapter 83 or its FSHA Construction Agreement or the FSHA Operations Agreement, as applicable, before seeking an assessment of liquidated damages pursuant to Section 83.12 of the Administrative Code. FSHA's sole remedies against a Contractor, Subcontractor or Commercial Tenant shall be as set forth in Chapter 83, including the enforcement process. Upon FSHA's request, a Project Sponsor shall reasonably cooperate with FSHA in any such enforcement action against any Contractor, Subcontractor or Commercial Tenant, provided in no event shall a Project Sponsor be liable for any breach by a Contractor, Subcontractor or Commercial Tenant.

6. If a Project Sponsor fulfills its obligations as set forth in this Section A, it shall not be held responsible for the failure of a Contractor, Subcontractor, Commercial Tenant or any other person or party to comply with the requirements of Chapter 83 or this Section A. If a Project Sponsor fails to fulfill its obligations under this Section A, the applicable provisions of Chapter 83 shall apply, though the City and the Project Sponsor shall have the right to invoke the process set forth in Section 9.2 of the Development Agreement.

7. This Section A is an approved "First Source Hiring Agreement" as referenced in Section 83.11 of the Administrative Code.

B. Local Business Enterprise (LBE) Utilization Program.

Each Project Sponsor of a Workforce Building, as defined in Attachment C, and its respective Contractors and Consultants, shall comply with the Local Business Enterprise Utilization Program set forth in Attachment C hereto.

C. FSH and LBE Obligations.

The obligations set forth in this Workforce Agreement shall constitute the entirety of the First Source Hiring and LBE obligations with respect to the Project, and no additional First Source Hiring or LBE obligations, or any similar obligations, shall be imposed, directly or indirectly, on the Project.

# MEMORANDUM OF UNDERSTANDING

**This Memorandum of Understanding ("MOU") is entered into as of , by and between the City and County of San Francisco (the "City") through its First Source Hiring Administration ("FSHA") and ("Project Sponsor").**

WHEREAS, Project Sponsor, as developer, proposes to construct new dwelling units, with up to square feet of commercial space and accessory, off-street parking spaces ("Project") at , Lots in Assessor's Block , San Francisco California ("Site"); and

WHEREAS, the Administrative Code of the City provides at Chapter 83 for a "First Source Hiring Program" which has as its purpose the creation of employment opportunities for qualified Economically Disadvantaged Individuals (as defined in Exhibit A); and

WHEREAS, the Project requires a building permit for a commercial activity of greater than 25,000 square feet and/or is a residential project greater than ten (10) units and therefore falls within the scope of the Chapter 83 of the Administrative Code; and

WHEREAS, Project Sponsor wishes to make a good faith effort to comply with the City's First Source Hiring Program.

Therefore, the parties to this Memorandum of Understanding agree as follows:

A. Project Sponsor, upon entering into a contract for the construction of the Project with Prime Contractor after the date of this MOU, will include in that contract a provision in the form attached hereto as Exhibit A and Exhibit A-1. It is the Project Sponsor's responsibility to provide a signed copy of Exhibit A to First Source Hiring program and CityBuild within 10 business days of execution.

B. Project Sponsor, as the developer of the Project, will comply with the requirements of Chapter 83 and upon entering into leases for the commercial space at the Project that are subject to Chapter 83, will include in that contract a provision in the form attached hereto as Exhibit B and Exhibit B-1. Project Sponsor will inform the FSHA when leases or occupancy contracts have been negotiated and provide a signed copy of Exhibit B and Exhibit B-1.

C. Any lessee(s) or operator(s) of commercial space within the Project shall have the same obligations under this MOU as the Project Sponsor.

D. CityBuild shall represent the First Source Hiring Administration and will provide referrals of Qualified economically disadvantaged individuals for employment on the construction phase of the Project as required under Chapter 83. The First Source Hiring Program will

provide referrals of Qualified economically disadvantaged individuals for the permanent jobs located within the commercial space of the Project.

E. The owners or residents of the residential units within the Project shall have no obligations under this MOU, or the attached First Source Hiring Agreement.

F. FSHA shall advise Project Sponsor, in writing, of any alleged breach on the part of the Project's contractor and/or tenant(s) with regard to participation in the First Source Hiring Program at the Project prior to seeking an assessment of liquidated damages pursuant to Section 83.12 of the Administrative Code.

G. As stated in Section 83.10(d) of the Administrative Code, if Project Sponsor fulfills its obligations as set forth in Chapter 83, it shall not be held responsible for the failure of a contractor or commercial tenant to comply with the requirements of Chapter 83.

H. This MOU is an approved "First Source Hiring Agreement" as referenced in Section 83.11 of the Administrative Code. The parties agree that this MOU shall be recorded and that it may be executed in counterparts, each of which shall be considered an original and all of which taken together shall constitute one and the same instrument.

J. Except as set forth in Section E, above: (1) this MOU shall be binding on and inure to the benefit of all successors and assigns of Project Sponsor having an interest in the Project and (2) Project Sponsor shall require that its obligations under this MOU shall be assumed in writing by its successors and assigns. Upon Project Sponsor's sale, assignment or transfer of title to the Project, it shall be relieved of all further obligations or liabilities under this MOU.

Signature:_____ Date:

Name of Authorized Signer: Email:

Company: Phone:

Address:

---

Project Sponsor:

Contact: Phone:

Address: Email:

---

_____ Date:

**First Source Hiring Administration**
OEWD, 1 South Van Ness 5th Fl. San Francisco, CA 94103
Attn: Ken Nim, Compliance Manager, ken.nim@sfgov.org

**Exhibit A:**

**First Source Hiring Agreement**

This First Source Hiring Agreement (this "Agreement"), is made as of , by and between , the First Source Hiring Administration, (the "FSHA"), and the undersigned contractor ("Contractor"):

RECITALS

WHEREAS, Contractor has executed or will execute an agreement (the "Contract") to construct or oversee a portion of the project to construct new dwelling units, with up to square feet of commercial space and accessory, off-street parking spaces ("Project") at , Lots in Assessor's Block , San Francisco California ("Site"), and a copy of this Agreement is attached as an exhibit to, and incorporated in, the Contract; and

WHEREAS, as a material part of the consideration given by Contractor under the Contract, Contractor has agreed to execute this Agreement and participate in the San Francisco Workforce Development System established by the City and County of San Francisco, pursuant to Chapter 83 of the San Francisco Administrative Code;

WHEREAS, as a material part of the consideration given by Contractor under the Contract, Contractor has agreed to execute this Agreement and participate in the San Francisco Workforce Development System established by the City and County of San Francisco, pursuant to Chapter 83 of the San Francisco Administrative Code;

NOW, THEREFORE, in consideration of the mutual covenants set forth herein and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the parties covenant and agree as follows:

1. DEFINITIONS

For purposes of this Agreement, initially capitalized terms shall be defined as follows:

a. "Core" or "Existing" workforce. Contractor's "core" or "existing" workforce shall consist of any worker who appears on the Contractor's active payroll for at least 60 days of the 100 working days prior to the award of this Contract.

b. "Economically Disadvantaged Individual". An individual who is either (a) eligible for services under the Workforce Investment Act of 1998 (29 U.S.C.A. 2801, *et seq.*), as may be amended from time to time, or (b) designated as "economically disadvantaged" by the OEWD/First Source Hiring Administration as an individual who is at risk of relying upon, or returning to, public assistance.

c. "Hiring opportunity". When a Contractor adds workers to its existing workforce

for the purpose of performing the Work under this Contract, a "hiring opportunity" is created. For example, if the carpentry subcontractor has an existing crew of five carpenters and needs seven carpenters to perform the work, then there are two hiring opportunities for carpentry on the Project.

d. "Job Notification". Written notice of job request from Contractor to CITYBUILD for any hiring opportunities. Contract shall provide Job Notifications to CITYBUILD with a minimum of 3 business days' notice.

e. "New hire". A "new hire" is any worker who is not a member of Contractor's core or existing workforce.

f. "Referral". A referral is an individual member of the CITYBUILD Referral Program who has received training appropriate to entering the construction industry workforce.

g. "Workforce participation goal". The workforce participation goal is expressed as a percentage of the Contractor's and its Subcontractors' new hires for the Project.

h. Entry Level Position: A non-managerial position that requires no education above a high school diploma or certified equivalency, and less than two (2) years training or specific preparation, and shall include temporary and permanent jobs, and construction jobs related to the development of a commercial activity.

i. First Opportunity: Consideration by Contractor of System Referrals for filling Entry Level Positions prior to recruitment and hiring of non-System Referral job applicants.

j. Job Classification: Categorization of employment opportunity or position by craft, occupational title, skills, and experience required, if any.

k. Job Notification: Written notice, in accordance with Section 2(b) below, from Contractor to FSHA for any available Entry Level Position during the term of the Contract.

l. Publicize: Advertise or post available employment information, including participation in job fairs or other forums.

m. Qualified: An Economically Disadvantaged Individual who meets the minimum bona fide occupational qualifications provided by Contractor to the System in the job availability notices required this Agreement.

n. System: The San Francisco Workforce Development System established by the City and County of San Francisco, and managed by the Office of Economic and Workforce Development (OEWD), for maintaining (1) a pool of Qualifiedindividuals, and (2) the mechanism by which such individuals are certified and referred to prospective employers covered by the First Source Hiring requirements under Chapter 83 of the San Francisco Administrative Code. Under this agreement, CityBuild will act as the representative of the San Francisco

Workforce Development System.

o. System Referrals: Referrals by CityBuild of Qualified applicants for Entry Level Positions with Contractor.

p. Subcontractor: A person or entity who has a direct contract with Contractor to perform a portion of the work under the Contract.

2. PARTICIPATION OF CONTRACTOR IN THE SYSTEM

a. The Contractor agrees to work in Good Faith with the Office of Economic and Workforce Development (OEWD)'s CityBuild Program to achieve the goal of 50% of new hires for employment opportunities in the construction trades and Entry-level Position related to providing support to the construction industry.

The Contractor shall provide CityBuild the following information about the Contractor's employment needs under the Contract:

i. On Exhibit A-1, the CityBuild Workforce Projection Form 1, Contractor will provide a detailed numerical estimate of journey and apprentice level positions to be employed on the project for each trade.

ii. Contractor is required to ensure that a CityBuild Workforce Projection Form 1 is also completed by each its subcontractors.

iii. Contractor will collaborate with CityBuild staff in negotiating a First Source Hiring Plan to identify, by trade, the number of Core workers at project start and the number of workers at project peak; and the number of positions that will be required to fulfill the First Source hiring expectation.

iv. Contractor and Subcontractors will provide documented verification that its "core" employees for this contract meet the definition listed in Section 1.a.

b.

i. Contractor must (A) give good faith consideration to all CityBuild Referrals, (B) review the resumes of all such referrals, (C) conduct interviews for posted Entry Level Positions in accordance with the non-

discrimination provisions of this contract, and (D) affirmative obligation to notify CityBuild of any new entry-level positions throughout the life of the project.

ii. Contractor must provide constructive feedback to CityBuild on all System Referrals in accordance with the following:

(A) If Contractor meets the criteria in Section 5(a) below that establishes "good faith efforts" of Contractor, Contractor must only respond orally to follow-up questions asked by the CityBuild account executive regarding each System Referral; and

(B) After Contractor has filled at least 5 Entry Level Positions under this Agreement, if Contractor is unable to meet the criteria in Section 5(b) below that establishes "good faith efforts" of Contractor, Contractor will be required to provide written comments on all CityBuild Referrals.

c. Contractor must provide timely notification to CityBuild as soon as the job is filled, and identify by whom.

3. CONTRACTOR RETAINS DISCRETION REGARDING HIRING DECISIONS

Contractor agrees to offer the System the First Opportunity to provide qualified applicants for employment consideration in Entry Level Positions, subject to any enforceable collective bargaining agreements. Contractor shall consider all applications of Qualified System Referrals for employment. Provided Contractor utilizes nondiscriminatory screening criteria, Contractor shall have the sole discretion to interview and hire any System Referrals.

4. COMPLIANCE WITH COLLECTIVE BARGAINING AGREEMENTS

Notwithstanding any other provision hereunder, if Contractor is subject to any collective bargaining agreement(s) requiring compliance with a pre-established applicant referral process, Contractor's only obligations with regards to any available Entry Level Positions subject to such collective bargaining agreement(s) during the term of the Contract shall be the following:

a. Contractor shall notify the appropriate union(s) of the Contractor's obligations under this Agreement and request assistance from the union(s) in referring Qualified applicants for the available Entry Level Position(s), to the extent such referral can conform to the requirements of the collective bargaining

agreement(s).

b. Contractor shall use "name call" privileges, in accordance with the terms of the applicable collective bargaining agreement(s), to seek Qualified applicants from the System for the available Entry Level Position(s).

c. Contractor shall sponsor Qualified apprenticeship applicants, referred through the System, for applicable union membership.

5. CONTRACTOR'S GOOD FAITH EFFORT TO COMPLY WITH ITS OBLIGATIONS HEREUNDER

Contractor will make good faith efforts to comply with its obligations to participate in the System under this Agreement. Determinations of Contractor's good faith efforts shall be in accordance with the following:

a. Contractor shall be deemed to have used good faith efforts if Contractor accurately completes and submits prior to the start of demolition and/or construction Exhibit A-1: CityBuild Workforce Projection Form 1; and

b. Contractor's failure to meet the criteria set forth from Section 5(c) to 5(m) does not impute "bad faith." Failure to meet the criteria set forth in Section 5(c) to 5(m) shall trigger a review of the referral process and the Contractor's efforts to comply with this Agreement. Such review shall be conducted by FSHA in accordance with Section 11 (c) below.

c. Meet with the Project's owner, developer, general contractor, or CityBuild representative to review and discuss your plan to meet your hiring obligations under San Francisco's First Source Hiring Ordinance (Municipal Code- Chapter 83) or the City and County of San Francisco Administrative Code Chapter 6.

d. Contact a CityBuild representative to review your hiring projections and goals for this project. Developer/prime must take active steps to advise all of its subcontractors of the First Source hiring obligations on the project, including, but not limited to providing CityBuild access and presentation time at each pre-bid, each pre-construction, and if necessary, any progress meeting held throughout the life of the project

e. Submit to CityBuild a "Projection of Entry Level Positions" form or other formal written notification specifying your expected hiring needs during the project's duration.

f. Notify your respective union(s) regarding your First Source hiring obligations and request their assistance in referring qualified San Francisco residents for any

available position(s). This step applies to the extent that such referral would not violate your union's collective bargaining agreement(s).

g. Be sure to reserve your "name call" privileges for qualified applicants referred through the CityBuild system. This should be done within the terms of applicable collective bargaining agreement(s).

h. Provide CityBuild with up-to-date list of all trade unions affiliated with any work on this project in a timely matter in order to facilitate CityBuild's notification to these unions of the project's workforce requirements.

i. Submit a "Job Request" form to CityBuild for each apprentice level position that becomes available. Please allow a minimum of 3 Business Days for CityBuild to provide appropriate candidate(s). You should simultaneously contact your union about the position as well, and let them know that you have contacted CityBuild as part of your First Source hiring obligations.

j. Developer has an ongoing, affirmative obligation and must advise each of its subs of their ongoing obligation to notify CityBuild of any/all apprentice level openings that arise throughout the duration of the project, including openings that arise from layoffs of original crew. Developer/contractor shall not exercise discretion in informing CityBuild of any given position; rather, CityBuild is to be universally notified, and a discussion between the developer/contractor and CityBuild can determine whether a CityBuild graduate would be an appropriate placement for any given apprentice level position.

k. Hire qualified candidate(s) referred through the CityBuild system. In the event of the firing/layoff of any CityBuild graduate, developer/contractor must notify CityBuild staff within two days of the decision and provide justification for the layoff; ideally, developer/contractor will request a meeting with the project's employment liaison as soon as any issue arises with a CityBuild placement in order to remedy the situation before termination becomes necessary.

l. Provide a monthly report and/or any relevant workforce records or data from contractors to identify workers employed on the project, source of hire, and any other pertinent information as pertain to compliance with this Agreement.

m. Maintain accurate records of your efforts to meet the steps and requirements listed above. Such records must include the maintenance of an on-site First Source Hiring Compliance binder, as well as records of any new hire made by the contractor/developer through a San Francisco CBO whom the contractor believes meets the First Source Hiring criteria. Any further efforts or actions agreed upon by CityBuild staff and the developer/contractor on a project-by- project basis.

## 6. COMPLIANCE WITH THIS AGREEMENT OF SUBCONTRACTORS

In the event that Contractor subcontracts a portion of the work under the Contract, Contractor shall determine how many, if any, of the Entry Level Positions are to be employed by its Subcontractor(s) using Form 1: the CityBuild Workforce Projection Form, provided, however, that Contractor shall retain the primary responsibility for meeting the requirements imposed under this Agreement. Contractor shall ensure that this Agreement is incorporated into and made applicable to such Subcontract.

## 7. EXCEPTION FOR ESSENTIAL FUNCTIONS

Nothing in this Agreement precludes Contractor from using temporary or reassigned existing employees to perform essential functions of its operation; provided, however, the obligations of this Agreement to make good faith efforts to fill such vacancies permanently with System Referrals remains in effect. For these purposes, "essential functions" means those functions absolutely necessary to remain open for business.

## 8. CONTRACTOR'S COMPLIANCE WITH EXISTING EMPLOYMENT AGREEMENTS

Nothing in this Agreement shall be interpreted to prohibit the continuation of existing workforce training agreements or to interfere with consent decrees, collective bargaining agreements, or existing employment contracts. In the event of a conflict between this Agreement and an existing agreement, the terms of the existing agreement shall supersede this Agreement.

## 9. HIRING GOALS EXCEEDING OBLIGATIONS OF THIS AGREEMENT

Nothing in this Agreement shall be interpreted to prohibit the adoption of hiring and retention goals, first source hiring and interviewing requirements, notice and job availability requirements, monitoring, record keeping, and enforcement requirements and procedures which exceed the requirements of this Agreement.

## 10. OBLIGATIONS OF CITYBUILD

Under this Agreement, CityBuild shall:

a. Upon signing the CityBuild Workforce Hiring Plan, immediately initiate recruitment and pre-screening activities.

b. Recruit Qualified individuals to create a pool of applicants for jobs who match Contractor's Job Notification and to the extent appropriate train applicants for jobs that will become available through the First Source Program;

c. Screen and refer applicants according to qualifications and specific selection criteria submitted by Contractor;

d. Provide funding for City-sponsored pre-employment, employment training, and support services programs;

e. Follow up with Contractor on outcomes of System Referrals and initiate corrective action as necessary to maintain an effective employment/training delivery system;

f. Provide Contractor with reporting forms for monitoring the requirements of this Agreement; and

g. Monitor the performance of the Agreement by examination of records of Contractor as submitted in accordance with the requirements of this Agreement.

11. CONTRACTOR'S REPORTING AND RECORD KEEPING OBLIGATIONS

Contractor shall:

a. Maintain accurate records demonstrating Contractor's compliance with the First Source Hiring requirements of Chapter 83 of the San Francisco Administrative Code including, but not limited to, the following:

(1) Applicants
(2) Job offers
(3) Hires
(4) Rejections of applicants

b. Submit completed reporting forms based on Contractor's records to CityBuild monthly, utilizing the Form 4: CityBuild First Source Summary Report, unless more frequent submittals are reasonably required by FSHA. In this regard, Contractor agrees that if a significant number of positions are to be filled during a given period or other circumstances warrant, CityBuild may require daily, weekly, or monthly reports containing all or some of the above information.

c. If based on complaint, failure to report, or other cause, the FSHA has reason to question Contractor's good faith effort, Contractor shall demonstrate to the reasonable satisfaction of the City that it has exercised good faith to satisfy its obligations under this Agreement.

12. DURATION OF THIS AGREEMENT

This Agreement shall be in full force and effect throughout the term of the Contract. Upon expiration of the Contract, or its earlier termination, this Agreement shall terminate and it shall be of no further force and effect on the parties hereto.

13. NOTICE

All notices to be given under this Agreement shall be in writing and sent by: certified mail, return receipt requested, in which case notice shall be deemed delivered three (3) business days after deposit, postage prepaid in the United States Mail, a nationally recognized overnight courier, in which case notice shall be deemed delivered one (1) business day after deposit with that courier, or hand delivery, in which case notice shall be deemed delivered on the date received, all as follows:

If to FSHA: First Source Hiring Administration
OEWD, 1 South Van Ness 5th Fl.
San Francisco, CA 94103
Attn: Ken Nim, Compliance Manager, ken.nim@sfgov.org

Attn: Ken Nim

If to CityBuild: CityBuild Compliance Manager
OEWD, 1 South Van Ness 5th Fl. San Francisco, CA 94103
Attn: Ken Nim, Compliance Manager, ken.nim@sfgov.org

If to Developer:

Attn:

**If to Contractor:**

Attn:

a. Any party may change its address for notice purposes by giving the other parties notice of its new address as provided herein. A "business day" is any day other than a Saturday, Sunday or a day in which banks in San Francisco, California are authorized to close.

b. Notwithstanding the forgoing, any Job Notification or any other reports required of Contractor under this Agreement (collectively, "Contractor Reports") shall be delivered to the address of FSHA pursuant to this Section via first class mail, postage paid, and such Contractor Reports shall be deemed delivered two (2) business days after deposit in the mail in accordance with this Subsection.

14. ENTIRE AGREEMENT

This Agreement contains the entire agreement between the parties to this Agreement and shall not be modified in any manner except by an instrument in writing executed by the parties or their respective successors in interest.

15. SEVERABILITY

If any term or provision of this Agreement shall, to any extent, be held invalid or unenforceable, the remainder of this Agreement shall not be affected.

16. COUNTERPARTS

This Agreement may be executed in one or more counterparts. Each shall be deemed an original and all, taken together, shall constitute one and the same instrument.

17. SUCCESSORS

This Agreement shall inure to the benefit of and shall be binding upon the parties to this Agreement and their respective heirs, successors and assigns. If there is more than one person comprising Seller, their obligations shall be joint and several.

18. HEADINGS

Section titles and captions contained in this Agreement are inserted as a matter of convenience and for reference and in no way define, limit, extend or describe the scope of this Agreement or the intent of any of its provisions

19. GOVERNING LAW

This Agreement shall be governed and construed by the laws of the State of California.

IN WITNESS WHEREOF, the following have executed this Agreement as of the date set forth above.

**CONTRACTOR:**

Date: _____ Signature: _____

Name of Authorized Signer: _____

Company: _____

Address: _____

Phone:

Email: _____

**Exhibit B: First Source Hiring Agreement**
**For Business, Commercial, Operation and Lease Occupancy of the Building**

This First Source Hiring Agreement (this "Agreement"), is made as of , by and between (the "Lessee"), and the First Source Hiring Administration, (the "FSHA"), collectively the "Parties":

RECITALS

WHEREAS, Lessee has plans to occupy the building at [Address] "Premises" which required a First Source Hiring Agreement between the project sponsor and FSHA due to the issuance of building permit for 25,000 square feet or more of floor space or constructed ten or more residential units; and,

WHEREAS, the project sponsor was required to provide notice in leases, subleases and other occupancy contracts for use of the Premises ("Contract");and

WHEREAS, as a material part of the consideration given by Lessee under

_contract, Lessee has agreed to execute this Agreement and participate in the Workforce System managed by the Office of Economic and Workforce Development (OEWD) as established by the City and County of San Francisco pursuant to Chapter 83 of the San Francisco Administrative Code;

NOW, THEREFORE, in consideration of the mutual covenants set forth herein and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, Parties covenant and agree as follows:

1. DEFINITIONS

For purposes of this Agreement, initially capitalized terms shall be defined as follows:

a. Entry Level Position: Any non-managerial position that requires no education above a high school diploma or certified equivalency, and less than two (2) years training or specific preparation, and shall include temporary, permanent, trainee and intern positions.

b. Workforce System: The First Source Hiring Administrator established by the City and County of San Francisco and managed by the Office of Economic and Workforce Development (OEWD).

c. Referral: A member of the Workforce System who has been identified by OEWD

as

having the appropriate training, background and skill sets for a Lessee specified Entry Level Position.

Lessee: Tenant, business operator and any other occupant of the building requiring a First Source Hiring Agreement as defined in SF Administrative Code Chapter 83.

Lessee shall include every person tenant, subtenant, or any other entity occupying the building for the intent of doing business in the City and County of San Francisco and possessing a Business Registration Certificate with the Office of Treasurer.

2. OEWD WORKFORCE SYSTM PARTICIPATION

a. Lessee shall notify OEWD's Business Team of every available Entry Level Position and provide OEWD 10 business days to recruit and refer qualified candidates prior to advertising such position to the general public. Lessee shall provide feedback including but not limited to job seekers interviewed, including name, position title, starting salary and employment start date of those individuals hired by the Lessee no later than 10 business days after date of interview or hire. Lessee will also provide feedback on reasons as to why referrals were not hired. Lessee shall have the sole discretion to interview any Referral by OEWD and will inform OEWD's Business Team why specific persons referred were not interviewed. Hiring decisions shall be entirely at the discretion of Lessee.

b. This Agreement shall be in full force and effect throughout the Lessee's occupancy of the building.

3. GOOD FAITH EFFORT TO COMPLY WITH ITS OBLIGATIONS HEREUNDER

Lessee will make good faith efforts to comply with its obligations under this Agreement. Determination of good faith efforts shall be based on all of the following:

a. Lessee will execute this Agreement and attachment *Exhibit B-1* upon entering into leases for the commercial space of the building. Lessee will also accurately complete and submit *Exhibit B-1* annually to reflect employment conditions.

b. Lessee agrees to register with OEWD's Referral Tracking System, upon execution of this Agreement.

c. Lessee shall notify OEWD's Business Services Team of all available Entry Level Positions 10 business days prior to posting with the general public. The Lessee must identify a single point of contact responsible for communicating Entry-Level Positions and take active steps to ensure continuous communication with OEWD's Business Services Team

d. Lessee accurately completes and submits Exhibit B-1, the "First Source Employer's Projection of Entry-Level Positions" form to OEWD's Business Services Team upon execution of this Agreement.

e. Lessee fills at least 50% of open Entry Level Positions with First Source referrals. Specific hiring decisions shall be the sole discretion of the Lessee.

f. Nothing in this Agreement shall be interpreted to prohibit the continuation of existing

workforce training agreements or to interfere with consent decrees, collective bargaining agreements, or existing employment contracts. In the event of a conflict between this Agreement and an existing agreement, the terms of the existing agreement shall supersede this Agreement.

Lessee's failure to meet the criteria set forth in Section 3 (a.b.c.d.e.) does not impute "bad faith" and shall trigger a review of the referral process and compliance with this Agreement. Failure and noncompliance with this Agreement will result in penalties as defined in SF Administrative Code Chapter 83, Lessee agrees to review SF Administrative Code Chapter 83, and execution of the Agreement denotes that Lessee agrees to its terms and conditions.

4. NOTICE

All notices to be given under this Agreement shall be in writing and sent via mail or email as follows:

ATTN: Business Services, Office of Economic and Workforce Development
1 South Van Ness Avenue, 5th Floor, San Francisco, CA 94103

Email: Business.Services@sfgov.org

This Agreement contains the entire agreement between the parties and shall not be modified in any manner except by an instrument in writing executed by the parties or their respective successors. If any term or provision of this Agreement shall be held invalid or unenforceable, the remainder of this Agreement shall not be affected. If Agreement is executed in one or more counterparts, each shall be deemed an original and all, taken together, shall constitute one and the same instrument. Agreement shall inure to the benefit of and shall be binding upon the parties to this Agreement and their respective heirs, successors and assigns. If there is more than one person comprising Seller, their obligations shall be joint and several.

Section titles and captions contained in this Agreement are inserted as a matter of convenience and for reference and in no way define, limit, extend or describe the scope of this Agreement or the intent of any of its provisions. This Agreement shall be governed and construed by laws of the State of California.

IN WITNESS WHEREOF, the following have executed this Agreement as of the date set forth above.

Date: _____ Signature:: _____

Name of Authorized Signer: _____

Company: _____

Address:

Phone:

Email: _____

SAN FRANCISCO
Office of Economic and Workforce Development

FIRST SOURCE HIRING
CITY & COUNTY OF SAN FRANCISCO

***WORKFORCE PROJECTIONS FORM***

CITY AND COUNTY OF SAN FRANCISCO
OFFICE OF ECONOMIC AND WORKFORCE DEVELOPMENT

**Business Name:** **Main Contact:**
**Contract ID: (If applicable)** **Supplier ID:(If applicable)**
**Phone:** **Email:**

**Name of authorized representative** **Signature of authorized representative** **Date**

** By signing this form, the company agrees to participate in the San Francisco Workforce Development System established by the City and County of San Francisco, and comply with the provisions of the First Source Hiring Program pursuant to Chapter 83 of the San Francisco Administrative Code*

**Instructions:**

- This form must be submitted via email to the Office of Economic and Workforce Development, Workforce Development Division at business.services@sfgov.org with the subject line First Source Non-Construction Hiring Projection Form
- If an entry level position becomes available at any time during the term of the lease and/or contract, the company must notify the First Source Hiring Administrator at business.services@sfgov.org

**Section 1: Select your Industry**

| | | | |
|---|---|---|---|
| ☐ Admin/Support/Waste | ☐ Food Services | ☐ Mgmt/Enterprises | ☐ Transport/Warehouse |
| ☐ Agri/Forestry/Fish/Hunt | ☐ Government | ☐ Manufacturing | ☐ Utilities |
| ☐ Construction | ☐ Health Care | ☐ Real Estate/Rental | ☐ Wholesale Trade |
| ☐ Educational Services | ☐ Info/Tech/Prof | ☐ Retail Trade | ☐ Other _____ |
| ☐ Finance/Insurance | ☐ Leisure/Hospitality | ☐ Social Services | _____ |

**Section 2: Indicate Industry NAICS code if known:** _____

**Section 3: Provide information on all Entry Level Positions**

| Entry level Position Title | Job Description | Number of New Hires | Projected Hiring Date |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |

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**FOR INTERNAL USE ONLY:**

**Section 3: Select the type of First Source Project:**

| | | | |
|---|---|---|---|
| ☐ | Contractor | ☐ | Biotech Payroll Tax Exclusion Applicant |
| ☐ | Subcontractor | ☐ | Scene in San Francisco Rebate Applicant |
| ☐ | City of San Francisco Tenant | ☐ | San Francisco Airport |
| ☐ | Subtenant | ☐ | Other _____ |
| ☐ | Developer | | |

Office of Economic and Workforce Development
1 South Van Ness Avenue, 5th Floor,
San Francisco, CA 94103 Tel: 415-701-4848, Email:
Business.services@sfgov.org Website:
www.workforcedevelopmentsf.org

## Attachment C:

## Local Business Enterprise Utilization Plan

1. Purpose and Scope. This Attachment C ("LBE Utilization Plan") governs the Local Business Enterprise obligations of the Project pursuant to San Francisco Administrative Code Section 14B.20 and satisfies the obligations of each Project Sponsor and its Contractors and Consultants for a LBE Utilization Plan as set forth therein. Capitalized terms not defined herein shall have the meanings ascribed to them in the Agreement or Section 14B.20 as applicable. The purpose of the LBE program is to engage contracting teams that reflect the diversity of the City and include participation of both businesses and residents from the City's most disadvantaged communities. In the event of any conflict between Administrative Code Chapter 14B and this Attachment, this Attachment shall govern.

2. Roles of Parties. In connection with the design and construction phases of each Workforce Building (as defined below), the Project will provide community benefits designed to foster employment opportunities for disadvantaged individuals by offering contracting and consulting opportunities to local business enterprises ("LBEs") in accordance with this Attachment. Each Project Sponsor shall participate in this local business enterprise program, and the City's Contract Monitoring Division ("CMD") will serve the roles as set forth below; provided, however, that, as set forth in Section 5 below, the requirements of this Attachment C may be satisfied on a project-wide basis.

3. Definitions. For purposes of this Attachment, the definitions shall be as follows:

a. "CMD" shall mean the Contract Monitoring Division of the City Administrator's Office.

b. "Commercially Useful Function" shall mean that the business is directly responsible for providing the materials, equipment, supplies or services to the Project Sponsor, Construction Contractor or professional services firm retained to work on a Workforce Building, as the case may be (each, a "Contracting Party"), as required by the solicitation or request for quotes, bids or proposals. Businesses that engage in the business of providing brokerage, referral or temporary employment services shall not be deemed to perform a "commercially useful function" unless the brokerage, referral or temporary employment services are those required and sought by the Project Sponsor or a Contractor or professional services firm. When the Project Sponsor or a Contractor or professional services firm requires and seeks products from an LBE supplier or distributor, including, without limitation, products that are not regularly stocked or are a specially manufactured item(s), no more than 60% of the entire cost of the product shall be credited towards LBE participation goals.

c. "Consultant" shall mean a person or company that has entered into a professional services contract for monetary consideration with a Project Sponsor to provide advice or services to the Project Sponsor directly related to the architectural or landscape design, physical planning, and/or civil, structural or environmental engineering of a Workforce Building.

d. "Contract(s)" shall mean an agreement, whether a direct contract or subcontract, for Consultant or Contractor services for all or a portion of a Workforce Building, subject to the exclusions set forth in Section 5 below.

e. "Contractor" shall mean a person or entity that enters into a direct Contract with a Project Sponsor to build or construct all or a portion of a Workforce Building.

f. "Good Faith Efforts" shall mean procedural steps taken by the Project Sponsor, Contractor or Consultant with respect to the attainment of the LBE participation goals, as set forth in Section 7 below.

g. "Local Business Enterprise" or "LBE" means a business that is certified as a Micro or Small LBE under Chapter 14B.3.

h. "LBE Liaison" shall mean the Project Sponsor's primary point of contact with CMD regarding the obligations of this LBE Utilization Plan. Each prime Contractor(s) shall likewise have a LBE Liaison.

i. "Project Sponsor" shall mean the project sponsor of a Workforce Building.

j. "Subconsultant" shall mean a person or entity that has a direct Contract with a Consultant to perform a portion of the work under a Contract for a Workforce Building.

k. "Subcontractor" shall mean a person or entity that has a direct Contract with a Contractor to perform a portion of the work under a Contract for a Workforce Building.

l. "Workforce Building" shall mean the following: (i) residential buildings, including associated residential units, common space, amenities, retail, parking and back of house construction; and (ii) all construction related to standalone affordable housing buildings. Workforce Buildings shall expressly exclude residential owner-contracted improvements in for-sale residential units.

4. Diversity. Developer will be seeking to, whenever practicable, engage contracting teams that reflect the diversity of the City and participation of both businesses and residents from the City's most disadvantaged communities. Developer's compliance with the good faith efforts in Section 7 shall be deemed to satisfy this objective.

5. LBE Participation Goal. Project Sponsor agrees to participate in this LBE Utilization Program and CMD agrees to work with Project Sponsor in this effort, as set forth in this Attachment C. As long as this Attachment C remains in full force and effect, each Project Sponsor shall make good faith efforts as defined below to achieve an overall LBE participation goal of 12% of the total cost of all Contracts for a Workforce Building awarded to LBE Contractors, Subcontractors, Consultants or Subconsultants that are Small and Micro-LBEs, as set forth in Administrative Code Section 14B.8(A). Project Sponsor may satisfy the overall LBE participation goal on a project-wide basis. Follow-on Tenant Improvements and services are not included in the numerical goal but Developer and/or lessee must follow LBE Participation Program's good faith efforts as set forth in the last paragraph of Section 6 below.

Notwithstanding the foregoing, CMD's Director may, in his or her discretion, provide for a downward adjustment of the LBE participation goal, depending on LBE participation data presented by the Project Sponsor and its team in quarterly and annual reports and meetings. In addition, where, based on reasonable evidence presented to the Director by a party attempting to achieve the LBE Participation goals, there are not sufficient qualified Small and Micro-LBEs available, then, at such party's request, the Director may authorize the applicable party to satisfy the LBE participation goal through the use of Small, Micro or SBA-LBEs (as each such term is defined is employed in Chapter 14B of the Administrative Code), or may set separate subcontractor participation requirements for Small and Micro-LBEs, and for SBA-LBEs.6. Project Sponsor Obligations. Each Project Sponsor shall comply with the requirements of this Attachment C as follows: Upon entering into a Contract with a Contractor or Consultant, each Project Sponsor will include in each such Contract a provision requiring the Contractor or Consultant to comply with the terms of this Attachment C, and setting forth the applicable percentage goal for such Contract and provide a signed copy of the Contract to CMD within 10 business days of execution. Such Contract shall specify the notice information for the Contractor or Consultant to receive notice pursuant to Section 17.

Each Project Sponsor shall identify an LBE Liaison. The LBE Liaison shall be an LBE Consultant and have experience in and responsibility for making recommendations on maximizing engagement of LBEs, including those from disadvantaged communities. The LBE Liaison shall be available to meet with CMD staff on a regular basis or as necessary regarding the implementation of this Attachment C. If a Project Sponsor fulfills its obligations as set forth in this Section 6 and otherwise cooperates in good faith at CMD's request with respect to any meet and confer process or enforcement action against a non-compliant Contractor, Consultant, Subcontractor or Subconsultant, then it shall not be held responsible for the failure of a Contractor, Consultant, Subcontractor or Subconsultant or any other person or party to comply with the requirements of this Attachment C.

Developer will use good faith efforts to hire LBEs for ongoing service contracts (e.g. maintenance, janitorial, landscaping, security etc.) within Workforce Buildings and advertise such contracting opportunities with CMD except to the extent impractical or infeasible but such contracts shall not be subject to the LBE participation goals or requirements of this Agreement. If a master association is responsible for the operation and maintenance of publicly owned improvements within the Project Site, CMD shall refer LBEs to such association for consideration with regard to contracting opportunities for such improvements. Such association will consider, in good faith such LBE referrals, but hiring decisions shall be entirely at the discretion of such association.

7. Good Faith Efforts. City acknowledges and agrees that each Project Sponsor, Contractor, Subcontractor, Consultant and Subconsultant shall have the sole discretion to qualify, hire or not hire LBEs. If a Contractor or Consultant does not meet the LBE hiring goal set forth above, it will nonetheless be deemed to satisfy the good faith effort obligation of this Section 7 and thereby satisfy the requirements and obligations of this Attachment C if the Contractor, Consultants and their Subcontractors and Subconsultants, as applicable, perform the good faith efforts set forth in this Section 7 as follows:

a. Advance Notice. Notify CMD in writing of all upcoming solicitations of proposals for work under a Contract at least 15 business days before issuing such solicitations to

allow opportunity for CMD to identify and outreach to any LBEs that it reasonably deems may be qualified for the Contract scope of work.

b. Contract Size. Where practicable and feasible, the Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant will divide the work in order to encourage maximum LBE participation or, encourage joint venturing. If the Contracting Party reasonably determines that it would be efficient for Subcontractors to perform specific items, then the Contracting Party will identify those specific items of each Contract that may be performed by Subcontractors.

c. Advertise. The Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant will (i) advertise for 30 days for professional services and contracting opportunities in media focused on small businesses including the Bid and Contract Opportunities website through the City's SF Supplier Portal and other local and trade publications, and (ii) allow subcontractors to attend outreach events, pre-bid meetings, and invite LBEs to submit bids to Project Sponsor or its prime Contractor or Consultant, as applicable. As practicable, the contractor shall convene pre-bid or pre-solicitation meetings no less than 15 days prior to the opening of bids and proposals to all for LBEs to ask questions about the selection process and technical specifications/requirements. A Project Sponsor may request CMD's permission to award a contract without advertising if the work consists of specialty services or otherwise does not provide opportunities for LBE participation.

d. CMD Invitation. If a pre-bid meeting or other similar meeting is held with proposed Contractors, Subcontractors, Consultants or Subconsultants, invite CMD to the meeting to allow CMD to explain proper LBE utilization.

e. Public Solicitation. The Project Sponsor or its Prime Contractor(s) and/or Consultants, as applicable, will work with CMD to follow up on initial solicitations of interest by contacting LBEs to determine with certainty whether they are interested in performing specific items in a project, [have sufficient experience performing similar types of work, and are available during the desired time frame for performance of the work].

f. Outreach and Other Assistance. The Project Sponsor or its Prime Contractor(s) and/or Consultants, as applicable, will a) provide LBEs with plans, specifications and requirements for all or part of the project; and b) notify LBE trade associations that disseminate bid and contract information and provide technical assistance to LBEs. The designated LBE Liaison(s) will work with CMD to conduct outreach to LBEs for all consulting/contracting opportunities in the applicable trades and services in order to encourage them to participate on the project.

g. Contacts. Make contacts with LBEs, associations or development centers, or any agencies, which disseminate bid and contract information to LBEs and document any other efforts undertaken to encourage participation by LBEs.

h. Good Faith/Nondiscrimination. Make good faith efforts to enter into Contracts with LBEs and give good faith consideration to bids and proposals submitted by LBEs.

Use nondiscriminatory selection criteria (for the purpose of clarity, exercise of subjective aesthetic taste in selection decisions for architect and other design professionals shall not be deemed discriminatory and the exercise of its commercially reasonable judgment in all hiring decisions shall not be deemed discriminatory), [ including, without limitation, assessment of qualifications for the scope of work, ability to obtain bonds and insurance with types and amounts of coverage typical in the general marketplace, availability during the desired time frame for performance of the work], and whether the LBE's proposed pricing and other terms are commercially reasonable and competitive in the general marketplace.

i. Incorporation into contract provisions. Project Sponsor shall include in prime Contracts provisions that require prospective Contractors and Consultants that will be utilizing Subcontractors or Subconsultants to follow the above good faith efforts to subcontract to LBEs, including overall LBE participation goal and any LBE percentage that may be required under such Contract.

j. Monitoring. Allow CMD Contract Compliance unit to monitor Consultant/Contractor selection processes and, when necessary give suggestions as to how best to maximize LBEs ability to complete and win procurement opportunities.

k. Insurance and Bonding. Recognizing that lines of credit, insurance and bonding are problems common to local businesses, staff will be available to explain the applicable insurance and bonding requirements, answer questions about them, and, if possible, suggest governmental or third party avenues of assistance. Contractor, Subcontractor, Consultant and Subconsultant will work with the Project Sponsor and CMD in good faith to design and implement any commercially reasonable insurance programs that may become available to provide to LBE subcontractors access to the required coverage through either the owner, Owner-Controlled Insurance Policy (OCIP), general contractor, Contractor-Controlled Insurance Policy (CCIP), or other insurance programs.

l. Maintain Records and Cooperation. Maintain records of LBEs that are awarded Contracts, not discriminate against any LBEs, and, if requested, meet and confer with CMD as reasonably required in addition to the meet and confer sessions described in Section 10 below to identify a strategy to meet the LBE goal;

m. Quarterly Reports. During construction, the LBE Liaison(s) shall prepare a quarterly report of LBE participation goal attainment and submit to CMD as required by Section 10 herein; and

n. Meet and Confer. Attend the meet and confer process described in Section 10.

8. Good Faith Outreach. Good faith efforts shall be deemed satisfied solely by compliance with Section 7. [Notwithstanding anything to the contrary in this LBE Utilization Plan, if despite satisfying the good faith efforts requirements by complying with Section 7, the LBE participation goal is not met as to any Workforce Building, then any deficiency shall not be carried over to any remaining Workforce Building, and the LBE participation goal shall remain 12% for each remaining Workforce Building.] Contractors and Consultants, and Subcontractors and

Subconsultants as applicable shall also work with CMD to identify from CMD's database of LBEs those LBEs who are most likely to be qualified for each identified opportunity under Section 7.b, and following CMD's notice under Section 9.a, shall undertake reasonable efforts at CMD's request to support CMD's outreach to identified LBEs as mutually agreed upon by CMD and each Contractor or Consultant and its Subcontractors and Subconsultants, as applicable.

9. CMD Obligations. The following are obligations of CMD to implement this LBE Utilization Plan:

a. During the thirty (30) day advertising period for upcoming Contracts required by Section 7.b, CMD will work with the Project Sponsor and its prime Contractor and/or Consultant as applicable to send such notification to qualified LBEs to alert them to upcoming Contracts.

b. Provide detailed technical assistance to Contractors, Subcontractors, Consultants and Subconsultants on good faith outreach to LBEs.

c. Review quarterly reports of LBE participation goals; when necessary give suggestions as to how best to maximize LBEs ability to compete and win procurement opportunities.

d. Perform other tasks as reasonably required to assist the Project Sponsor and its Contractors, Subcontractors, Consultants and Subconsultants in meeting LBE participation goals and/or satisfying good faith efforts requirements.

e. Insurance and Bonding. Recognizing that lines of credit, insurance and bonding are problems common to local businesses, CMD staff will be available to explain the applicable insurance and bonding requirements, answer questions about them, and, if possible, suggest governmental or third party avenues of assistance.

10. Meet and Confer Process. Commencing with the first Contract that is executed for a Workforce Building, and every six (6) months thereafter, or more frequently if requested by either CMD, Project Sponsor or a Contractor or Consultant each Contractor and Consultant and the CMD shall engage in an informal meet and confer to assess compliance of such Contractor and Consultants and its Subcontractors and Subconsultants as applicable with this Attachment C. When deficiencies are noted, meet and confer with CMD to ascertain and execute plans to increase LBE participation and remediate deficiencies.

11. Prohibition on Discrimination. Project Sponsors shall not discriminate in its selection of Contractors and Consultants, and such Contractors and Consultants shall not discriminate in their selection of Subcontractors and Subconsultants against any person on the basis of race, gender, or any other basis prohibited by law. As part of its efforts to avoid unlawful discrimination in the selection of Subconsultants and Subcontractors, Contractors and Consultants will undertake the Good Faith Efforts and participate in the meet and confer processes as set forth in Sections 7 and 10 above.

12. Collective Bargaining Agreements. Nothing in this Attachment C shall be interpreted to prohibit the continuation of existing workforce training agreements or to interfere with consent

decrees, collective bargaining agreements, project labor agreement, project stabilization agreement, existing employment contract or other labor agreement or labor contract ("Collective Bargaining Agreements"). In the event of a conflict between this Attachment C and a Collective Bargaining Agreement, the terms of the Collective Bargaining Agreement shall supersede this Attachment C.

13. Reporting and Monitoring. Each Contractor, Consultant, and its Subcontractors and Subconsultants as applicable shall maintain accurate records demonstrating compliance with the LBE participation goals, including keeping track of the date that each response, proposal or bid that was received from LBEs, including the amount bid by and the amount to be paid (if different) to the non-LBE contractor that was selected, documentation of any efforts regarding good faith efforts as set forth in Section 7. Developer and/or their Contractors and Consultants shall use the City's online project reporting system (currently LCP Tracker/B2G) or other CMD approved reporting method. Project Sponsors shall create a reporting method for tracking LBE participation. Data tracked shall include the following (at a minimum):

a. Name/Type of Contract(s) let (e.g. Civil Engineering contract, Environmental Consulting, etc.)

b. Name of prime Contractors (including identifying which are LBEs and non-LBEs)

c. Name of Subcontractors (including identifying which are LBEs and non-LBEs)

d. Scope of work performed by LBEs (e.g. under an Architect, an LBE could be procured to provide renderings)

e. Dollar amounts associated with both LBE and non-LBE Contractors at both prime and Subcontractor levels.

f. Total LBE participation is defined as a percentage of total Contract dollars.

g. Performance in engaging LBEs, including LBEs from disadvantaged neighborhoods.

14. Written Notice of Deficiencies. If based on complaint, failure to report, or other cause, the CMD has reason to question the good faith efforts of a Project Sponsor, Contractor, Subcontractor, Consultant or Subconsultant, then CMD shall provide written notice to the Project Sponsor, each affected prime Contractor or Consultant and, if applicable, also to its Subcontractor or Subconsultant. The prime Contractor or Consultant and, if applicable, the Subcontractor or Subconsultant, shall have a reasonable period, based on the facts and circumstances of each case, to demonstrate to the reasonable satisfaction of the CMD that it has exercised good faith to satisfy its obligations under this Attachment C. When deficiencies are noted CMD staff will work with the appropriate LBE Liaison(s) to remedy such deficiencies.

15. Remedies. Notwithstanding anything to the contrary in the Development Agreement, the following process and remedies shall apply with respect to any alleged violation of this Attachment C:

Mediation and conciliation shall be the administrative procedure of first resort for any and all compliance disputes arising under this Attachment C. The Director of CMD shall have power to oversee and to conduct the mediation and conciliation.

Non-binding arbitration shall be the administrative procedure of second resort utilized by CMD for resolving the issue of whether a Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant discriminated in the award of one or more LBE Contracts to the extent that such issue is not resolved through the mediation and conciliation procedure described above. Obtaining a final judgment through arbitration on LBE contract related disputes shall be a condition precedent to the ability of the City or the Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant to file a request for judicial relief.

If a Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant is found to be in willful breach of the obligations set forth in this Attachment C, assess against the noncompliant Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant liquidated damages not to exceed [$10,000] or 5% of the Contract, whichever is less, for each such willful breach. In determining the amount of any liquidated damages to be assessed within the limits described above, the arbitrator or court of competent jurisdiction shall consider the financial capacity of the Project Sponsor, Contractor, Consultant, Subcontractor or Subconsultant. For purposes of this paragraph, "willful breach" means a knowing and intentional breach.

For all other violations of this Attachment C, the sole remedy for violation shall be specific performance, without the limits with respect thereto in Section 9.4.3-9.4.5 of the Development Agreement.

16. Duration of this Agreement. This Attachment C shall terminate as to each Workforce Building and all construction related to each standalone affordable housing building, upon the issuance of the last Certificate of Occupancy for such Workforce Building or such standalone affordable housing building (i.e., upon completion of the Workforce Building or standalone affordable housing building). Upon such termination, this Attachment C shall be of no further force and effect.

17. Notice. All notices to be given under this Attachment C shall be in writing and sent by: certified mail, return receipt requested, in which case notice shall be deemed delivered three (3) business days after deposit, postage prepaid in the United States Mail, a nationally recognized overnight courier, in which case notice shall be deemed delivered one (1) business day after deposit with that courier, or hand delivery, in which case notice shall be deemed delivered on the date received, all as follows:

If to CMD: _____

_____

_____

Attn: _____

If to Project Sponsor: _____
_____
_____
Attn: _____

If to Contractor: _____
_____
_____
Attn: _____

If to Consultant: _____
_____
_____
Attn: _____

Any party may change its address for notice purposes by giving the other parties notice of its new address as provided herein. A "business day" is any day other than a Saturday, Sunday or a day in which banks in San Francisco, California are authorized to close.

# Exhibit J

## Transportation

This Transportation Exhibit outlines the Project's transportation commitments in two areas: (i) the Transportation Demand Management Plan and (ii) the reconfiguration of two slip lanes.

1. Transportation Demand Management Plan

   The Developer shall implement a site-specific Transportation Demand Management Plan included as Attachment 1 to this exhibit. While the Project would be subject to Planning Code Section 169.3(e)(1) and required to implement 50% of applicable target points, the Developer commits through this Agreement, to be subject to Planning Code Section 169.3(e)(2) and to implement 75% of applicable target points. Otherwise, the Project remains subject to all of the provisions of Planning Code Section 169 et seq.

2. Reconfiguration of Slip Lanes

   A key element of the Project's Public Improvements includes the reconfiguration of existing traffic slip lanes at the intersections of Presidio Avenue and Pine Street/Masonic Avenue and at Masonic Avenue and Euclid Avenue. These Public Improvements consist of bulb outs and other sidewalk improvements where two separate slip lanes are currently located. With the Public Improvements, the slip lane areas will remain publicly accessible, but will no longer be accessible to motorized vehicles. The parties, including the SFMTA Board of Directors through its consent to the Development Agreement, agree to the slip lane and sidewalk reconfiguration concept level plans that are included as Attachment 2 to this Exhibit. The Developer will work with DPW and SFMTA to obtain all necessary review, approvals and construction permits.

**Attachment 1**
Transportation Demand Management Plan

[see attached]

# TDM PLAN WORKSHEET

Target: 75%

| Category | Measure | Points | Land Use Category A Retail | B Office | C Residential | D Other |
|---|---|---|---|---|---|---|
| ACTIVE-1 | Improve Walking Conditions: Option A; or | 1 | Ⓟ 1 | Ⓟ 1 | Ⓟ 1 | ○ — |
| | Improve Walking Conditions: Option B | 1 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| ACTIVE-2 | Bicycle Parking: Option A; or | 1 | Ⓟ | Ⓟ 1 | Ⓟ | Ⓟ |
| | Bicycle Parking: Option B; or | 2 | Ⓟ | Ⓟ | Ⓟ | Ⓟ |
| | Bicycle Parking: Option C; or | 3 | Ⓟ 3 | Ⓟ | Ⓟ 3 | Ⓟ |
| | Bicycle Parking: Option D | 4 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| ACTIVE-3 | Showers and Lockers | 1 | Ⓟ 1 | Ⓟ 1 | ⊘ | Ⓟ |
| ACTIVE-4 | Bike Share Membership: Location A; or | 1 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| | Bike Share Membership: Location B | 2 | Ⓑ | Ⓑ | Ⓑ | ○ — |
| ACTIVE-5A | Bicycle Repair Station | 1 | Ⓟ 1 | Ⓟ | Ⓟ 1 | ○ — |
| ACTIVE-5B | Bicycle Maintenance Services | 1 | Ⓟ 1 | Ⓟ | Ⓟ 1 | ○ — |
| ACTIVE-6 | Fleet of Bicycles | 1 | Ⓟ | Ⓟ | Ⓟ 1 | ○ — |
| ACTIVE-7 | Bicycle Valet Parking | 1 | Ⓑ | ⊘ | ⊘ | ○ — |
| CSHARE-1 | Car-share Parking and Membership: Option A; or | 1 | Ⓟ | Ⓟ | Ⓟ | Ⓟ |
| | Car-share Parking and Membership: Option B; or | 2 | Ⓟ 2 | Ⓟ | Ⓟ 2 | Ⓟ |
| | Car-share Parking and Membership: Option C; or | 3 | Ⓟ | Ⓟ | Ⓟ | Ⓟ |
| | Car-share Parking and Membership: Option D; or | 4 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| | Car-share Parking and Membership: Option E | 5 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| DELIVERY-1 | Delivery Supportive Amenities | 1 | Ⓟ 1 | Ⓟ | Ⓟ 1 | ○ — |
| DELIVERY-2 | Provide Delivery Services | 1 | Ⓑ 1 | ⊘ | ⊘ | ○ — |
| FAMILY-1 | Family TDM Amenities: Option A; and/or | 1 | ⊘ | ⊘ | Ⓟ 1 | ⊘ |
| | Family TDM Amenities: Option B | 1 | ⊘ | ⊘ | Ⓟ 1 | ⊘ |
| FAMILY-2 | On-site Childcare | 2 | Ⓟ 2 | Ⓟ 2 | Ⓟ 2 | ⊘ |
| FAMILY-3 | Family TDM Package | 2 | ⊘ | ⊘ | Ⓟ | ⊘ |
| HOV-1 | Contributions or Incentives for Sustainable Transportation: Option A; or | 2 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| | Contributions or Incentives for Sustainable Transportation: Option B; or | 4 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| | Contributions or Incentives for Sustainable Transportation: Option C; or | 6 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| | Contributions or Incentives for Sustainable Transportation: Option D | 8 | Ⓟ | Ⓟ | Ⓟ | ○ — |
| HOV-2 | Shuttle Bus Service: Option A; or | 7 | Ⓑ | Ⓑ | Ⓑ | ○ — |
| | Shuttle Bus Service: Option B | 14 | Ⓑ | Ⓑ | Ⓑ | ○ — |

Ⓟ = applicable to land use category.

Ⓑ = applicable to land use category, see fact sheets for further details regarding project size and/or location.

Ⓟ = applicable to land use catgory only if project includes some parking.

⊘ = not applicable to land use category.

○ = project sponsor can select these measures for land use category D, but will not receive points.

NOTE: Please tally the points on the next page.

NOTE: A project sponsor can only receive up to 14 points between HOV-2 and HOV-3.

| Category | Measure | Points | Land Use Category A Retail | B Office | C Residential | D Other |
|---|---|---|---|---|---|---|
| HOV-3 | Vanpool Program: Option A; or | 1 | Ⓟ | Ⓟ | ⊘ | ○ |
| | Vanpool Program: Option B; or | 2 | Ⓟ | Ⓟ | ⊘ | ○ |
| | Vanpool Program: Option C; or | 3 | Ⓟ | Ⓟ | ⊘ | ○ |
| | Vanpool Program: Option D; or | 4 | Ⓟ | Ⓟ | ⊘ | ○ |
| | Vanpool Program: Option E; or | 5 | Ⓟ | Ⓟ | ⊘ | ○ |
| | Vanpool Program: Option F; or | 6 | Ⓟ | Ⓟ | ⊘ | ○ |
| | Vanpool Program: Option G | 7 | Ⓟ | Ⓟ | ⊘ | ○ |
| INFO-1 | Multimodal Wayfinding Signage | 1 | Ⓟ 1 | Ⓟ 1 | Ⓟ 1 | Ⓟ |
| INFO-2 | Real Time Transportation Information Displays | 1 | Ⓟ 1 | Ⓟ 1 | Ⓟ 1 | Ⓟ |
| INFO-3 | Tailored Transportation Marketing Services: Option A; or | 1 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Tailored Transportation Marketing Services: Option B; or | 2 | Ⓟ | Ⓟ | Ⓟ 2 | ○ |
| | Tailored Transportation Marketing Services: Option C; or | 3 | Ⓑ 3 | Ⓑ | Ⓑ | ○ |
| | Tailored Transportation Marketing Services: Option D | 4 | Ⓑ | Ⓑ | Ⓑ | ○ |
| LU-1 | Healthy Food Retail in Underserved Area | 2 | Ⓑ | ⊘ | ⊘ | ⊘ |
| LU-2 | On-site Affordable Housing: Option A; or | 1 | ⊘ | ⊘ | Ⓟ | ⊘ |
| | On-site Affordable Housing: Option B; or | 2 | ⊘ | ⊘ | Ⓟ 2 | ⊘ |
| | On-site Affordable Housing: Option C; or | 3 | ⊘ | ⊘ | Ⓑ | ⊘ |
| | On-site Affordable Housing: Option D | 4 | ⊘ | ⊘ | Ⓑ | ⊘ |
| PKG-1 | Unbundle Parking: Location A; or | 1 | Ⓑ Ⓟ | Ⓑ Ⓟ | Ⓑ Ⓟ | ○ |
| | Unbundle Parking: Location B; or | 2 | Ⓑ Ⓟ | Ⓑ Ⓟ | Ⓑ Ⓟ | ○ |
| | Unbundle Parking: Location C; or | 3 | Ⓑ Ⓟ | Ⓑ Ⓟ | Ⓑ Ⓟ | ○ |
| | Unbundle Parking: Location D; or | 4 | Ⓑ Ⓟ 4 | Ⓑ Ⓟ 4 | Ⓑ Ⓟ 4 | ○ |
| | Unbundle Parking: Location E | 5 | Ⓑ Ⓟ | Ⓑ Ⓟ | Ⓑ Ⓟ | ○ |
| PKG-2 | Parking Pricing | 2 | Ⓟ 2 | Ⓟ | ⊘ | ○ |
| PKG-3 | Parking Cash Out: Non-residential Tenants | 2 | Ⓟ | Ⓟ | ⊘ | ○ |
| PKG-4 | Parking Supply: Option A; or | 1 | Ⓟ | Ⓟ | Ⓟ | Ⓟ |
| | Parking Supply: Option B; or | 2 | Ⓟ | Ⓟ | Ⓟ | Ⓟ |
| | Parking Supply: Option C; or | 3 | Ⓟ | Ⓟ | Ⓟ | Ⓟ |
| | Parking Supply: Option D; or | 4 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option E; or | 5 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option F; or | 6 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option G; or | 7 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option H; or | 8 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option I; or | 9 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option J; or | 10 | Ⓟ | Ⓟ | Ⓟ | ○ |
| | Parking Supply: Option K | 11 | Ⓟ | Ⓟ | Ⓟ | ○ |

Ⓟ = applicable to land use category.
Ⓑ = applicable to land use category, see fact sheets for further details regarding project size and/or location.
Ⓟ = applicable to land use catgory only if project includes some parking.
⊘ = not applicable to land use category.
○ = project sponsor can select these measures for land use category D, but will not receive points.

| | Land Use Category Totals A Retail | B Office | C Residential | D Other |
|---|---|---|---|---|
| Point Subtotal from Page 1: | 13 | 5 | 14 | |
| Point Subtotal from Page 2: | 11 | 6 | 10 | |
| Totals: | 24 | 11 | 24 | |

7

Note: Childcare TDM points listed under office.

## Project Characeteristics

DRAFT Tool - 1/19/2017

Cell is automatically filled out based on response elsewhere.
Fillable cell.

| Site Information | |
|---|---|
| Case No. | 2015-014028ENV |
| Street Address of Project | 3333 California Street (REVISED PROJECT) |
| Cross Streets | California Street / Presidio Avenue, Euclid Avenue / Masonic Avenue |
| Zip Code | 94118 |
| Assessors Block/Lot | 1032/003 |
| Lot Area (SQ FT) | 447,361 |
| Use District | RM-1, Residential - Mixed, Low Density |
| Height/Bulk District | 40-X |
| Community Plan (IF ANY) | None |
| Transportation Analysis Zone Number (click hyperlink) | 709 |

| Project Characteristics - Land Use Category A (Retail Type) | |
|---|---|
| *Specify Use(s)* | Retail & Restaurant |
| *Gross Floor Area (square footage)* | 34,496 |
| *Occupied Floor Area[1] (square footage)* | 34,496 |
| *Accessory Parking Spaces* | 74 |
| TARGET[4] | 32 |

75% Target = 24 points

| Project Characteristics - Land Use Category B (Office Type) | |
|---|---|
| *Specify Use(s)* | Childcare (14,665) |
| *Gross Floor Area (square footage)* | 14,665 |
| *Occupied Floor Area[1] (square footage)* | 14,665 |
| *Accessory Parking Spaces* | 29 |
| TARGET[4] | 14 |

75% Target = 11 points

| Project Characteristics - Land Use Category C (Residential Type) | |
|---|---|
| *Dwelling Units and Bedrooms in Group Housing[2]* | 744 |
| *% of Two-Bedrooms* | 63% |
| *% On-site Affordable Housing (Income > 55 ≤ 80%)[3]* | 0% |
| *% On-site Affordable Housing (Income ≤ 55%)[3]* | 0% |
| *Accessory Parking Spaces* | 744 |
| TARGET[4] | 32 |

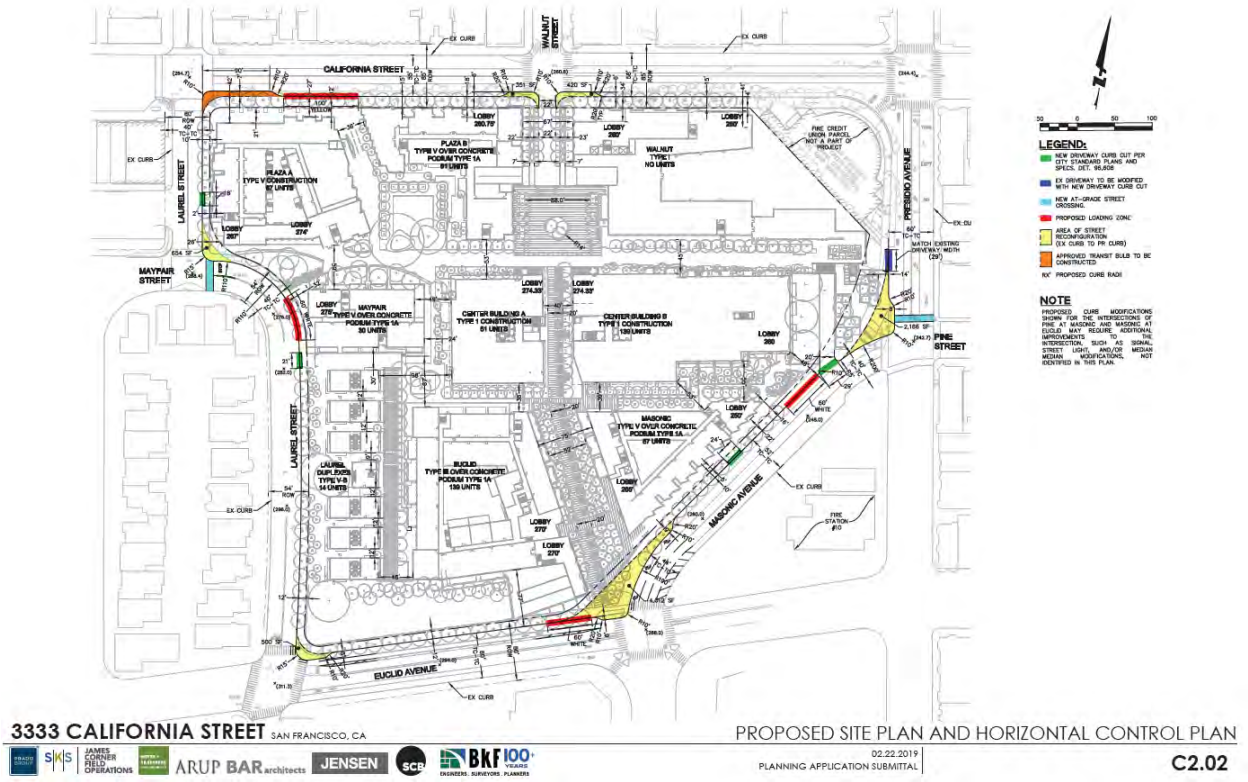
75% Target = 24 points

| Project Characteristics - Land Use Category D (Other) | |
|---|---|
| *Specify Use(s)* | None |
| *Gross Floor Area (square footage)* | 0 |
| *Occupied Floor Area[1] (square footage)* | 0 |
| *Accessory Parking Spaces* | 0 |
| TARGET[4] | 0 |

1. Less than 10,000 square feet (25,000 square feet for a change of use) is not subject to TDM Program.
2. Less than 10 dwelling units or beds is not subject to TDM Program.
3. 100% Affordable Housing projects are not subject to TDM Program.
4. Phase-In. Development Projects with a Development Application filed or Environmental Evaluation Application deemed complete on or before September 4, 2016 shall be subject to 50% of the target; Development Projects with a Development Application filed on or after September 5, 2016, and before January 1, 2018, shall be subject to 75% of the target; Development Projects witha Development Application filed on or after January 1, 2018 shall be subject to 100% of the target.

**Attachment 2**

Proposed Site Plans and Horizontal Control Plan



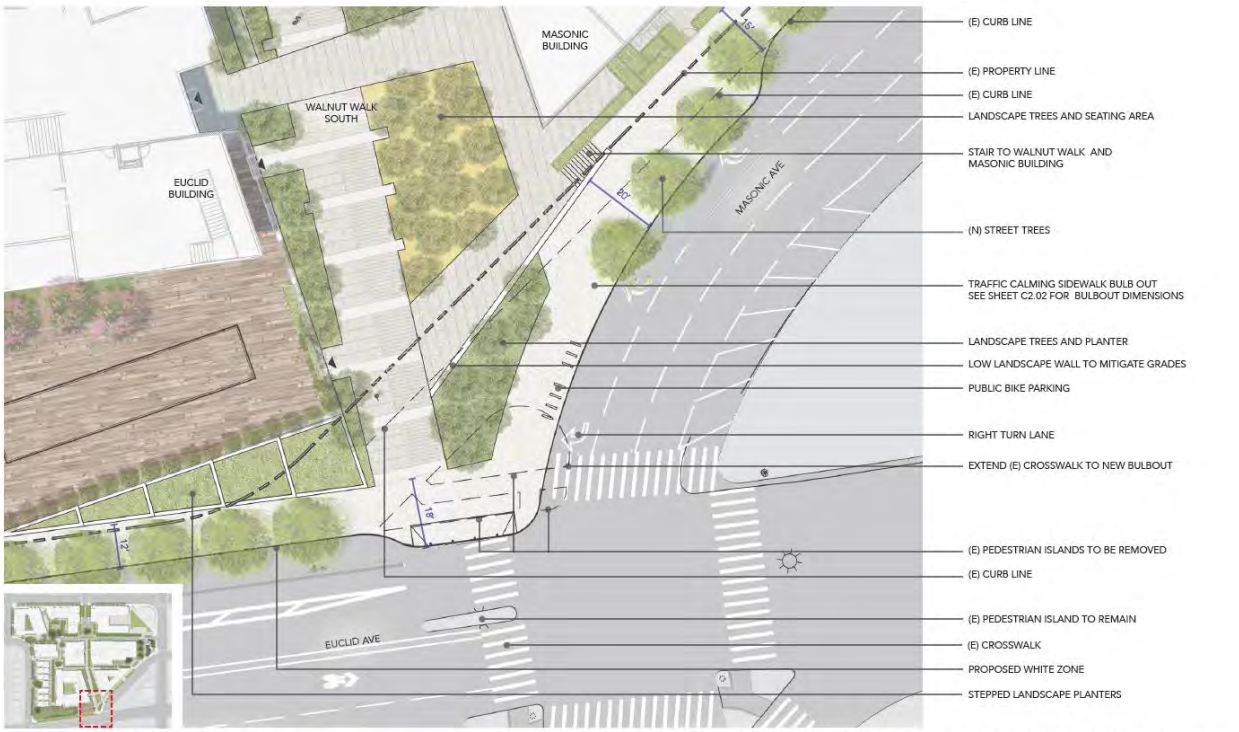



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

ENLARGED PLAN - PINE STREET STEPS STREETSCAPE IMPROVEMENTS

02.22.2019
PLANNING APPLICATION SUBMITTAL

L2.03




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

ENLARGED PLAN - CORNER PLAZA STREETSCAPE IMPROVEMENTS

02.22.2019
PLANNING APPLICATION SUBMITTAL

L2.04

# Exhibit K

## Schedule Template for Later Approvals

Developer will submit a project milestone schedule at the time of filing any application for the following Later Approvals: Major Encroachment Permit (if applicable), Street Improvement Permit, Final Map(s), or other pre-construction phase Later Approvals. The initial project schedule will be conceptual in nature and will be based upon the best estimate of the Developer.

Project schedules are intended to provide basic information to assist the City with its review and staff capacity planning related to the Later Approvals described above. Due to the many outside factors that affect a real estate development project's schedule and the varying workload of City staff, the Parties understand that this schedule is intended only as guidance to the City.

This schedule should include the following major milestones and be in the format described below. Public Works Infrastructure Taskforce and OEWD will review this schedule and then share this schedule with City departments for feedback. With department feedback in hand, Public Works Infrastructure Taskforce and OEWD may request a meeting with Developer for schedule confirmation.

Milestones to be included, as applicable to project:

City approvals:

- **Subdivision/mapping actions**
- **Transaction documents** (any easements, street vacations, etc.)
- **Infrastructure engineering/permit applications**
    - Example: Street Improvement Plan (SIP), storm water plan, and other major systems, like AWSS or backwater system
- **Any necessary commission approvals**
- **Start of construction** (demolition/site prep, horizontal and/or vertical)
- **Substantial completion**
- **City acceptance of infrastructure**
- **TCO**
- **Any other relevant major milestones**

Non-City approvals:

- **Any associated non-San Francisco approvals** (i.e. Navy, Caltrans, Caltrain, State lands, etc.)

Schedule format:

- The schedule should be in Gantt chart format
    - Time should be in in fiscal years via months or quarters at the top
    - Milestones should be in rows on the left

    - Start dates (day/month/year) and durations in days should be indicated for each milestone
- Project should be broken out into major Phases and sub Phases, if applicable
- The planning horizon should include: SIP, Transactional Documents, Tent./Final Map, Vertical Design, SoC, TCO
- The preferred schedule software is Microsoft Project

Schedule submission:

Developer will submit each schedule to the following address:

Office of Economic and Workforce Development
Public Works Infrastructure Taskforce
City Hall, Room 496
Attn: Housing Hub/3333 California Project
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

# Exhibit L

## Child Care Program

1. Developer to provide approximately 14,000 gross square feet of rentable area for a child care facility built on the Walnut Child Care Parcel with an adjacent open space for child care use (as required by local/State law). Developer will deliver the child care facility in warm shell condition (for example, with the space demised to meet occupancy separation requirements (minus finishes on wall, floor and ceiling), stubs for standard utilities, path to a location for mechanical equipment, storefront and rear access as required, and other items required to obtain a temporary certificate of occupancy to allow tenant to proceed with their improvements). The child care provider would specify the tenant improvements necessary for the space, which Developer would not be responsible for providing under this Agreement.

2. A State-licensed child care provider shall operate in the space under the following terms, provided that all Later Approvals and applicable operating and licensing and other requirements as may be necessary are first obtained.
    a. Provider shall comply with all State guidelines and applicable local guidelines for operating a child care facility.
    b. Provider shall operate a facility licensed to serve approximately 175 children with the final number to be determined based on state and any local licensing requirements.
    c. In accordance with Planning Code Section 414.13, Developer shall include (and require compliance with) a provision in its lease with the child care provider requiring the provider to reserve at least ten percent (10%) of the maximum capacity of the child care facility (as determined by the license for the facility issued by the California Department of Social Services) to be affordable to children of households of low income. Operators are encouraged to work with the San Francisco Office of Early Care and Education to learn about Early Learning Scholarships for low- and moderate-income families as well as other operator resources.
    d. Programs shall serve a broad range of age groups, including infants and toddlers.
    e. Slots shall be made available to the general public on the same terms and conditions as those for Project residents, employees and users.

3. The operating term for the child care facility shall equal the life of the Walnut Building. Subject to the provisions of this Exhibit L, the Developer shall use commercially reasonable efforts to lease the space to a child care operator at all times for the life of the Walnut Building. The operating term may be fulfilled by more than one child care operator

over the life of the Walnut Building. The Developer shall comply with the terms below during initial leasing and periods of operator turnover and/or vacancy periods.

a. (i) On the earlier to occur of (A) applying for a First Construction Document (as defined in San Francisco Building Code Section 107A.13.1(a)(8)) for the Walnut Building and (B) 15 business days before initially offering the facility for rent and (ii) within 15 business days following the expiration or termination of a child care operator's lease for the facility, the owner of the facility shall notify governmental and nonprofit entities that can assist in publicizing the availability of the facility (the "Child Care Marketers") of the opportunity to lease it, including, at a minimum, the following entities: the San Francisco Office of Early Care and Education (or any successor agency), the Family Child Care Association of San Francisco, the Children's Council, and Wu Yee Children's Services.

b. If the child care space remains vacant for more than three years after DBI has issued of a first certificate of occupancy (including any temporary certificate of occupancy) for the Walnut Building despite Developer's commercially reasonable efforts to lease it at prevailing child care facility market terms (comparable to other similarly-sized and geographically proximate licensed child care facilities) to an initial child care operator, and Developer wishes to be released from its obligation to lease the facility to a child care operator, then Developer shall have the right to pay City an amount equal to $2,101,489.55 [*in lieu child care facility fee that would otherwise be due at the Effective Date if the fee was not waived*], proportionately adjusted to reflect any increase between the published CPI Index in effect as of the Effective Date and the published CPI Index in effect at the time such payment is made (as adjusted, the "Base Fee"), plus an amount equal to 10% of the Base Fee, for deposit in the Child Care Capital Fund established under Planning Code Section 414.14. On paying such amount to City under this subsection, the Developer may use the facility for any use permitted under the Project SUD.

c. If after having leased the facility to at least one child care operator, the child care space remains vacant for more than three years after the termination or earlier expiration of the most recent child care operator's lease despite Developer's commercially reasonable efforts to lease the facility at prevailing child care facility market terms (comparable to other similarly-sized and geographically proximate licensed child care facilities) to a child care operator, and Developer wishes to be released from its obligation to lease the facility to a child care operator, then Developer shall have the right to pay City an amount equal to the Base Fee prorated over a fifteen (15) year period, with a credit for any time the facility was operated by a child care provider in compliance with this Agreement. On paying such amount to City under this subsection, the Developer may use the facility for any use permitted under the Project SUD.

4. Developer or subsequent owner of the Walnut Building cannot charge rent (including security, common building charges and utilities, etc.) to the child care operator that exceeds prevailing market rent comparable to other similarly-sized and geographically proximate licensed child care facilities.

5. Developer or subsequent owner of the Walnut Building shall execute a Notice of Special Restrictions to dedicate the space for child care use ("NSR"). The NSR shall incorporate the requirements of this Exhibit L, be in a form approved by Developer and City (which approval shall not be unreasonably withheld or conditioned), and recorded against the Walnut Child Care Parcel at the earlier to occur of the time that the final map that includes the Walnut Child Care Parcel is recorded or the First Construction Document is issued for the Building to be constructed on the Walnut Child Care Parcel.

6. In consideration of this community benefit, the Project shall not be subject to the residential child care fee (Planning Code Sec. 414A) and that fee shall be waived.

7. Phasing/performance requirements for the child care facility will be detailed in Schedule 1 (Community Benefits Linkages and Impact Fees). If DBI has not issued a certificate of occupancy (including any temporary certificate of occupancy) for the child care facility prior to the expiration of the Term but Developer has received First Construction Document for any Building, then Developer shall pay to City an amount equal to the Base Fee plus 20% of the Base Fee at the end of the Term.

# Exhibit M

## SUD Ordinance and Conditional Use/Planned Unit Development Exceptions

[to be attached]

# Schedule 1

## Community Benefits Linkages and Impact Fees Schedule

Pursuant to Section 4.1 of the Agreement, the Developer's Community Benefits obligations are tied to specific Buildings or number of Market Rate Units (as defined in Exhibit D) that will be developed over the course of the Project and during the Term of the Agreement. The linkages between the specific Community Benefits and the associated Buildings or Market Rate Units are detailed below, as well as within any referenced exhibits. The development impact fees that apply to the Project are detailed below.

COMMUNITY BENEFITS

1. **Publicly Accessible Private Improvements**. The Developer shall complete the Publicly Accessible Private Improvements described in Exhibit C and generally depicted in Attachment C-1 prior to obtaining a first certificate of occupancy (including any temporary certificate of occupancy) for any non-retail portion, if any, of specific Buildings as described below (or, in the case of Publicly Accessible Private Improvements to be delivered only after completion of more than one Building, then prior to obtaining the first certificate of occupancy for the later Building); provided, however, that if Developer wishes to receive a first certificate of occupancy (or the equivalent thereof) for a Building (or later Building, as applicable) before completing its associated Publicly Accessible Private Improvement, then, notwithstanding anything to the contrary in this Schedule, Developer may complete this obligation after that certificate of occupancy for the associated Building (or later Building, as applicable) by providing to the City, prior to issuance of the first certificate of occupancy for that Building (or later Building, as applicable), a surety performance bond or other security in form acceptable to the City and in an amount equal to 100% of the reasonably estimated cost to complete that Publicly Accessible Private Improvement, and shall diligently and continuously pursue that Publicly Accessible Private Improvement to completion following which such bond will be released.
    a. California Plaza – with the completion of Plaza A Building
    b. Cypress Square – with the completion of Plaza B Building
    c. Cypress Stairs – with the later completion of either Plaza A Building or Plaza B Building
    d. Mayfair Walk – the Mayfair Walk extends the entire width of the Project Site and shall be completed in segments tied to the completion of the adjacent Buildings as depicted in Attachment C-1 (the later of Mayfair Building or Plaza A Building, the later of Plaza B Building or Center A Building, and the completion of Center B Building)
    e. Presidio Overlook – with the completion of Center Building B

f. Pine Street Steps – with the completion of Center Building B
g. Walnut Walk North – with the later completion of Center A Building or Center B Building
h. Walnut Walk South – with the later completion of the Euclid Building or Masonic Building
i. Walnut Drive and Walnut Court – with the later completion of Plaza B Building or Walnut Affordable Housing Building (as defined in Exhibit D)
j. Euclid Green – with the completion of the Project's final Building; provided, however, that if the Developer receives a first certificate of occupancy (including any temporary certificate of occupancy) for any Building(s) without completing all proposed Buildings during the Term, then Euclid Green shall be completed by the end of the Term.
k. Pedestrian Access – if Developer receives a first certificate of occupancy (including any temporary certificate of occupancy) for any Building(s) without completing all proposed Buildings during the Term that would otherwise require the completion of Walnut Walk North, Walnut Walk South, and Mayfair Walk as described above, then Developer, in conjunction with the Planning Department, shall design an alternative plan for pedestrian access that seeks to achieve similar pedestrian access and widths as Walnut Walk North, Walnut Walk South, and Mayfair Walk, but takes into account then then-current on-site conditions, including locations of improvements and the Project Site's topography, and the Developer shall construct such alternative plan improvements prior to the end of the Term.

2. **Streetscape Improvements.** The Developer shall complete each of the Streetscape Improvements described in Exhibit C and generally depicted in Attachment C-1 (and as will be more specifically set forth in the building permit application for the Streetscape Improvements associated with the applicable Building) before obtaining any first certificate of occupancy (including any temporary certificate of occupancy) for the applicable Building (or later of adjacent Buildings, if applicable) for such Streetscape Improvement as depicted in Attachment C-1; provided, however, that if Developer wishes to receive a first certificate of occupancy for a Building before completing its associated Streetscape Improvement, then, notwithstanding anything to the contrary in this Schedule, Developer may complete its associated Streetscape Improvement after that certificate of occupancy by providing a surety performance bond or other security to City, prior to issuance of the first certificate of occupancy for that Building, in form acceptable to the City and in an amount equal to 100% of the reasonably estimated cost to complete that Streetscape Improvement, and the Developer shall diligently and continuously pursue that Streetscape Improvement to completion following which the bond shall be released. Such requirement shall be in addition to any security or bonding requirements required under

the street improvement permit issued by City's Department of Public Works for the performance of such Streetscape Improvement.

3. **Maintenance and Operation.** The Developer shall cause the appropriate party (e.g., a master association) to enter into agreements for the ongoing operation, maintenance and repair of the Publicly Accessible Private Improvements to the standards described in Attachment C-2 and Attachment C-3.

4. **Housing Plan.** The Project's BMR Units shall be complete as set forth in Exhibit D, the Affordable Housing Program.

5. **AWSS Community Benefit Fee.** The Project's AWSS Community Benefit Fee shall be paid as set forth in Schedule 2.

6. **Workforce Agreement.** The workforce requirements will apply to the Project as set forth in Exhibit I, the Workforce Program.

7. **Transportation Demand Management.** The Transportation Demand Management Plan shall be implemented as set forth in Exhibit J, the Transportation Exhibit, and the Approvals described in Exhibit E.

8. **Child Care Program.** The Developer shall have constructed the child care facility to warm shell condition, as described in Exhibit L, on the Walnut Child Care Parcel (as defined in Exhibit D) by the earlier of receiving a first certificate of occupancy (including any temporary certificate of occupancy) for the Walnut Affordable Housing Building (as defined in Exhibit D) and obtaining a first certificate of occupancy (including any temporary certificate of occupancy) for more than three hundred eighty-six (386) Market Rate Units (as defined in Exhibit D). In addition, if the Developer receives a first certificate of occupancy (or a temporary certificate of occupancy) for any Building, the Developer must obtain a first certificate of occupancy (or a temporary certificate of occupancy) for the child care facility before the expiration of the Term. The child care facility shall be operated on the terms described in Exhibit L.

DEVELOPMENT IMPACT FEES

The following development impact fees apply to the Project: Transportation Sustainability Fee (Planning Code Section 411A) and Jobs Housing Linkage Fee (Section 413). The Residential Child Care Impact Fee (Planning Code Section 414A) and the Affordable Housing Fee (Planning

Code Section 415) have been waived in consideration of the on-site provision of a child care facility and affordable housing as described in Exhibit L and Exhibit D, respectively.

## Schedule 2

### AWSS Community Benefit Fee

1. Background and Need

The Auxiliary Water Supply System ("AWSS") is a water distribution system used by the San Francisco Fire Department ("SFFD") for fire suppression. The AWSS delivers water under high pressure for firefighting and is independent from the San Francisco's domestic water system. The design elements of the AWSS, such as restrained pipeline joints and earthquake resistant ductile iron pipe make it more resistant to earthquake damage. The San Francisco Public Utilities Commission ("SFPUC") operates and maintains the AWSS citywide.

Life safety is the paramount concern of the SFFD, followed by the protection of property. When new developments are proposed in San Francisco with high density structures, adequate and readily available water supplies for firefighting are imperative. The Project is a proposed new development within San Francisco which will have both high occupancy and a significant amount of wood frame construction. The closest AWSS main runs east to west on Sacramento Street with AWSS/High Pressure ("HP") hydrants at each corner from Presidio Avenue to Arguello Boulevard. The closest HP hydrant to the entrance of the proposed Project is currently located at the northwest corner of Walnut and Sacramento Streets, approximately 400 feet away from the Project's closest property line. SFFD fire engines carry a maximum of 1,000 feet of fire hose.

One new HP fire hydrant shall be installed on California Street at the southern intersection of Walnut and California Streets with a connection back to the AWSS main on Sacramento Street in order for SFFD to have backup emergency water supply for firefighting and rescue operations at the Project. This HP hydrant would allow one fire engine to obtain AWSS water supply and immediately initiate firefighting and rescue operations to any area within the development upon arrival. During a greater alarm fire when fire operations demand more water than a domestic water hydrant can supply, the AWSS HP hydrant will support the need for additional water volume and pressure. Following a major event, when additional fire engines are not available, a fire crew can use the HP hydrants and still have ample water pressure and volume for firefighting operations.

2. AWSS Requirement for 3333 California Project

The SFFD and SFPUC have analyzed the Project and determined that AWSS is not required or appropriate for installation within the Project's property line. This is due to (1) confirmation that a standard 1,000 fire hose is able to serve the entire site from one new HP hydrant at the southern intersection of Walnut and California Streets; and (2) the fact that the Project will be

privately-owned and no public right of ways will be created within which AWSS could be installed, owned, and maintained by SFPUC.

The SFPUC and SFFD have determined that in order to provide the Project with a backup emergency water supply, the following new AWSS infrastructure (the "AWSS Scope") will be required: a new HP hydrant on the public sidewalk at Walnut and California Streets, and a connection to be installed on Walnut Street from the new HP hydrant to the existing AWSS main running east to west on Sacramento Street. This new infrastructure will be designed and installed by the SFPUC, with contributory fair-share funding paid by the Developer.

The Developer and SFPUC will coordinate on the installation and timing of installation of this AWSS Scope in relation to the ultimate development phasing and improvements. The intent is to have the AWSS Scope coordinated with Project's street improvements on California Street or adjacent streets to minimize or eliminate the need to demolish newly constructed improvements related to the Project.

3. AWSS Community Benefit Fee

The AWSS Community Benefit Fee will offset the cost of bringing AWSS to the Project boundary. The SFPUC has developed an initial capital cost estimate of the AWSS Scope (including contingencies) totaling approximately $1,055,000 in 2018 dollars. In consideration of the AWSS Scope that the Project requires to be adequately served and protected by SFFD, the Developer shall pay an AWSS Community Benefit Fee of $1,055,000.

4. Fee Payment Terms

The Developer shall pay the AWSS Community Benefit Fee as a proportion of Gross Square Feet ("GSF") developed in the Project. Based on the Project's total of 1,434,098 GSF, the Developer shall pay the AWSS Community Benefit Fee at a rate of $.735 per GSF. Payment shall be made to SFPUC on a Building by Building basis and shall be determined by the total GSF of each Building. Payment shall be due prior to and as a condition to the Developer obtaining a temporary Certificate of Occupancy or Certificate of Final Completion for each Building.

# EXHIBIT B:

# PLANS

# PLANNING APPLICATION
# RE-SUBMITTAL 3

**AUGUST 20, 2019**

PLANNING APPLICATION RESUBMITAL 2 - JULY 3, 2019
PLANNING APPLICATION RESUBMITAL 1 - FEBRUARY 22, 2019
PLANNING APPLICATION SUBMITAL - AUGUST 1, 2017


DEVELOPMENT TEAM
LAUREL HEIGHTS PARTNERS, LLC
CONTACT: DON BRAGG
415.395.0880
dbragg@pradogroup.com

LANDSCAPE
MEYER STUDIO LAND ARCHITECTS
CONTACT: DAVID MEYER
510.559.2973
david@ms-la.com

URBAN PLANNING
JAMES CORNER FIELD OPERATIONS
CONTACT: JAMES CORNER
212.433.1450
jcorner@fieldoperations.net

ARCHITECTURE
BAR ARCHITECTS
CONTACT: DAVID ISRAEL
415.263.5700
disrael@bararch.com

ARCHITECTURE
JENSEN ARCHITECTS
CONTACT: MARK JENSEN
415.348.9650
markj@jensen-architects.com

ARCHITECTURE
SOLOMON CORDWELL BUENZ
CONTACT: STRACHAN FORGAN
415.216.2432
strachan.forgan@scb.com

CIVIL
BKF ENGINEERS
CONTACT: ERIC GIROD
925.396.7751
egirod@bkf.com

SUSTAINABILITY+LOGISTICS
ARUP
CONTACT: COLE ROBERTS
415.946.0287
cole.roberts@arup.com

**GENERAL -**

| | | |
|---|---|---|
| X | G0.00A | SHEET INDEX |
| X | G0.00B | SHEET INDEX (CONT'D) |
| X | G0.01 | TITLE SHEET |
| X | G1.00 | VICINITY MAP |
| X | G1.01 | VICINITY MAP + EXISTING SITE IMAGES |
| X | G1.02 | EXISTING CONTEXT |
| X | G1.03 | URBAN PLANNING DIAGRAMS |
| X | G1.04 | SITE PLAN - EXISTING |
| X | G1.05 | KEYING SITE PLAN - PROPOSED |
| X | G2.01 | PROPOSED SITE VIEWS |
| X | G2.02 | PROPOSED SITE VIEWS |
| X | G2.03 | PROPOSED SITE VIEWS |
| X | G2.04 | REFERENCE SITE ELEVATIONS - EXISTING |
| X | G2.05 | REFERENCE SITE ELEVATIONS - EXISTING |
| X | G2.06 | REFERENCE SITE ELEVATIONS - PROPOSED |
| X | G2.07 | REFERENCE SITE ELEVATIONS - PROPOSED |
| X | G2.08 | REFERENCE SITE SECTIONS |
| X | G3.01a | PROJECT DATA - SUMMARY |
| X | G3.01b | PROJECT DATA - PARKING SUMMARY |
| X | G3.01c | PROJECT DATA - AREAS BY BUILDING |
| X | G3.01d | PROJECT DATA - UNIT COUNT BY BUILDING |
| X | G3.02 | PLANNING CODE DIAGRAMS - SEC. 130 |
| X | G3.03 | PLANNING CODE DIAGRAMS - SEC. 135 |
| X | G3.04 | PLANNING CODE DIAGRAMS - HEIGHT |
| X | G3.05 | PLANNING CODE DIAGRAMS - UNIT EXPOSURE |
| X | G4.01 | SUSTAINABILITY |
| X | G4.02 | SUSTAINABILITY |

**CIVIL -**

| | | |
|---|---|---|
| X | C1.01 | EXISTING SITE TOPO |
| X | C1.02 | EXISTING UTILITY PLAN |
| X | C2.01 | EXISTING AND POPOSED BUILDING OVERLAY |
| X | C2.02 | PROPOSED SITE PLAN AND HORIZONTAL CONTROL PLAN |
| X | C3.00 | SCHEMATIC ROUGH GRADING & EVACUATION PLAN |
| X | C3.01 | PROPOSED WET UTILITY PLAN |
| X | C4.00 | TRUCK TURNING INDEX |
| X | C4.01 | TRUCK TURNING SU-30 |
| X | C4.02 | TRUCK TURNING WB-40 |
| X | C4.03 | TRUCK TURNING WB-50 |
| X | C4.04 | TRUCK TURNING FIRE ENGINE |
| X | C4.05 | TRUCK TURNING FIRE LADDER |
| X | C4.06 | TRUCK TURNING BUS-40 |
| X | C4.07 | TRUCK TURNING WALNUT EXTENSION |

**LANDSCAPE -**

| | | |
|---|---|---|
| X | L0.00 | SITE DIAGRAM- CONNECTIVITY |
| X | L0.01 | SITE DIAGRAM- OPEN SPACE NETWORK |
| X | L1.01 | SITE DIAGRAM-SITE ACCESS |
| X | L1.02 | SITE DIAGRAM-STREET PARKING |
| X | L1.03 | SITE DIAGRAM-STREET TREES |
| X | L1.04 | SITE DIAGRAM-PUBLIC BIKE PARKING |
| X | L1.05 | STREETSACPE PLAN |
| X | L1.06 | STREETSCAPE SECTIONS |
| X | L2.00 | LANDSCAPE SITE PLAN |
| X | L2.01 | ENLARGED PLAN – CYPRESS SQUARE / CALIFORNIA STREETSCAPE IMPROVEMENTS |
| X | L2.01A | CYPRESS SQUARE - PERSPETIVE |
| X | L2.01B | CYPRESS SQUARE – PERSPETIVE AT PRIVATE TERRACE |
| X | L2.01C | MAYFAIR WALK WEST - PERSPETIVE |
| X | L2.02 | ENLARGED PLAN – WALNUT COURT STREETSCAPE IMPROVEMENTS |
| X | L2.02A | WALNUT COURT – PERSPECTIVE |
| X | L2.02B | CENTRAL WALNUT WALK - PERSPETIVE |
| X | L2.03 | ENLARGED PLAN – PINE STREET STEPS STREETSCAPE IMPROVEMENTS |
| X | L2.03A | MAYFAIR WALK EAST - PERSPETIVE |
| X | L2.03B | PINE PLAZA AND STEPS - PERSPETIVE |
| X | L2.04 | ENLARGED PLAN – MASONIC PLAZA |
| X | L2.04A | MASONIC PLAZA - PERSPETIVE |
| X | L2.05 | ENLARGED PLAN – CORNER PLAZA STREETSCAPE IMPROVEMENTS |
| X | L2.05A | WALNUT WALK SOUTH - PERSPETIVE |
| X | L2.06 | ENLARGED PLAN – EUCLID GREEN STREETSCAPE IMPROVEMENTS |
| X | L2.06A | LAUREL TOWNHOMES - PERSPETIVE |
| X | L2.06B | EUCLID GREEN - PERSPETIVE |

**ARCHITECTURE -**

| | | |
|---|---|---|
| X | A1.00 | SITE BELOW-GRADE PARKING DIAGRAM |
| X | A1.01 | CALIFORNIA ST. PARKING GARAGE - LEVEL B3 |
| X | A1.02 | CALIFORNIA ST. PARKING GARAGE - LEVEL B2 |
| X | A1.03 | CALIFORNIA ST. PARKING GARAGE - LEVEL B1 |
| X | A1.04 | LOADING PLAN - LEVEL B3 |
| X | A1.05 | LOADING PLAN - LEVEL B2 |
| X | A1.06 | REFUSE PLAN - LEVEL B3 |
| X | A1.07 | REFUSE PLAN - LEVEL B2 |
| X | A2.00 | "PLAZA BLDG A" BUILDING PLANS - LEVEL B1 AND 1 |
| X | A2.01 | "PLAZA BLDG A" BUILDING PLANS - LEVEL 2 AND 3 |
| X | A2.02 | "PLAZA BLDG A" BUILDING PLANS - ROOF |
| X | A2.11 | "PLAZA BLDG A" BUILDING ELEVATION |
| X | A2.12 | "PLAZA BLDG A" BUILDING ELEVATION |
| X | A2.13 | "PLAZA BLDG A" BUILDING ELEVATION |
| X | A2.14 | "PLAZA BLDG A" BUILDING ELEVATION |
| X | A2.21 | "PLAZA BLDG A" BUILDING SECTION |
| X | A2.22 | "PLAZA BLDG A" BUILDING SECTION |
| X | A2.30 | "PLAZA BLDG A" SAMPLE UNIT PLANS |
| X | A2.41 | "PLAZA BLDG A" OPEN SPACE DIAGRAMS |
| X | A2.42 | "PLAZA BLDG A" OPEN SPACE DIAGRAMS |
| X | A2.60 | "PLAZA BLDG A" PERSPECTIVES |
| X | A3.00 | "PLAZA BLDG B" BUILDING PLANS - LEVEL B1 |
| X | A3.01 | "PLAZA BLDG B" BUILDING PLANS - LEVEL 1 & 2 |
| X | A3.02 | "PLAZA BLDG B" BUILDING PLANS - LEVEL 3 & 4 |
| X | A3.03 | "PLAZA BLDG B" BUILDING PLANS - ROOF |
| X | A3.11 | "PLAZA BLDG B" BUILDING ELEVATION |
| X | A3.12 | "PLAZA BLDG B" BUILDING ELEVATION |
| X | A3.13 | "PLAZA BLDG B" BUILDING ELEVATION |
| X | A3.14 | "PLAZA BLDG B" BUILDING ELEVATION |
| X | A3.15 | "PLAZA BLDG B" BUILDING ELEVATION |
| X | A3.16 | "PLAZA BLDG B" BUILDING ELEVATION |
| X | A3.21 | "PLAZA BLDG B" BUILDING SECTION |
| X | A3.22 | "PLAZA BLDG B" BUILDING SECTION |
| X | A3.23 | "PLAZA BLDG B" BUILDING SECTION |
| X | A3.24 | "PLAZA BLDG B" BUILDING SECTION |
| X | A3.30 | "PLAZA BLDG B" SAMPLE UNIT PLANS |
| X | A3.41 | "PLAZA BLDG B" OPEN SPACE DIAGRAMS |
| X | A3.42 | "PLAZA BLDG B" OPEN SPACE DIAGRAMS |
| X | A3.60 | "PLAZA BLDG B" PERSPECTIVES |
| X | A4.00 | "WALNUT" OFFICE BUILDING PLANS - LEVEL B3 |
| X | A4.01 | "WALNUT" OFFICE BUILDING PLANS - LEVEL B2 |
| X | A4.02 | "WALNUT" OFFICE BUILDING PLANS - LEVEL B1 |
| X | A4.03 | "WALNUT" OFFICE BUILDING PLANS - LEVEL 1 |
| X | A4.04 | "WALNUT" OFFICE BUILDING PLANS - LEVEL 2 |
| X | A4.05 | "WALNUT" OFFICE BUILDING PLANS - ROOF |
| X | A4.11 | "WALNUT" OFFICE BUILDING ELEVATION |

**ARCHITECTURE (CONT'D) -**

| | | |
|---|---|---|
| X | A4.12 | "WALNUT" OFFICE BUILDING ELEVATION |
| X | A4.13 | "WALNUT" OFFICE BUILDING ELEVATION |
| X | A4.14 | "WALNUT" OFFICE BUILDING ELEVATION |
| X | A4.15 | "WALNUT" OFFICE BUILDING ELEVATION |
| X | A4.21A | "WALNUT" OFFICE BUILDING SECTION |
| X | A4.21B | "WALNUT" OFFICE BUILDING SECTION |
| X | A4.22 | "WALNUT" OFFICE BUILDING SECTION |
| X | A4.23 | "WALNUT" OFFICE BUILDING SECTION |
| X | A4.24 | "WALNUT" OFFICE BUILDING SECTION |
| X | A4.25 | "WALNUT" OFFICE BUILDING SECTION |
| X | A4.50 | "CALIFORNIA STREET BLDGS" MATERIAL PALETTE |
| X | A6.00 | EXISTING CONDITIONS + PROPOSED ADAPTION |
| X | A6.01 | ADAPTIVE REUSE STRATEGY |
| X | A6.02 | CENTER A & B - LEVEL B3 PLAN |
| X | A6.03 | CENTER A & B - LEVEL B2 PLAN |
| X | A6.04 | CENTER A & B - LEVEL B1 PLAN |
| X | A6.05 | CENTER A & B - LEVEL L1 PLAN |
| X | A6.06 | CENTER A & B - LEVEL L2 PLAN |
| X | A6.07 | CENTER A & B - LEVEL L3 PLAN |
| X | A6.08 | CENTER A & B - LEVEL L4 PLAN |
| X | A6.09 | CENTER A & B - LEVEL L5 PLAN |
| X | A6.10 | CENTER A & B - LEVEL L6 PLAN |
| X | A6.11 | CENTER A & B - LEVEL L7 PLAN |
| X | A6.12 | CENTER A & B - ROOF PLAN |
| X | A6.13 | CENTER B - NORTH ELEVATION |
| X | A6.14 | CENTER A - NORTH ELEVATION |
| X | A6.15 | CENTER A - SOUTH ELEVATION |
| X | A6.16 | CENTER B - SOUTH ELEVATION |
| X | A6.17 | CENTER A - WEST ELEVATION |
| X | A6.18 | CENTER B - WEST ELEVATION |
| X | A6.19 | CENTER A - EAST ELEVATION |
| X | A6.20 | CENTER B - EAST ELEVATION |
| X | A6.21 | CENTER A &B - EXISTING & PROPOSED SITE SECTIONS |
| X | A6.22 | CENTER A &B - EXISTING & PROPOSED SITE SECTIONS |
| X | A6.30 | CENTER A & B - ILLUSTRATIVE UNIT PLANS |
| X | A6.40 | CENTER A & B - BUILDING OPEN SPACE - LEVEL B2 PLAN |
| X | A6.41 | CENTER A & B - BUILDING OPEN SPACE - LEVEL L1 PLAN |
| X | A6.42 | CENTER A & B - BUILDING OPEN SPACE - LEVEL L3 PLAN |
| X | A6.43 | CENTER A & B - BUILDING OPEN SPACE - LEVEL L4 PLAN |
| X | A6.44 | CENTER A & B - BUILDING OPEN SPACE - LEVEL L5 PLAN |
| X | A6.45 | CENTER A & B - BUILDING OPEN SPACE - LEVEL L6 PLAN |
| X | A6.46 | CENTER A & B - UNIT EXPOSURE SECTIONS |
| X | A6.47 | CENTER A & B - UNIT EXPOSURE SECTIONS |
| X | A6.50 | CENTER A & B - MATERIAL PALETTE |
| X | A6.60 | CENTER A & B - PERSPECTIVES |
| X | A6.61 | CENTER A & B - PERSPECTIVES |
| X | A6.62 | CENTER A & B - PERSPECTIVES |
| X | A7.01 | MASONIC BUILDING PLAN - B1 |
| X | A7.02 | MASONIC BUILDING PLAN - LEVEL 1 |
| X | A7.03 | MASONIC BUILDING PLAN - LEVEL 2 |
| X | A7.04 | MASONIC BUILDING PLAN - LEVEL 3 |
| X | A7.05 | MASONIC BUILDING PLAN - LEVEL 4 |
| X | A7.06 | MASONIC BUILDING PLAN - LEVEL 5 |
| X | A7.07 | MASONIC BUILDING PLAN -LEVEL 6 |
| X | A7.08 | MASONIC BUILDING ROOF PLAN |
| X | A7.09 | MASONIC BUILDING ROOF PLAN |
| X | A7.11 | MASONIC BUILDING ELEVATIONS |
| X | A7.12 | MASONIC BUILDING ELEVATIONS |
| X | A7.21 | MASONIC BUILDING SECTIONS |
| X | A7.22 | MASONIC BUILDING SECTIONS |

**ARCHITECTURE (CONT'D) -**

| | | |
|---|---|---|
| X | A7.23 | MASONIC BUILDING SECTIONS |
| X | A7.24 | MASONIC BUILDING SECTIONS |
| X | A7.25 | MASONIC BUILDING SECTIONS |
| X | A7.30 | MASONIC TYPICAL UNIT PLANS |
| X | A7.41 | MASONIC BUILDING OPEN SPACE - LEVEL 1 |
| X | A7.42 | MASONIC BUILDING OPEN SPACE - LEVEL 2 |
| X | A7.43 | MASONIC BUILDING OPEN SPACE - LEVEL 4 |
| X | A7.44 | MASONIC BUILDING OPEN SPACE - LEVEL 5 |
| X | A7.45 | MASONIC BUILDING OPEN SPACE - LEVEL 6 |
| X | A7.46 | MASONIC BUILDING OPEN SPACE - ROOF |
| X | A7.50 | MASONIC MATERIAL PALETTE |
| X | A7.60 | MASONIC BUILDING PERSPECTIVE |
| X | A8.01 | EUCLID BUILDING PLAN - LEVEL 1 |
| X | A8.02 | EUCLID BUILDING PLAN - LEVEL 2 |
| X | A8.03 | EUCLID BUILDING PLAN - LEVEL 3 |
| X | A8.04 | EUCLID BUILDING PLAN - LEVEL 4 |
| X | A8.05 | EUCLID BUILDING PLAN - LEVEL 5 |
| X | A8.06 | EUCLID BUILDING PLAN - LEVEL 6 |
| X | A8.07 | EUCLID BUILDING PLAN - ROOF PLAN |
| X | A8.11 | EUCLID BUILDING ELEVATIONS |
| X | A8.12 | EUCLID BUILDING ELEVATIONS |
| X | A8.13 | EUCLID BUILDING ELEVATIONS |
| X | A8.21 | EUCLID BUILDING SECTIONS |
| X | A8.22 | EUCLID BUILDING SECTIONS |
| X | A8.23 | EUCLID BUILDING SECTIONS |
| X | A8.24 | EUCLID BUILDING SECTIONS |
| X | A8.25 | EUCLID BUILDING SECTIONS |
| X | A8.30 | EUCLID TYPICAL UNIT PLANS |
| X | A8.41 | EUCLID BUILDING OPEN SPACE - LEVEL 1 |
| X | A8.42 | EUCLID BUILDING OPEN SPACE - LEVEL 2 |
| X | A8.43 | EUCLID BUILDING OPEN SPACE - LEVEL 3 |
| X | A8.44 | EUCLID BUILDING OPEN SPACE - LEVEL 6 |
| X | A8.50 | EUCLID MATERIAL PALETTE |
| X | A8.60 | EUCLID BUILDING PERSPECTIVE |
| X | A8.61 | EUCLID GREEN PERSPECTIVE |
| X | A9.01 | MAYFAIR BUILDING PLANS - LEVEL B1 & 1 |
| X | A9.02 | MAYFAIR BUILDING PLANS - LEVEL 2 & 3 |
| X | A9.03 | MAYFAIR BUILDING PLANS - LEVEL 4 & ROOF |
| X | A9.04 | MAYFAIR BUILDING PLANS - ROOF |
| X | A9.11 | MAYFAIR BUILDING ELEVATIONS |
| X | A9.12 | MAYFAIR BUILDING ELEVATIONS |
| X | A9.21 | MAYFAIR BUILDING SECTIONS |
| X | A9.22 | MAYFAIR BUILDING SECTIONS |
| X | A9.30 | MAYFAIR TYPICAL UNIT PLANS |
| X | A9.41 | MAYFAIR BUILDING OPEN SPACE - LEVEL 1 & 3 |
| X | A9.42 | MAYFAIR BUILDING OPEN SPACE - LEVEL 4 & ROOF |
| X | A9.50 | MAYFAIR MATERIAL PALETTE |
| X | A9.60 | MAYFAIR PERSPECTIVE |
| X | A10.01 | LAUREL DUPLEX PLANS |
| X | A10.02 | LAUREL DUPLEX PLANS |
| X | A10.03 | LAUREL DUPLEX PLANS |
| X | A10.04 | LAUREL DUPLEX PLANS |
| X | A10.11 | LAUREL DUPLEX ELEVATIONS |
| X | A10.12 | LAUREL DUPLEX ELEVATIONS |
| X | A10.13 | LAUREL DUPLEX ELEVATIONS |
| X | A10.21 | LAUREL DUPLEX SECTIONS |
| X | A10.22 | LAUREL DUPLEX SECTIONS |
| X | A10.23 | LAUREL DUPLEX SECTIONS |
| X | A10.24 | LAUREL DUPLEX SECTIONS |
| X | A10.25 | LAUREL DUPLEX SECTIONS |
| X | A10.40 | LAUREL DUPLEX OPEN SPACE |
| X | A10.50 | LAUREL MATERIAL PALETTE |
| X | A10.60 | LAUREL PERSPECTIVE |

**EIR VARIANT 1**

**GENERAL -**

X G0.01v TITLE SHEET - VARIANT
X VAR.00 KEYING SITE PLAN - EIR VARIANT 1
X VAR.01a EIR VARIANT 1: DATA
X VAR.01b EIR VARIANT 1: PARKING SUMMARY
X VAR.02 EIR VARIANT 1: SITE ELEVATIONS

**LANDSCAPE -**

X VAR.04 LANDSCAPE SITE PLAN

**ARCHITECTURE -**

X VAR.10 EIR VARIANT 1: SITE - BELOW GRADE PARKING DIAGRAM
X VAR.11 EIR VARIANT 1: CALIF. ST. PARKING GARAGE - LEVEL B3
X VAR.12 EIR VARIANT 1: CALIF. ST. PARKING GARAGE - LEVEL B2
X VAR.13 EIR VARIANT 1: CALIF. ST. PARKING GARAGE - LEVEL B1
X VAR.14 EIR VARIANT 1: "WALNUT" BUILDING PLANS - B3
X VAR.15 EIR VARIANT 1: "WALNUT" BUILDING PLANS - B2
X VAR.16 EIR VARIANT 1: "WALNUT" BUILDING PLANS - B1
X VAR.17 EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 1
X VAR.18 EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 2
X VAR.19 EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 3-4
X VAR.20 EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 5
X VAR.21 EIR VARIANT 1: "WALNUT" BUILDING PLANS - ROOF
X VAR.22 EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS
X VAR.23 EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS
X VAR.24 EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS
X VAR.25 EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS
X VAR.26 EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS
X VAR.31 EIR VARIANT 1: WALNUT SECTIONS
X VAR.32 EIR VARIANT 1: WALNUT SECTIONS
X VAR.33 EIR VARIANT 1: WALNUT SECTIONS
X VAR.34 EIR VARIANT 1: WALNUT SECTIONS
X VAR.41 EIR VARIANT 1: OPEN SPACE
X VAR.42 EIR VARIANT 1: OPEN SPACE
X VAR.43 EIR VARIANT 1: OPEN SPACE
X VAR.44 EIR VARIANT 1: PLANNING CODE DIAGRAMS
X VAR.60 EIR VARIANT 1: "WALNUT" RESIDENTIAL PERSPECTIVES

*"X" DENOTES SHEET IS INCLUDED IN SUBMITTAL*

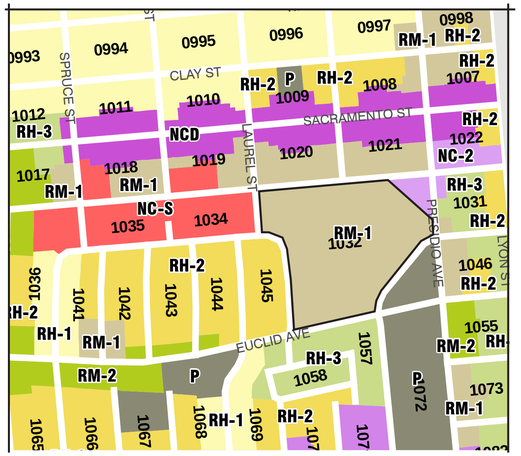
## PROJECT DESCRIPTION

THE 3333 CALIFORNIA STREET MIXED-USE PROJECT (PROPOSED PROJECT) SITE IS A 446,468-SQUARE-FOOT, OR AN APPROXIMATELY 10.25-ACRE PARCEL BOUNDED BY CALIFORNIA STREET TO THE NORTH, PRESIDIO AVENUE TO THE EAST, MASONIC AVENUE TO SOUTHEAST, EUCLID AVENUE TO THE SOUTH, AND LAUREL STREET/MAYFAIR DRIVE TO THE WEST, IN SAN FRANCISCO'S PRESIDIO HEIGHTS NEIGHBORHOOD, IN THE NORTHWEST PORTION OF SAN FRANCISCO. THE PROJECT SPONSOR, LAUREL HEIGHTS PARTNERS, LLC, OWNS THE SITE AND LEASES IT TO THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, WHICH USES THE PROJECT SITE FOR ITS UNIVERSITY OF CALIFORNIA SAN FRANCISCO (UCSF) LAUREL HEIGHTS CAMPUS. PRIOR TO THE PROJECT SPONSOR'S RECENT ACQUISITION OF FEE TITLE TO THE SITE, THE PROJECT SPONSOR HAD ENTERED INTO A 99-YEAR PRE-PAID GROUND LEASE WITH THE REGENTS, THE FORMER OWNER OF THE SITE, IN 2014. THE PROJECT SITE DOES NOT INCLUDE THE SAN FRANCISCO FIREMAN'S CREDIT UNION (NOW CALLED SF FIRE CREDIT UNION) AT THE SOUTHWEST CORNER OF CALIFORNIA STREET AND PRESIDIO AVENUE, WHICH IS ON A SEPARATE PARCEL.

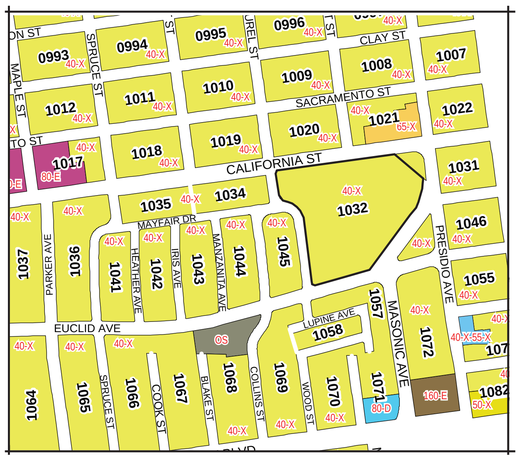
THE PROJECT SITE IS DEVELOPED WITH A FOUR-STORY, 455,000-GROSS-SQUARE-FOOT (GSF) OFFICE BUILDING WITH A THREE-LEVEL, 212-SPACE, PARTIALLY BELOW-GRADE PARKING GARAGE AT THE CENTER OF THE SITE; A ONE-STORY, 14,000-GSF ANNEX BUILDING AT THE CORNER OF CALIFORNIA AND LAUREL STREETS; THREE SURFACE PARKING LOTS WITH A TOTAL OF 331 SPACES CONNECTED BY INTERNAL ROADWAYS; TWO CIRCULAR GARAGE RAMP STRUCTURES LEADING TO BELOW-GRADE PARKING LEVELS; AND LANDSCAPING OR LANDSCAPED OPEN SPACE. THE CAMPUS SERVES AS THE PRIMARY LOCATION FOR UCSF'S OFFICES FOR ITS SOCIAL, BEHAVIORAL, AND POLICY SCIENCE RESEARCH DEPARTMENTS.

THE PROPOSED PROJECT CONSISTS OF REDEVELOPMENT OF THE SITE FROM OFFICE, RESEARCH, CHILD CARE, AND PARKING USES TO A MIX OF RESIDENTIAL, RETAIL, OFFICE, CHILD CARE, AND ASSOCIATED PARKING USES. THESE PROPOSED USES WOULD BE LOCATED IN 13 NEW BUILDINGS AND IN THE ADAPTIVELY REUSED OFFICE BUILDING, WHICH WOULD BE DIVIDED INTO TWO SEPARATE RESIDENTIAL BUILDINGS. PROPOSED PARKING WOULD BE PROVIDED IN FOUR BELOW-GRADE PARKING GARAGES AND SEVEN INDIVIDUAL, TWO-CAR PARKING GARAGES. THE PROPOSED PROJECT WOULD REQUIRE DEMOLITION, SOILS DISTURBANCE, AND EXCAVATION TO DEPTHS RANGING FROM 7 TO 40 FEET BELOW THE EXISTING GRADE FOR CONSTRUCTION OF THE BELOW-GRADE PARKING GARAGES, BUILDING FOUNDATIONS, AND SITE TERRACING.

## ZONING MAP*




## HEIGHT / BULK MAP*




* MAPS FROM WWW.SF-PLANNING.ORG

## PROJECT TOTALS SUMMARY

PROJECT TOTALS

| | | EXISTING (area or count) | PROPOSED (area or count) | DELTA |
|---|---|---|---|---|
| **AREA SUMMARY** | | | | |
| | **RESIDENTIAL** | 0 | 829,847 | 829,847 |
| | **RETAIL** | 0 | 27,263 | 27,263 |
| | **RETAIL F&B** | 0 | 12,998 | 12,998 |
| | **OFFICE** | 364,500 | 49,999 | -314,501 |
| | **CHILDCARE** | 11,500 | 13,630 | 2,130 |
| | **GARAGE** | 93,000 | 361,788 | 268,788 |
| | **Total** | 469,000 | 1,295,525 | 826,525 |
| **TOTAL UNIT COUNT SUMMARY** | | | | |
| | **JR** | 0 | 27 | 27 |
| | **1-BED** | 0 | 207 | 207 |
| | **2-BED** | 0 | 194 | 194 |
| | **3-BED** | 0 | 103 | 103 |
| | **4-BED** | 0 | 27 | 27 |
| | **Total** | 0 | 558 | 558 |
| **PARKING SUMMARY** | | | | |
| | **RESIDENTIAL** | 0 | 558 | 558 |
| | **RETAIL** | 0 | 58 | 58 |
| | **RETAIL F&B** | 0 | 28 | 28 |
| | **OFFICE** | 483 | 80 | -403 |
| | **CHILDCARE** | 0 | 29 | 29 |
| | **COMMERCIAL** | 60 | 0 | -60 |
| | **Total** | 543 | 753 | 210 |
| | **CAR SHARE** | 0 | 10 | 10 |
| **SECTION 135 OPEN SPACE SUMMARY** | | | | |
| | **RESIDENTIAL PRIVATE** | 0 | 11,700 | 11,700 |
| | **TENANT COMMON** | 160,700 | 24,200 | -136,500 |
| | **PUBLIC** | 0 | 34,453 | 34,453 |
| | **COMMON NON-SEC.135** | 4,500 | 45,300 | 40,800 |
| | **PUBLIC NON-SEC.135** | | 92,673 | 92,673 |
| | **Total** | 165,200 | 208,326 | 43,126 |

**BELOW MARKET RATE UNITS NOTE:**

*THE PROPOSED PROJECT WOULD INCLUDE AFFORDABLE HOUSING UNITS AS REQUIRED UNDER PLANNING CODE SECTION 415 AND/OR AS SET FORTH IN A DEVELOPMENT AGREEMENT (DA) FOR THE PROJECT BETWEEN THE PROJECT SPONSOR AND THE CITY. THE TERMS OF THE DA REGARDING PROVISION OF AFFORDABLE HOUSING AND OTHER MATTERS ARE STILL UNDER DISCUSSION, AND, IN ADDITION, THE PROJECT SPONSOR IS GATHERING COMMUNITY INPUT REGARDING THIS MATTER.*

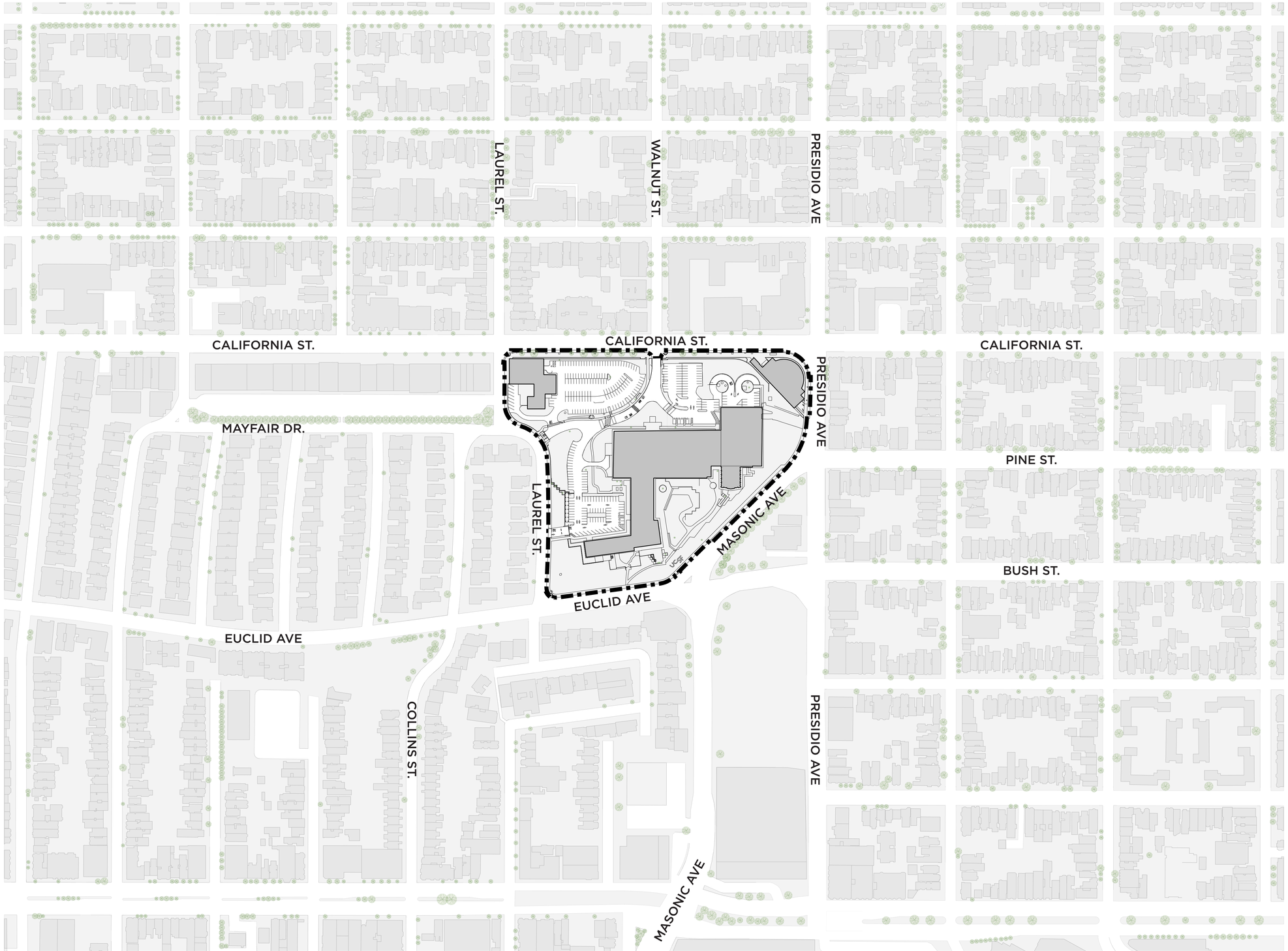
## PROPERTY SUMMARY:

| | |
|---|---|
| ADDRESS: | 3333 CALIFORNIA STREET |
| SUPERVISOR: | DISTRICT 2 / CATHERINE STEFANI |
| BLOCK/LOT: | 1032/003 |
| LOT AREA: | 446,468 SF |
| ZONING: | RM-1 |
| HEIGHT/BULK: | 40-X |

## ZONING SUMMARY:

| | REQUIRED / PERMITTED | PROVIDED |
|---|---|---|
| USES PERMITTED: (TABLE 209.2) | DWELLING UNITS (P)<br>RETAIL SALES (NP)[1]<br>COMMERCIAL USE (NP)[1] | 558 RESIDENTIAL DWELLING UNITS<br>40,261 SF RETAIL<br>49,999 SF OFFICE |
| DWELLING UNIT DENSITY : (TABLE 209.2) | 1:800 SF LOT AREA<br>446,468/800 = 558<br>/600 WITH PUD = 744 | 558 - COMPLIES |
| HEIGHT (SEC. 260): | 40-FT[2]<br><br><br><br>(E) BLDG A - 68'-6"(NON-CONFORMING)<br>(E) BLDG B - 67'-0"(NON-CONFORMING) | CALIFORNIA ST - 45-FT<br>MASONIC AVE - 40-FT<br>EUCLID AVE - 40-FT<br>LAUREL - 30 TO 40FT<br>MAYFAIR - 40-FT<br>(E) BLDG A - 11'-6" ABOVE (E) BLDG<br>(E) BLDG B - 25 FT ABOVE (E) BLDG |
| BULK (SEC. 270): | "X" - HEIGHT STEPPING REQ'D IF GRADE EXCEEDS 5% SLOPE. | COMPLIES, SEE SHEET G3.04 |
| FAR (SEC. 124(b)) | 1.8:1-ONLY APPLIES TO COMMERCIAL | OFFICE COMPLIES |
| UNIT MIX | MIN. 25% 2-BED; 10% 3 BED PER SFP SEC. 207.7 | COMPLIES - SEE G301.D |
| REAR YARD (SEC. 209.2): | 45% LOT DEPTH | 53 % OF SITE IS OPEN AREA[3] |
| OPEN SPACE (SEC. 135): | 100 SF/UNIT PRIVATE,<br>133 SF/UNIT COMMON | COMPLIES, SEE SHEET G3.03 |
| PARKING (SEC. 150): | RES: REQ'D 1.0/1.0 DU<br>OFFICE: REQ'D 2/1000 OSF<br>RETAIL GEN: REQ'D 2/1000 UP TO 20K GSF<br>RETAIL F+B: 4/1000 OSF<br>CHILDCARE 1/25 CHILDREN = 7 | 558 SPACES, OR 1.0/1.0<br>80 SPACES (2/1000 OSF)<br>58 (PER TDM)<br>28 (PER TDM)<br>29 SPACES |
| CAR SHARE (SEC. 166): | 201+ DU: 2, + 1/200 = 4 REQ'D<br>50+ STALLS: 1= 1/50 OVER 50 = 5 REQ'D<br>TOTAL PARKING: | 5 - COMPLIES<br>5 - COMPLIES<br>763 |
| OFF-STREET LOADING: (SEC. 152) | 1 FOR 10,000-60,000 SF RETAIL<br>3 FOR 500,000-900,000 SF RES+OFFICE | TOTAL OF 6 PROVIDED - COMPLIES<br>(3 IN WALNUT BLDG, 3 IN MASONIC BLDG) |
| BIKE PARKING (SEC. 155): | CLASS ONE:<br>RES: 100 + 1/4 DU OVER 100 = 215<br>OFFICE: 1/5,000 0SF = 39,999/5,000 = 8<br>RETAIL: 1/7,500 OSF = 40,261/7,500 = 6<br>CHILDCARE: 1/20 CHILDREN = 172/20=9<br>TOTAL CLASS 1 BIKE STALLS:<br><br>CLASS TWO:<br>RES: 1 / 20 DU = 558/20 = 28<br>OFFICE: 2 REQ'D IF <50,000 GSF<br>RETAIL: 1/2,500 NSF IF <50K GSF = 8<br>FOOD/BEV: 1/750 NSF = 10,398/750<br>CHILDCARE: 1/20 CHILDREN = 8<br>TOTAL CLASS 2 BIKE STALLS: | 558 - COMPLIES[4]<br>8 - COMPLIES<br>8 - COMPLIES<br>10 - COMPLIES<br>584<br><br>36 - COMPLIES[4]<br>4 - COMPLIES<br>8 - COMPLIES<br>14 - COMPLIES<br>10 - COMPLIES<br>72 |

1. *SPONSOR WILL BE REQUESTING A ZONING CHANGE TO INCLUDE THESE USES.*
2. *SPONSOR WILL BE REQUESTING AN ADDITIONAL FIVE-FEET FOR MIXED-USE BUILDINGS ALONG CALIFORNIA STREET.*
3. *SPONSOR WILL BE REQUESTING A REAR YARD EQUIVALENCY AND TO THE EXTENT IT IS APPLICABLE, PLANNING COMMISSION RESOLUTION 4109 WILL REQUIRE MODIFICATION.*
4. *SPONSOR IS EXPLORING UP TO ONE "CLASS ONE" SPACE PER BEDROOM AND INCORPORATION OF BIKE SHARE PROGRAMS.*




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

Cheryl Barton

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

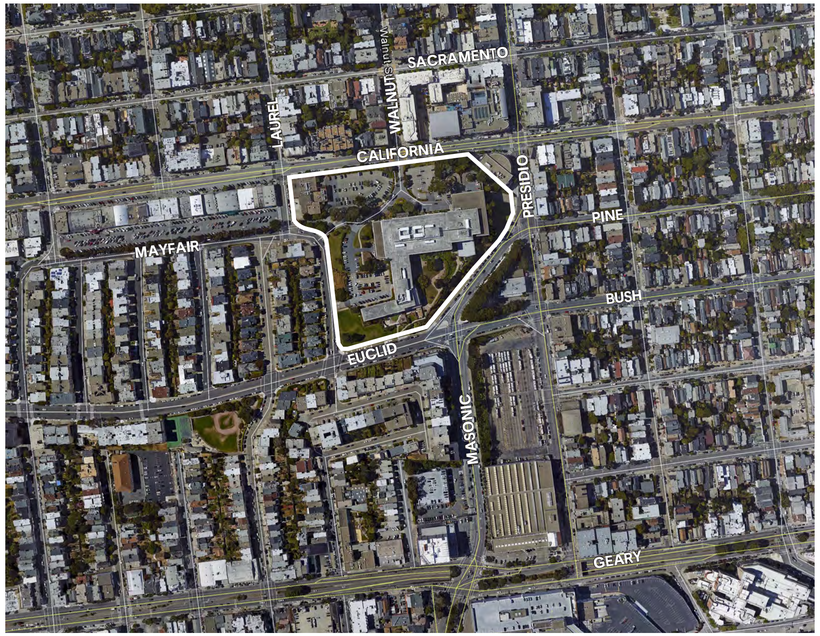
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 75' 150' 300' 600'

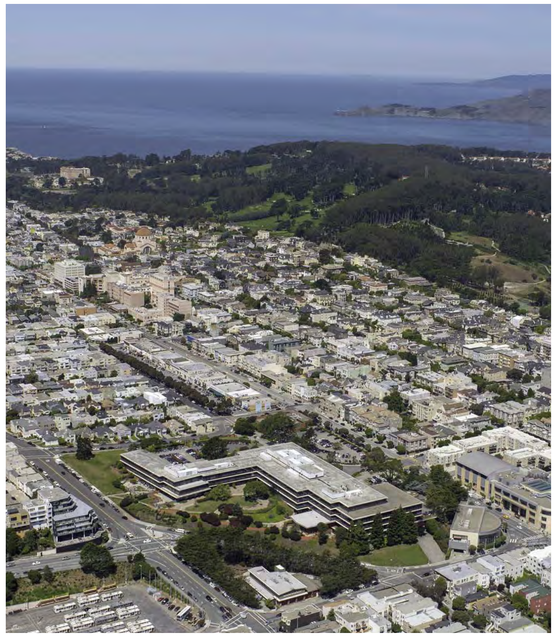
N

## VICINITY MAP

**G1.00**




VICINITY MAP



AERIAL VIEW LOOKING NORTH-WEST



AERIAL VIEW LOOKING SOUTH-EAST



BRICK ELEMENTS AND LINEAR MODERN FACADE



EXISTING CYPRESS TREE



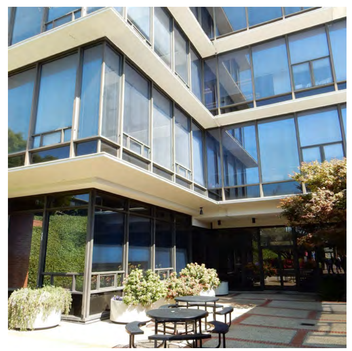
VIEW OF BRICK WALL ALONG CALIFORNIA



EXISTING VIEW FROM HILLTOP PARK



EXISTING GARAGE ENTRY AT MAYFAIR DR.



EXISTING BUILDING

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

VICINITY MAP + EXISTING SITE IMAGES

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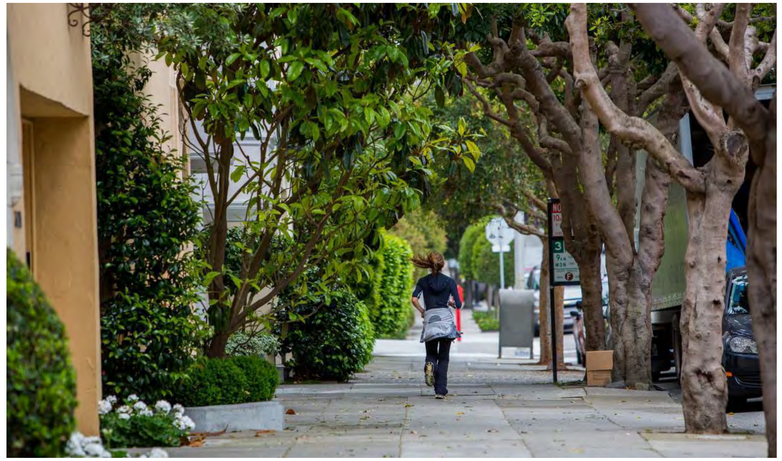
**G1.01**



RESIDENTIAL UNITS ACROSS CALIFORNIA



HOMES WITH TREE LINED STREETS



MULTIFAMILY HOUSING ON EUCLID



ATTACHED HOUSING ON COLLINS STREET



DETATCHED HOUSING ON WEST SIDE OF LAUREL ST.




COMMUNITY CENTER ON CALIFORNIA AND PRESIDIO



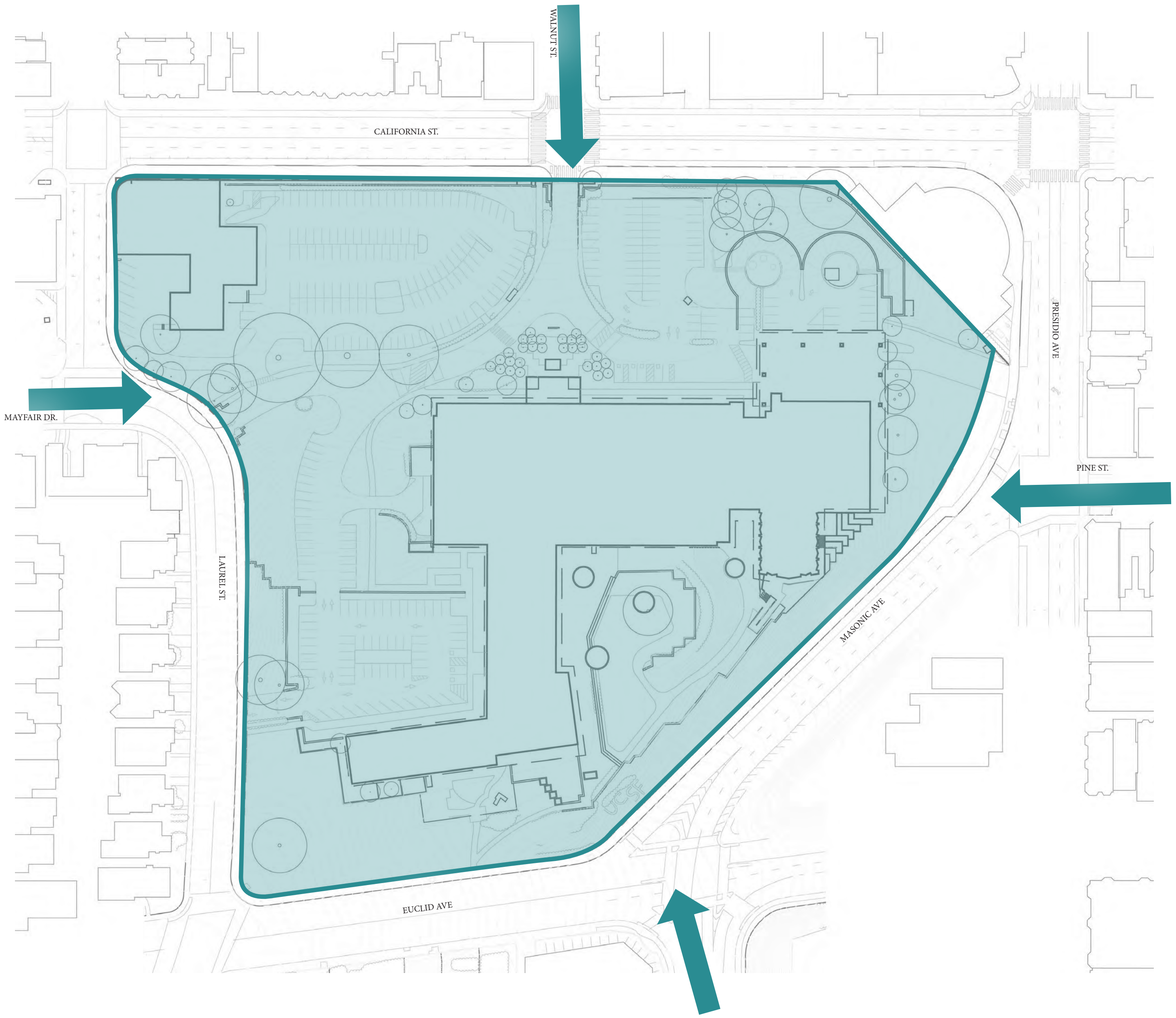
RETAIL AND RESTAURANT ON CALIFORNIA STREET



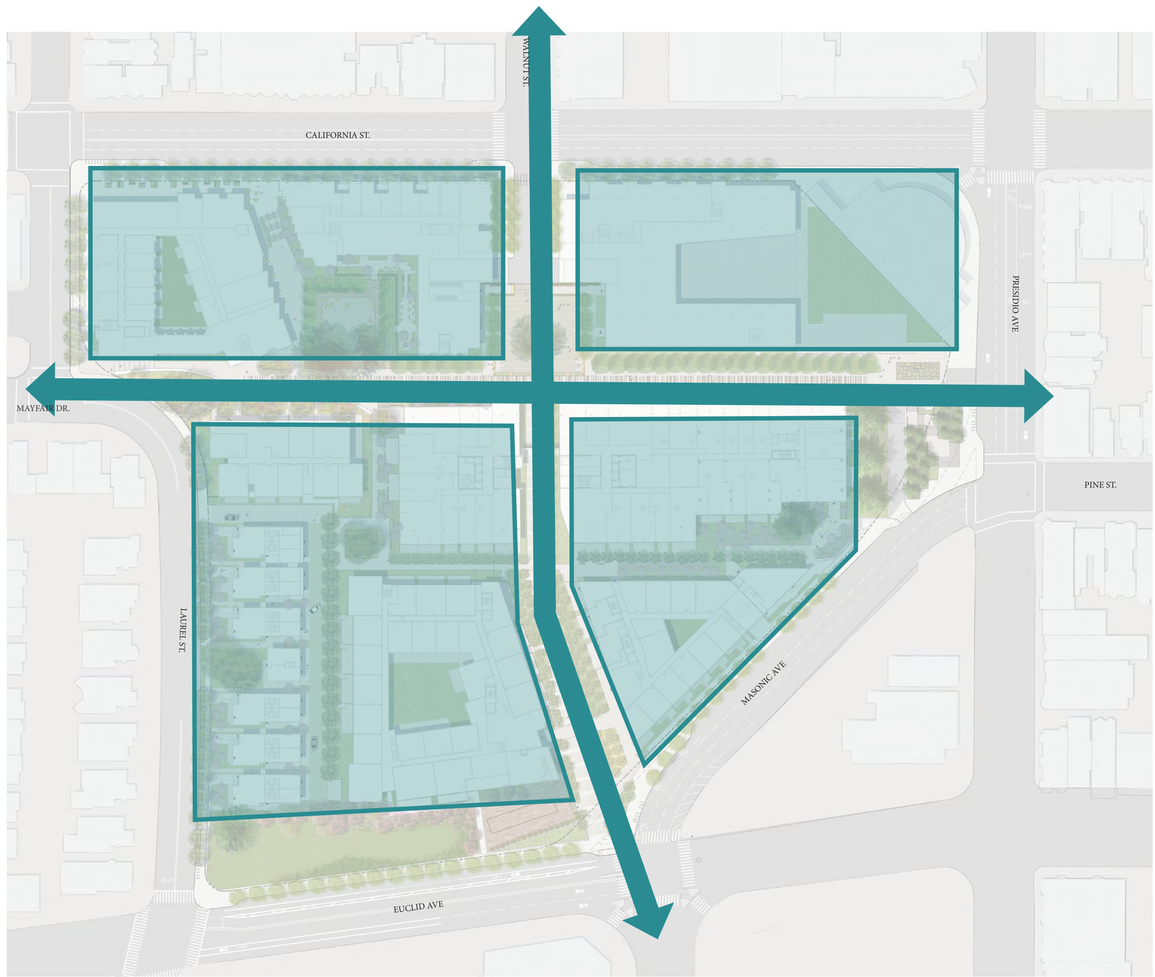

RETAIL FRONT WITH RESIDENTIAL ABOVE ON SACRAMENTO STREET



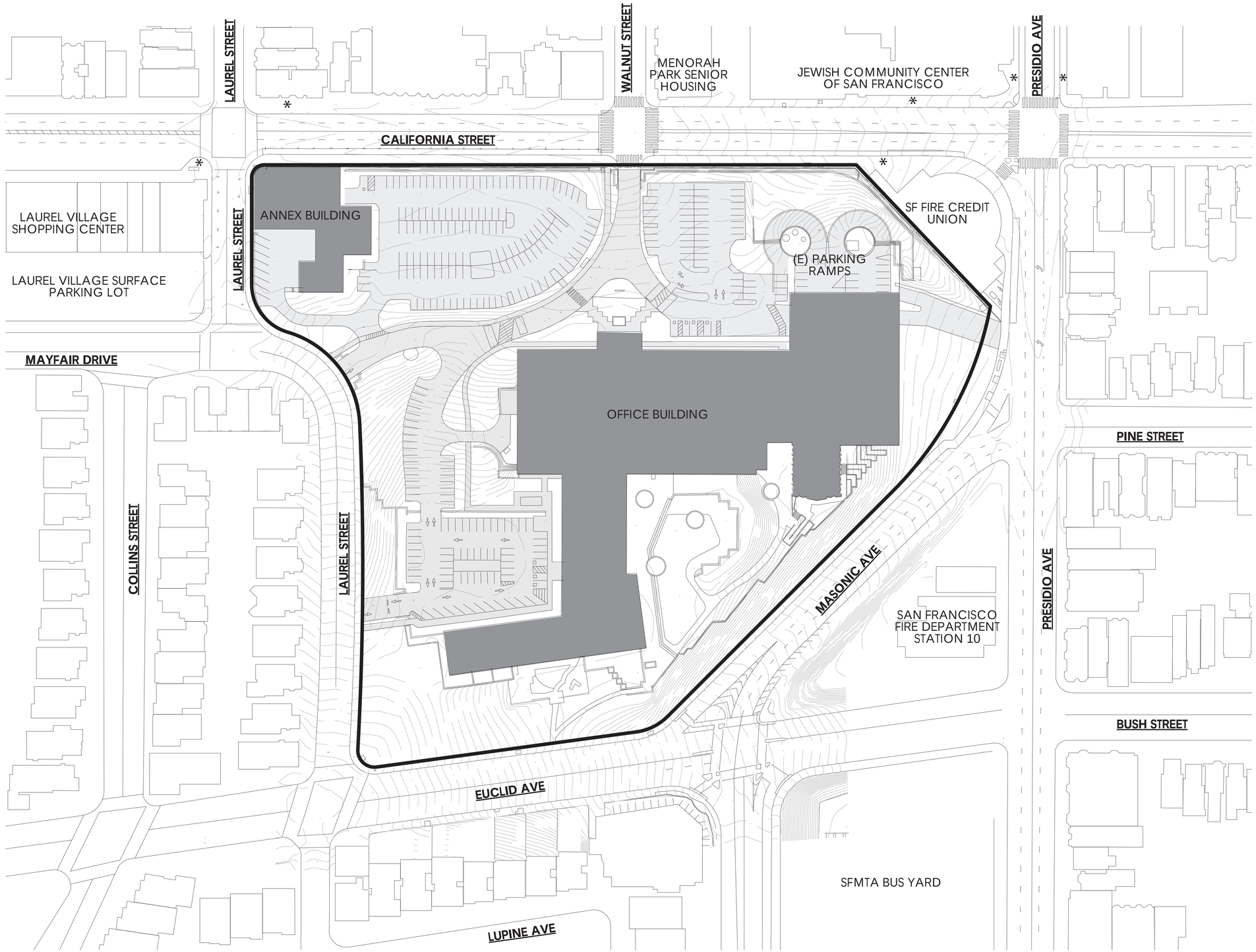

COMMUNITY SERVING RETAIL AT LAUREL VILLAGE




**EXISTING CONDITION:**
SINGLE BLOCK ISOLATED FROM THE CITY GRID




**PROPOSED CONDTION:**
SITE BROKEN INTO CITY BLOCKS




* DENOTES (E) BUS STOP

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

SITE PLAN - EXISTING

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 120' 180'

N

G1.04




FOLLOWING THE PPA SUBMITTAL THE "PRESIDIO BUILDING" WAS REMOVED FROM THE PROJECT - A5 SERIES IS OMITTED FROM DRAWING SET.

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## KEYING SITE PLAN - PROPOSED

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

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PLANNING APPLICATION RESUBMITTAL

0 30' 60' 120' 180' N

**G1.05**

VIEW IS FROM PREVIOUS SUBMISSION AND IS INCLUDED FOR ILLUSTRATIVE PURPOSES ONLY - SOME ARCHITECTURE MAY NOT REFLECT CURRENT SUBMITTAL.

AERIAL VIEW LOOKING NORTH

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## PROPOSED SITE VIEWS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**G2.01**

VIEW IS FROM PREVIOUS SUBMISSION AND IS INCLUDED FOR ILLUSTRATIVE PURPOSES ONLY - SOME ARCHITECTURE MAY NOT REFLECT CURRENT SUBMITTAL.

AERIAL VIEW LOOKING EAST

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## PROPOSED SITE VIEWS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

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**G2.02**



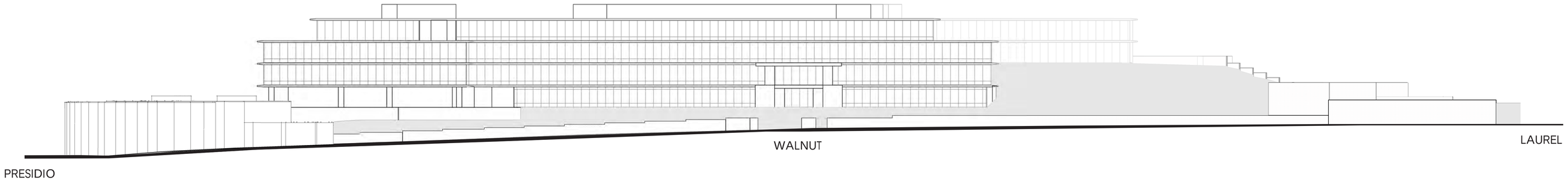

VIEW LOOKING WEST ON CALIFORNIA TOWARDS THE WALNUT BUILDING



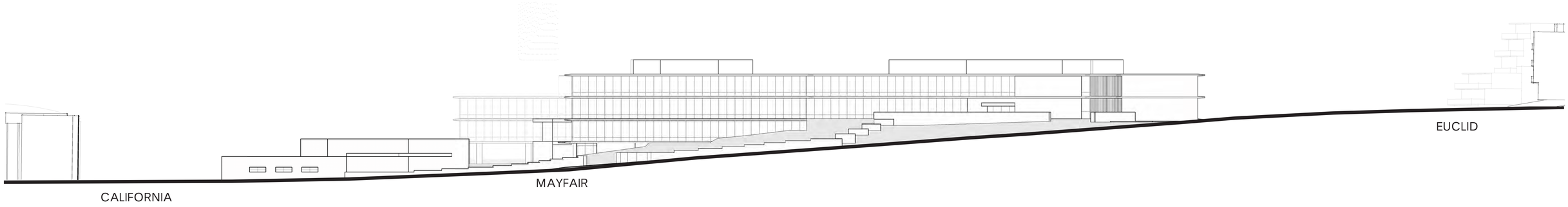
VIEW OF EUCLID GREEN



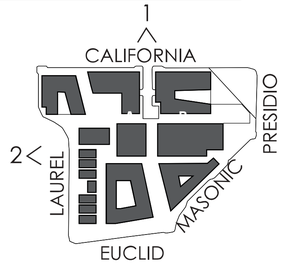
VIEW TOWARD DOWNTOWN FROM THE OVERLOOK ON MAYFAIR




1. EXISTING CALIFORNIA STREET ELEVATION - OVERALL




2. EXISTING LAUREL STREET ELEVATION - OVERALL




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

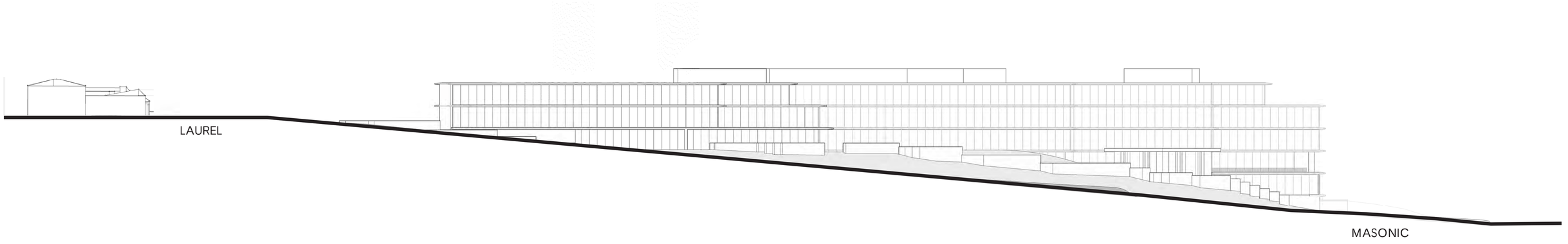
REFERENCE SITE ELEVATIONS - EXISTING

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

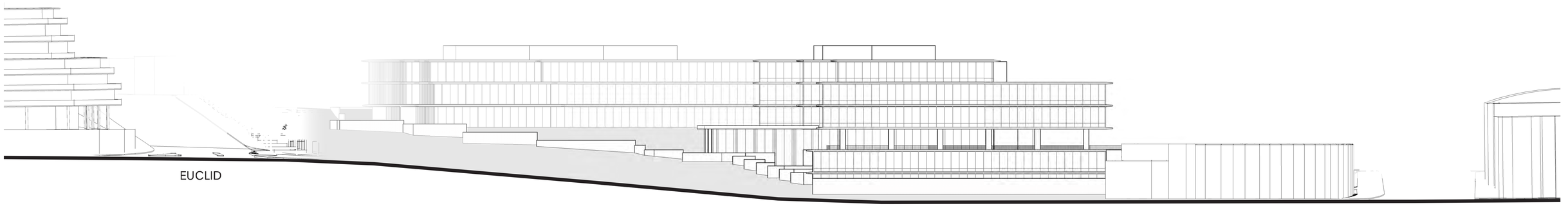
7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

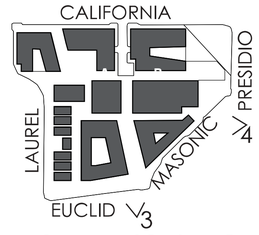
**G2.04**




3. EXISTING EUCLID AVENUE ELEVATION - OVERALL




4. EXISTING PRESIDIO / MASONIC ELEVATION - OVERALL




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

REFERENCE SITE ELEVATIONS - EXISTING

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

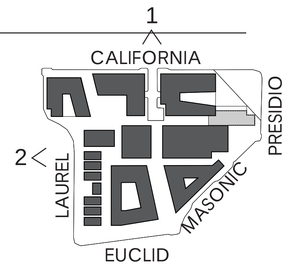
**G2.05**




1. CALIFORNIA STREET ELEVATION - OVERALL




2. LAUREL STREET ELEVATION - OVERALL




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

REFERENCE SITE ELEVATIONS - PROPOSED

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15’ 30’ 60’ 90’

**G2.06**




## 3. EUCLID AVENUE ELEVATION - OVERALL




## 4. PRESIDIO / MASONIC ELEVATION - OVERALL




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

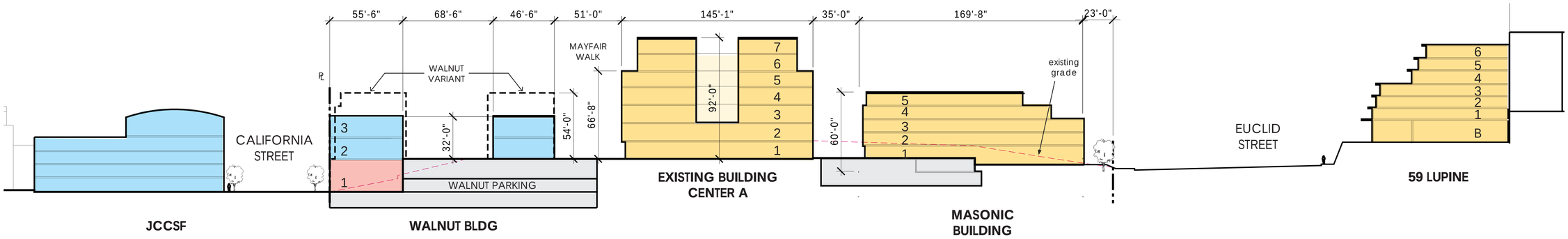
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

REFERENCE SITE ELEVATIONS - PROPOSED

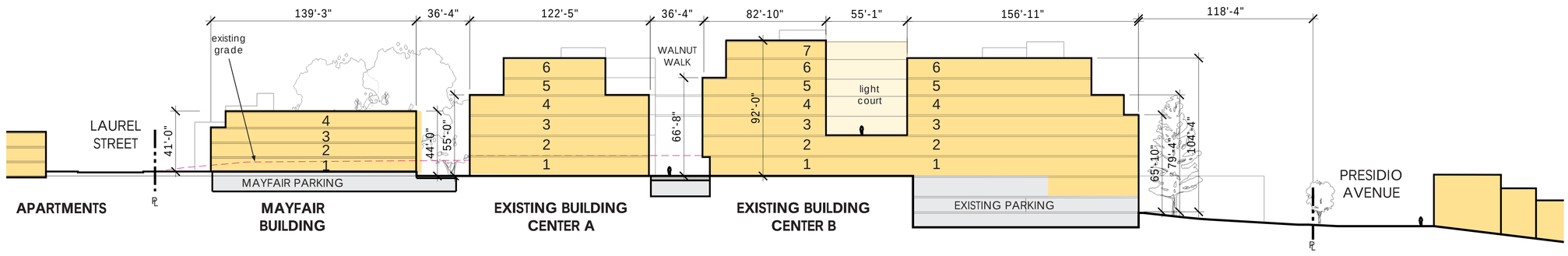
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15’ 30’ 60’ 90’

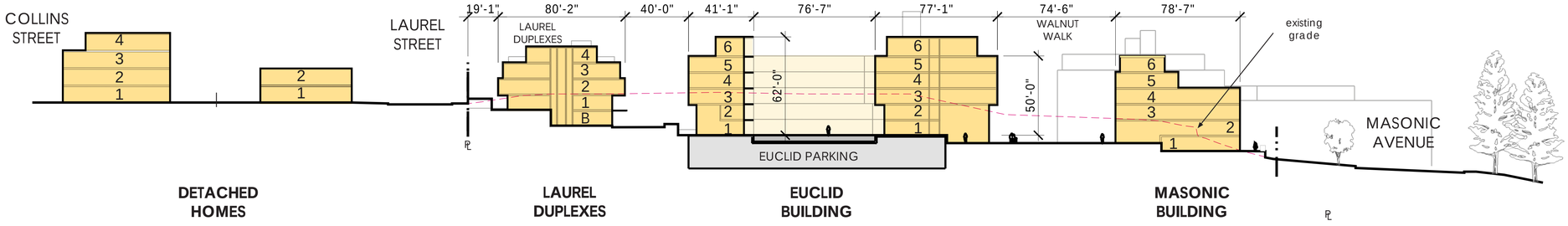
**G2.07**




## 1 NORTH-SOUTH SITE SECTION




## 2 EAST-WEST SITE SECTION




## 3 EAST-WEST SITE SECTION

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PROJECT SITE SECTIONS

PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 20' 40' 80' 120'

G2.08

## PROJECT AREAS

PROJECT TOTALS

| Bldg | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Retail Core | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|---|
| Plaza Bldg A | 66,755 | 7,408 | 7,408 | | 0 | 0 | 62,190 | 143,761 |
| Plaza Bldg B | 72,035 | 5,590 | 5,590 | | 0 | 0 | 50,542 | 133,757 |
| Walnut | 0 | 14,265 | 0 | | 49,999 | 13,630 | 152,425 | 230,319 |
| Center Bldg A | 89,735 | 0 | 0 | 0 | 0 | 0 | 0 | 89,735 |
| Center Bldg B | 231,667 | 0 | 0 | 0 | 0 | 0 | 22,731 | 254,398 |
| Masonic | 83,505 | 0 | 0 | 0 | 0 | 0 | 14,220 | 97,725 |
| Euclid | 184,170 | 0 | 0 | 0 | 0 | 0 | 42,360 | 226,530 |
| Laurel Duplexes | 55,300 | 0 | 0 | 0 | 0 | 0 | 4,960 | 60,260 |
| Mayfair | 46,680 | 0 | 0 | 0 | 0 | 0 | 12,360 | 59,040 |
| | | | | | | | | |
| Total | 829,847 | 27,263 | 12,998 | 0 | 49,999 | 13,630 | 361,788 | 1,295,525 |

## UNIT MIX/COUNT

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED or PH | TOTAL |
|---|---|---|---|---|---|---|
| Plaza Bldg A | 18 | 22 | 23 | 4 | 0 | 67 |
| Plaza Bldg B | 9 | 21 | 25 | 6 | 0 | 61 |
| Walnut | 0 | 0 | 0 | 0 | 0 | 0 |
| Center Bldg A | 0 | 24 | 11 | 10 | 6 | 51 |
| Center Bldg B | 0 | 51 | 49 | 30 | 9 | 139 |
| Masonic | 0 | 22 | 25 | 10 | 0 | 57 |
| Euclid | 0 | 55 | 54 | 30 | 0 | 139 |
| Laurel Duplexes | 0 | 0 | 0 | 2 | 12 | 14 |
| Mayfair | 0 | 12 | 7 | 11 | 0 | 30 |
| | | | | | | |
| Total | 27 | 207 | 194 | 103 | 27 | 558 |
| | *5%* | *37%* | *35%* | *18%* | *5%* | *100%* |

# PARKING PROVIDED

| Bldg | Dwelling Units | Res *0 to 1.5 /du* | Res Total TDM Provided | Childcare | Childcare Req'd *1.5/25 children* | Total TDM Provided | Retail (general) x 0.8 * | Retail (general) *Code 1.5/500 osf* | Total Retail TDM Provided | Retail (F&B) x 0.8* | Retail (F&B) *Code 1.5/200 osf* | Total Retail TDM Provided | Office x 0.8* | Office Code 1.5/500 *osf* | Total Office TDM Provided | Commercial | Commercial Req'd | Total Com. Provided |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 101 | **67** | 0 | 0 | **0** | 5,926 | 18 | **18** | 5,926 | 44 | **14** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Plaza Bldg B** | 61 | 92 | **61** | 0 | 0 | **0** | 4,472 | 13 | **10** | 4,472 | 34 | **14** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Walnut** | 0 | 0 | **0** | 179 children | 11 | **29** | 11,412 | 34 | **30** | 0 | 0 | **0** | 39,999 | 120 | **80** | 0 | 0 | **0** |
| **Center Bldg A** | 51 | 77 | **51** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg B** | 139 | 209 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Masonic** | 57 | 86 | **57** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Euclid** | 139 | 209 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Laurel Duplexes** | 14 | 21 | **14** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Mayfair** | 30 | 45 | **30** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Total** | | 837 | **558** | | 11 | **29** | | 65 | **58** | | 78 | **28** | | 120 | **80** | | 0 | **0** |

Car Share: 4 Required Residential | 5 Required Non-Residential | 9 Total Required | 10 Total Car Share Provided | Total Parking on Site: **763**

* Occupied Floor Area (OFA) is assumed to be 80% of tenant floor area per NOPDR1

# CLASS 1 BIKE PARKING

**CLASS ONE BIKE**

| Bldg | Dwelling Units | Stalls Req'd *1/du to 100 then 1/4du* | Total Res. Provided | Childcare | Stalls Req'd *1/20 children* | Total Provided | Retail (general) x 0.8 | Retail (general) Req'd *1/7,500sf* | Total Retail Provided | Retail (F&B) x 0.8 | Retail (F&B) *Req'd 1/7,500sf* | Total Retail Provided | Office x 0.8 | Office Req'd *1/5000sf* | Total Office Provided |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 67 | **67** | 0 | 0 | **0** | 5,926 | 1 | **0*** | 5,926 | 1 | **0*** | 0 | 0 | **0** |
| **Plaza Bldg B** | 61 | 61 | **61** | 0 | 0 | **0** | 4,472 | 1 | **2** | 4,472 | 1 | **2** | 0 | 0 | **0** |
| **Walnut** | 0 | 0 | **0** | 179 children | 9 | **10** | 14,265 | 2 | **4** | 0 | 0 | **0** | 39,999 | 8 | **8** |
| **Center Bldg A** | 51 | 51 | **51** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg B** | 139 | 110 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Masonic** | 57 | 89 | **57** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Euclid** | 139 | 110 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Laurel Duplexes** | 14 | 14 | **14** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Mayfair** | 30 | 30 | **30** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Total** | | 532 | **558** | | 9 | **10** | | 3 | **6** | | 2 | **2** | | 8 | **8** |

* Class 1 bike parking for retail in the Plaza buildings is centralized at the B1 level in Plaza B and adjacent to a locker and shower room — **Total on Site: 584**

# CLASS 2 BIKE PARKING

**CLASS TWO BIKE**

| Bldg | Dwelling Units | Stalls Req'd *1/20 du* | Total Res. Provided | Childcare | Stalls Req'd *1/20 children* | Total Provided | Retail (general) x 0.8 | Retail (general) Req'd *1/2,500sf* | Total Retail Provided | Retail (F&B) x 0.8 | Retail (F&B) *Req'd 1/750sf* | Total Retail Provided | Office x 0.8 | Office *min 2, plus 1/50,000 sf* | Total Office Provided |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 3 | **4** | 0 | 0 | **0** | 5,926 | 2 | **2** | 5,926 | 8 | **8** | 0 | 0 | **0** |
| **Plaza Bldg B** | 61 | 3 | **4** | 0 | 0 | **0** | 4,472 | 2 | **2** | 4,472 | 6 | **6** | 0 | 0 | **0** |
| **Walnut** | 0 | 0 | **0** | 179 children | 9 | **10** | 8,500 | 4 | **4** | 0 | 0 | **0** | 39,999 | 3 | **4** |
| **Center Bldg A** | 51 | 3 | **4** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg B** | 139 | 7 | **8** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Masonic** | 61 | 3 | **4** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Euclid** | 139 | 7 | **8** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Laurel Duplexes** | 14 | 1 | **2** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Mayfair** | 30 | 2 | **2** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Total** | | 29 | **36** | | 9 | **10** | | 8 | **8** | | 14 | **14** | | 3 | **4** |

## PLAZA BLDG A

| Level | Residential Gross SF | Retail Uses SF | Retail Food and Bev. SF | Retail Core | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|---|
| 3 | 24,615 | 0 | 0 | 0 | 0 | 0 | 0 | 24,615 |
| 2 | 24,615 | 0 | 0 | 0 | 0 | 0 | 0 | 24,615 |
| 1 | 14,745 | 2,268 | 2,268 | 0 | 0 | 0 | 0 | 19,281 |
| B1 | 2,780 | 5,140 | 5,140 | | 0 | 0 | 25,285 | 38,345 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 | 36,905 | 36,905 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | | |
| **Total** | 66,755 | 7,408 | 7,408 | 0 | 0 | 0 | 62,190 | **143,761** |

## PLAZA BLDG B

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Retail Core | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|---|
| 4 | 7,200 | 0 | 0 | 0 | 0 | 0 | 0 | 7,200 |
| 3 | 21,430 | 0 | 0 | 0 | 0 | 0 | 0 | 21,430 |
| 2 | 22,055 | 0 | 0 | 0 | 0 | 0 | 0 | 22,055 |
| 1 | 20,220 | 0 | 0 | 0 | 0 | 0 | 0 | 20,220 |
| B1 | 1,130 | 5,590 | 5,590 | | 0 | 0 | 13,982 | 26,292 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 | 36,560 | 36,560 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | | |
| **Total** | 72,035 | 5,590 | 5,590 | 0 | 0 | 0 | 50,542 | **133,757** |

## WALNUT

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 3 | 0 | 0 | | 0 | 0 | 0 | 0 |
| 2 | 0 | 0 | | 28,750 | 0 | 0 | 28,750 |
| 1 | 0 | 6,850 | | 19,900 | 0 | 0 | 26,750 |
| B1 | 0 | 1,350 | | 1,349 | 12,450 | 41,615 | 56,764 |
| B2 | 0 | 6,065 | | 0 | 1,180 | 45,275 | 52,520 |
| B3 | 0 | 0 | | 0 | 0 | 65,535 | 65,535 |
| | | | | | | | |
| **Total** | 0 | 14,265 | 0 | 49,999 | 13,630 | 152,425 | **230,319** |

## MASONIC

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 6 | 6,400 | 0 | 0 | 0 | 0 | 0 | 6,400 |
| 5 | 9,060 | 0 | 0 | 0 | 0 | 0 | 9,060 |
| 4 | 15,840 | 0 | 0 | 0 | 0 | 0 | 15,840 |
| 3 | 19,440 | 0 | 0 | 0 | 0 | 0 | 19,440 |
| 2 | 18,840 | 0 | 0 | 0 | 0 | 0 | 18,840 |
| 1 | 11,870 | 0 | 0 | 0 | 0 | 0 | 11,870 |
| B1 | 2,055 | 0 | 0 | 0 | 0 | 14,220 | 16,275 |
| | | | | | | | |
| **Total** | 83,505 | 0 | 0 | 0 | 0 | 14,220 | **97,725** |

## EUCLID

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 6 | 19,240 | 0 | 0 | 0 | 0 | 0 | 19,240 |
| 5 | 33,000 | 0 | 0 | 0 | 0 | 0 | 33,000 |
| 4 | 33,000 | 0 | 0 | 0 | 0 | 0 | 33,000 |
| 3 | 33,000 | 0 | 0 | 0 | 0 | 0 | 33,000 |
| 2 | 31,600 | 0 | 0 | 0 | 0 | 0 | 31,600 |
| 1 | 34,330 | 0 | 0 | 0 | 0 | 0 | 34,330 |
| B1 | 0 | 0 | 0 | 0 | 0 | 42,360 | 42,360 |
| | | | | | | | |
| **Total** | 184,170 | 0 | 0 | 0 | 0 | 42,360 | **226,530** |

## CENTER BLDG. A

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 7 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 6 | 9,830 | 0 | 0 | 0 | 0 | 0 | 9,830 |
| 5 | 9,830 | 0 | 0 | 0 | 0 | 0 | 9,830 |
| 4 | 17,783 | 0 | 0 | 0 | 0 | 0 | 17,783 |
| 3 | 17,783 | 0 | 0 | 0 | 0 | 0 | 17,783 |
| 2 | 17,783 | 0 | 0 | 0 | 0 | 0 | 17,783 |
| 1 | 16,726 | 0 | 0 | 0 | 0 | 0 | 16,726 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | | |
| **Total** | 89,735 | 0 | 0 | 0 | 0 | 0 | **89,735** |

## CENTER BLDG. B

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 7 | 12,216 | 0 | 0 | 0 | 0 | 0 | 12,216 |
| 6 | 23,191 | 0 | 0 | 0 | 0 | 0 | 23,191 |
| 5 | 28,540 | 0 | 0 | 0 | 0 | 0 | 28,540 |
| 4 | 33,839 | 0 | 0 | 0 | 0 | 0 | 33,839 |
| 3 | 35,462 | 0 | 0 | 0 | 0 | 0 | 35,462 |
| 2 | 35,736 | 0 | 0 | 0 | 0 | 0 | 35,736 |
| 1 | 36,189 | 0 | 0 | 0 | 0 | 0 | 36,189 |
| B1 | 11,800 | 0 | 0 | 0 | 0 | 10,034 | 21,834 |
| B2 | 13,694 | 0 | 0 | 0 | 0 | 0 | 13,694 |
| B3 | 1,000 | 0 | 0 | 0 | 0 | 12,697 | 13,697 |
| | | | | | | | |
| **Total** | 231,667 | 0 | 0 | 0 | 0 | 22,731 | **254,398** |

## LAUREL DUPLEXES

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 4 | 9,270 | 0 | 0 | 0 | 0 | 0 | 9,270 |
| 3 | 14,390 | 0 | 0 | 0 | 0 | 0 | 14,390 |
| 2 | 15,550 | 0 | 0 | 0 | 0 | 0 | 15,550 |
| 1 | 13,300 | 0 | 0 | 0 | 0 | 0 | 13,300 |
| B1 | 2,790 | 0 | 0 | 0 | 0 | 4,960 | 7,750 |
| **Total** | 55,300 | 0 | 0 | 0 | 0 | 4,960 | **60,260** |

## MAYFAIR

| Level | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 4 | 10,020 | 0 | 0 | 0 | 0 | 0 | 10,020 |
| 3 | 11,010 | 0 | 0 | 0 | 0 | 0 | 11,010 |
| 2 | 10,960 | 0 | 0 | 0 | 0 | 0 | 10,960 |
| 1 | 10,990 | 0 | 0 | 0 | 0 | 0 | 10,990 |
| B1 | 3,700 | 0 | 0 | 0 | 0 | 12,360 | 16,060 |
| **Total** | 46,680 | 0 | 0 | 0 | 0 | 12,360 | **59,040** |

## PLAZA BLDG A

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 3 | 5 | 11 | 10 | 2 | 0 | 28 |
| 2 | 5 | 11 | 10 | 2 | 0 | 28 |
| 1 | 8 | 0 | 3 | 0 | 0 | 11 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 18 | 22 | 23 | 4 | 0 | **67** |
| *Percentage* | *27%* | *33%* | *34%* | *6%* | *0%* | |

## PLAZA BLDG B

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 4 | 3 | 1 | 3 | 0 | 0 | 7 |
| 3 | 3 | 7 | 9 | 2 | 0 | 21 |
| 2 | 3 | 7 | 10 | 2 | 0 | 22 |
| 1 | 0 | 6 | 3 | 2 | 0 | 11 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 9 | 21 | 25 | 6 | 0 | **61** |
| *Percentage* | *15%* | *34%* | *41%* | *10%* | *0%* | |

## MASONIC

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 6 | 0 | 1 | 3 | 1 | 0 | 5 |
| 5 | 0 | 0 | 2 | 4 | 0 | 6 |
| 4 | 0 | 5 | 7 | 1 | 0 | 13 |
| 3 | 0 | 4 | 8 | 2 | 0 | 14 |
| 2 | 0 | 7 | 5 | 1 | 0 | 13 |
| 1 | 0 | 5 | 0 | 1 | 0 | 6 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 0 | 22 | 25 | 10 | 0 | **57** |
| *Percentage* | *0%* | *44%* | *39%* | *16%* | *0%* | *100%* |

## EUCLID

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 6 | 0 | 0 | 4 | 8 | 0 | 12 |
| 5 | 0 | 11 | 15 | 3 | 0 | 29 |
| 4 | 0 | 11 | 15 | 3 | 0 | 29 |
| 3 | 0 | 11 | 15 | 3 | 0 | 29 |
| 2 | 0 | 14 | 2 | 2 | 0 | 18 |
| 1 | 0 | 8 | 3 | 11 | 0 | 22 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 0 | 55 | 54 | 30 | 0 | **139** |
| *Percentage* | *0%* | *37%* | *40%* | *23%* | *0%* | *100%* |

## CENTER A

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| TH top | 0 | 0 | 0 | 0 | 0 | 0 |
| 5 | 0 | 0 | 0 | 0 | 6 | 6 |
| 4 | 0 | 7 | 4 | 2 | 0 | 13 |
| 3 | 0 | 7 | 3 | 3 | 0 | 13 |
| 2 | 0 | 7 | 3 | 3 | 0 | 13 |
| 1 | 0 | 3 | 1 | 2 | 0 | 6 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 0 | 24 | 11 | 10 | 6 | **51** |
| *Percentage* | *0%* | *47%* | *22%* | *20%* | *12%* | *100%* |

## CENTER B

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| TH top | 0 | 0 | 0 | 0 | 0 | 0 |
| 6 | 0 | 2 | 4 | 1 | 9 | 16 |
| 5 | 0 | 5 | 10 | 4 | 0 | 19 |
| 4 | 0 | 7 | 7 | 7 | 0 | 21 |
| 3 | 0 | 7 | 9 | 8 | 0 | 24 |
| 2 | 0 | 11 | 8 | 6 | 0 | 25 |
| 1 | 0 | 7 | 7 | 4 | 0 | 18 |
| B1 | 0 | 7 | 2 | 0 | 0 | 9 |
| B2 | 0 | 5 | 2 | 0 | 0 | 7 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Total** | 0 | 51 | 49 | 30 | 9 | **139** |
| *Percentage* | *0%* | *37%* | *35%* | *22%* | *6%* | *100%* |

## LAUREL DUPLEXES

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 1 | 0 | 0 | 0 | 2 | 12 | 14 |
| **Total** | 0 | 0 | 0 | 2 | 12 | **14** |
| *Percentage* | *0%* | *0%* | *0%* | *14%* | *86%* | *100%* |

## MAYFAIR

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 4 | 0 | 1 | 1 | 4 | 0 | 6 |
| 3 | 0 | 1 | 2 | 4 | 0 | 7 |
| 2 | 0 | 4 | 2 | 2 | 0 | 8 |
| 1 | 0 | 6 | 2 | 1 | 0 | 9 |
| **Total** | 0 | 12 | 7 | 11 | 0 | **30** |
| *Percentage* | *0%* | *40%* | *23%* | *37%* | *0%* | *100%* |

# LOT COVERAGE / YARD COMPLIANCE SUMMARY:

FRONT YARD SETBACK IS DEFINED AS THE AVERAGE OF ADJACENT PROPERTIES. PROJECT ELECTS EUCLID STREET AS THE PROJECT'S "FRONT". SINCE THE PROJECT IS FULL BLOCK, THERE ARE NO ADJACENT PROPERTIES TO AVERAGE, THEREFORE NO FRONT YARD SETBACK IS REQUIRED.

REAR YARD SETBACK NOT REQUIRED AS THE PROJECT IS FULL BLOCK, AND THUS DOES NOT HAVE A REAR YARD, WHICH TYPICALLY WOULD BE REQ'D TO BE 45% OF LOT DEPTH. THE PROPERTY IS A FULL BLOCK FRONTING SEVERAL STREETS. THEREFORE THE PROPERTY DOES NOT HAVE A TYPICAL REAR YARD SPACE. IN ORDER TO MEET STREET FRONTAGE REQUIREMENTS AND PROVIDE PUBLICLY ACCESSIBLE OPEN SPACE WITHIN THE BLOCK, THE PROJECT REQUESTS TO MEASURE REAR YARD BY AREA.

| | |
|---|---|
| LOT AREA: | 446,468 SF |
| 45% OF LOT AREA: | 200,911 SF REQUIRED REAR YARD EQUIVALENT * |
| OPEN AREA PROVIDED: | 239,240 SF OR 53% OF SITE AREA |

NOTE: SEE SHEET VAR.44 FOR EIR VARIANT 1 LOT COVERAGE / YARD COMPLIANCE SUMMARY DATA




DENOTES OPEN AREA

# PLANNING CODE REQUIRED OPEN SPACE SUMMARY (SECTION 135):

**PROJECT TOTALS**

| Building | Total Units | Base O.S. Req'd (100/du) | Units with Private O.S. | Provided Private O.S. | Remaining Area | Area Req'd as Common (x1.33) | Provided Common O.S. | Remaing Area Req'd on Project Site |
|---|---|---|---|---|---|---|---|---|
| Plaza Bldg A | 67 | 6,700 | 1 | 100 | 6,600 | 8,778 | 5,550 | 3,228 |
| Plaza Bldg B | 61 | 6,100 | 4 | 400 | 5,700 | 7,581 | 5,180 | 2,401 |
| Walnut | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Center Bldg A | 51 | 5,100 | 12 | 1,200 | 3,900 | 5,187 | 435 | 4,752 |
| Center Bldg B | 139 | 13,900 | 39 | 3,900 | 10,000 | 13,300 | 1,275 | 12,025 |
| Masonic | 57 | 5,700 | 11 | 1,100 | 4,600 | 6,118 | 1,400 | 4,718 |
| Euclid | 139 | 13,900 | 24 | 2,400 | 11,500 | 15,295 | 9,660 | 5,635 |
| Laurel Duplexes | 14 | 1,400 | 14 | 1,400 | 0 | 0 | 0 | 0 |
| Mayfair | 30 | 3,000 | 12 | 1,200 | 1,800 | 2,394 | 700 | 1,694 |
| | | | | | | | | |
| **Total** | **558** | **55,800** | **117** | **11,700** | **44,100** | **58,653** | **24,200** | **34,453** |

COMMON SITE PLAN OPEN SPACE CONTRIBUTING TO SECTION 135 REQUIREMENT:

| | |
|---|---|
| CYPRESS SQUARE + WESTERN MAYFAIR WALK: | 24,780 SF |
| LOWER WALNUT WALK: | 16,850 SF |
| CALIFORNIA PLAZA: | 4,290 SF |
| OVERLOOK: | 10,450 SF |

**TOTAL COMMON OPEN SPACE*:** **56,370 SF, EXCEEDS REQUIRED -- COMPLIES**

LOCATIONS FOR REQUIRED OPEN SPACE ON SITE:

PLAZA BLDG A: 3,228 SF REQUIRED ON PROJECT SITE
3,228 (OF 4,290) SF PROVIDED AT CALIFORNIA PLAZA

PLAZA BLDG B: 2,401 SF REQUIRED ON PROJECT SITE
2,401 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

WALNUT: 0 SF REQUIRED ON PROJECT SITE

CENTER BLDG. A: 4,752 SF REQUIRED ON PROJECT SITE
4,752 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

CENTER BLDG. B: 12,025 SF REQUIRED ON PROJECT SITE
6,400 (OF 16,850) SF PROVIDED AT LOWER WALNUT WALK
5,625 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

MASONIC: 4,718 SF REQUIRED ON PROJECT SITE
4,718 (OF 16,850) SF PROVIDED AT LOWER WALNUT WALK

EUCLID: 5,635 SF REQUIRED ON PROJECT SITE
5,635 (OF 16,850) SF PROVIDED AT LOWER WALNUT WALK

LAUREL DUPLEXES: 0 SF REQUIRED ON PROJECT SITE

MAYFAIR: 1,694 SF REQUIRED ON SITE
1,694 (OF 24,780) PROVIDED AT CYPRESS SQUARE

OPEN SPACE USE

CALIFORNIA PLAZA: 3,228 SF FOR PLAZA A BLDG
T: 3,228 SF OF 4,290

CYPRESS SQUARE: 2,401 SF FOR PLAZA B BLDG
4,752 SF FOR CENTER BLDG A
5,625 SF FOR CENTER BLDG B
1,694 SF FOR MAYFAIR BLDG
T: 14,472 SF OF 24,780

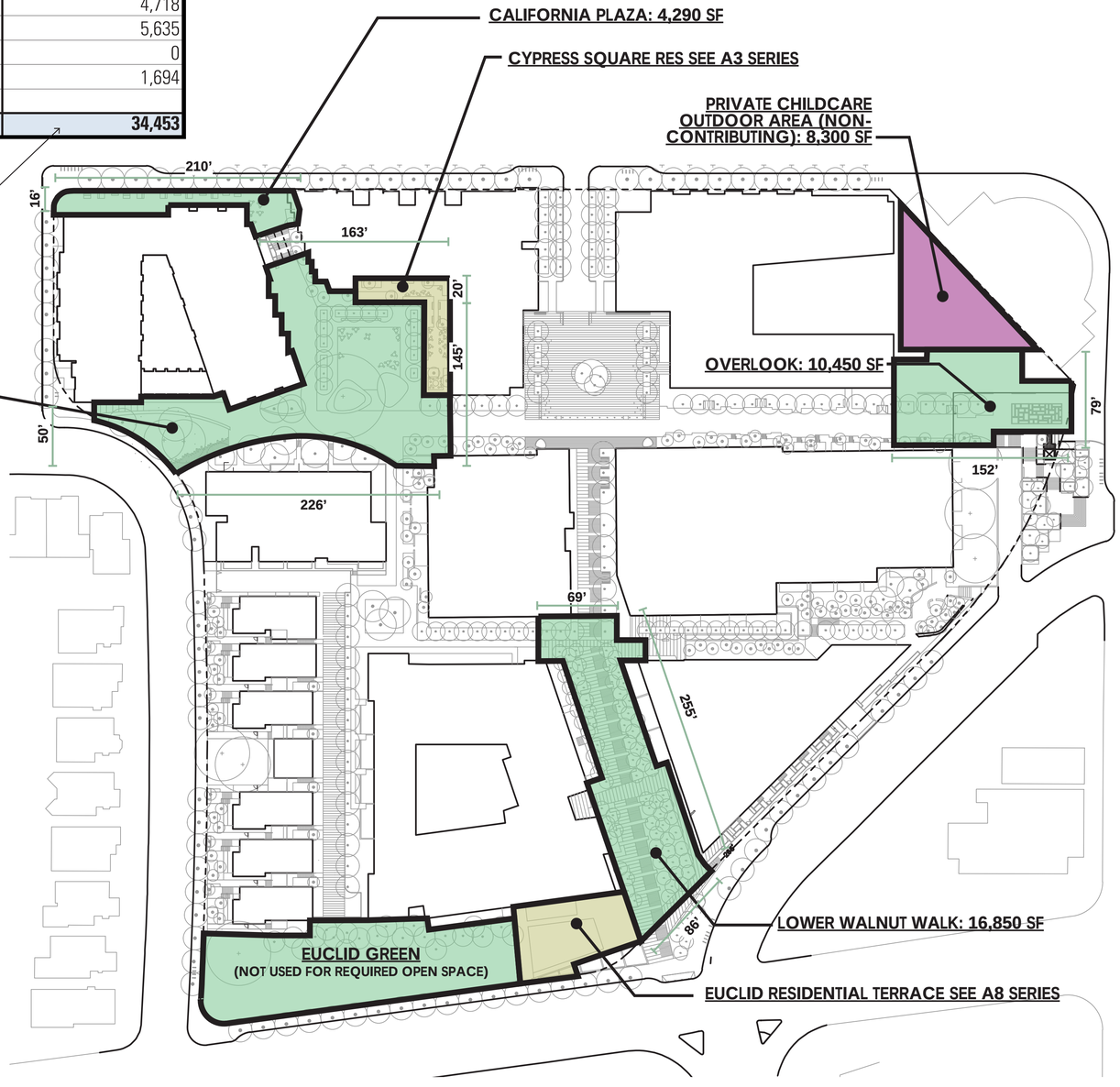
LOWER WALNUT WALK: 6,400 SF FOR CENTER BLDG B
4,718 SF FOR MASONIC BLDG
5,635 SF FOR EUCLID BLDG
T: 16,753 SF OF 16,850

## OPEN SPACE SUMMARY (SECTION 135):

PUBLICALLY ACCESSIBLE OPEN SPACE MEETS THE DIMENSIONAL REQUIREMENTS OF SECTION 135(g)(1&2): ALL SPACES ARE AT LEAST 15'x15' AND 300 SF MIN.

ALL INNER COURT CONDITIONS COUNTED TOWARDS OPEN SPACE CALCULATIONS ARE MIN. 20' WIDE AND AT LEAST AS WIDE AS THE BUILDINGS FRONTING THEM.

* NOTE: AREAS HIGHLIGHTED ARE SECTION 135 COMPLIANT. OTHER PUBLIC, COMMON, AND PRIVATE OPEN SPACE IS PROVIDED, BUT NOT DENOTED ON THIS DIAGRAM




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

PLANNING CODE DIAGRAMS - Sec. 135

07.12.2019
PLANNING APPLICATION RESUBMITTAL

**G3.03**




# BUILDING HEIGHTS SUMMARY (SECTION 260):

The project is composed of a site plan with several different buildings. Each building's height is measured independantly and in compliance with the provisions of Section 260.

Section 260(a)(1)(D): Where a building has frontages on two or more streets the owner may elect the street frontage from which the measurement is taken.

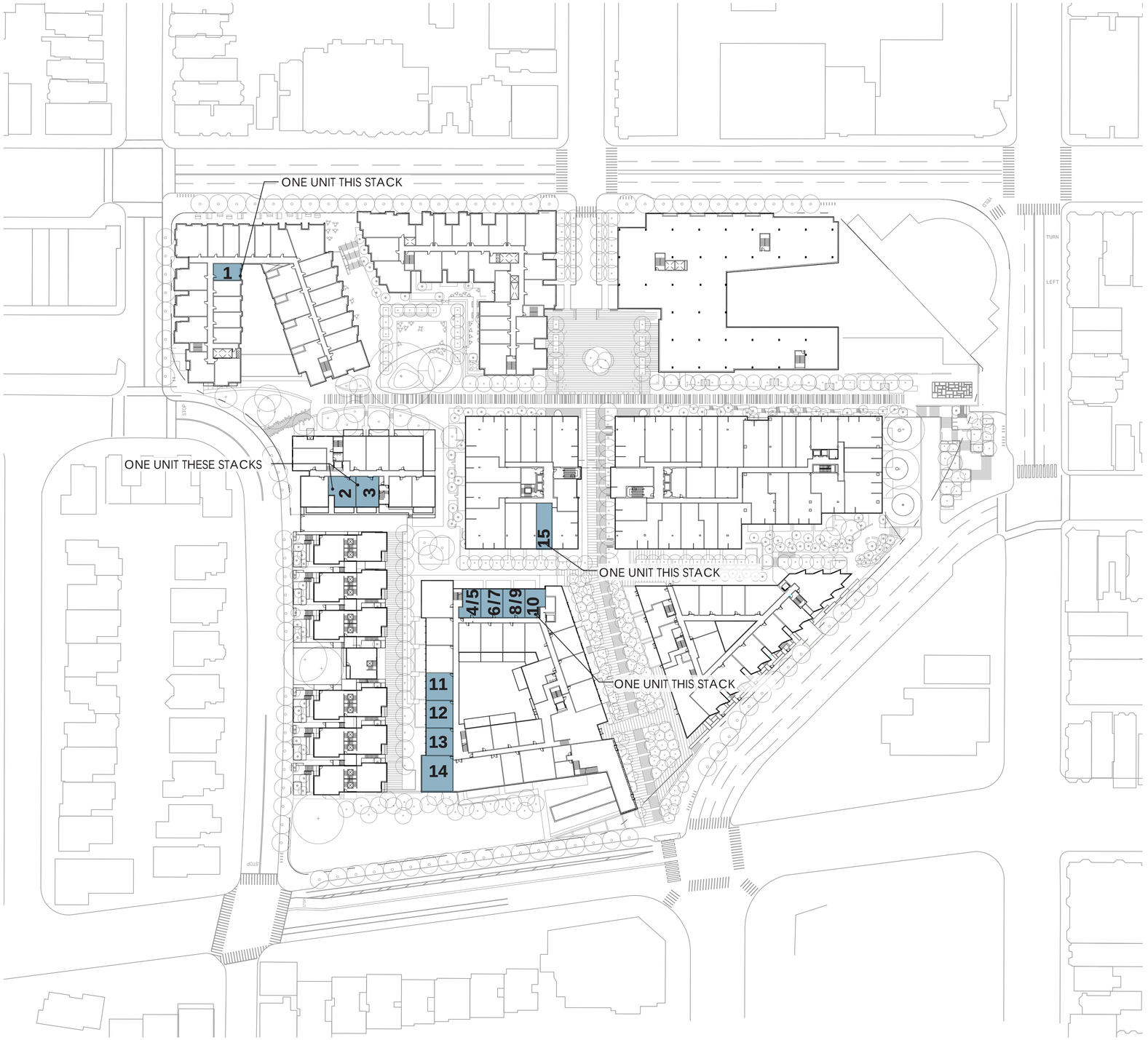
Section 260(a)(1)(B): Where the lot slopes downward from the street the point of measurement shall be taken from curb. This point may be used to measure all portions of the building within100-ft of the street or to a point equidistant between such street and the street on the opposite side of the block - whichever is greater.

Section 260(a)(1)(C) Where the lot slopes upward from the street, the point of measurement shall be taken from the curb at the centerline of the frontage or building step for the first 10-ft of the building. At all other sections the height shall be taken at the average of the grades on either side of the building or building step.

Table 260

| Avg. Slope of Curb | Maximum width for portions of the building that may be measured from a single point |
|---|---|
| 0% - 5% Slope: | No Requirement |
| 6%-15% Slope: | 65-ft |
| 15% - 20% Slope: | 55-ft |

| BUILDING | MEASUREMENT NARRATIVE |
|---|---|
| **PLAZA BLDG "A"** | Plaza Bldg "A" fronts both Laurel Street and California Street and elects to measure from Laurel per Section 260(a)(1)(D). The majority of Plaza "A" is within height measurement "Area A," with a small portion of the SE corner located in "Area B1." Laurel Street has a slope of less than 5% and thus is measured at the midpoint of the frontage at existing curb. The measurement from Laurel Street is downsloping and is carried to the line equidistant between Laurel Street and the Walnut Street Extension. The measurement is taken to 45-ft, to allow an additional 5-ft at California Street buildings for adequate retail floor-to-floor heights. See sheet A2.21for building section showing height compliance. |
| **PLAZA BLDG "B** | The majority of Plaza Bldg "B" falls in height measurement "Area B" and is measured from the Walnut Street Extension per Section 260(a)(1)(B). A small portion of the NW corner is within "Area A" and is measured per Plaza A above. The slope of Walnut Street varies, with the Southern portion under 5% and the portion closer to California requiring stepping. Per Table 260 the portion closer to California Street is measured in 55-ft segments. Measuring from the Walnut Street Extension is upsloping and complies with Section 260(a)(1)(C), with the first 10-ft measured from the centerline of the segment at new curb, thereafter measured at the average of new grades on either side of the section. The measurement is taken to 45-ft, to allow an additional 5-ft at California Street buildings for adequate retail floor-to-floor heights. See sheet A3.21for building section showing height compliance. |
| **WALNUT** | The Walnut Building is within height measurement "Area C" and "Area D." and fronts California Street, Walnut Street Extension and Presidio Streets. For the western portions of the building the project elects to measure downsloping from the Walnut Street Extension per Section 260(a)(1)(D). The slope of the Walnut Street Extension varies, with the Southern portion under 5% and the portion closer to California requiring stepping. Per Table 260 the portion closer to California Street is measured in 55-ft segments. The measurement from the Walnut Street Extension is downloping and is carried to the line equidistant between Walnut Street and Presidio Avenue. The Eastern portions of the Walnut building building fall within "Area D" and is measured upsloping from Presidio per Section 260(a)(1)(B). The slope of Presidio is less than 5% and is therefore measured at the midpoint of the frontage. Measuring from Presidio Avenue is upsloping and complies with Section 260(a)(1)(C), with the first 10-ft measured from the centerline of frontage at existing curb, thereafter measured from the average of new grades on either side of the building. The measurement is taken to 45-ft, to allow an additional 5-ft for adequate retail and commercial floor-to-floor heights. See sheet A4.21 A and B for building section showing height compliance.<br><br>**EIR Variant 1:** The Walnut Senior Building exceeds the height measurement "Area C" and "Area D." A density bonus waiver for height is requested. |
| **CENTER BLDG A & B** | See sheet A6.21 and A6.22 for building section showing overall building height. |
| **MASONIC** | The Masonic Building is within site 'Area E' and fronts onto Masonic Avenue and Walnut Walk. This area is measured from Masonic Avenue per Section 260(a)(1)(D). This site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Masonic Avenue slopes at 6%, the allowable height is measured at multiple cross-sections perpendicular to the building, taken at a maximum of 65 foot increments per Table 260. Each of the given reference points is derived from from the existing grade at each cross-section, adding 40 feet to arrive at the allowable height for points along that cross section. |
| **EUCLID** | The Euclid Building is within site 'Area F' and fronts onto Euclid Avenue and Walnut Walk. This area is measured from Euclid Avenue per Section 260(a)(1)(D). This site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Euclid Avenue slopes at 10%, the allowable height is measured at multiple cross-sections perpendicular to the building, taken at a maximum of 65 foot increments per Table 260. Each of the given reference points is derived from from the existing grade at each cross-section, adding 40 feet to arrive at the allowable height for points along that cross section. |
| **LAUREL DUPLEXES** | The Laurel Duplexes are within site 'Area G' and front onto Laurel Street. This area is measured from Laurel Street. This site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Laurel Street slopes at 7%, the allowable height is measured at a cross-sections perpendicular to the building, taken at the centerline of each duplex and no more than 65 foot apart per Table 260. Each of the given reference points is derived from from the existing grade at each cross-section, adding 40 feet to arrive at the allowable height for points along that cross section. |
| **MAYFAIR** | The Mayfair Building is within site 'Area H' and fronts onto Laurel Street. This area is measured from Laurel Street. This site is up-sloping and is therefore measured per Section 260(a)(1)(C). Since Laurel Street slopes at 7%, the allowable height is measured at a cross-sections perpendicular to the building, taken at the centerline of each building step and no more than 65 foot apart per Table 260. Each of the given reference points is derived from from the existing grade at each cross-section, adding 40 feet to arrive at the allowable height for points along that cross section. |




## MODIFICATION REQUEST: UNIT EXPOSURE (SECTION 140):

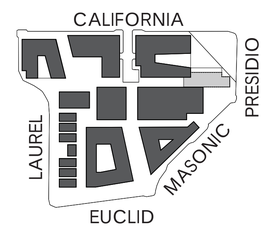
Required:
Section 140(a) requires all dwelling units face an open area. At least one room that meets the 120sf floor area requirement shall face directly onto an open area. Open areas are classified as:
- a public street or alley at least 20-ft in width, sideyard at least 25-ft in width, or complying rear yard
- an inner court, or space between buildings on the same lot, which is no less than 25-ft in every horizontal direction for the floor at which the Dwelling Unit is located and the floor immediately above it. There is an increase of 5-ft at each subsequent floor.

Provided:
All units, except those listed, and graphically shown to the left, are provided with an open area meeting the requirements set forth in Section 140. See building plans and sections for additional compliance.

| Building: | Units Requiring Modification |
|---|---|
| Plaza Bldg A | 1 |
| Plaza Bldg B | 0 |
| Walnut | not applicable - no dwelling units in building |
| Center Bldg A | 1 |
| Center Bldg B | 0 |
| Masonic | 0 |
| Euclid | 11 |
| Laurel Duplex's | 0 |
| Mayfair | 2 |
| Total: | 15 |

Justification:
In order to adaptively reuse the site's existing building, work around topography, achieve Planning Code density, provide clear connections for the public across the site, and maximize the amount of land for public use, some buildings had to be sited around courtyards not meeting Section 140 definitions for inner-courts.

NOTE: See Plans and Sections in the building specific drawing sheets for compliance and dimensions. For the units identified on the drawing to the left see the following sheets:
Unit 1: Plaza Bldg A see A2.00 series
Units 2-3: Mayfair A9.00 series
Units 4-14: Euclid A8.00 series,
Unit 15: Center Bldg A A6.00 series,




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

# PLANNING CODE DIAGRAMS - UNIT EXPOSURE

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**G3.05**

# Sustainability at 3333 California

3333 California aims to create a resilient design that meets the needs of today without compromising our common future through a focus on the triple bottom line of sustainability: community, environment and economy.

## A valuable contribution to a San Francisco neighborhood that exceeds City goals for sustainable development.

The design team is highly focused on creating a welcoming, walkable place for the neighborhood that will enable healthy, low-carbon lifestyles for future residents. The team also seeks to create an educational and inspirational place, taking a leadership role in achieving City goals for sustainability and green building. Our aspiration is to make this a net positive development for the community and environment, beating code requirements for energy and water, and having a positive impact on community wellness and connectivity, material and waste management, and urban ecosystems.

Highlighted commitments include:

- Creation of high-quality pedestrian connections and open space
- Better than code energy performance
- Water smart design
- 25% reduction in stormwater runoff volume compared to existing
- Net increase in street trees
- Transit First design
- EV Infrastructure and carsharing
- Better roofs (solar and living roofs exceeding code requirements)
- LEED Gold minimum
- Zero waste ready design (recycling infrastructure)
- Resilient design (seismic and climate change considered)

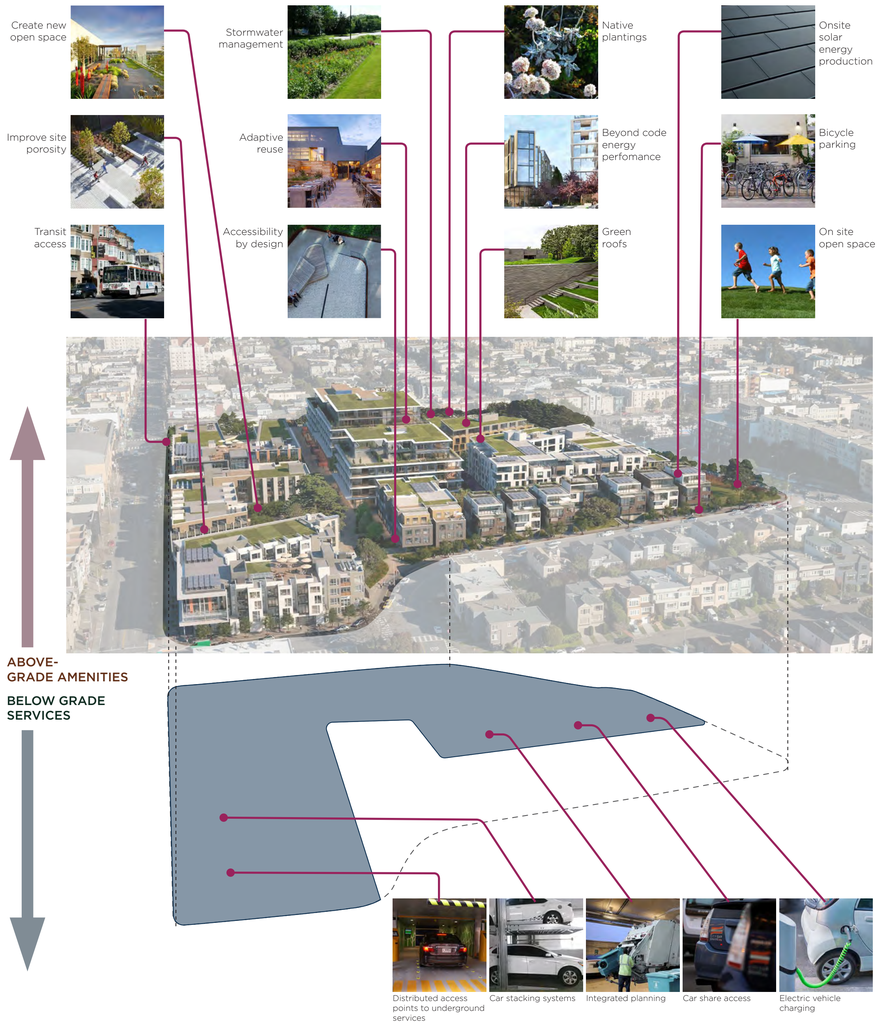
## SFGBO Approach - Beyond Compliance

3333 California proposes to meet and go beyond the requirements of the San Francisco Green Building Ordinance by achieving LEED for Neighborhood Development (LEED-ND) Plan certification at a minimum Gold level for the full development, and targeting Platinum. The project would thereby address two City priorities - exemplary rating level and increase in LEED-ND uptake. The team is seeking confirmation that this approach will satisfy the certification provisions of the Green Building Ordinance.

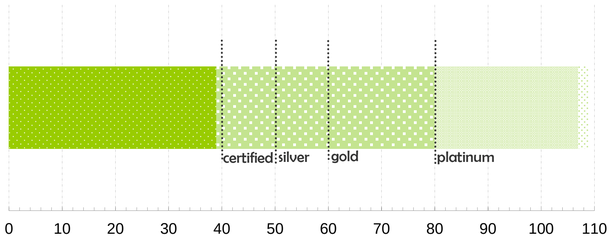
3333 California will also target better-than-code performance in stormwater management (exceeding the 25% volume reduction required by the Stormwater Management Ordinance). The project plans to achieve that reduction through a combination of rainwater harvesting, publicly-accessible greenspace, private greenspace and living roofs. Approximately half the site area is greenspace in the current plan, counting living roofs.

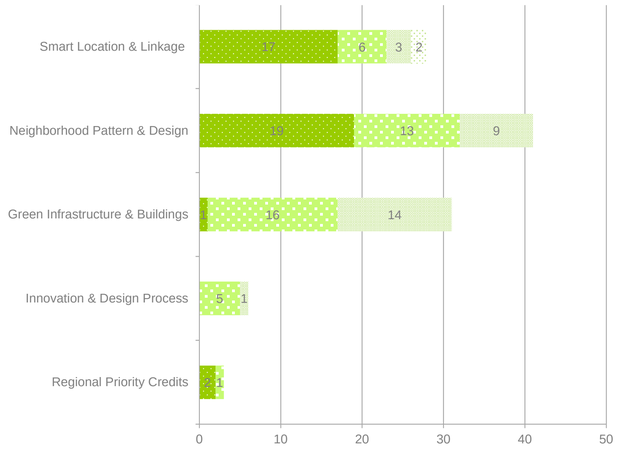
3333 California plans to be a leader in achieving the City's Better Roofs goals through extensive inclusion of living roofs, solar PV and solar hot water.

3333 California will also target leadership in acheivement of the City's expanded EV infrastructure goals.



LEED-ND




## LEED Certification

The chart at right illustrates 3333 California's preliminary LEED-ND checklist, showing high confidence credits as, "likely," credits anticipated with the current design direction as, "possible," and additional credits, "under study."

## Energy + Mobility

3333 California aims to be a low-carbon development, and energy and mobility are two key contributing factors. 3333 California plans to combine smart building technology with tried and true bioclimatic design to produce highly energy-efficient buildings. Solar energy onsite will further reduce energy use. The project aims to achieve net zero energy for lowrise residential components, and to produce about half of the full onsite energy demands with photovoltaics and solar hot water.

3333 California is well-connected to the city's public transportation network, and will be designed and operated to encourage residents to use it. Other low carbon transportation measures planned include carsharing, transportation demand management programs, bicycle infrastructure, and extensive electric vehicle infrastructure.

## Water + Ecology

3333 California's design is climate sensitive, with a goal to have a positive impact on San Francisco's water supply and urban ecosystems. The project will conserve using water smart landscaping, efficient fixtures, greywater and rainwater harvesting. It will also manage the stormwater to reduce runoff volume from the site by at least 25% compared to existing conditions.

A site of this size has the potential to enhance the ecological assets of the neighborhood and city. 3333 California will preserve several major trees and increase the total number of treescompared to existing, especially on the adjacent sidewalks.

3333 California's site design references local ecosystems, and emphasizes planting that attracts beneficial wildlife like butterflies and songbirds, inspired by the work of local organizations like Nature in the City.

## Wellness + Materials

Sustainability is about much more than conserving energy and water. Wellness for residents and the community is a high priority at 3333 California. The plan focuses heavily on creating new public open space and circulation networks, enhancing healthy living opportunities, and protecting indoor and outdoor air quality. Healthy neighborhoods also include affordable housing and universal design, both of which are integrated at 3333 California.

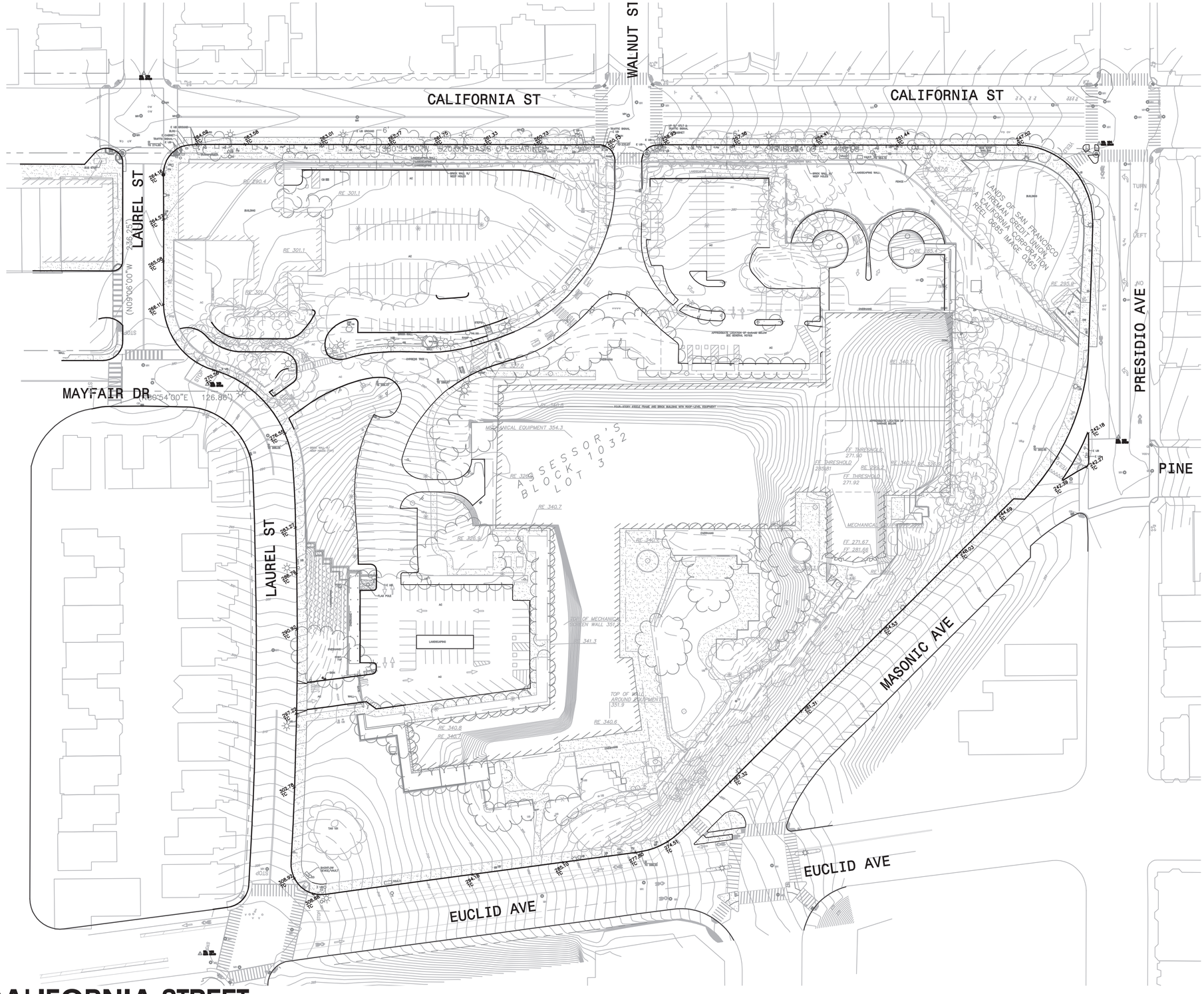
Integration and undergrounding of waste and material management systems will help the project achieve the dual goals of enhanced environmental performance and reduced traffic and noise compared to typical development. Advanced material management systems to achieve even greater waste diversion are under study.

| Commitments | Aspirations |
|---|---|
| Onsite solar power | 50% renewable energy onsite overall |
| Better than code energy performance | ZNE Lowrise Residential |
| New walking paths through site | New paths + traffic calming |
| All site parking underground, carsharing and EV infrastructure exceeding code requirements | Garage to include advanced infrastructure (e.g. vehicle to grid energy storage, stacked bike storage, etc) |
| TDM program encouraging alternatives to driving alone | Lower VMT generated than existing site |
| | |
| Water smart landscaping and fixtures, rainwater and greywater reuse | Use less potable water than existing site |
| Net increase in trees, preserve most healthy heritage trees, include living roofs | Net positive ecological value (create habitat, tailor plantings for native butterflies, etc). |
| Stormwater management - 25% volume reduction | 35% stormwater volume reduction using rainwater harvesting and living roofs |
| Visible green at site edge and throughout | Visible green at site edge and throughout, integrate biophilic design principles |
| | |
| Integrated planning and undergrounding for deliveries and waste | Automated waste collection |
| 75% diversion of construction waste and maintain healthy air quality and sound levels | Zero waste from construction and maintain healthy air quality and sound levels |
| New public open space | New public open space with wellness programming like a farmer's market or community gardens |








GRAPHIC SCALE

50 0 50 100

## SYMBOLS & LEGEND

EXISTING

- PROPERTY LINE
- MONUMENT LINE
- TREE DRIPLINE/LANDSCAPING
- CONCRETE
- FOUND MONUMENT
- LIGHT POLE
- STREET LIGHT
- SIGN
- FLAG POLE
- CIRCULAR UTILITY BOX COVER
- 0.0'N — DISTANCE & GENERAL DIRECTION OF FEATURE FROM PROPERTY LINE

ABBREVIATIONS

| | |
|---|---|
| ± | APPROXIMATELY |
| AC | ASPHALT CONCRETE |
| CB | CATCH BASIN |
| CO | CLEANOUT |
| DW | DRIVEWAY |
| *E* | EASTERLY |
| ELEV | ELEVATION |
| FH | FIRE HYDRANT |
| GI | GRATE INLET |
| MH | MANHOLE |
| *N* | NORTHERLY |
| *NE* | NORTHEASTERLY |
| RE | ROOF ELEVATION |
| *SE* | SOUTHEASTERLY |
| SFNF | SEARCHED FOR, NOT FOUND |
| TW | TOP OF WALL ELEVATION OF WALL SURROUNDING MECHANICAL EQUIPMENT ON ROOF |
| UB | UTILITY BOX |
| W | WEST |
| () | RECORD DATA. "MAP OF LAUREL HEIGHTS" FILED FOR RECORD ON JULY 28, 1947, IN BOOK P OF MAPS AT PAGES 55 AND 56, OFFICIAL RECORDS OF SAN FRANCISCO COUNTY. |

NOTE:
6071 OR 539 AND 6142 OR 103 (ITEM 4) CONTAIN STIPULATIONS WHICH MAY RESTRICTS BUILDING TYPE, USE, PARKING AND LOCATION ON THE SUBJECT PROPERTY. REFER TO SAID DOCUMENTS FOR ADDITIONAL INFORMATION.

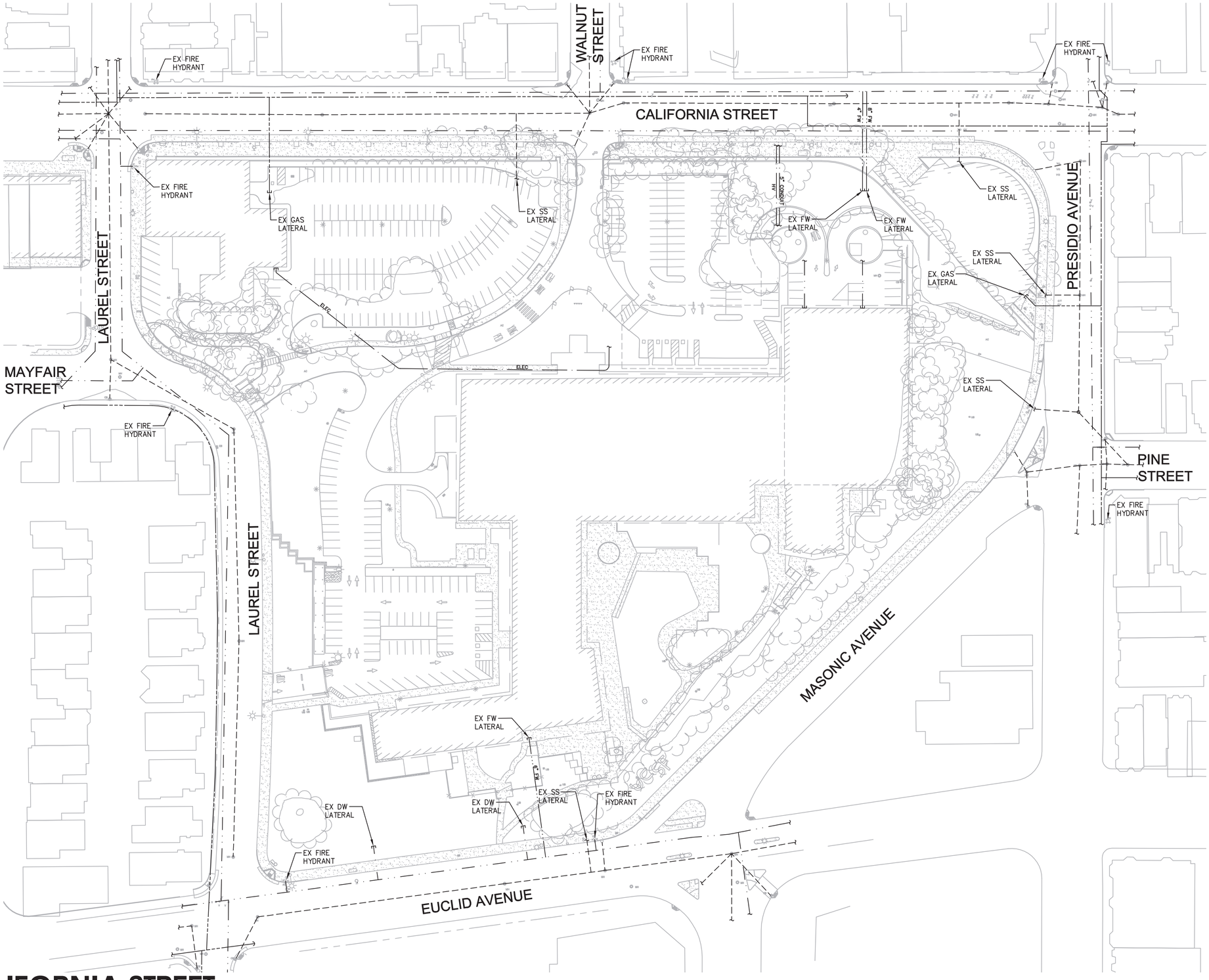
# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EXISTING SITE PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

C1.01




50 0 50 100

## LEGEND:

- EX WATER LINE
- EX SANITARY SEWER LINE
- EX GAS LINE
- EX ELECTRIC LINE
- EX FIRE HYDRANT
- EX MANHOLE
- EX CATCH BASIN
- EX ELECTRIC BOX
- EX STREET LIGHT

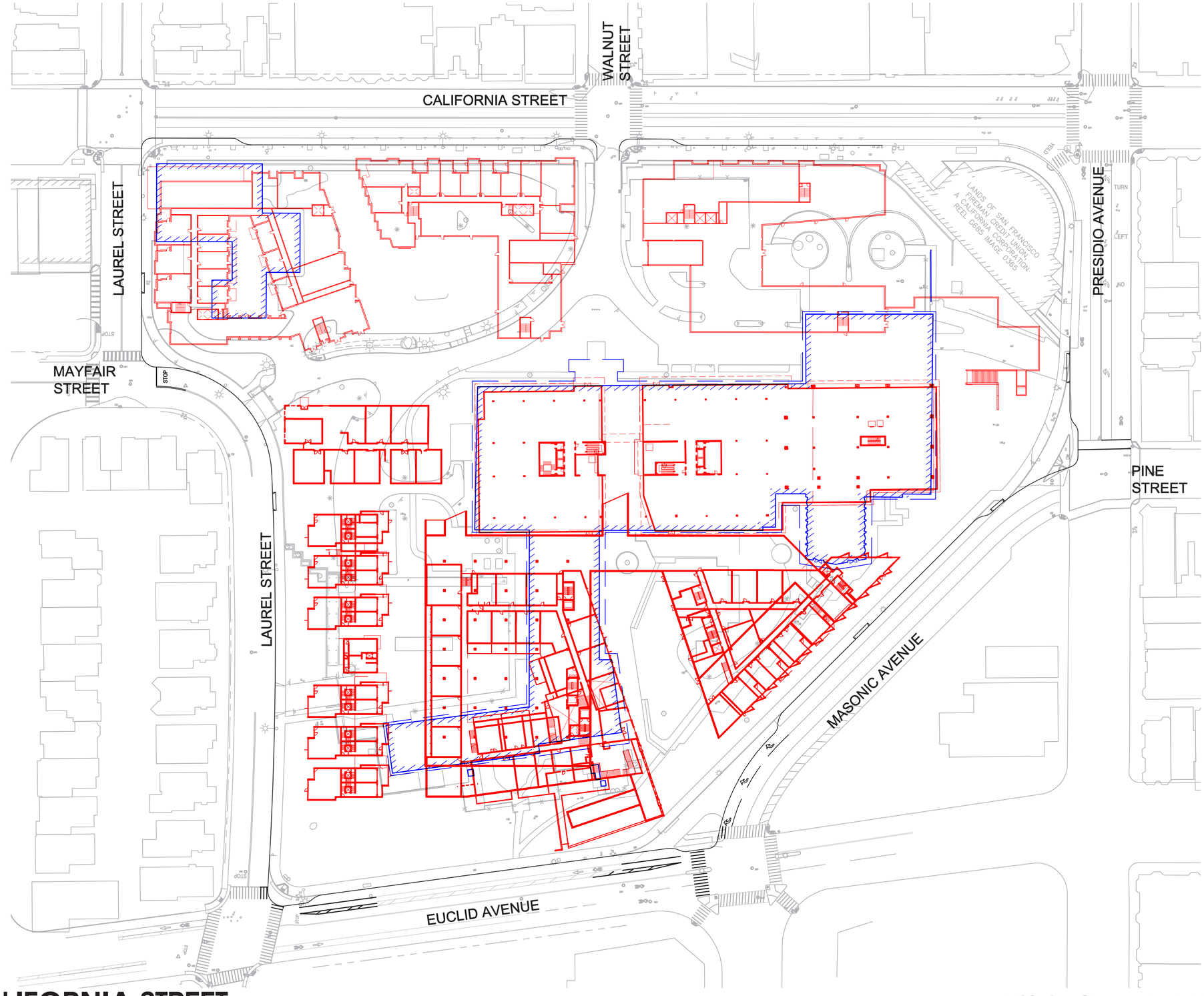
# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EXISTING UTILITY PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BKF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

**C1.02**



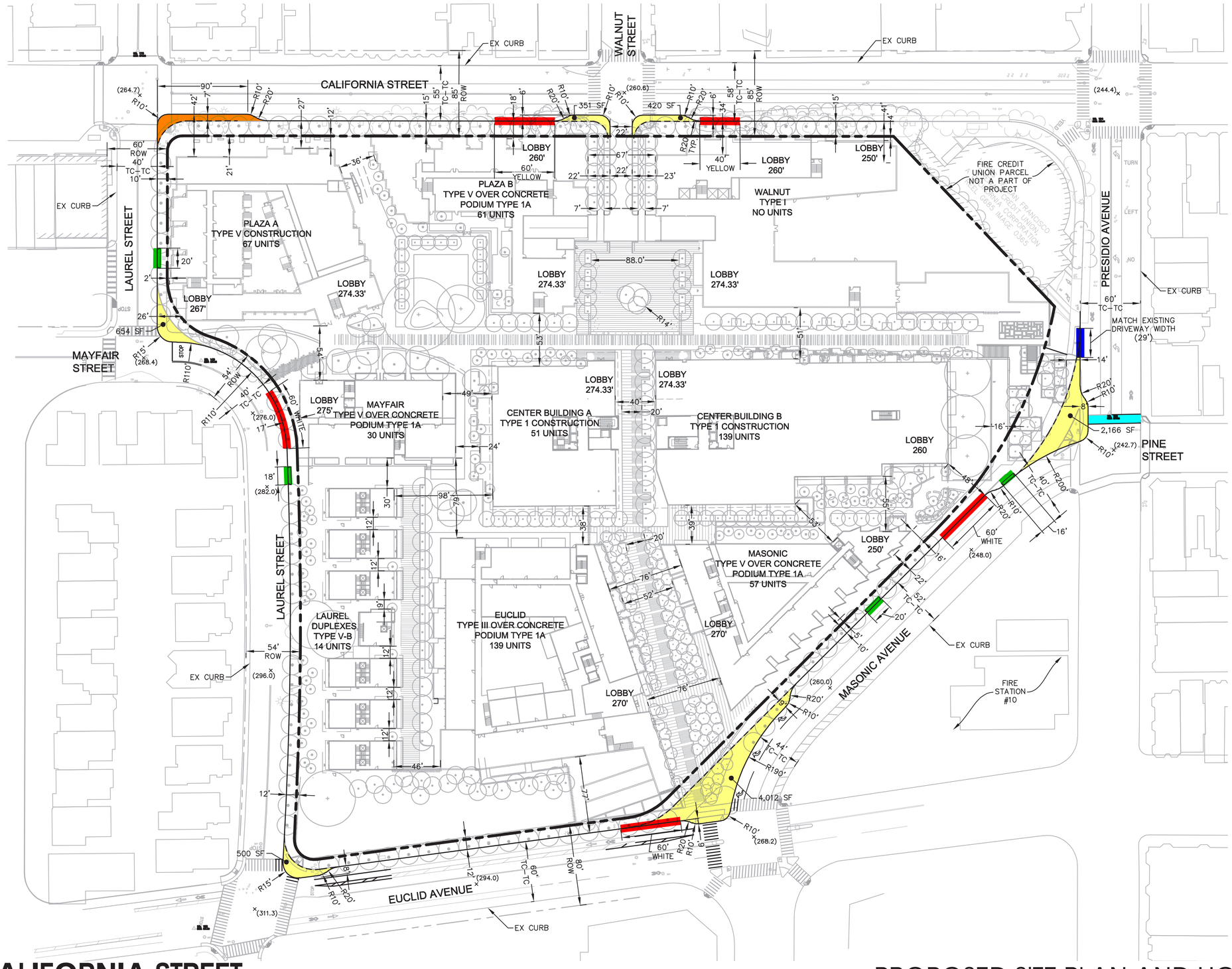

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EXISTING AND PROPOSED BUILDING OVERLAY

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB | BKF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

**C2.01**




50 0 50 100

## LEGEND:

- NEW DRIVEWAY CURB CUT PER CITY STANDARD PLANS AND SPECS. DET. 96,608
- EX DRIVEWAY TO BE MODIFIED WITH NEW DRIVEWAY CURB CUT
- NEW AT-GRADE STREET CROSSING.
- PROPOSED LOADING ZONE
- AREA OF STREET RECONFIGURATION (EX CURB TO PR CURB)
- APPROVED TRANSIT BULB TO BE CONSTRUCTED
- RX' PROPOSED CURB RADII

## NOTE

PROPOSED CURB MODIFICATIONS SHOWN FOR THE INTERSECTIONS OF PINE AT MASONIC AND MASONIC AT EUCLID MAY REQUIRE ADDITIONAL IMPROVEMENTS TO THE INTERSECTION, SUCH AS SIGNAL, STREET LIGHT, AND/OR MEDIAN MEDIAN MODIFICATIONS, NOT IDENTIFIED IN THIS PLAN.

ANY COLOR CURB DESIGNATION IS SUBJECT THE REVIEW AND DETERMINATION OF THE SFMTA COLOR CURB PROGRAM

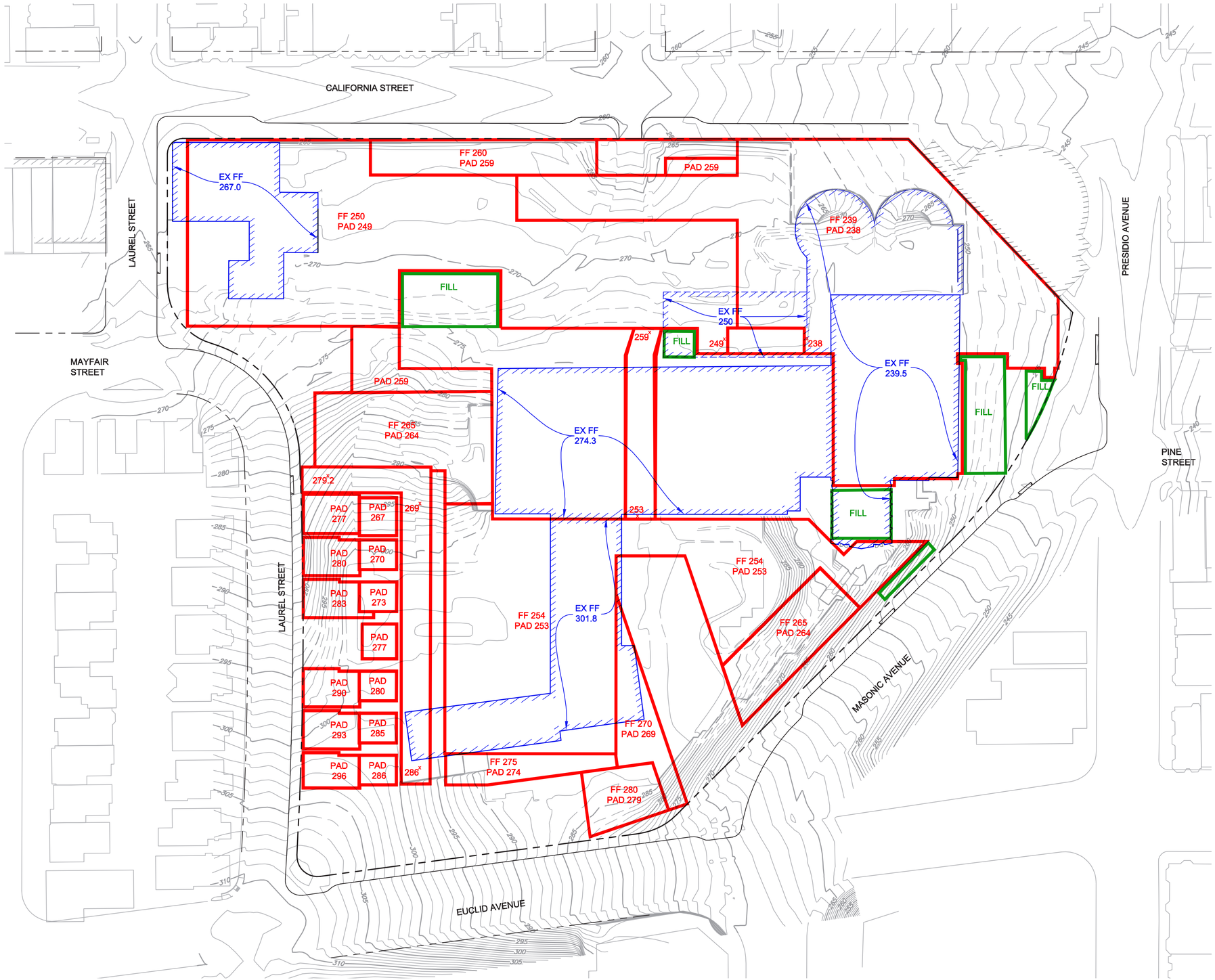
# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## PROPOSED SITE PLAN AND HORIZONTAL CONTROL PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB | BKF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

C2.02




## NOTE:

EARTHWORK VOLUMES ASSUME 1'–0" FOUNDATION THICKNESS FOR BOTH EXISTING AND PROPOSED BUILDINGS.

## ESTIMATED EARTHWORK (CY)

| | |
|---|---|
| CUT | 251,000 |
| FILL | 10,000 |
| NET | 241,000 CY EXPORT |

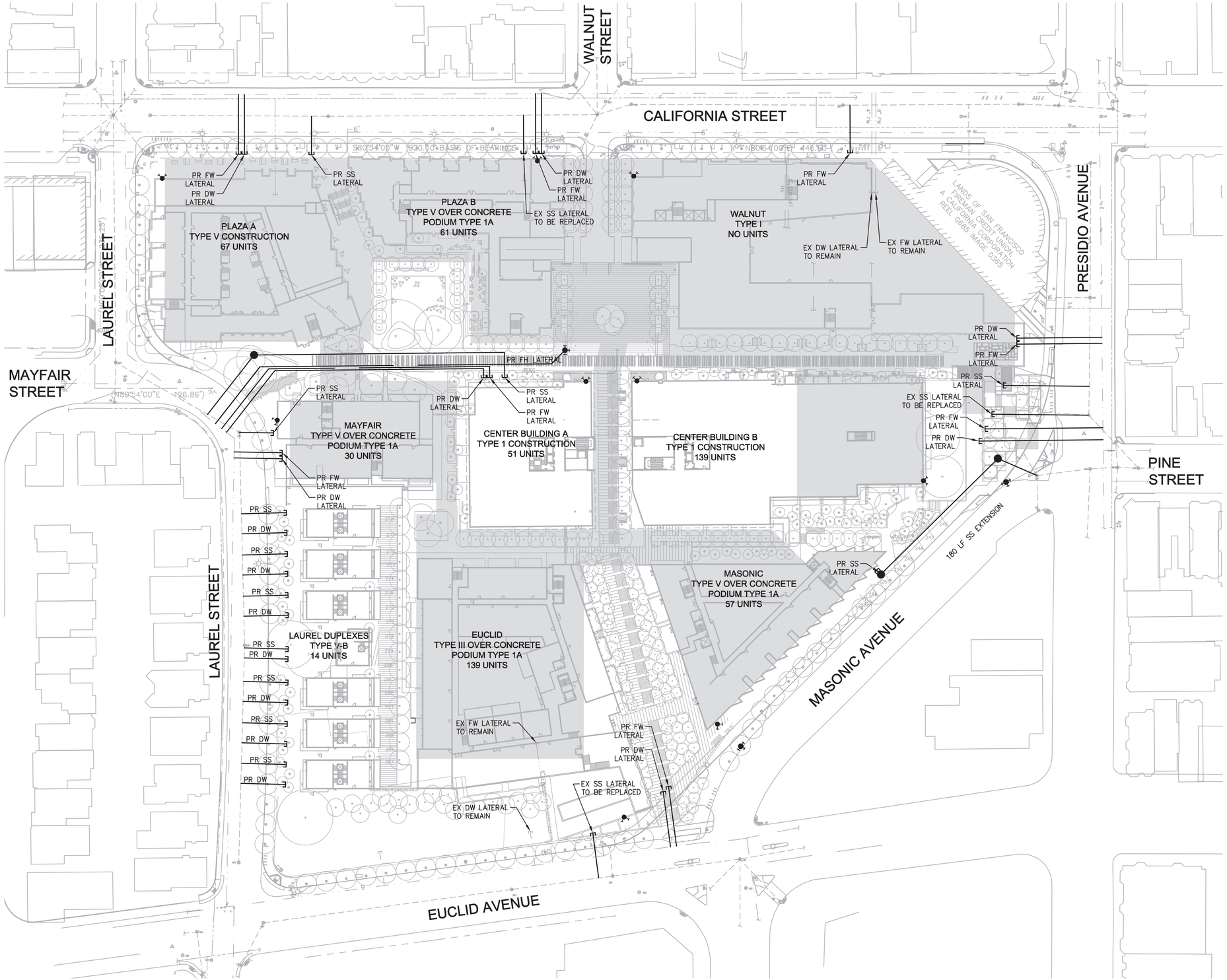
# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

# SCHEMATIC ROUGH GRADING & EXCAVATION PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB | BKF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

**C3.00**




50 0 50 100

## LEGEND:

- EX WATER LINE
- EX SANITARY SEWER LINE
- EX GAS LINE
- EX ELECTRIC LINE
- EX FIRE HYDRANT
- EX MANHOLE
- EX CATCH BASIN
- EX TRAFFIC SIGNAL
- EX ELECTRIC BOX
- EX SIGN
- EX STREET LIGHT
- PR FIRE HYDRANT
- WALL-MOUNTED FIRE DEPARTMENT CONNECTION (FDC)
- PR MANHOLE
- BELOW GRADE STRUCTURE

## ABBREVIATIONS

| | |
|---|---|
| DW | DOMESTIC WATER |
| EX | EXISTING |
| FW | FIRE WATER |
| LF | LINEAR FEET |
| PR | PROPOSED |
| SS | SANITARY SEWER |

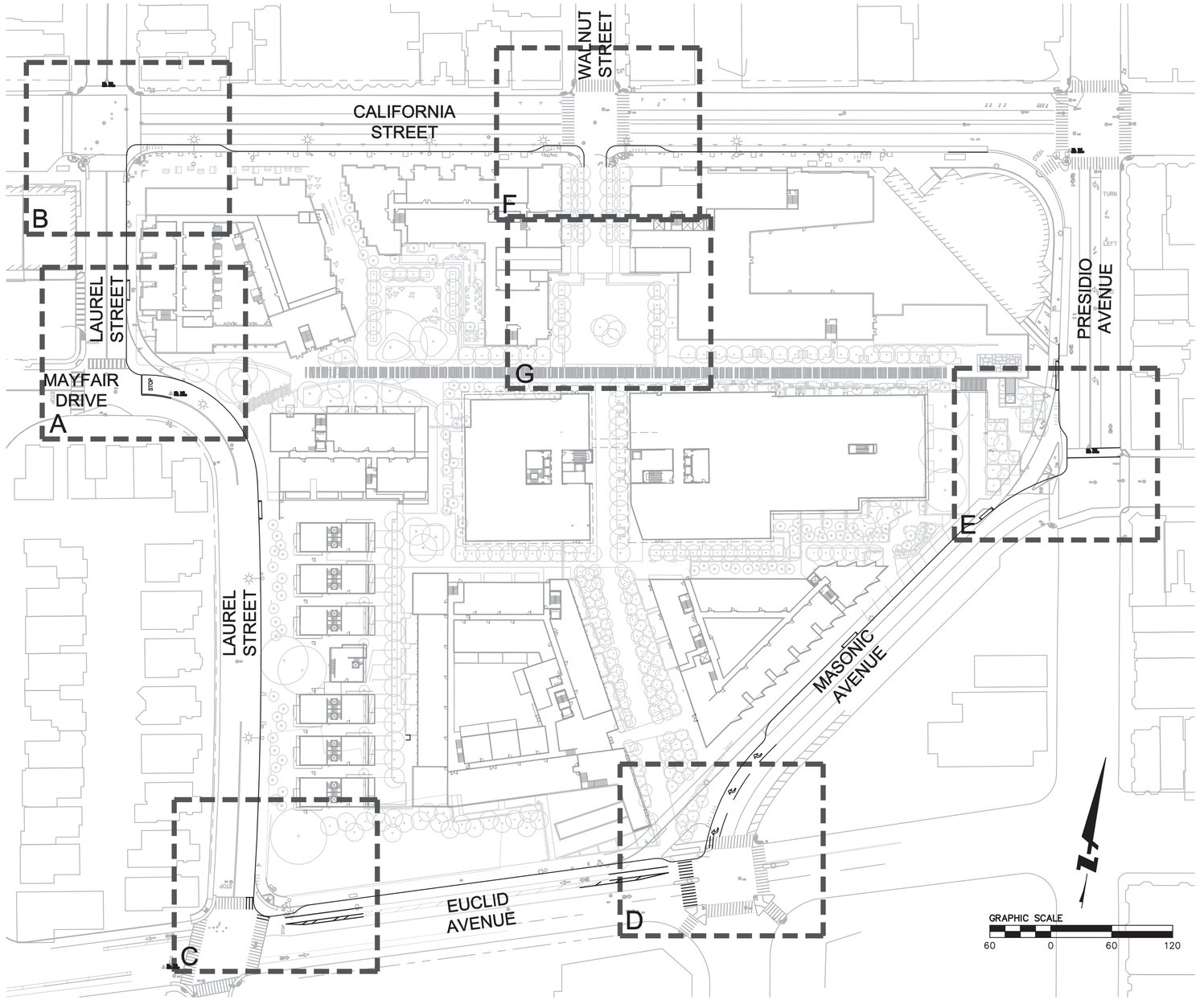
# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PROPOSED WET UTILITY PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BKF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

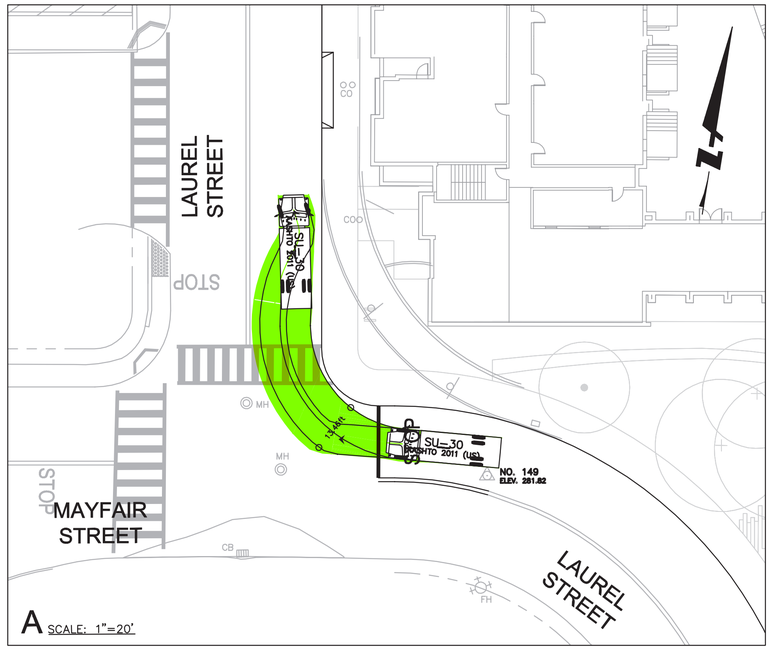
07.03.2019
PLANNING APPLICATION SUBMITTAL

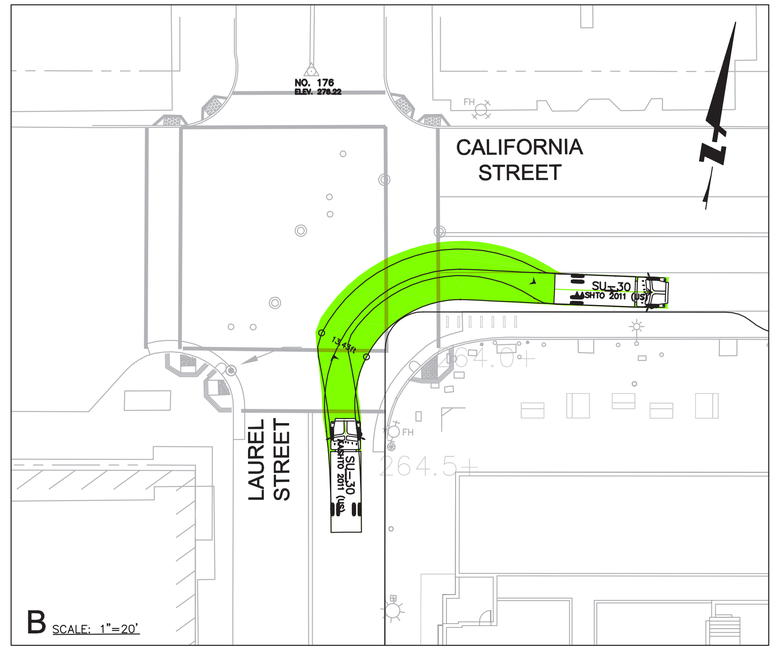
C3.01

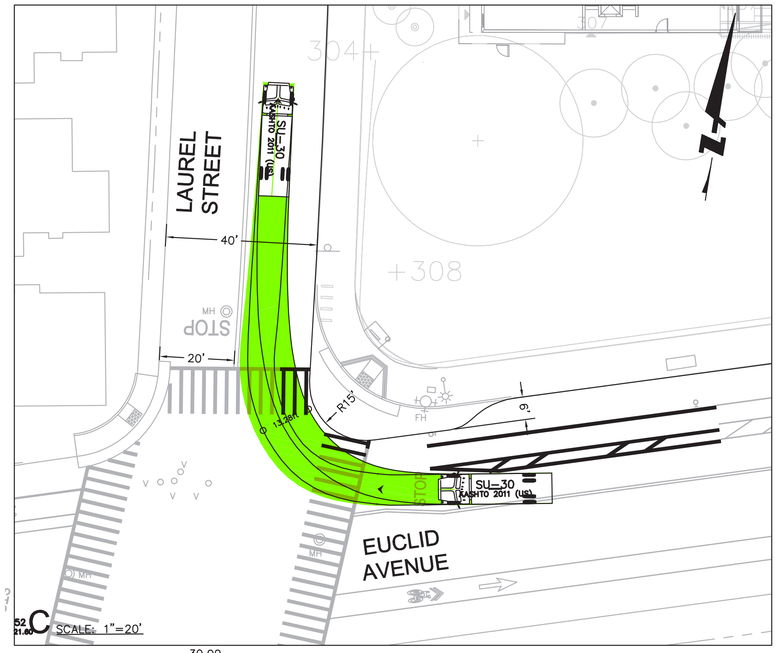


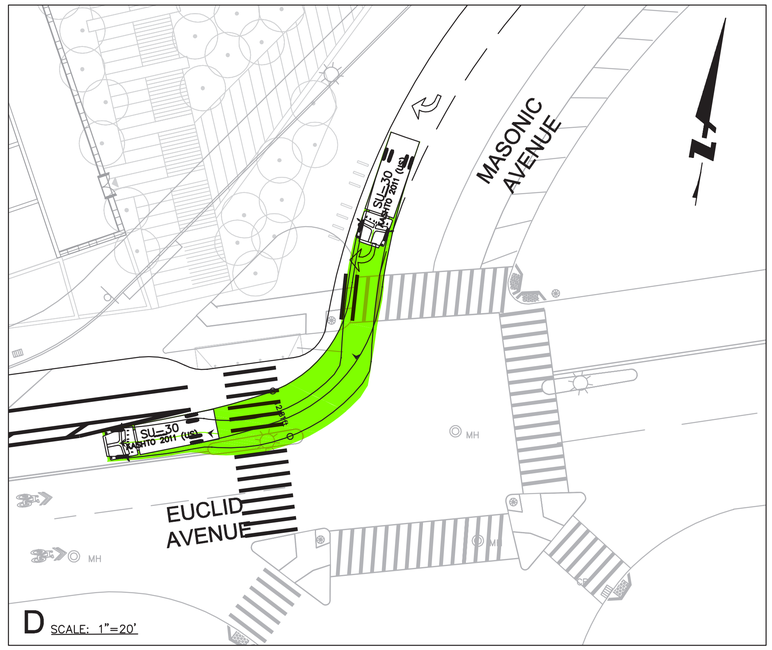

3333 CALIFORNIA

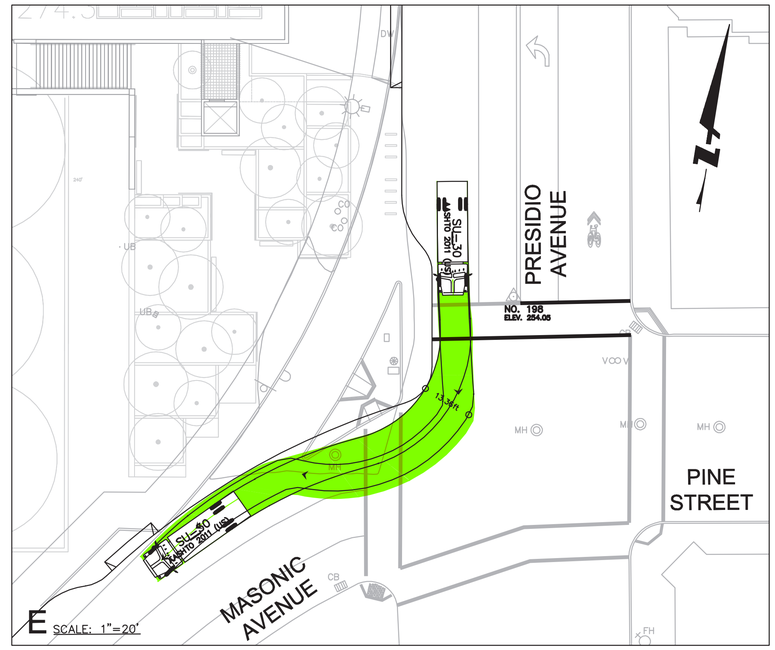
TRUCK TURNING INDEX

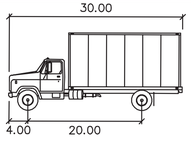



| SU-30 | feet |
|---|---|
| Width | : 8.00 |
| Track | : 8.00 |
| Lock to Lock Time | : 6.0 |
| Steering Angle | : 31.8 |

# 3333 CALIFORNIA

SU-30 CIRCULATION EXHIBIT

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

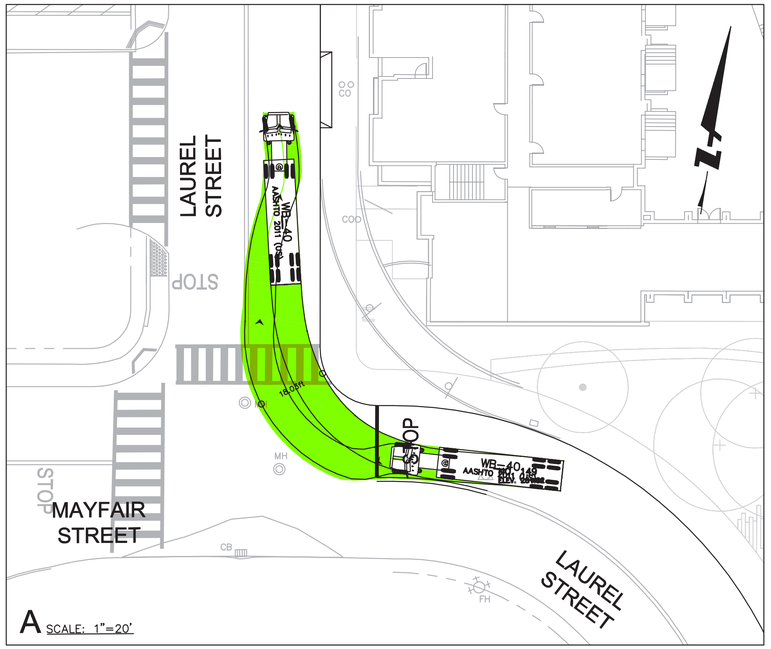
ENGINEERS . SURVEYORS . PLANNERS

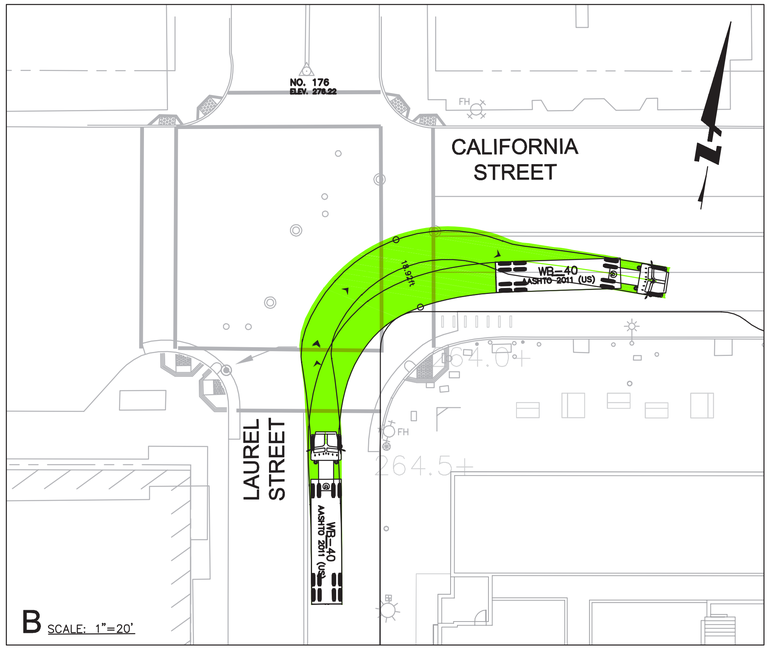
TRUCK TURNING SU-30

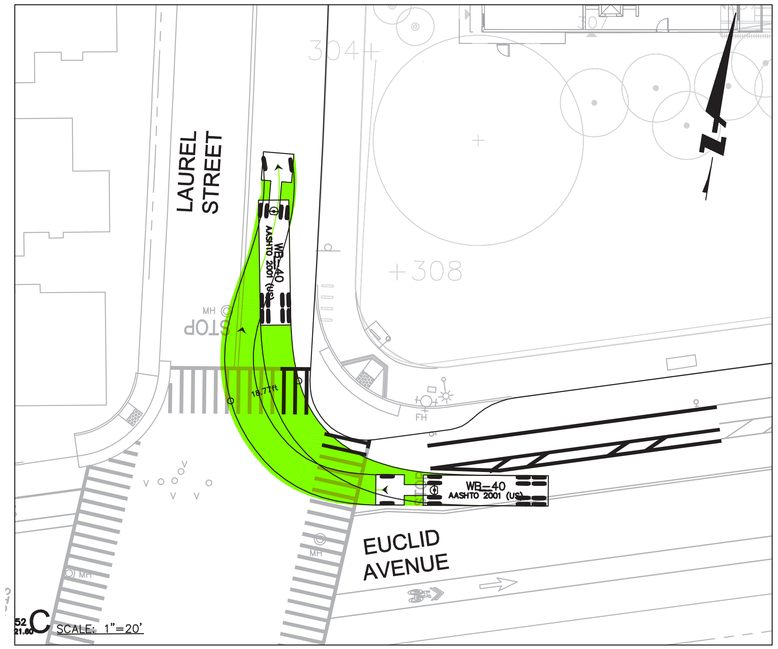
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

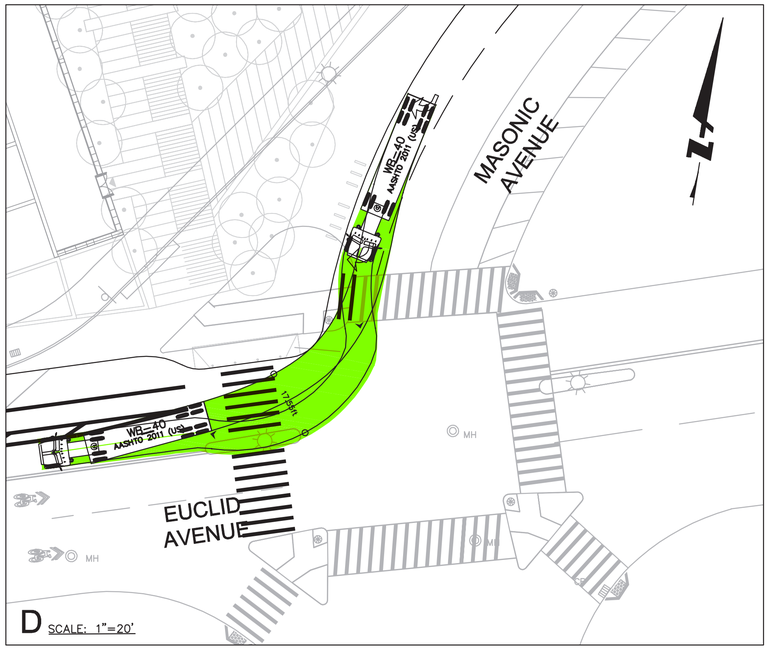
07.03.2019
PLANNING APPLICATION SUBMITTAL

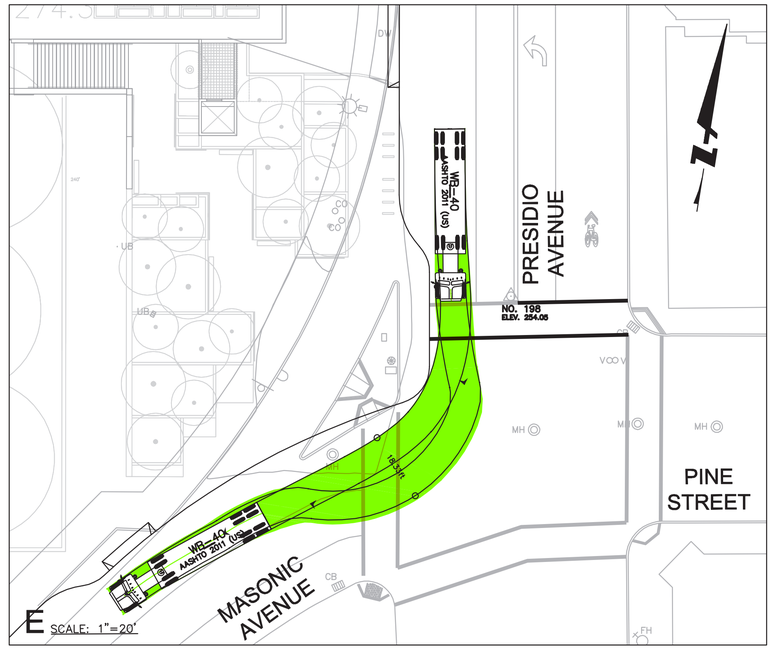
**C4.01**

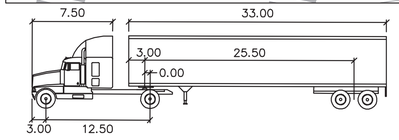



| WB—40 | feet | | |
|---|---|---|---|
| Tractor Width | : 8.00 | Lock to Lock Time | : 6.0 |
| Trailer Width | : 8.00 | Steering Angle | : 20.3 |
| Tractor Track | : 8.00 | Articulating Angle | : 70.0 |
| Trailer Track | : 8.00 | | |

## 3333 CALIFORNIA

WB-40 CIRCULATION EXHIBIT

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

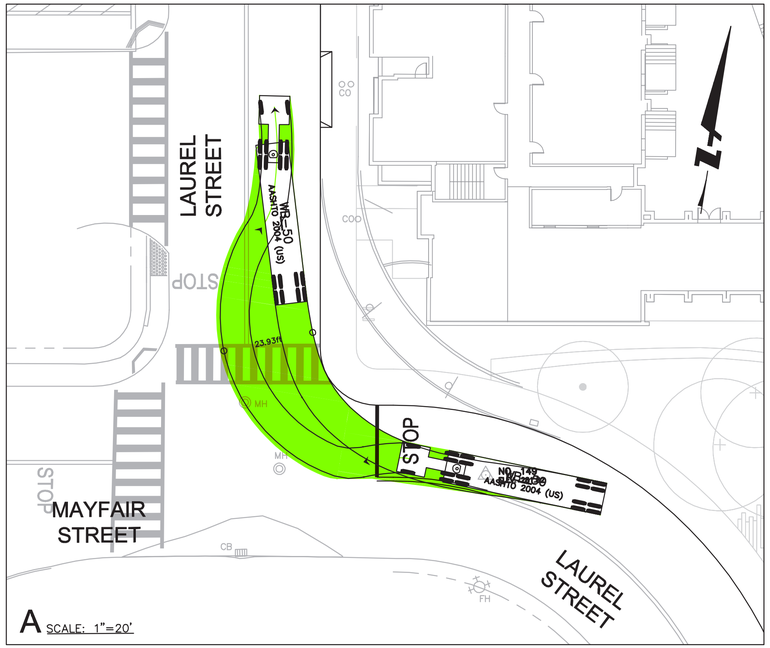
BkF 100+ YEARS
ENGINEERS . SURVEYORS . PLANNERS

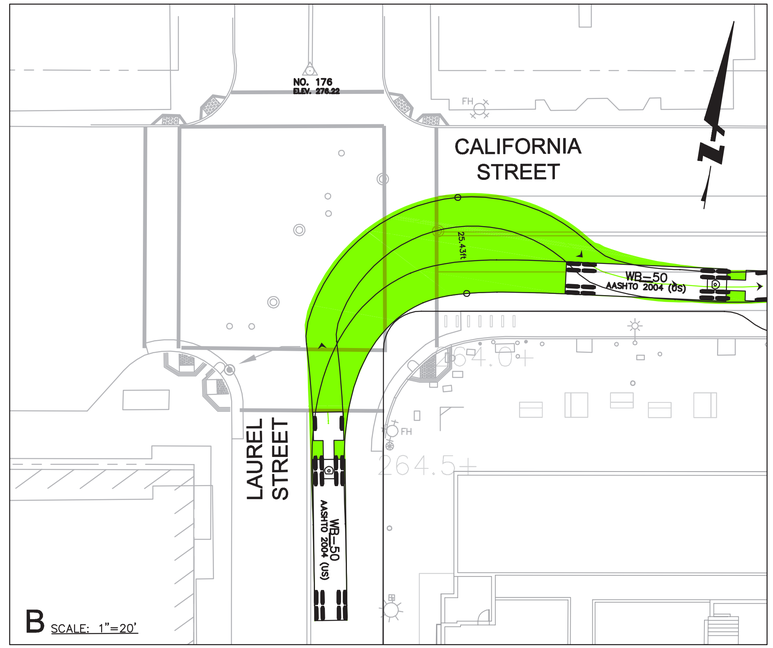
## TRUCK TURNING WB-40

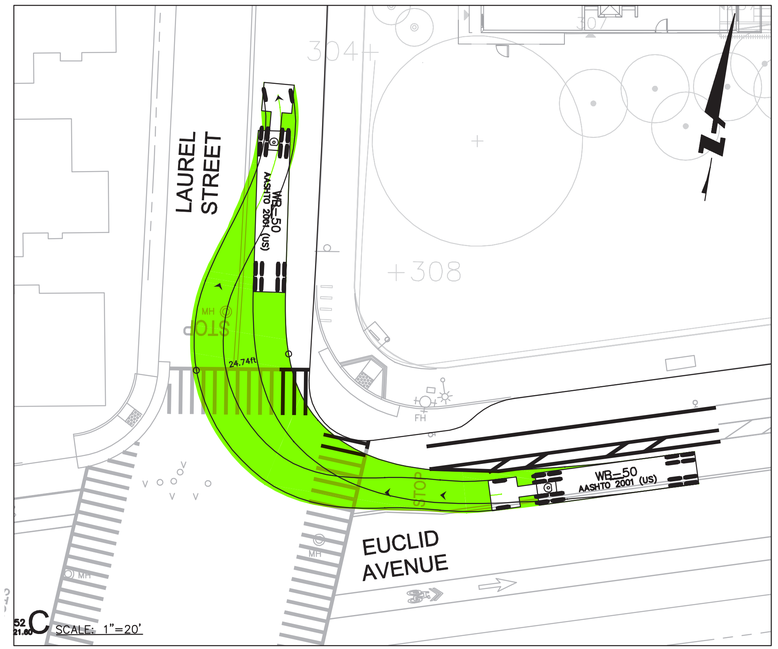
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

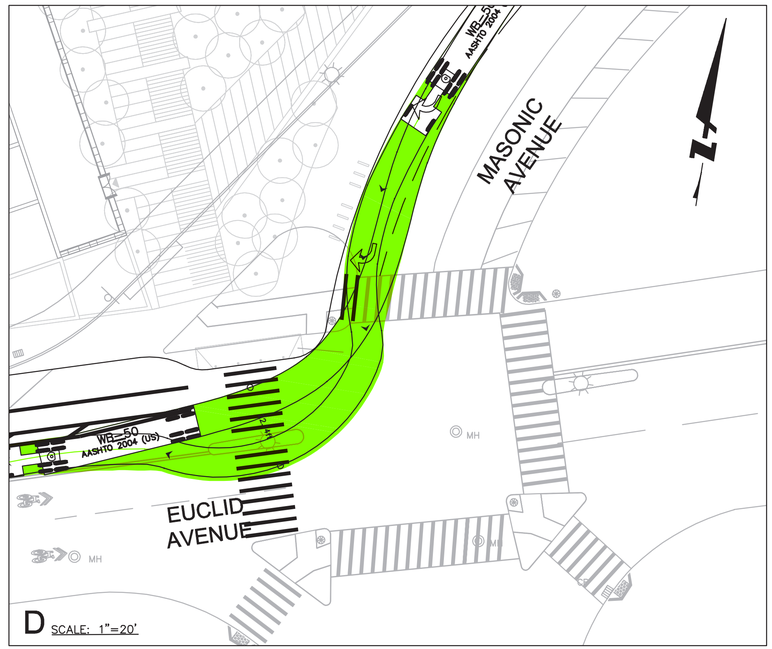
07.03.2019
PLANNING APPLICATION SUBMITTAL

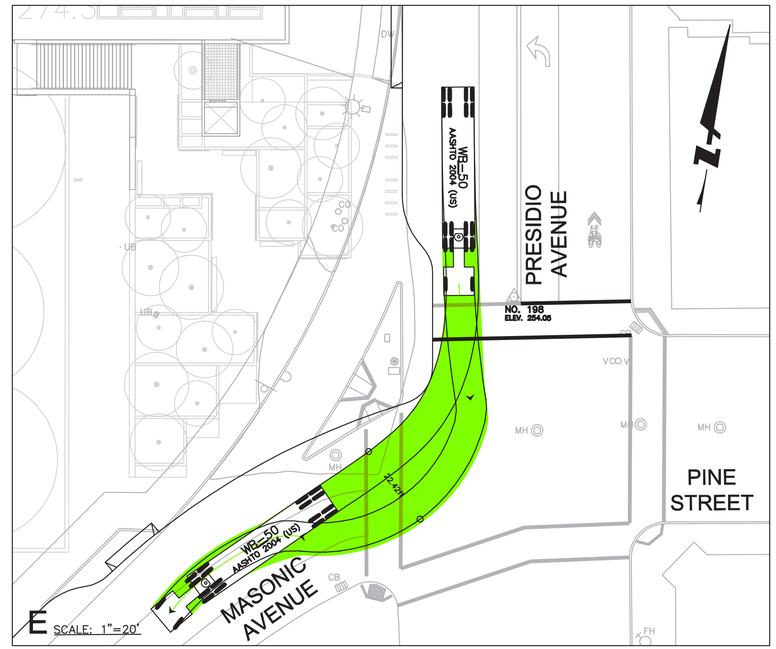
**C4.02**

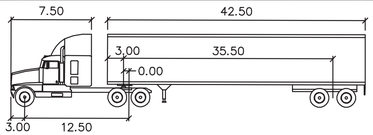



WB–50

| | feet | | |
|---|---|---|---|
| Tractor Width | : 8.00 | Lock to Lock Time | : 6.0 |
| Trailer Width | : 8.50 | Steering Angle | : 17.7 |
| Tractor Track | : 8.00 | Articulating Angle | : 70.0 |
| Trailer Track | : 8.50 | | |

# 3333 CALIFORNIA

WB-50 CIRCULATION EXHIBIT

BkF 100+ YEARS
ENGINEERS . SURVEYORS . PLANNERS

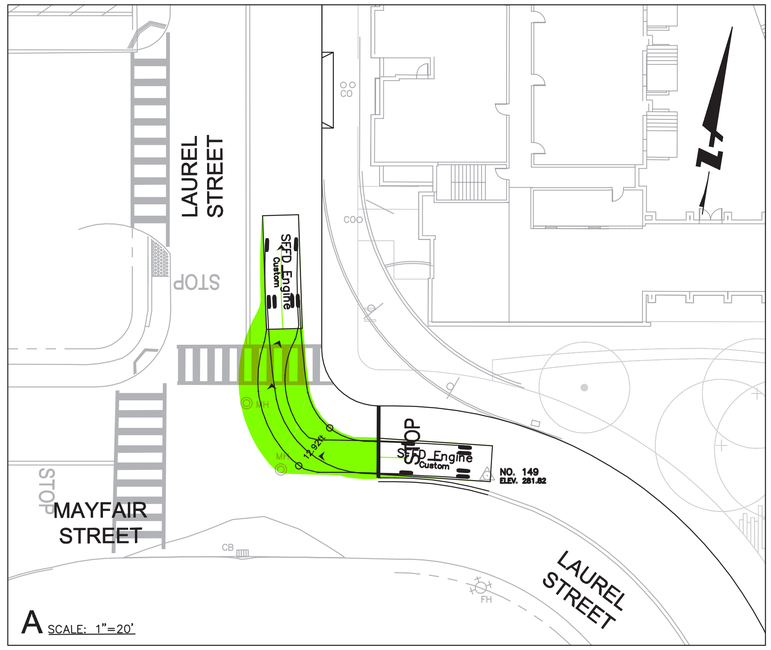
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

TRUCK TURNING WB-50

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

**C4.03**

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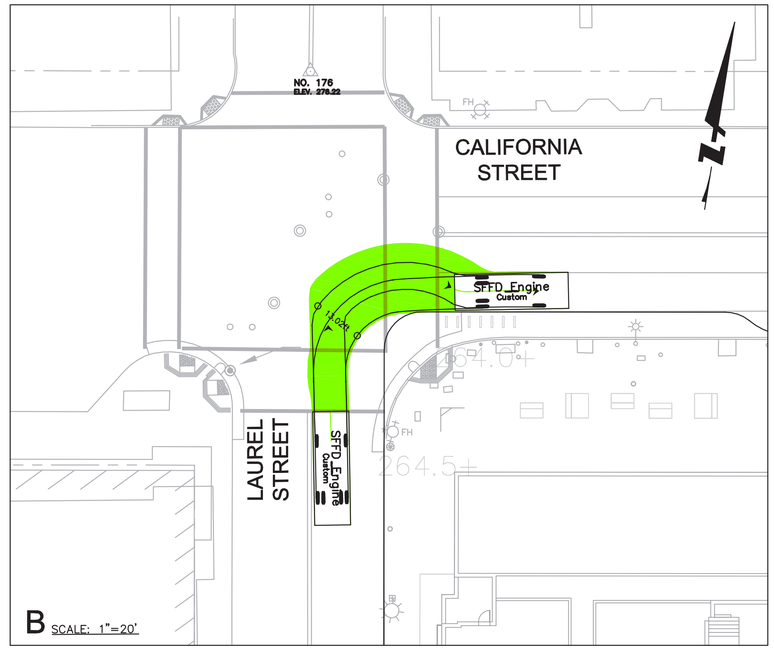


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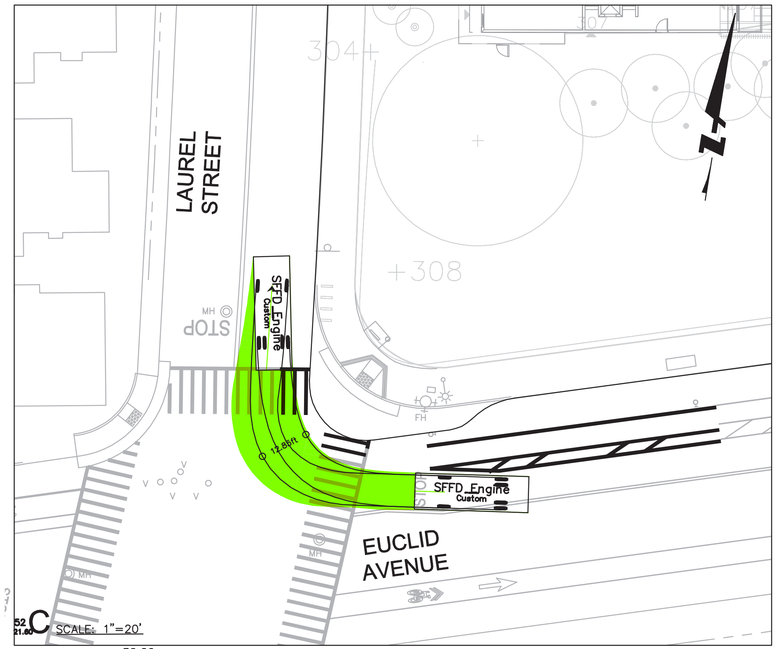


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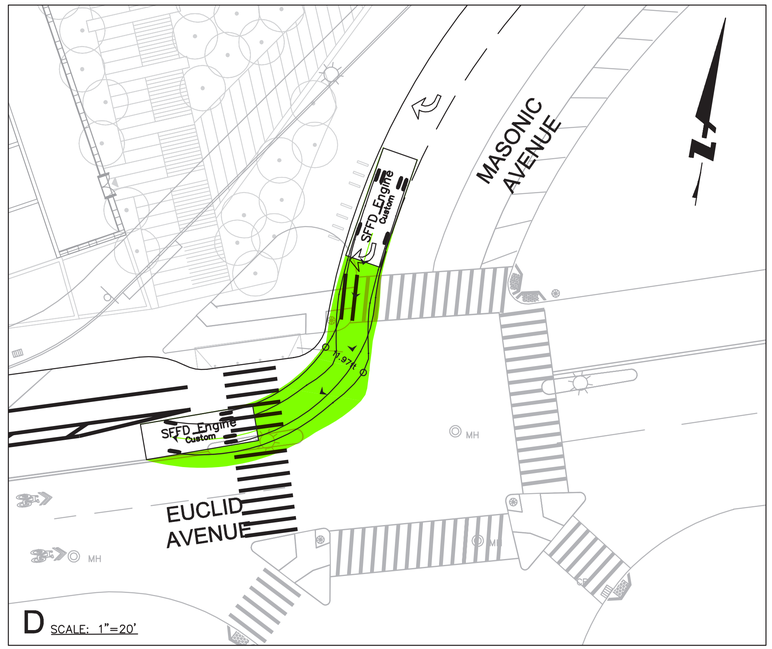


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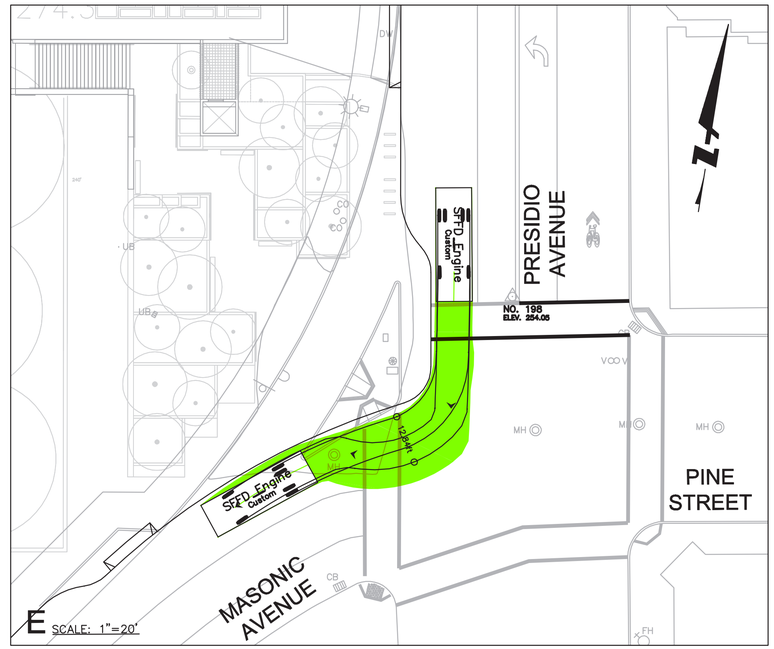


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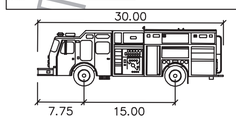



| SFFD Engine | feet |
|---|---|
| Width | : 9.50 |
| Track | : 8.50 |
| Lock to Lock Time | : 6.0 |
| Steering Angle | : 36.0 |

# 3333 CALIFORNIA

FIRE ENGINE CIRCULATION EXHIBIT

BkF 100+ YEARS
ENGINEERS . SURVEYORS . PLANNERS

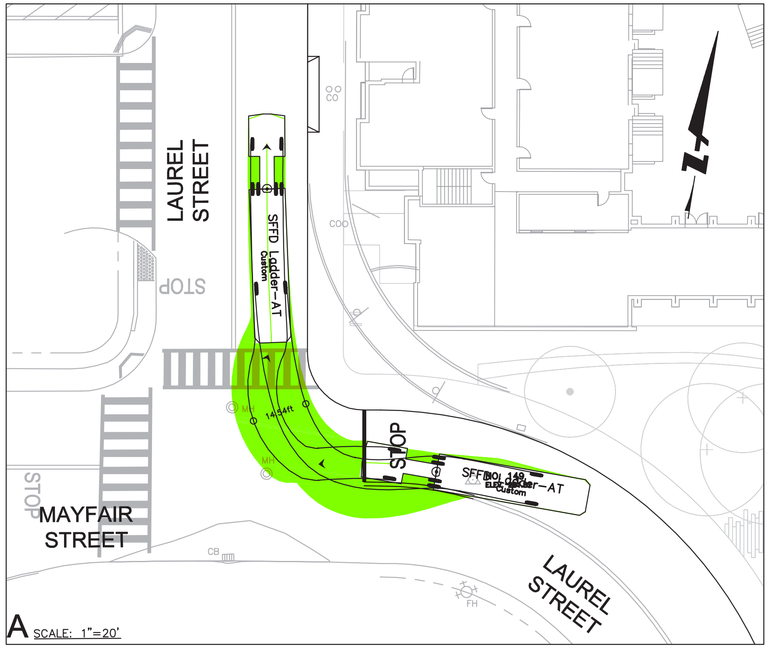
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

TRUCK TURNING SFFD-ENGINE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

**C4.04**

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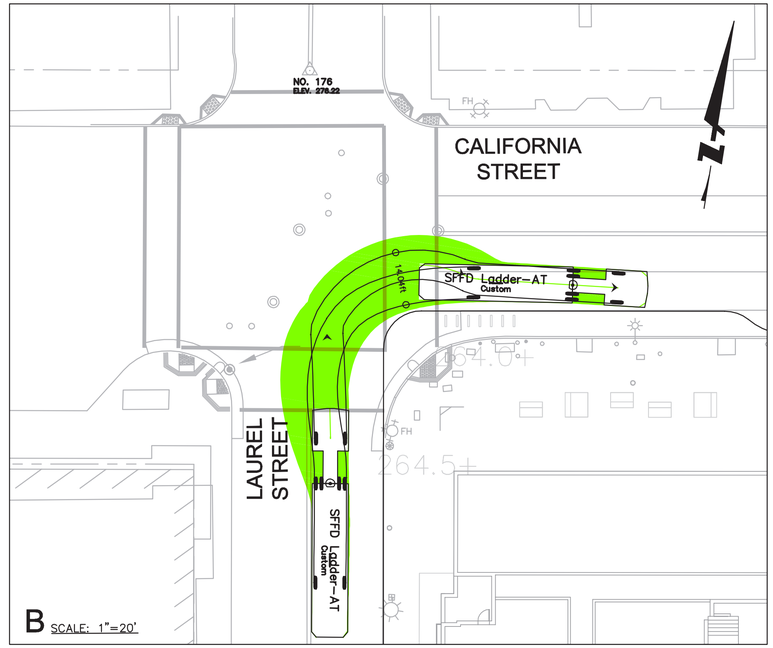


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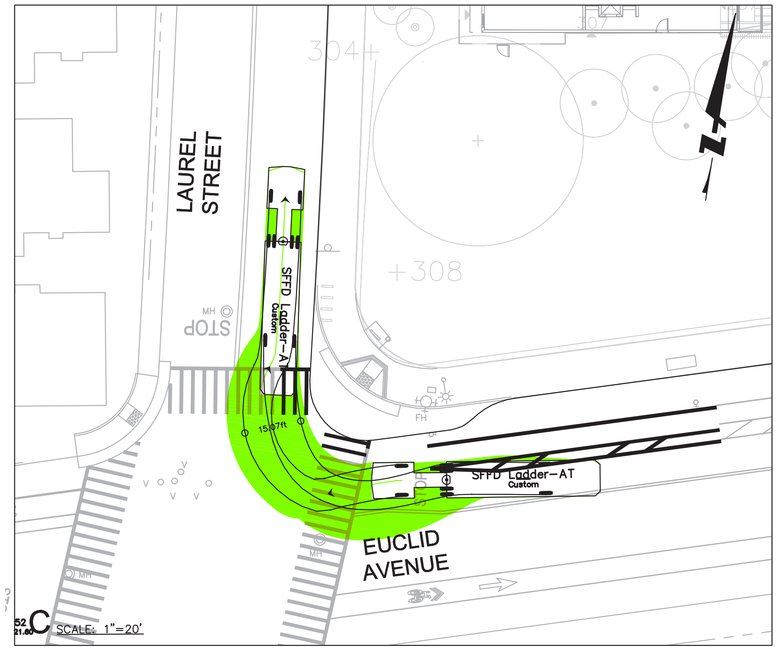


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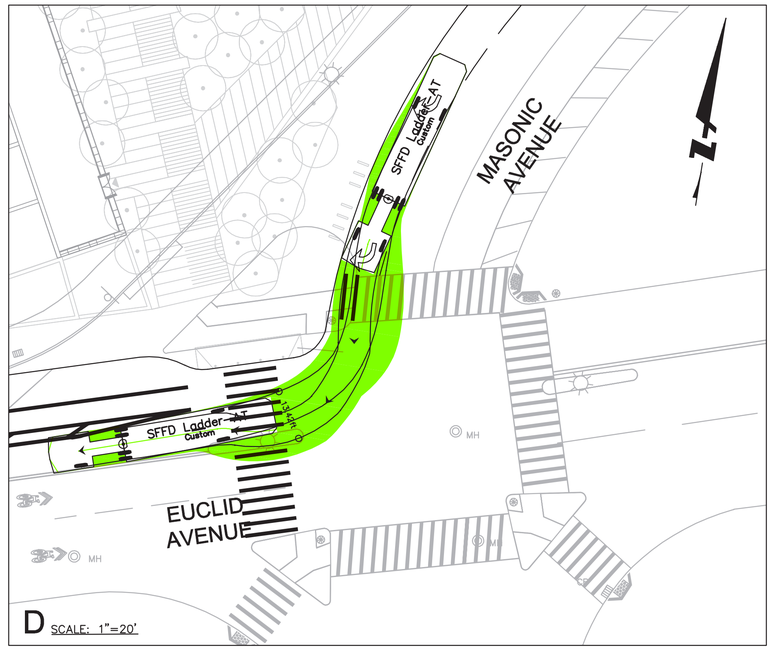


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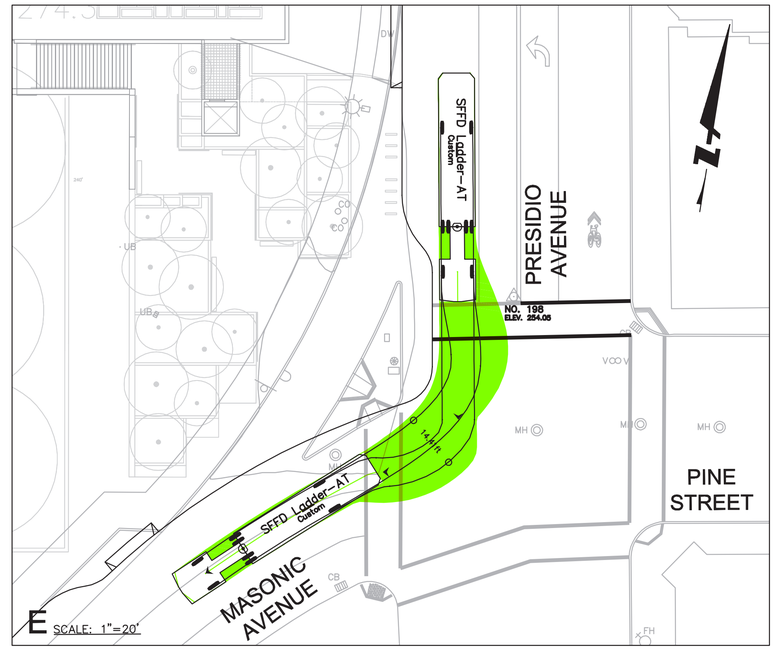


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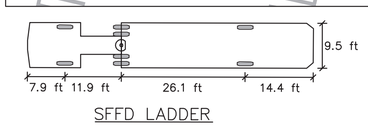



SFFD LADDER

# 3333 CALIFORNIA

FIRE LADDER CIRCULATION EXHIBIT

BkF 100+ YEARS
ENGINEERS . SURVEYORS . PLANNERS

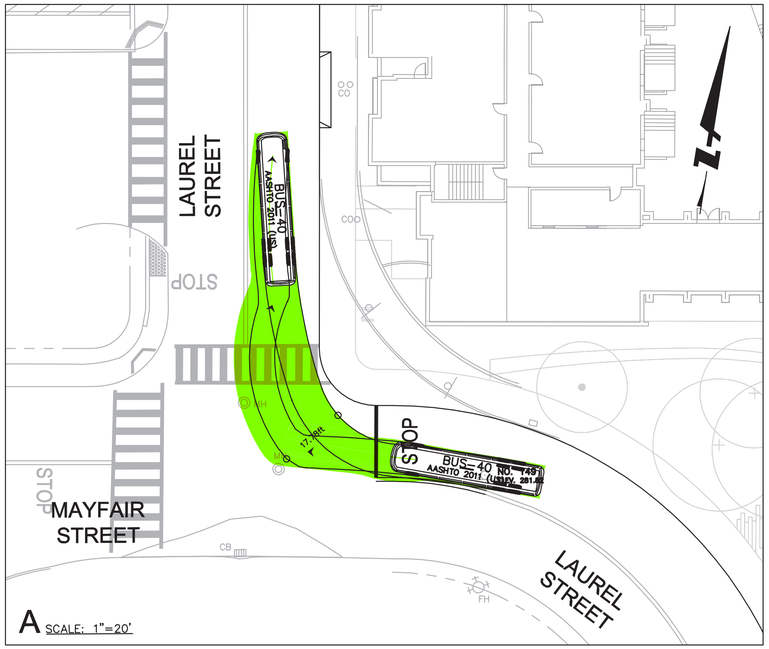
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

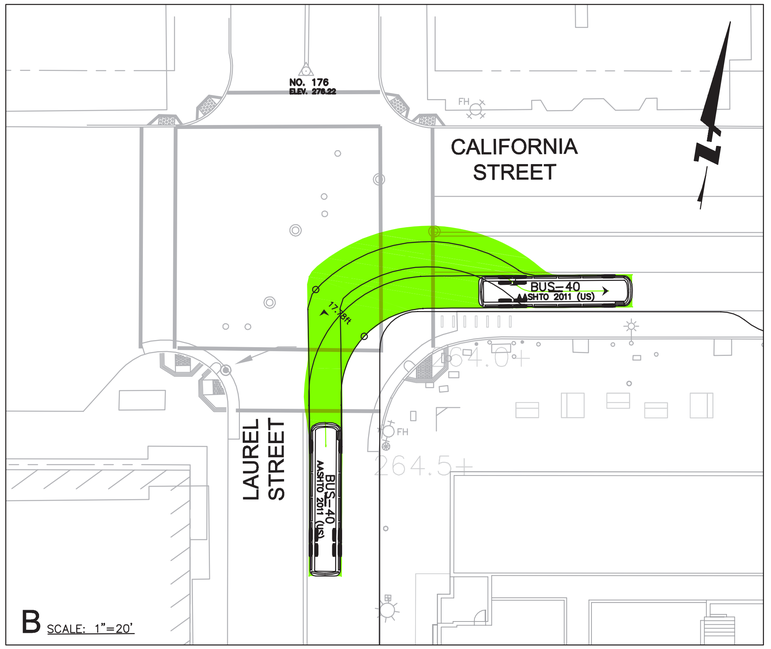
TRUCK TURNING SFFD-LADDER

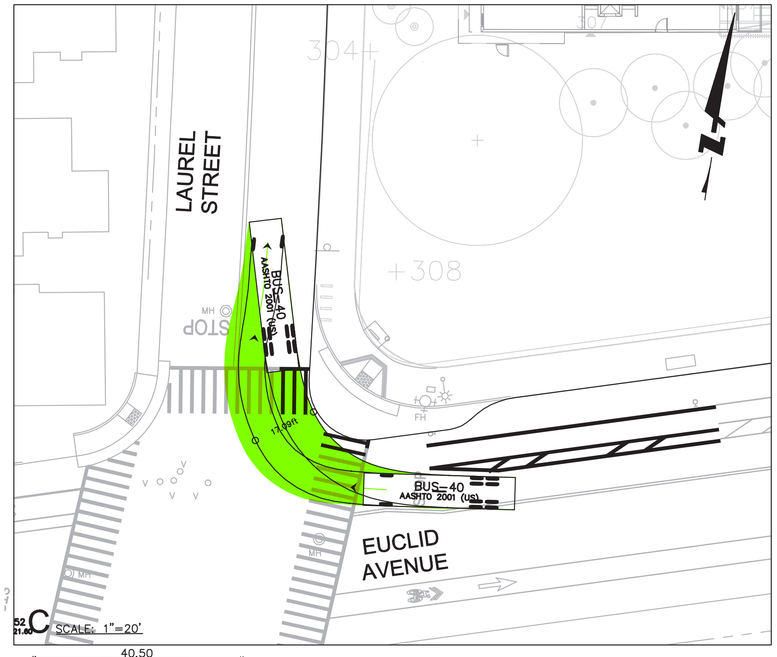
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

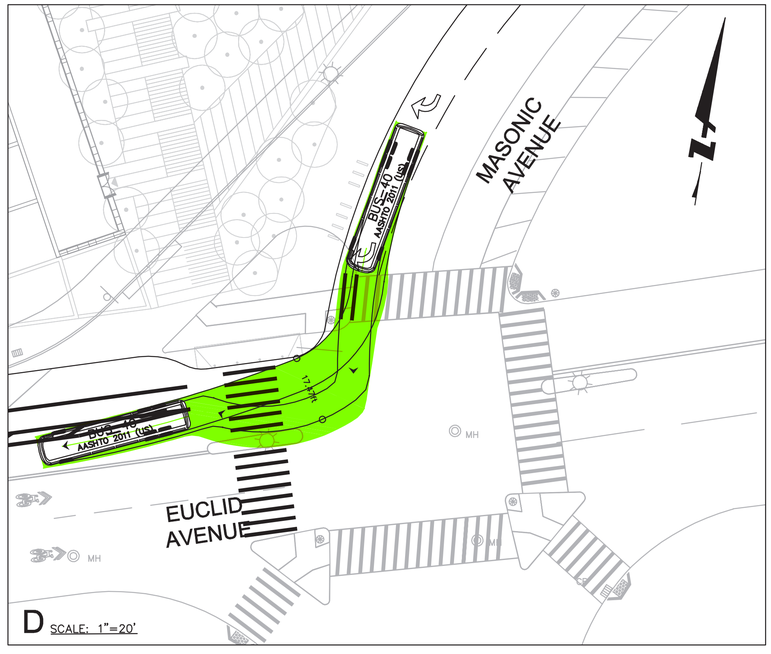
07.03.2019
PLANNING APPLICATION SUBMITTAL

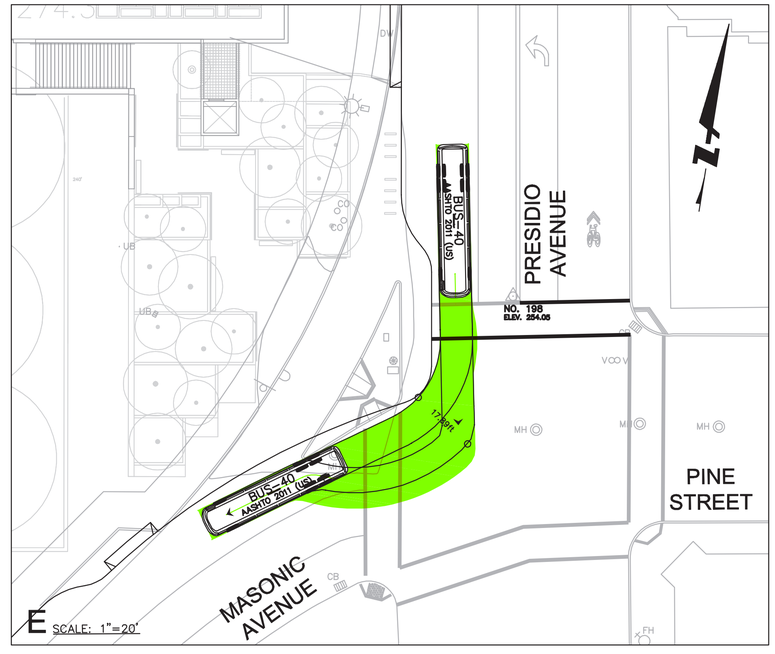
**C4.05**

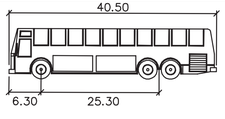



| BUS–40 | feet |
|---|---|
| Width | : 8.50 |
| Track | : 8.50 |
| Lock to Lock Time | : 6.0 |
| Steering Angle | : 41.9 |

# 3333 CALIFORNIA

BUS-40 CIRCULATION EXHIBIT

BkF 100+ YEARS
ENGINEERS . SURVEYORS . PLANNERS

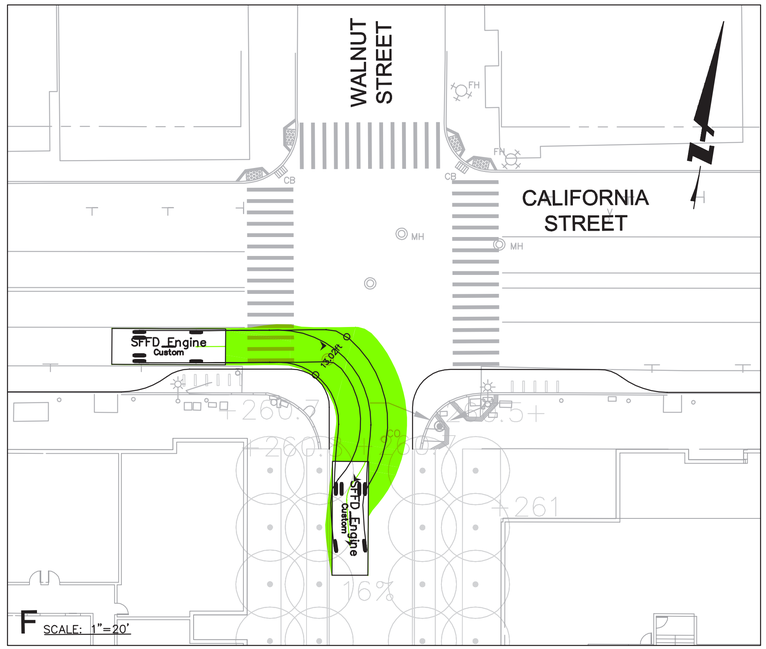
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

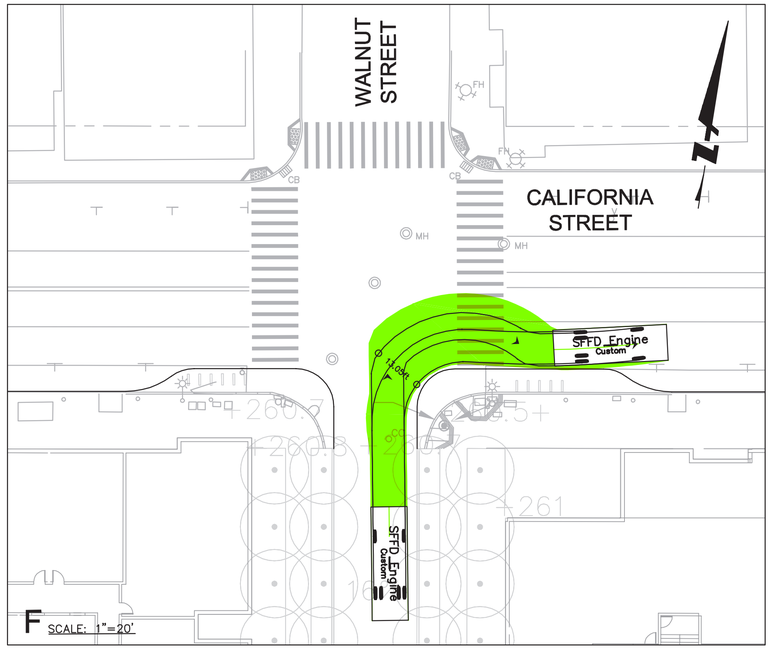
TRUCK TURNING BUS-40

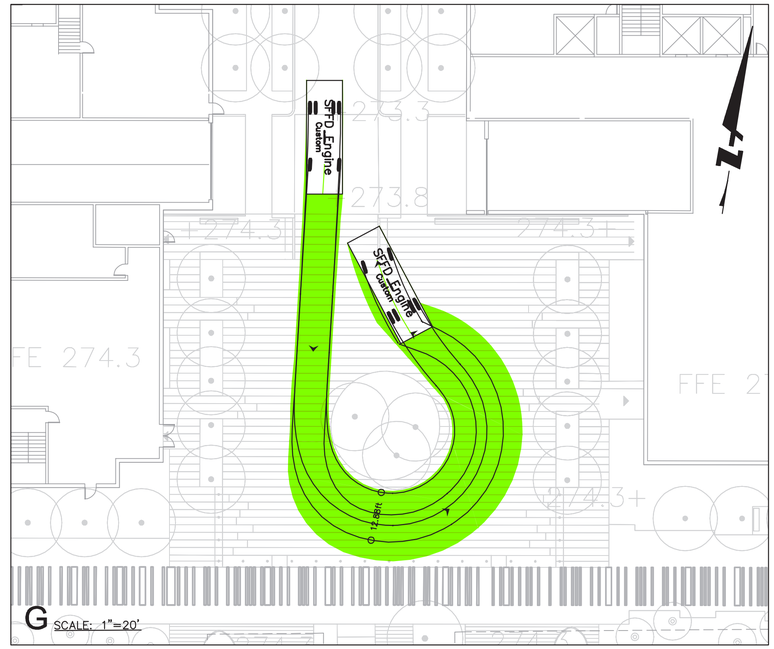
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BkF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

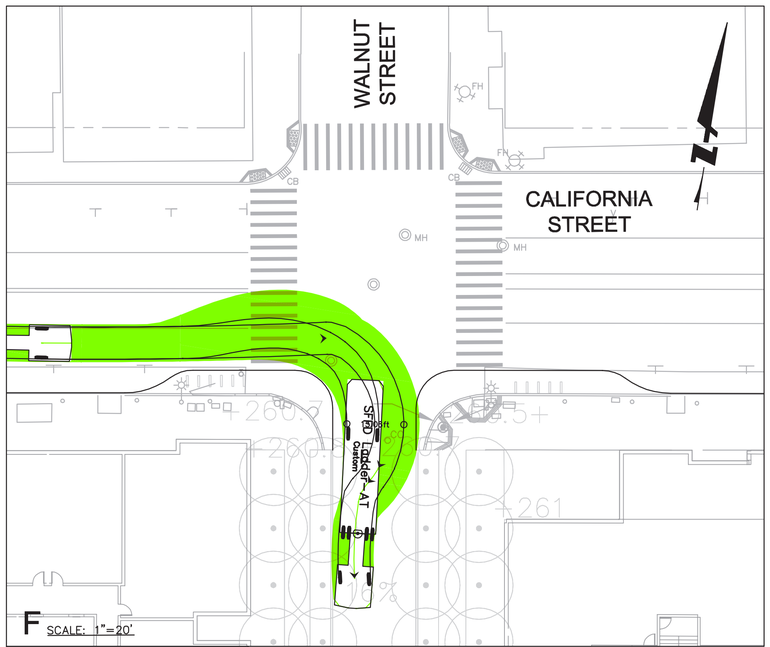
**C4.06**

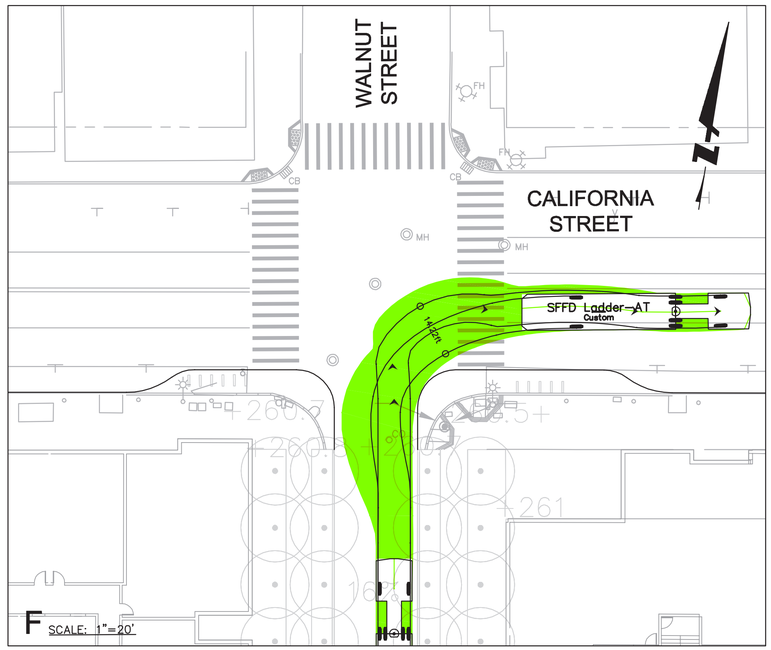


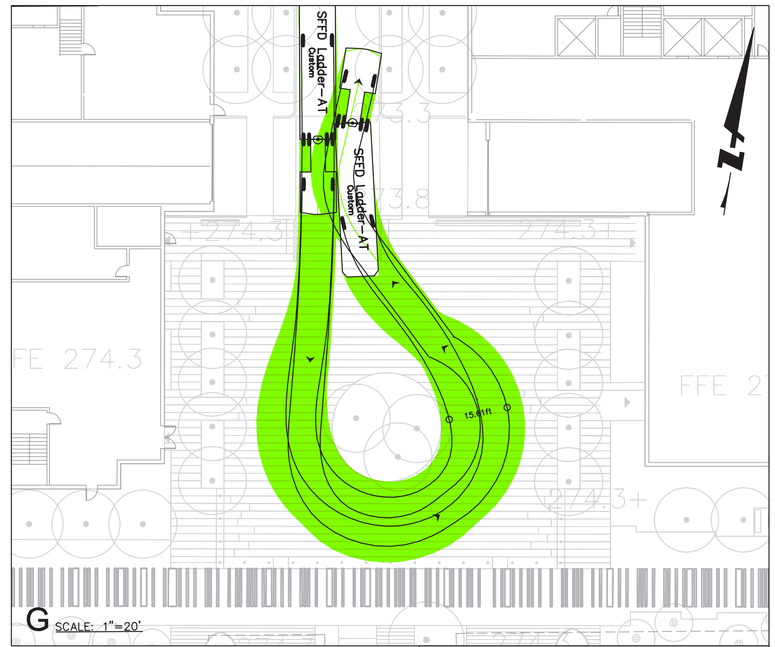



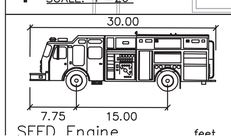




SFFD - ENGINE TRUCK



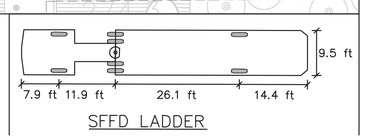




| SFFD Engine | feet |
|---|---|
| Width | : 9.50 |
| Track | : 8.50 |
| Lock to Lock Time | : 6.0 |
| Steering Angle | : 36.0 |

SFFD - LADDER TRUCK




# 3333 CALIFORNIA

WALNUT EXTENSION FIRE EXHIBIT

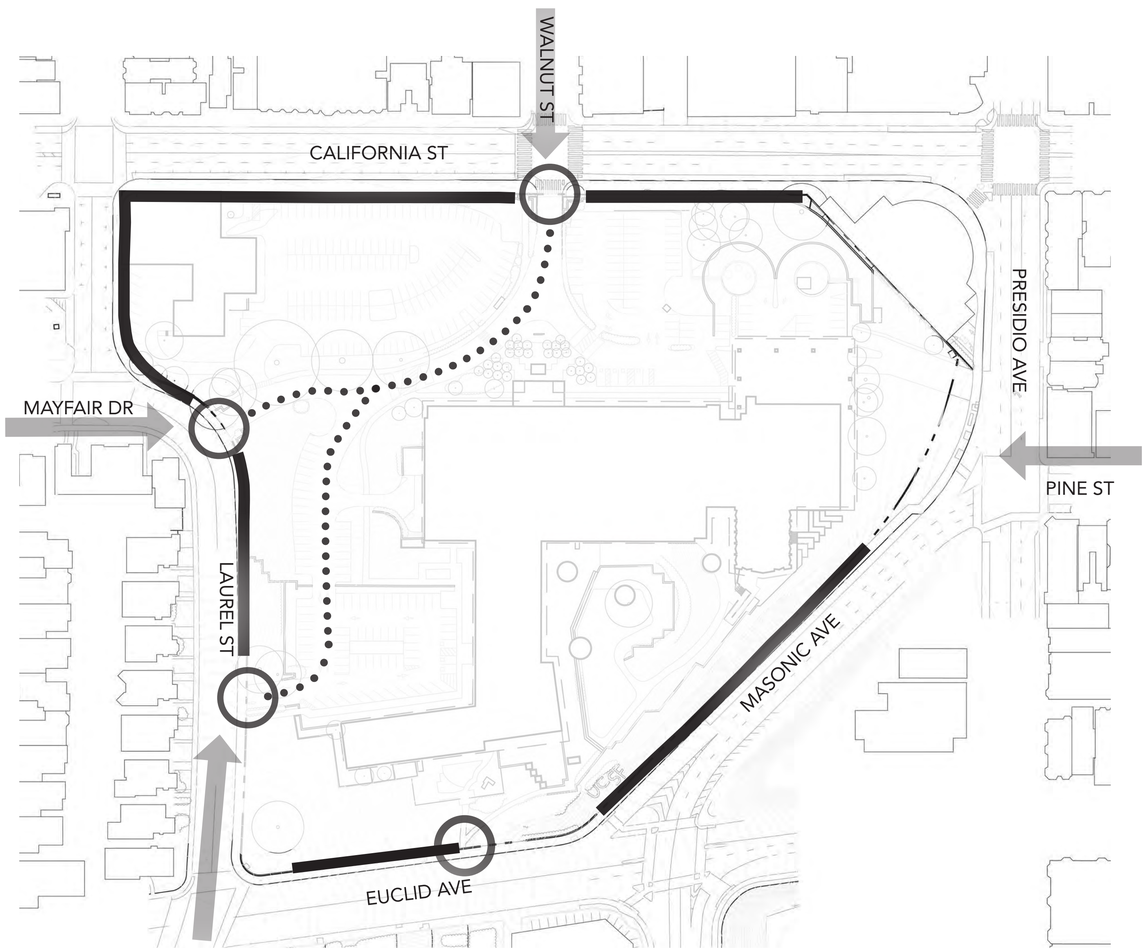
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

TRUCK TURNING WALNUT EXTENSION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB | BKF 100+ YEARS ENGINEERS . SURVEYORS . PLANNERS

07.03.2019
PLANNING APPLICATION SUBMITTAL

**C4.07**

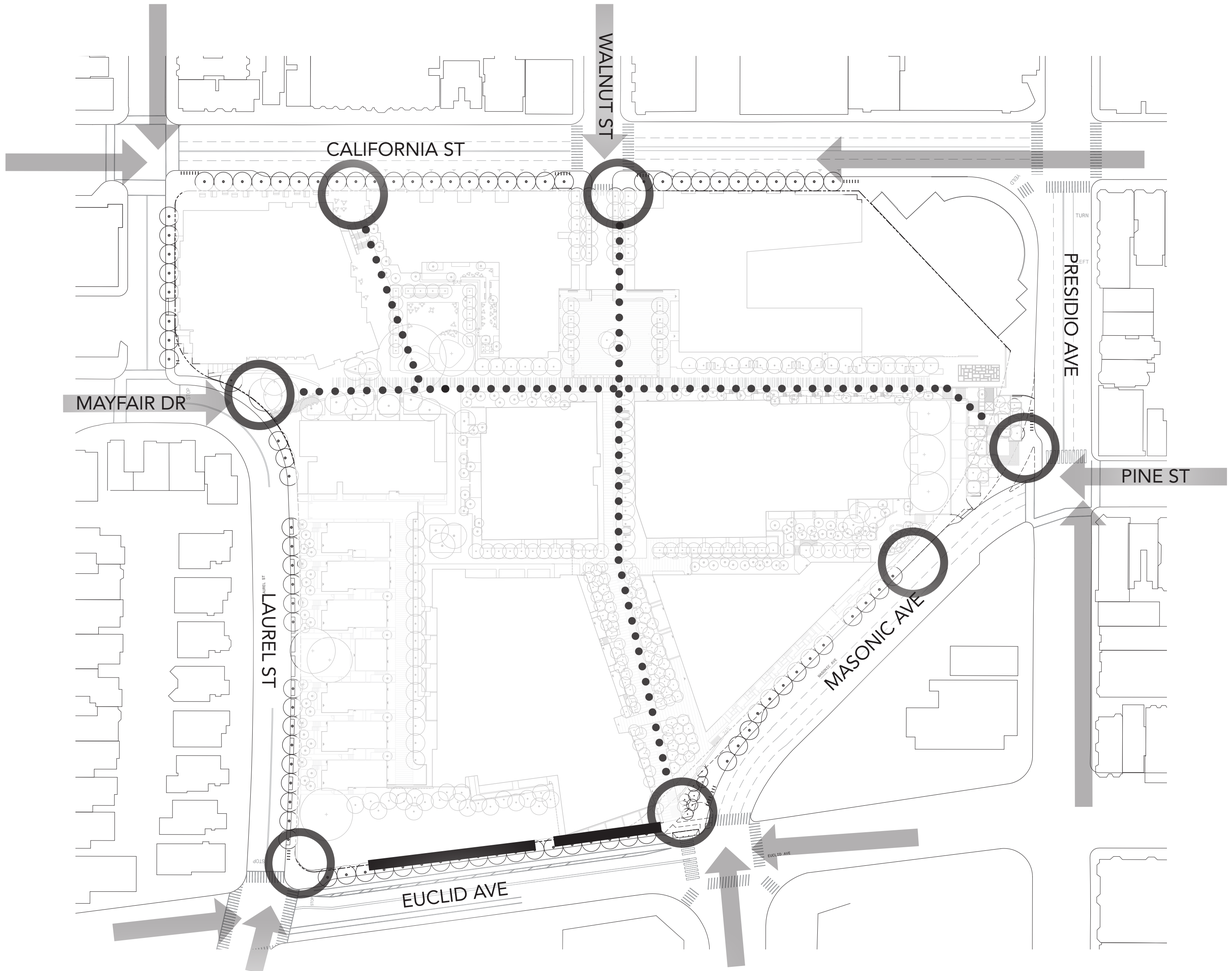



EXISTING PEDESTRIAN ACCESS + CONNECTIONS

WALL OR STEEP SLOPE, NO ACCESS

PUBLIC PATHWAY

PEDESTRIAN ACCESS




PROPOSED PEDESTRIAN ACCESS + CONNECTIONS

WALL OR STEEP SLOPE, NO ACCESS

PUBLIC PATHWAY

PEDESTRIAN ACCESS

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

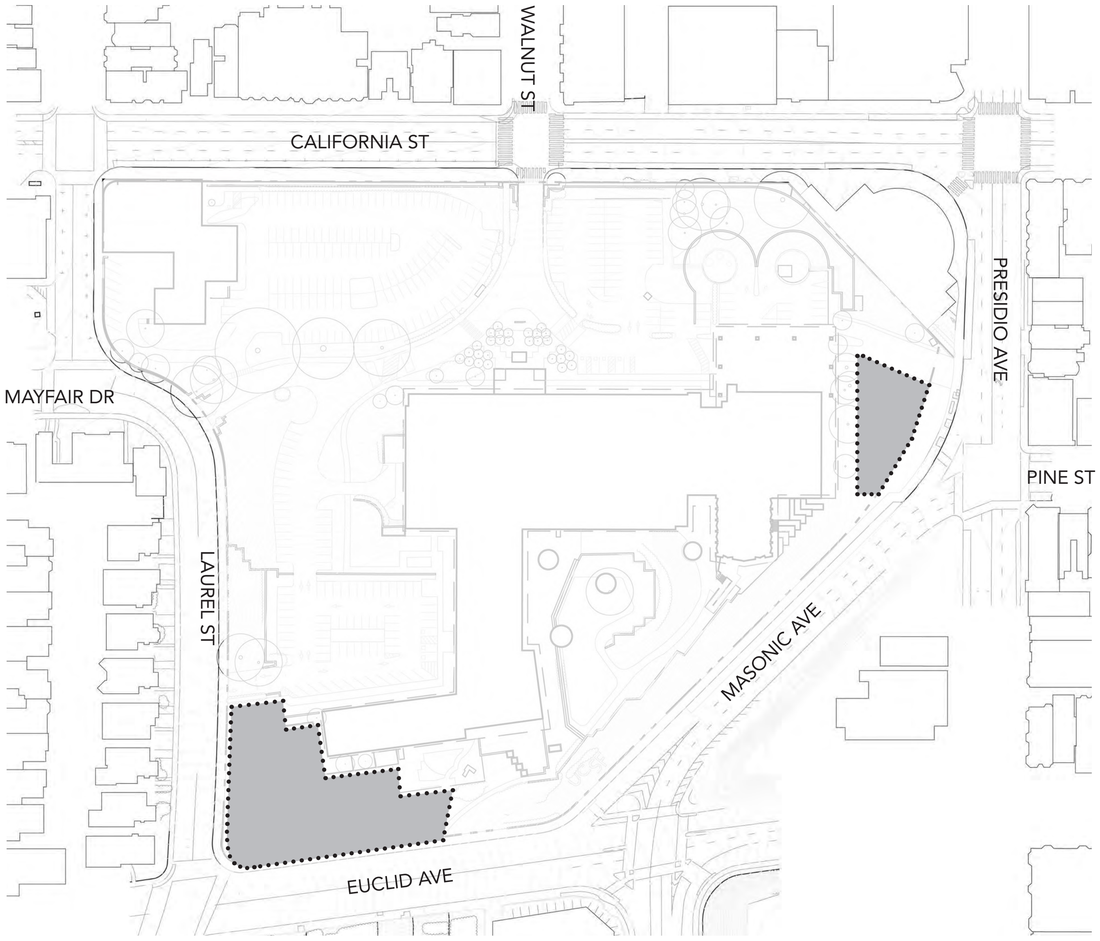
SITE DIAGRAM - CONNECTIVITY

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 40' 80' 160' 320'

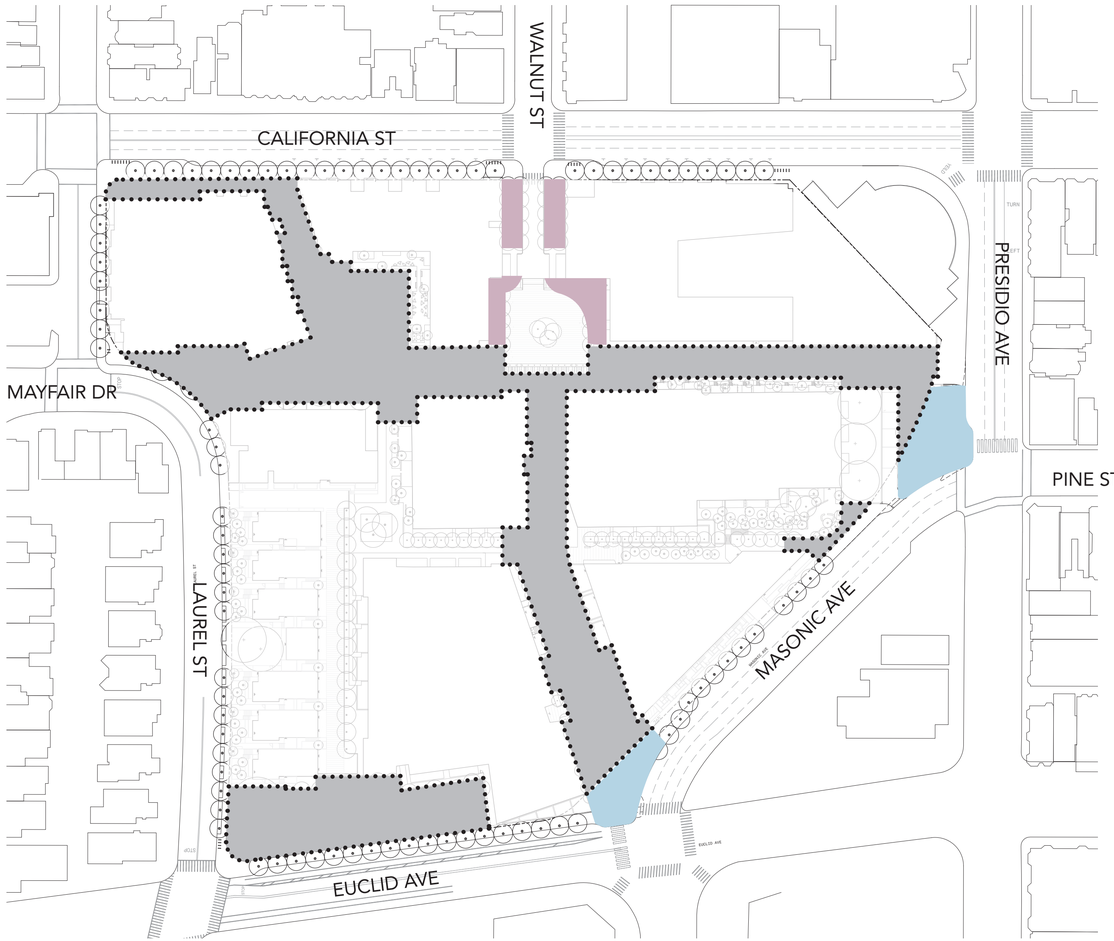
N

**L0.00**




EXISTING PRIVATELY OWNED PUBLICLY ACCESSIBLE OPEN SPACE

EXISTING PUBLICLY ACCESSIBLE OPEN SPACE
(34,300 SF)




PROPOSED PUBLICLY ACCESSIBLE OPEN SPACE

PROPOSED PUBLICLY ACCESSIBLE OPEN SPACE
(103,000 SF)
SEE SHEET G3.03 FOR SUMMARY OF OPEN SPACE COMPLIANCE

PROPOSED PUBLICLY ACCESSIBLE OPEN AREA LOCATED IN PUBLIC ROW (DOES NOT MEET PLANNING DEFINITION OF OPEN SPACE)
(10,000 SF)

PROPOSED PUBLICLY ACCESSIBLE OPEN AREA WITHIN PROPERTY LINE (DOES NOT MEET PLANNING DEFINITION OF OPEN SPACE)
(8,000 SF)

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

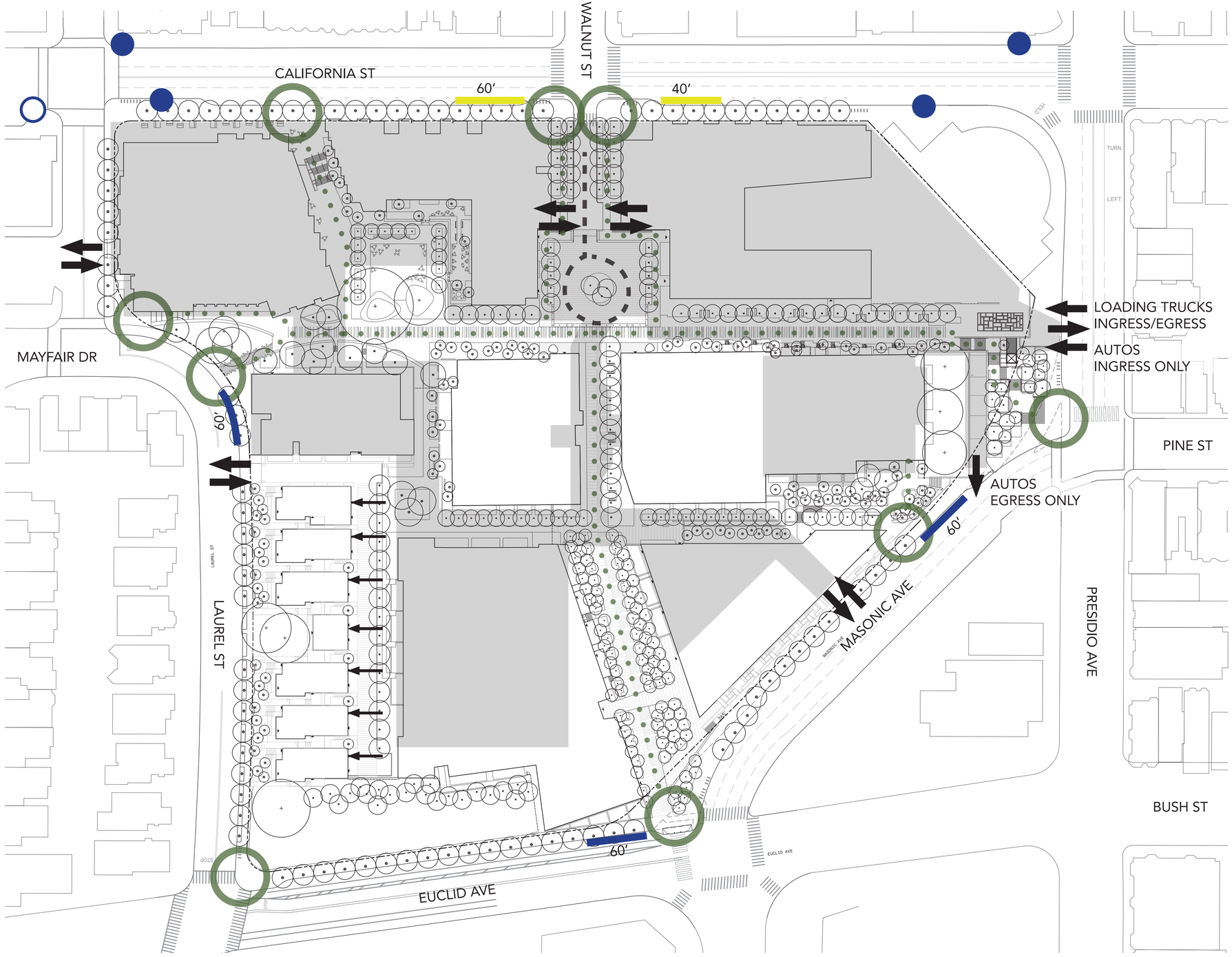
# SITE DIAGRAM - OPEN SPACE NETWORK

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 40' 80' 160' 320'

N

**L0.01**




PEDESTRIAN ACCESS POINT

PUBLICLY ACCESSIBLE PEDESTRIAN PATHWAY

PRIVATE GARAGE ACCESS

PARKING GARAGE ACCESS

BUS STOPS

EXISTING BUS STOP TO BE RELOCATED

WHITE ZONE

YELLOW ZONE

VEHICULAR CIRCULATION

INDICATES UNDERGROUND PARKING STRUCTURE, INCLUDING LOADING AREAS

SEE SHEET C2.02 FOR EXISTING AND PROPOSED DRIVEWAY AND BULBOUT DIMENSIONS.

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

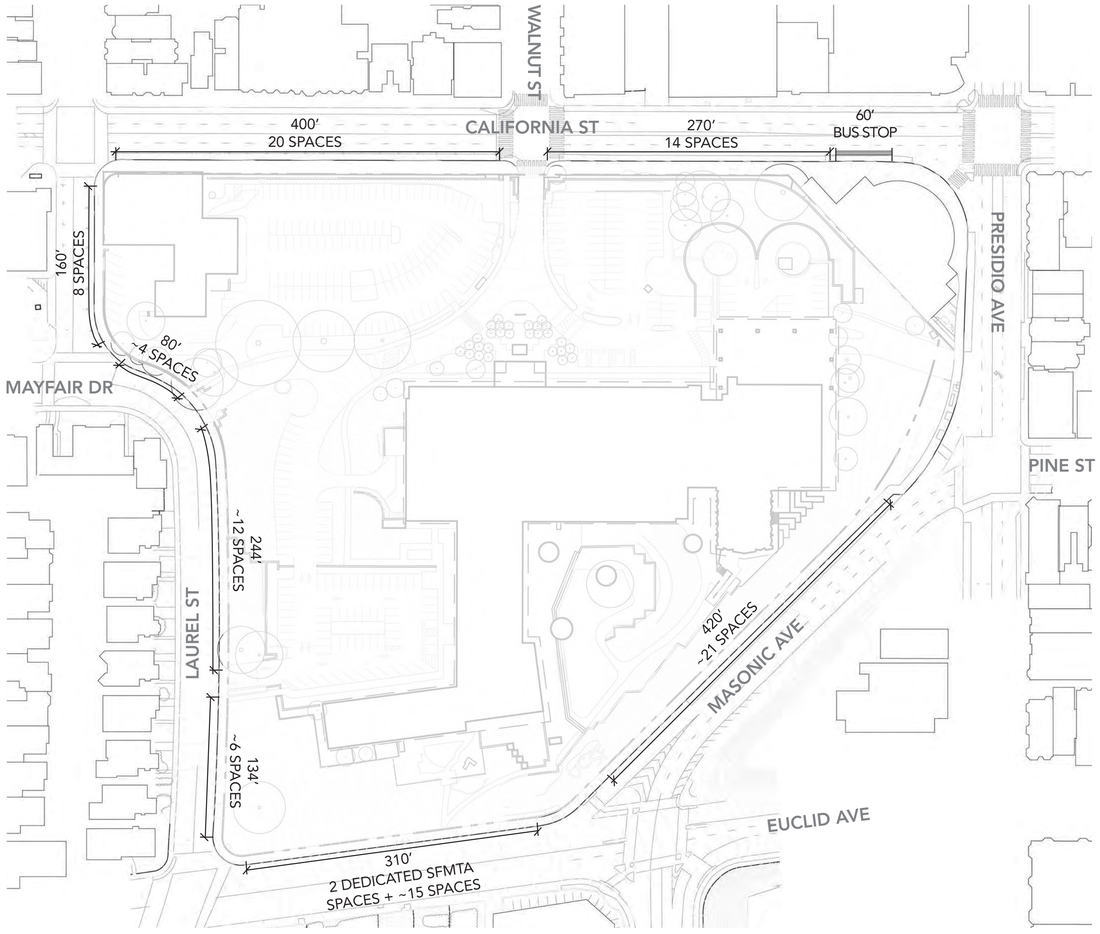
# SITE DIAGRAM - SITE ACCESS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 25' 50' 100' 150'

N

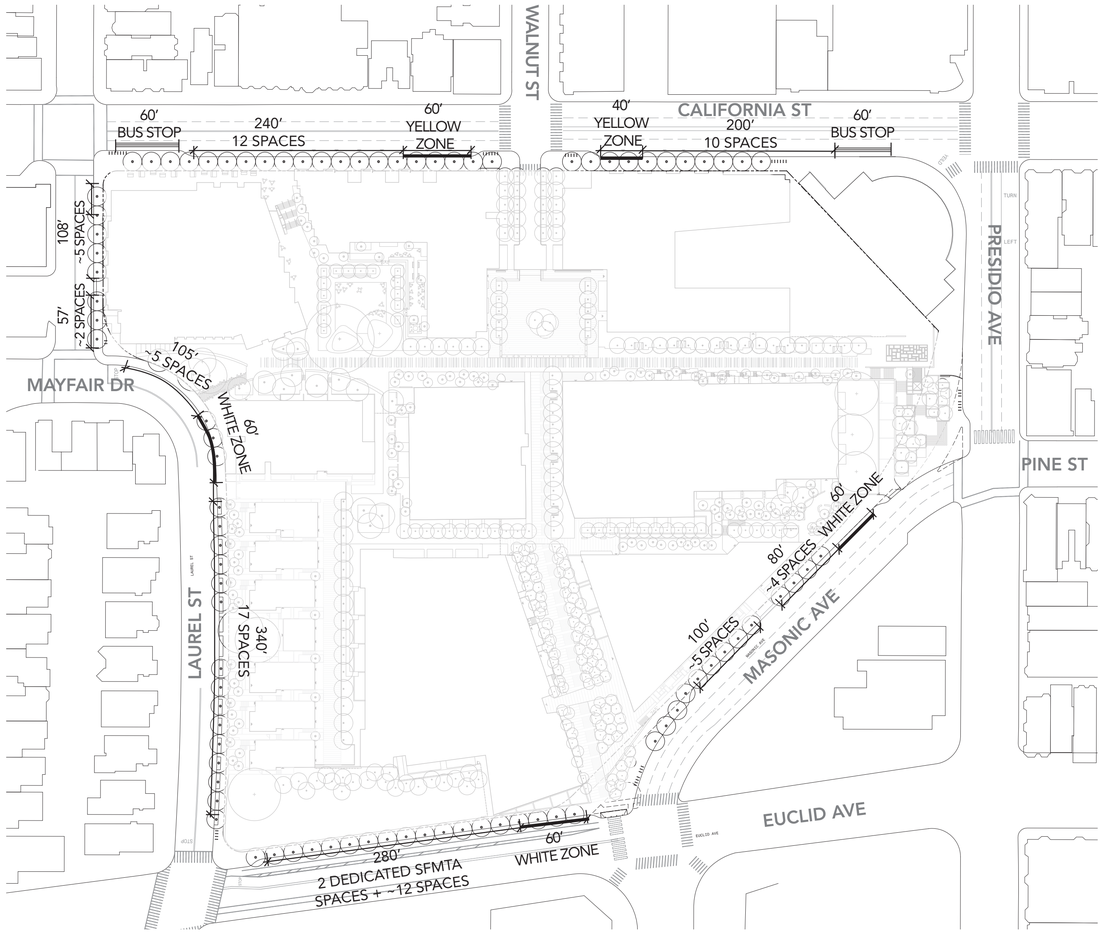
**L1.01**




## EXISTING STREET PARKING | ~102 SPACES TOTAL

EXISTING STREET PARKING
-EXCLUDES BUS STOPS AND ALL COLORED CURB ZONES

EXISTING BUS STOP




## PROPOSED STREET PARKING | ~74 SPACES TOTAL

PROPOSED STREET PARKING
-EXCLUDES BUS STOPS AND ALL COLORED CURB ZONES

PROPOSED LOADING ZONES, SUBJECT TO THE REVIEW
OF SFMTA COLORED CURB PROGRAM

PROPOSED BUS STOP

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

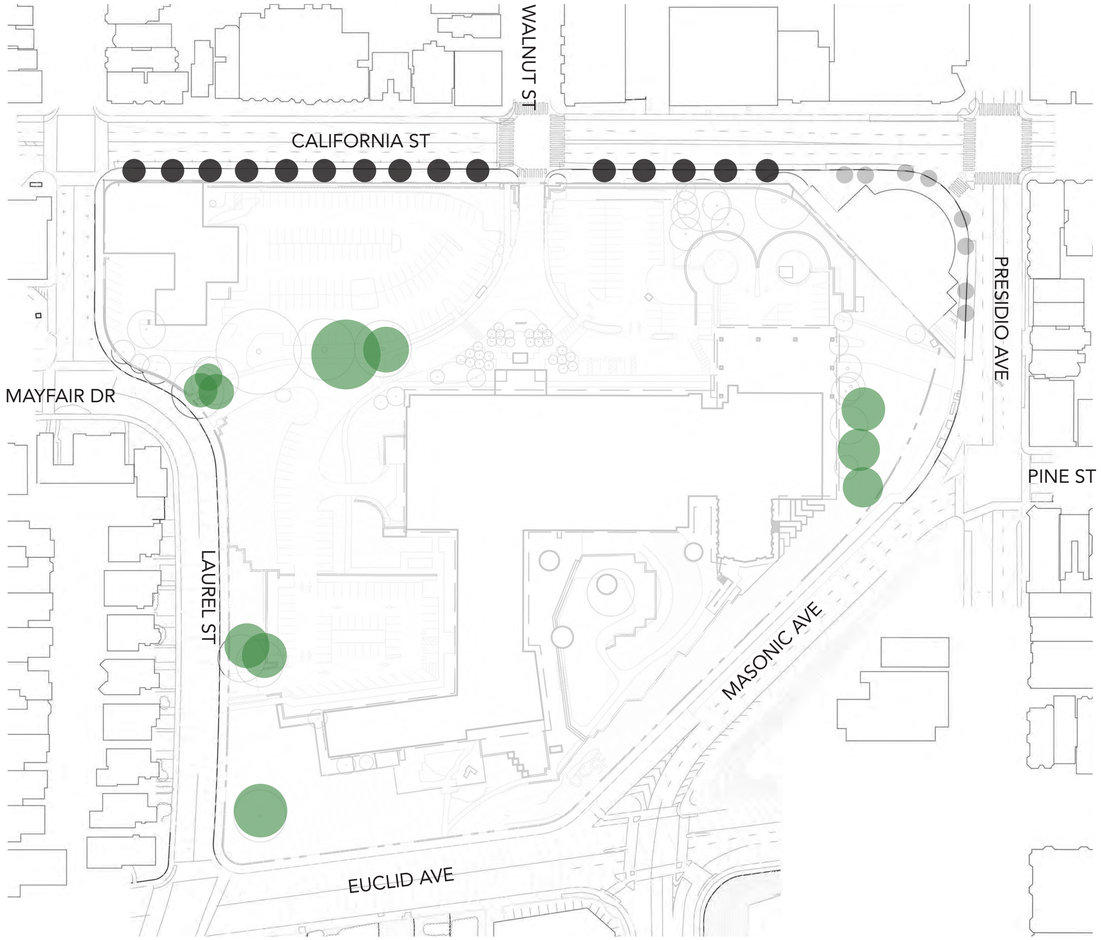
SITE DIAGRAM - STREET PARKING

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 40' 80' 160' 320'

N

L1. 02







## EXISTING STREET TREES

- EXISTING STREET TREES (15)
  *IN FRONT OF THE PROPERTY LINE
- EXISTING STREET TREES (8)
  AT ADJOINING PROPERTY
- KEY TREES TO BE PRESERVED (11)

## PROPOSED STREET TREES

- PROPOSED STREET TREES AT CALIFORNIA ST. (39)
  FRUITLESS OLIVE 'OLEA EUROPAEA SWAN HILL'
- PROPOSED STREET TREES (31)
  GINKGO 'GINKGO BILOBA PRINCETON SENTRY'
- PROPOSED STREET TREES (18)
  AESCULUS CARNEA
- KEY TREES TO BE PRESERVED (11)
- EXISTING STREET TREES (8)
  AT ADJOINING PROPERTY

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

SITE DIAGRAM - STREET TREES

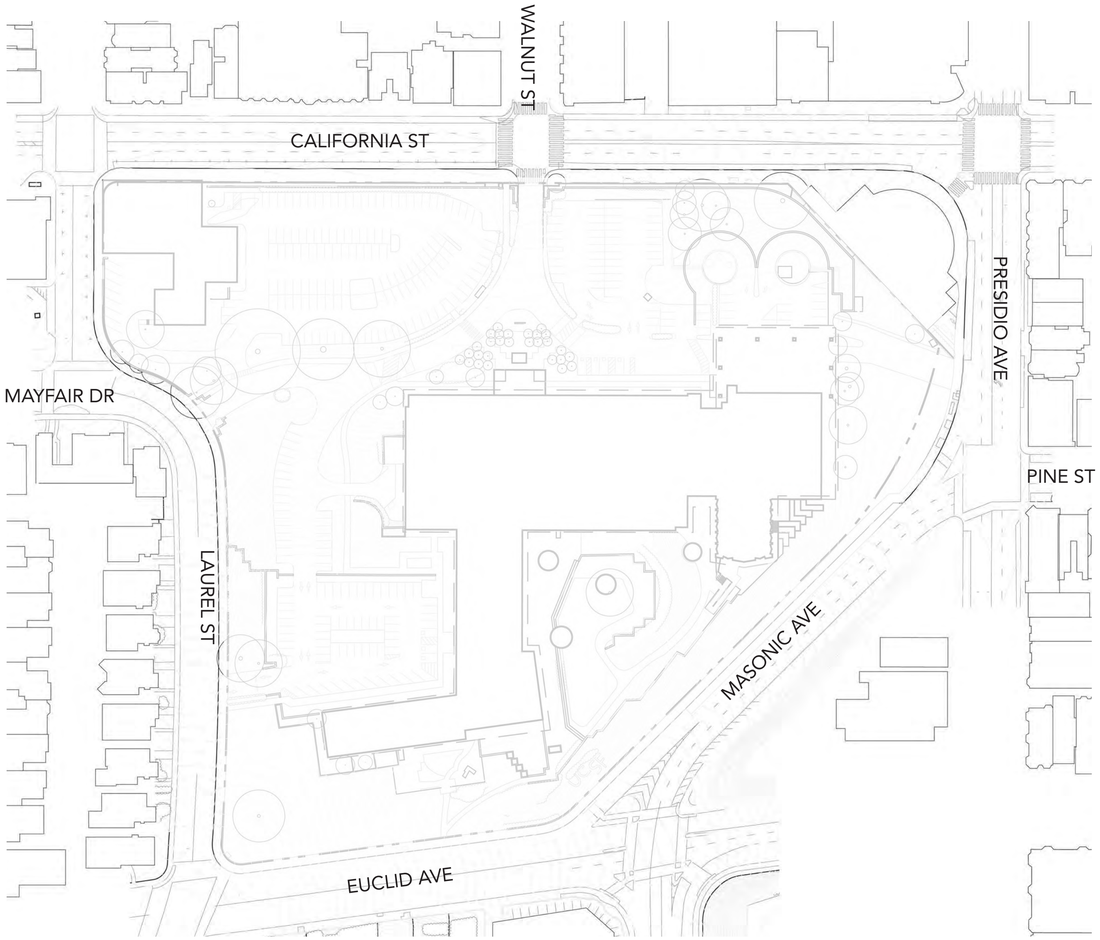
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 40' 80' 160' 320'

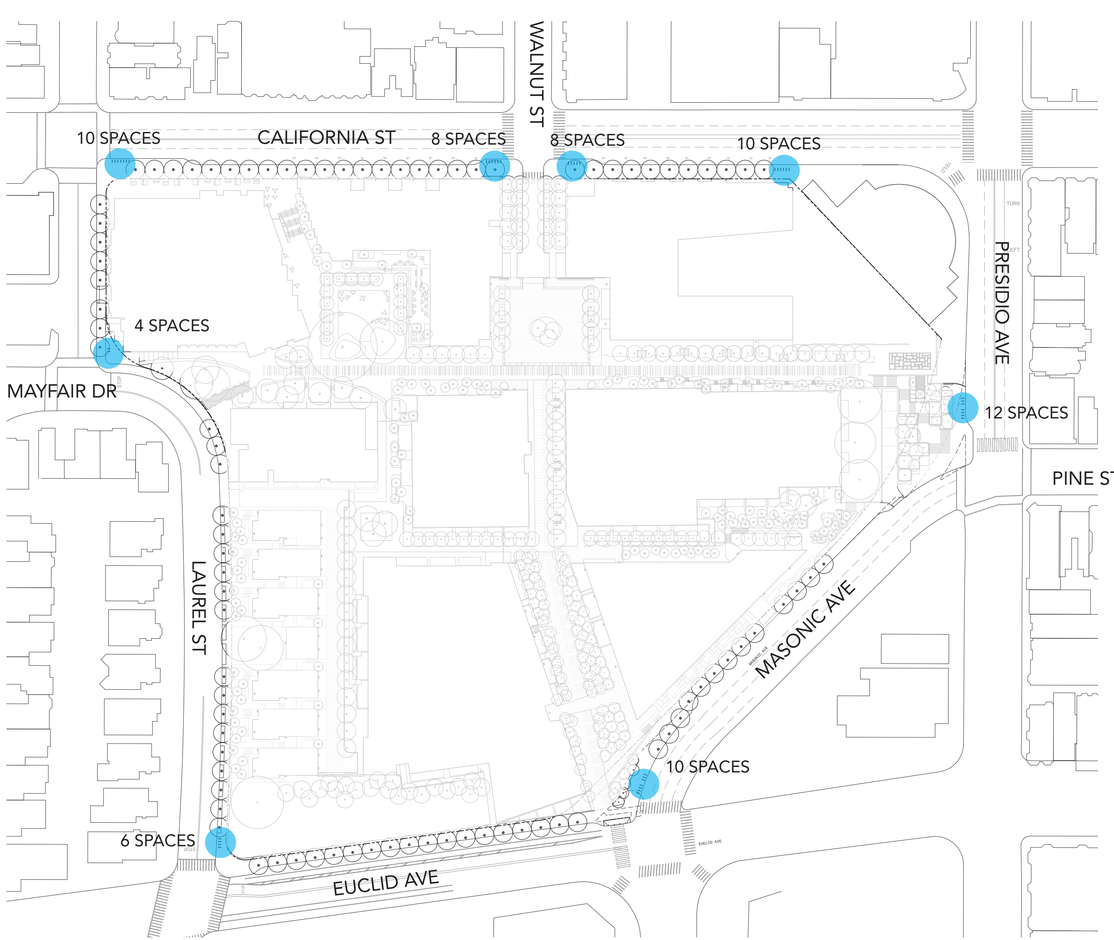
N

L1.03




EXISTING PUBLIC BIKE PARKING

EXISTING PUBLIC BIKE PARKING (0 SPACES)




PROPOSED PUBLIC BIKE PARKING

PROPOSED PUBLIC BIKE PARKING (68 BIKES/34 RACKS)

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

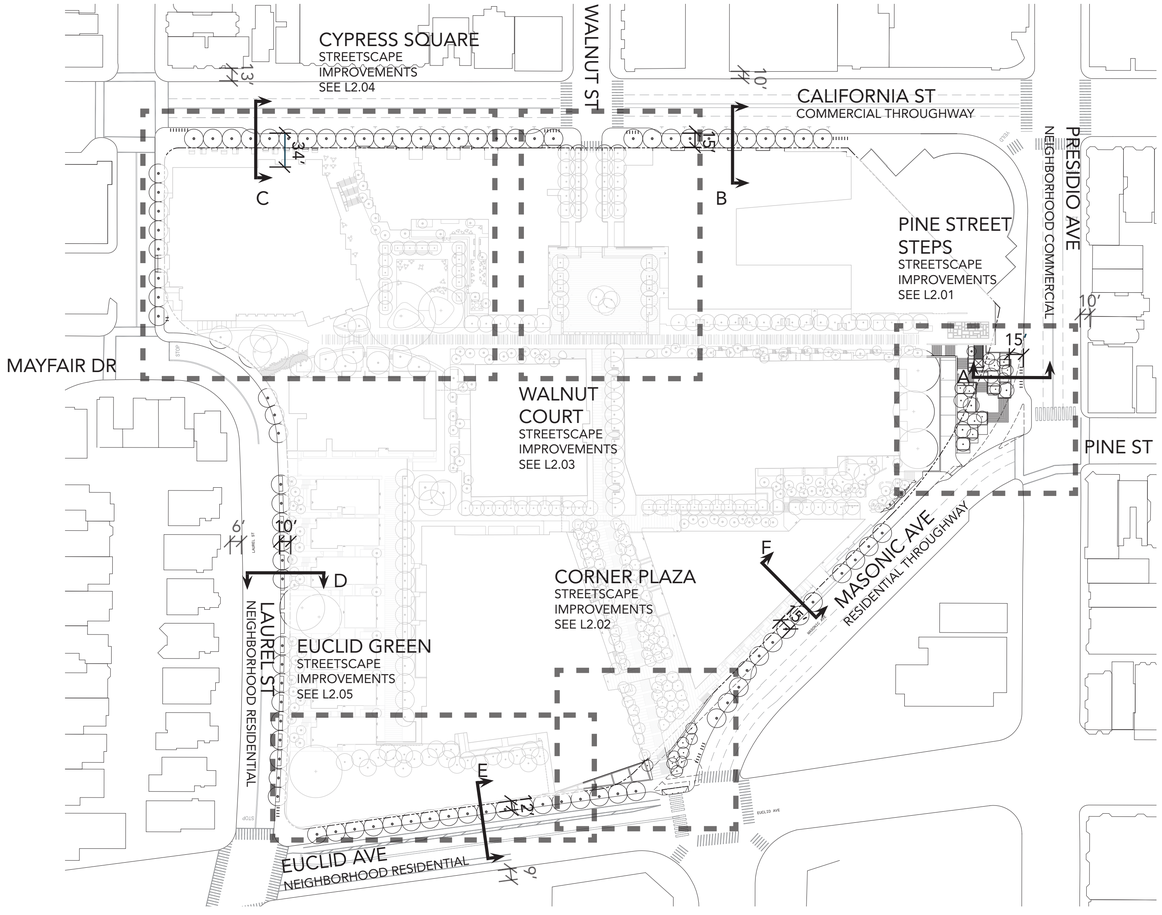
SITE DIAGRAM - PUBLIC BIKE PARKING

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 40' 80' 160' 320'

N

**L1.04**




## PLANNED STREET IMPROVEMENTS

| | CALIFORNIA ST. | PRESIDIO AVE. | MASONIC AVE. | EUCLID AVE. | LAUREL ST. |
|---|---|---|---|---|---|
| STREET TYPE | COMMERCIAL THROUGHWAY | NEIGHBORHOOD COMMERCIAL | RESIDENTIAL THROUGHWAY | NEIGHBORHOOD RESIDENTIAL | NEIGHBORHOOD RESIDENTIAL |
| EXISTING SIDEWALK WIDTH | 15′ | 10′ | 10′ | 10.5′ | 10′ |
| STREETSCAPE WIDTH (RECOMMENDATIONS PER BETTER STREETS) | 15′-33′ (12′ MIN; 15′ RECOMMENDED) | 15′ (12′ MIN; 15′ REC.) | 15′ (12′ MIN; 15′ REC.) | 12′ (12′ MIN + REC.) | 12′ (10′ MIN + 12′ REC.) |
| STREET TREES | SINGLE ROW | SINGLE ROW | SINGLE ROW | SINGLE ROW | SINGLE ROW |
| SIDEWALK PLANTING | PLANTING STRIPS AND RAISED PLANTERS | RAISED PLANTERS | PLANTING STRIPS | PLANTING STRIPS | PLANTING STRIPS |
| SIDEWALK FURNISHINGS | YES | NO | NO | NO | NO |

## STREET TYPES - PER SF BETTER STREETS PLAN

15′ PROPOSED SIDEWALK WIDTH

15′ EXISTING ADJACENT SIDEWALK WIDTH

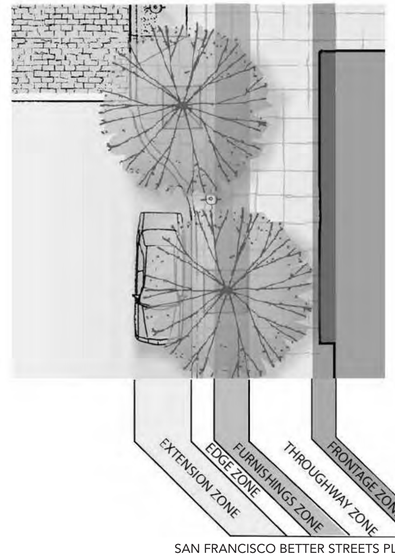
STREETSCAPE SECTION LOCATIONS, SEE SHEET L1.06

**MINIMUM AND RECOMMENDED SIDEWALK WIDTH BY STREET TYPE**

| | STREET TYPE | MINIMUM WIDTH | RECOMMENDED WIDTH |
|---|---|---|---|
| COMMERCIAL | Downtown commercial | Per Downtown Streetscape Plan | |
| | Commercial throughway | 12′ | 15′ |
| | Neighborhood commercial | 12′ | 15′ |
| RESIDENTIAL | Downtown residential | 12′ | 15′ |
| | Residential throughway | 12′ | 15′ |
| | Neighborhood residential | 10′ | 12′ |

SAN FRANCISCO BETTER STREETS PLAN, P99

Sidewalk Zones (Plan View)




SAN FRANCISCO BETTER STREETS PLAN, P98

Sidewalk Zones (Section View)




SAN FRANCISCO BETTER STREETS PLAN, P100

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

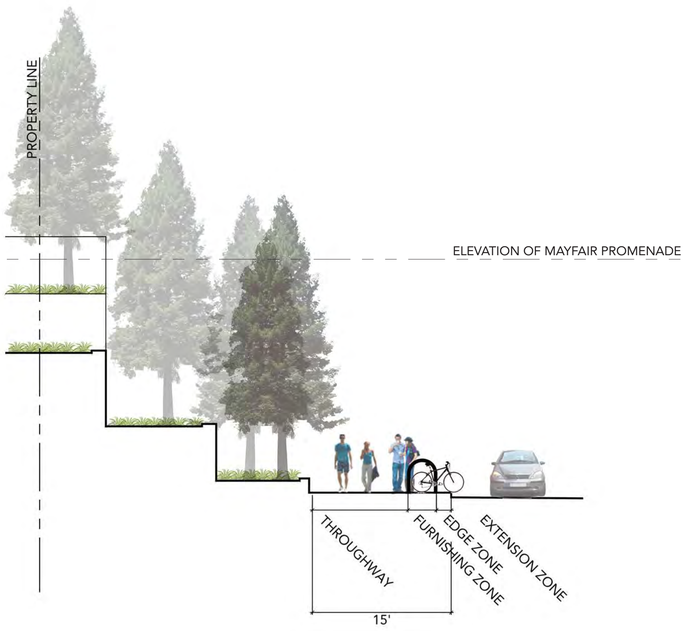
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

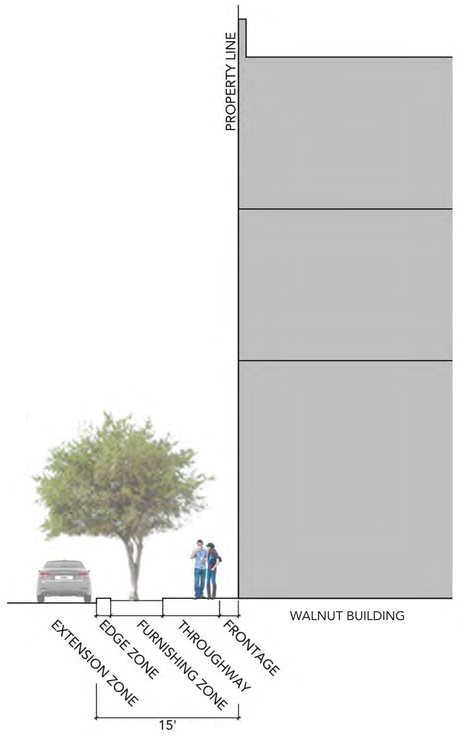
0 40′ 80′ 160′ 320′ N

STREETSCAPE PLAN

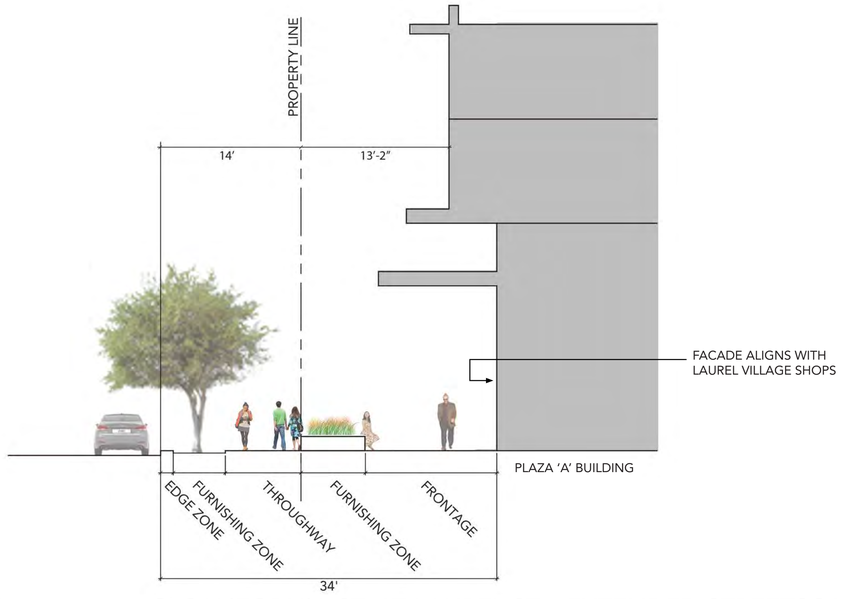
L1.05



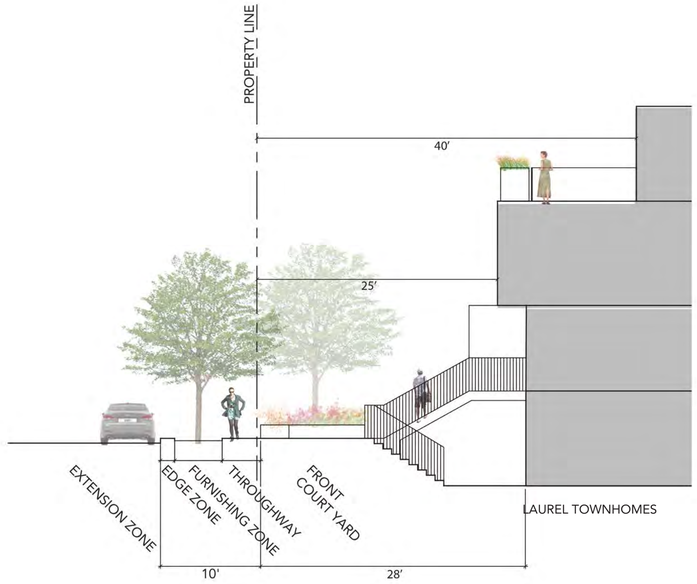

A| PRESIDIO AVENUE - TYPICAL STREETSCAPE




B| CALIFORNIA STREET - TYPICAL STREETSCAPE

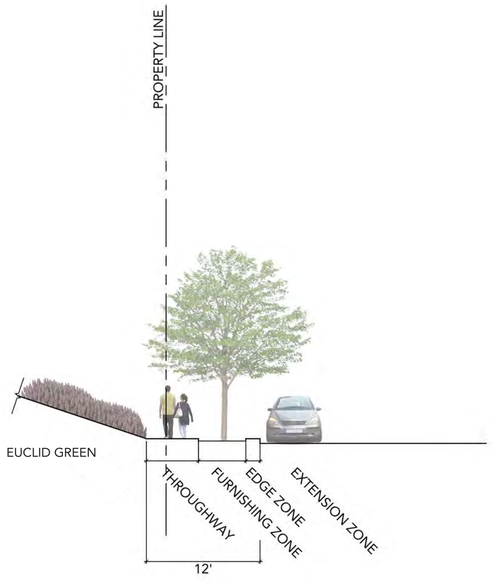



C| CALIFORNIA ST. AT LAUREL ST. - EXTENDED STREETSCAPE

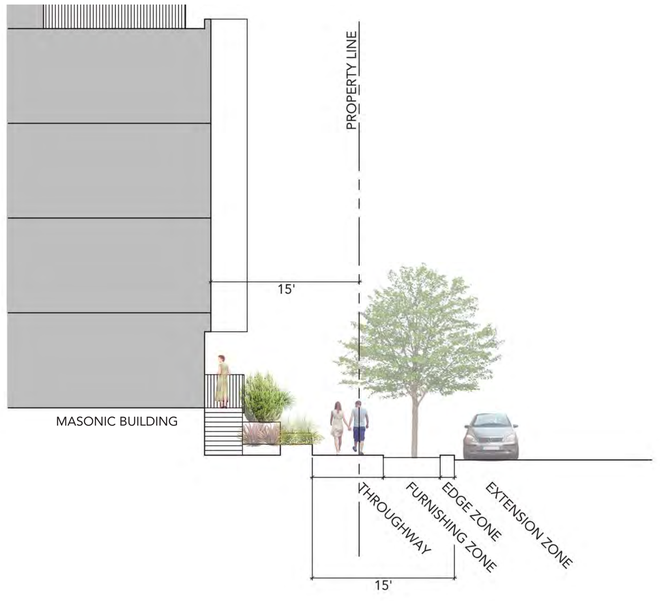



D| LAUREL STREET - TYPICAL STREETSCAPE

*GRADE VARIES




E| EUCLID AVENUE - TYPICAL STREETSCAPE




F| MASONIC AVENUE - TYPICAL STREETSCAPE

*SEE PRECEEDING PAGE FOR SECTION LOCATIONS

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

STREETSCAPE SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 8' 16' 32' 64'

L1.06




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

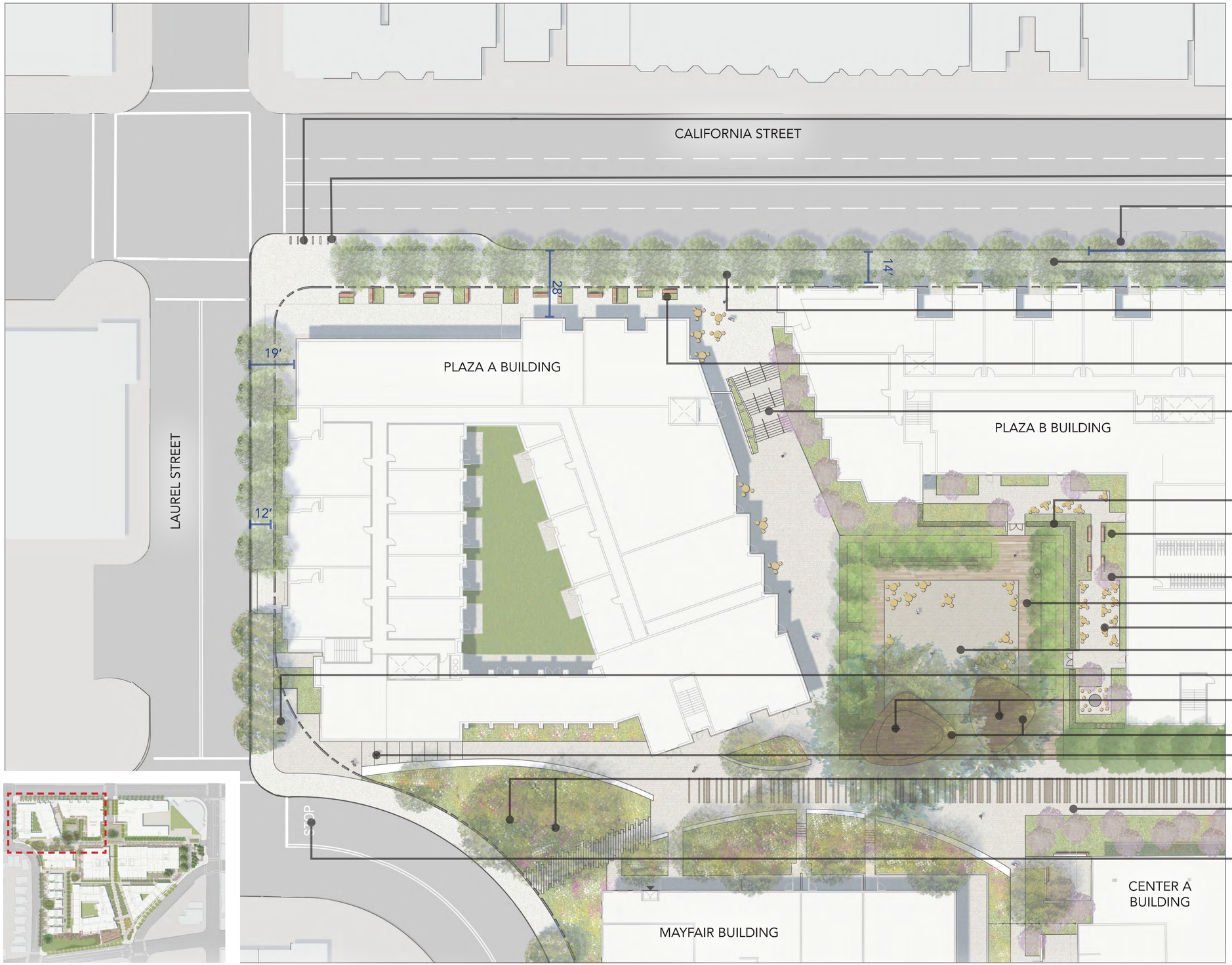
LANDSCAPE SITE PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 25' 50' 100' 150'

**L2.00**




EXISTING TRAFFIC CALMING BULBOUT AND MUNI BUS STOP
SEE SHEET C2.02 FOR DIMENSIONS

BIKE PARKING

YELLOW ZONE (60' IN TOTAL LENGTH)

(N) OLIVE STREET TREES AT LAUREL VILLAGE CONTINUATION

CONCRETE SIDEWALKS AT LAUREL VILLAGE CONTINUATION

PLANTERS AND SEATING AT LAUREL VILLAGE CONTINUATION

STAIRS TO CALIFORNIA STREET AND CYPRESS SQUARE

PRIVACY HEDGE AND PLANTINGS

PLANTED GARDENS AND BENCHES

FLOWERING TREES

WOOD DECKING

PRIVATE, FLEXIBLE SPACE AT ENTRANCE

PAVED SQUARE

BIKE PARKING

EXISTING MATURE MONTEREY CYPRESS TREES

WOOD DECK

STEPS TO LAUREL STREET AND MAYFAIR WALK

EXISTING MATURE OAK TREES FRAMED BY SEATWALL

MAYFAIR WALK
PEDESTRIAN PROMENADE

RESTRIPE STOP AT PROPOSED CURB LINE REVISION
SEE SHEET C2.02 FOR DIMENSIONS



# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## ENLARGED PLAN - CYPRESS SQUARE/CALIFORNIA STREETSCAPE IMPROVEMENTS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

L2.01



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

CYPRESS SQUARE - PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.01A**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

CYPRESS SQUARE - PERSPECTIVE AT PRIVATE TERRACE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.01B**



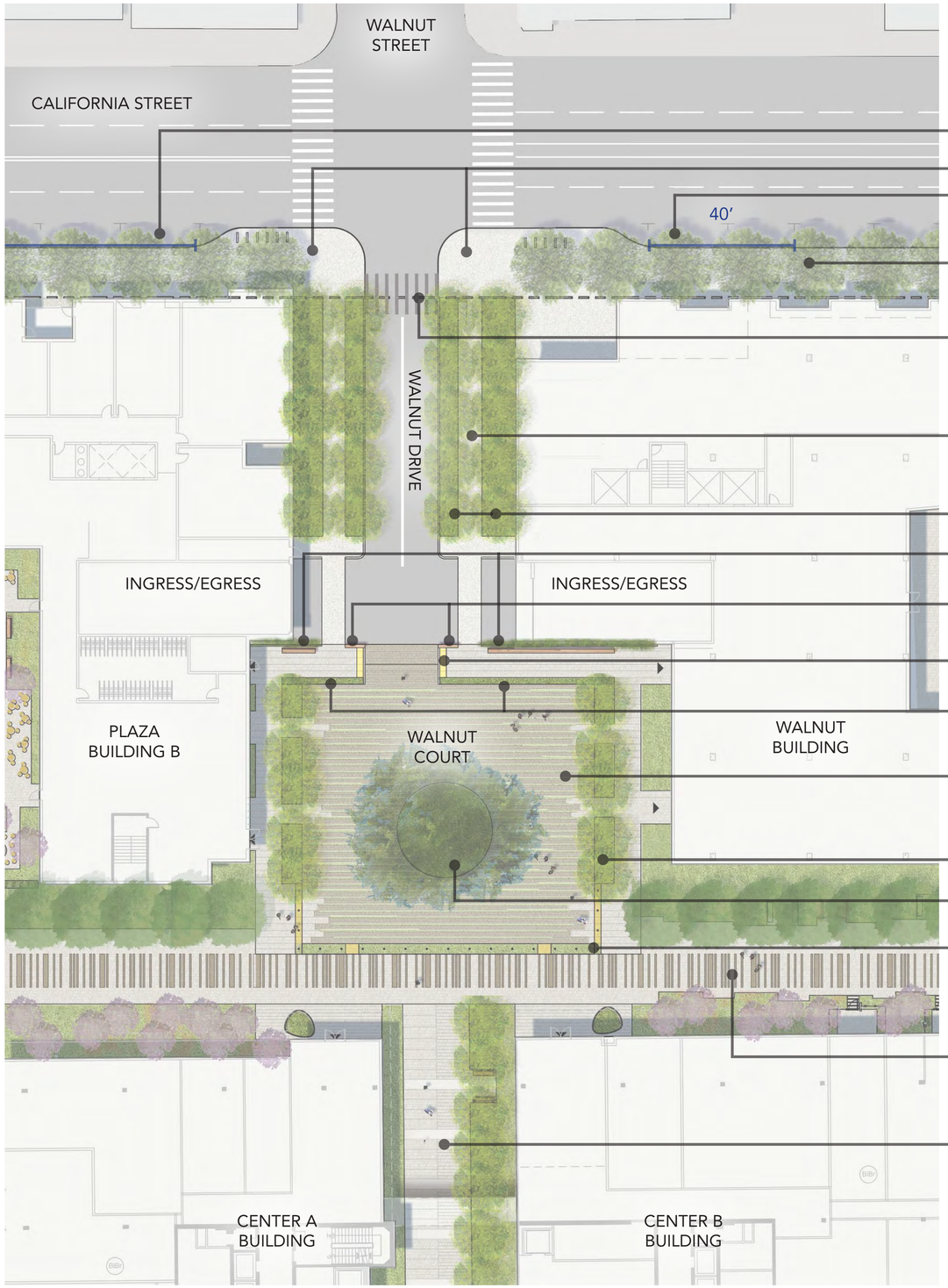
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

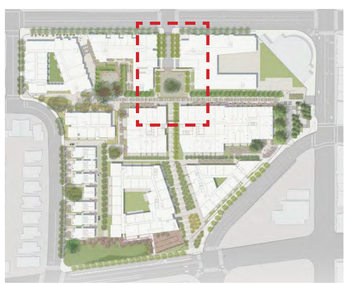
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MAYFAIR WALK WEST - PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.01C**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

# ENLARGED PLAN - WALNUT COURT STREETSCAPE IMPROVEMENTS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**L2.02**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

WALNUT COURT - PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.02A**



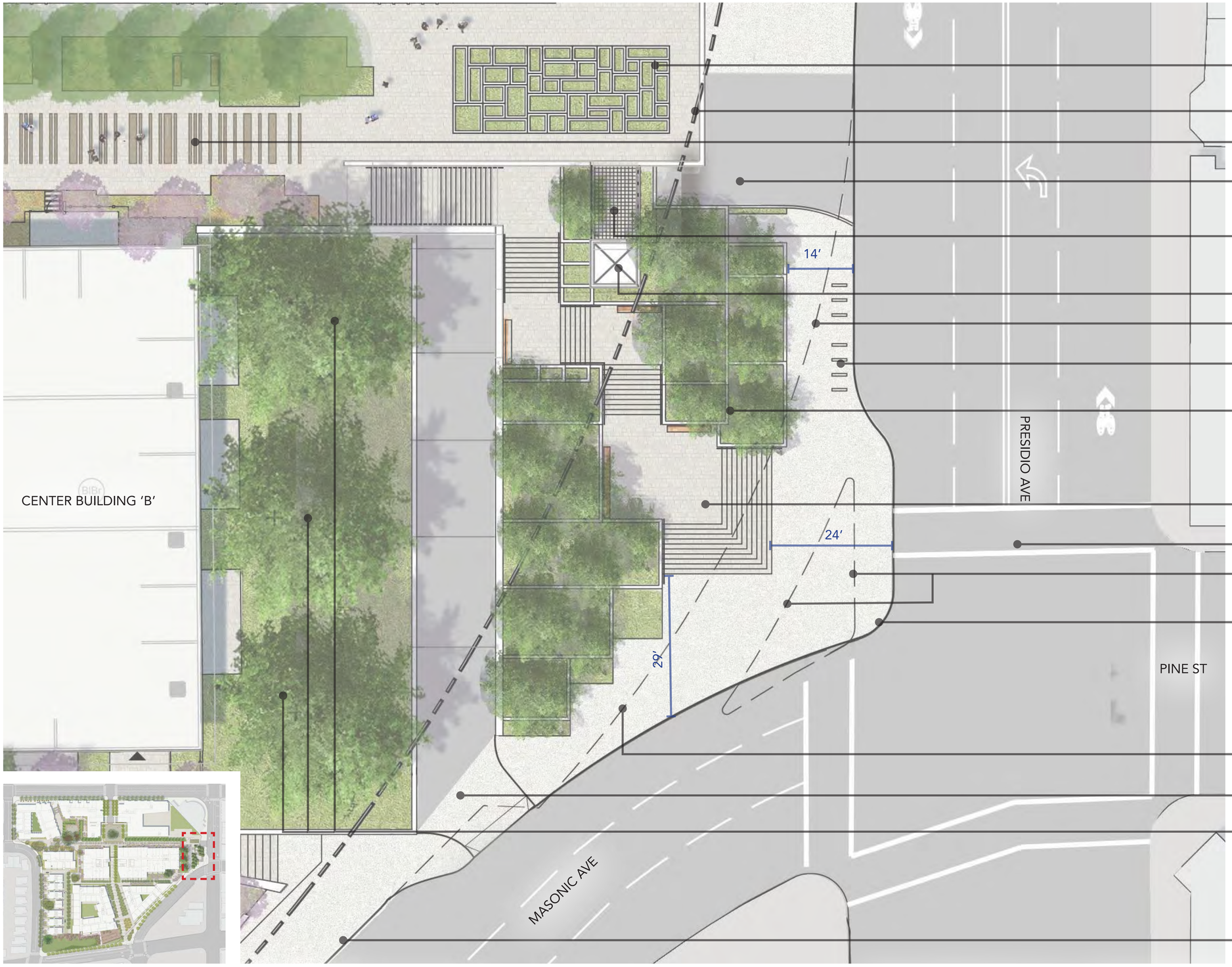
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

CENTRAL WALNUT WALK - PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.02B**






PLANTING AND SEATING AT THE OVERLOOK

(E) PROPERTY LINE

MAYFAIR WALK
PEDESTRIAN PROMENADE

GARAGE ENTRANCE AT (E) DRIVEWAY
INGRESS/EGRESS FOR LOADING TRUCKS
INGRESS ONLY FOR AUTOS

ELEVATED STEEL WALKWAY TO ELEVATOR

ADA ELEVATOR

(E) CURB LINE

PUBLIC BIKE PARKING

STEPPED PLANTERS WITH TREES

PINE STREET STEPS
PUBLIC STAIR TO MAYFAIR WALK

PROPOSED CROSSWALK

(E) PEDESTRIAN ISLAND AND SLIP LANE
TO BE REMOVED

TRAFFIC CALMING SIDEWALK BULB OUT
SEE SHEET C2.02 FOR BULBOUT DIMENSIONS

(E) CURB LINE

GARAGE EGRESS FOR AUTOS ONLY

(E) MATURE REDWOOD TREES

PROPOSED WHITE ZONE

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## ENLARGED PLAN - PINE STREET STEPS STREETSCAPE IMPROVEMENTS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

L2.03




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

MAYFAIR WALK EAST - PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.03A**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PINE PLAZA AND STEPS - PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.03B**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

ENLARGED PLAN - MASONIC PLAZA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

**L2.04**



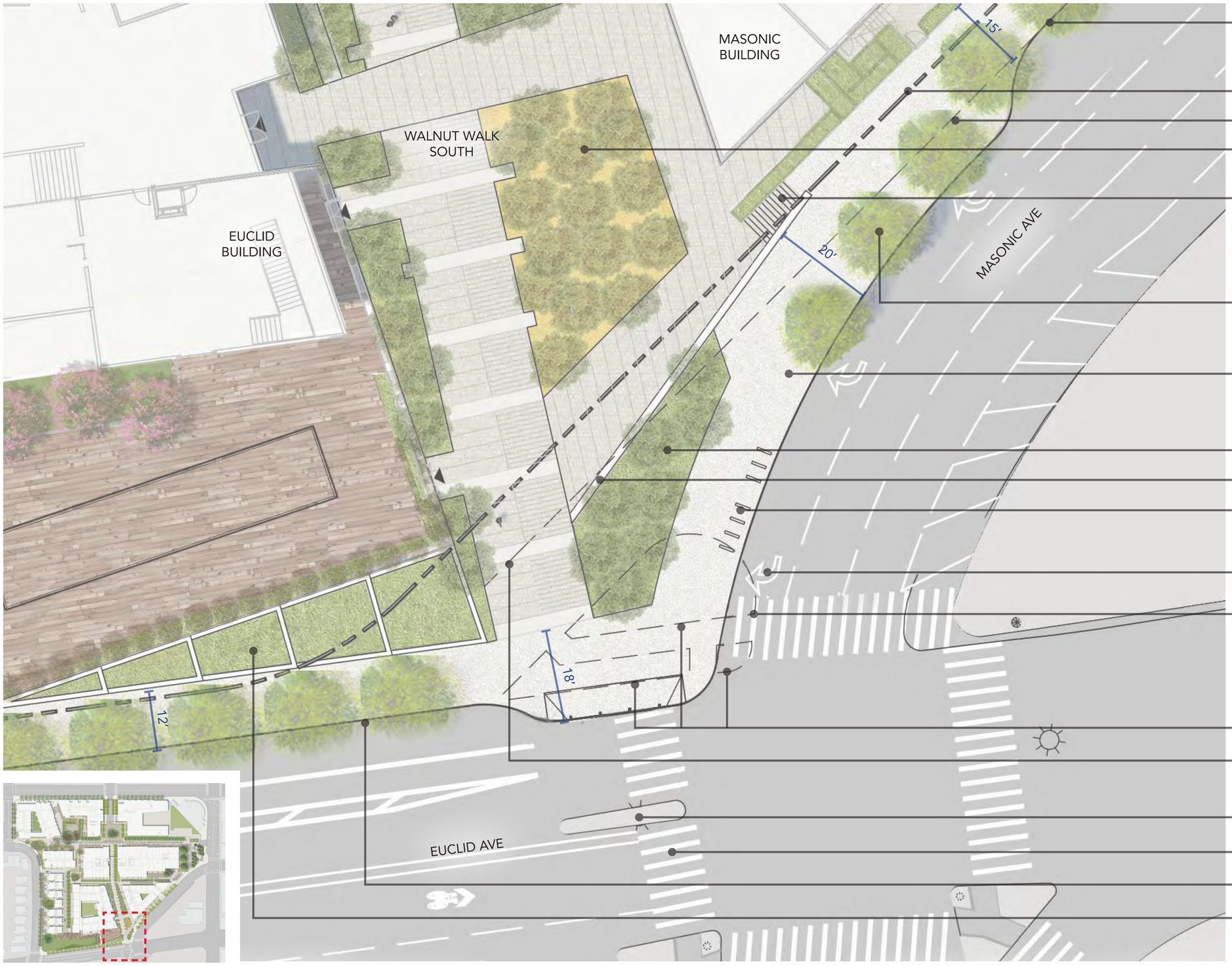
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MASONIC PLAZA - PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.04A**






**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

ENLARGED PLAN - CORNER PLAZA STREETSCAPE IMPROVEMENTS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

L2.05



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

WALNUT WALK SOUTH - PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.05A**






**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

# ENLARGED PLAN - EUCLID GREEN STREETSCAPE IMPROVEMENTS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**L2.06**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

LAUREL TOWNHOMES - PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**L2.06A**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EUCLID GREEN - PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

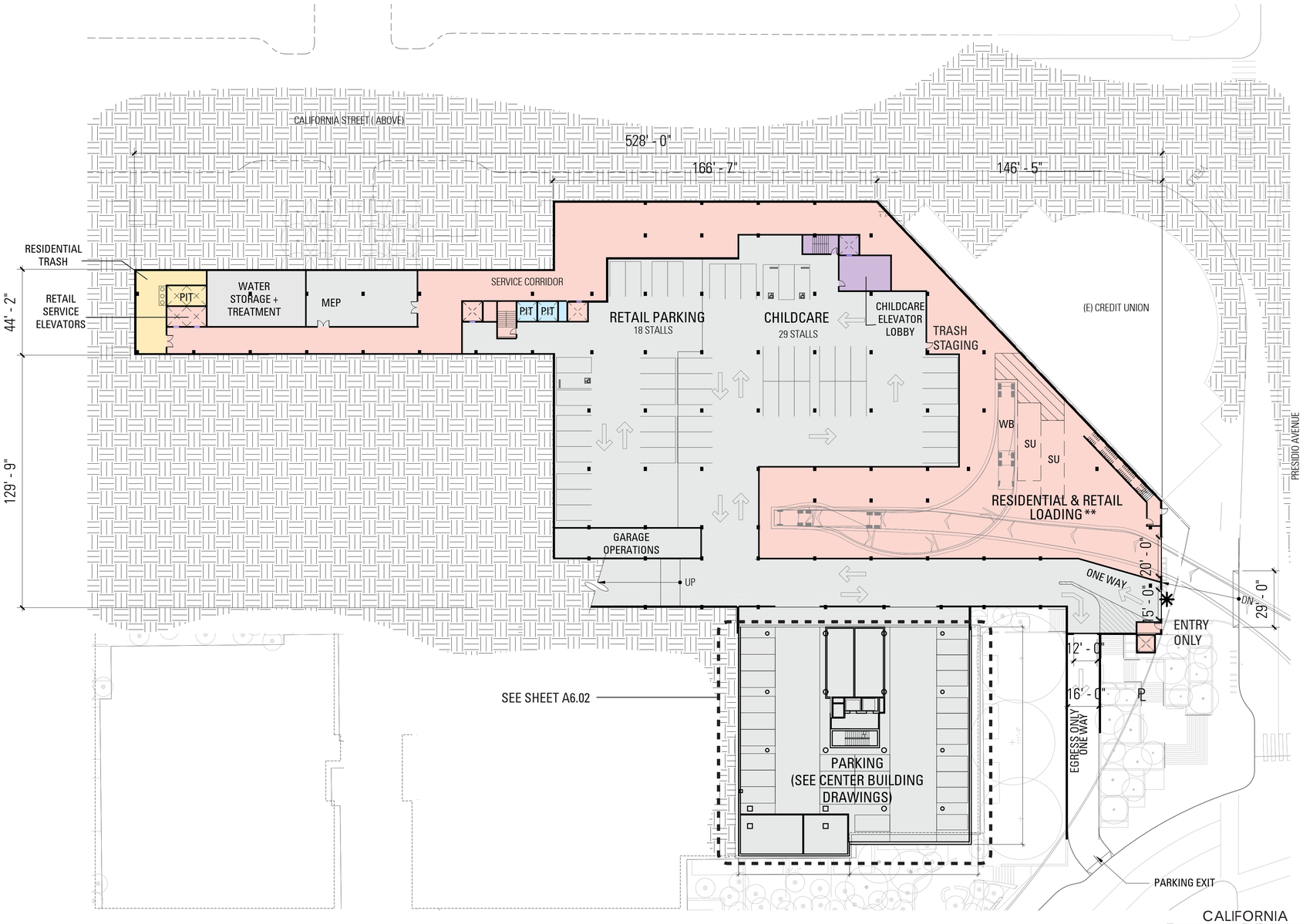
**L2.06B**




| | |
|---|---|
| **LAUREL STREET ENTRY** | **128 STALLS** |
| PLAZA A BLDG. RESIDENTIAL PARKING | 67 STALLS |
| PLAZA B BLDG. RESIDENTIAL PARKING | 61 STALLS |
| **WALNUT STREET ENTRY** | **185 STALLS** |
| CENTER BLDG. RESIDENTIAL PARKING | 102 STALLS |
| PLAZA A&B BLDG. RETAIL | 73 STALLS |
| CAR SHARE | 10 STALLS |
| **PRESIDIO AVENUE ENTRY** | **148 STALLS** |
| WALNUT BLDG. CHILDCARE | 29 STALLS |
| WALNUT BLDG. RETAIL | 13 STALLS |
| WALNUT BLDG. OFFICE | 80 STALLS |
| CENTER BLDG. RESIDENTIAL PARKING | 26 STALLS |
| **MASONIC AVENUE ENTRY** | **258 STALLS** |
| MASONIC RESIDENTIAL PARKING | 57 STALLS |
| EUCLID RESIDENTIAL PARKING | 139 STALLS |
| CENTER BLDG. RESIDENTIAL PARKING | 62 STALLS |
| **LAUREL STREET ENTRY** | **44 STALLS** |
| MAYFAIR BLDG. RESIDENTIAL PARKING | 30 STALLS |
| LAUREL RESIDENTIAL PARKING | 14 STALLS |
| **TOTAL ON-SITE PARKING** | **763 STALLS** |

**SITE PLAN LEGEND**

X PRIMARY VEHICLE ACCESS




CHILDCARE USABLE — CHILDCARE B.O.H.

PARKING

RETAIL USABLE — RETAIL B.O.H.

OFFICE — OFFICE, CORE

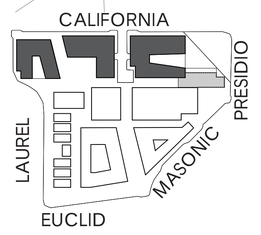
RESIDENTIAL HOMES — RESIDENTIAL CORE

LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.

* ENTRY FOR: RETAIL, CHILDCARE, OFFICE, & CENTER BUILDING B (SELECT STALLS)

** LOADING AREA USED FOR RETAIL, OFFICE, AND RESIDENTIAL TRASH COLLECTION AS WELL AS RESIDENTIAL AND RETAIL LOADING.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## CALIFORNIA STREET PARKING GARAGE - LEVEL B3

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15' 30' 60' 90'

N

**A1.01**

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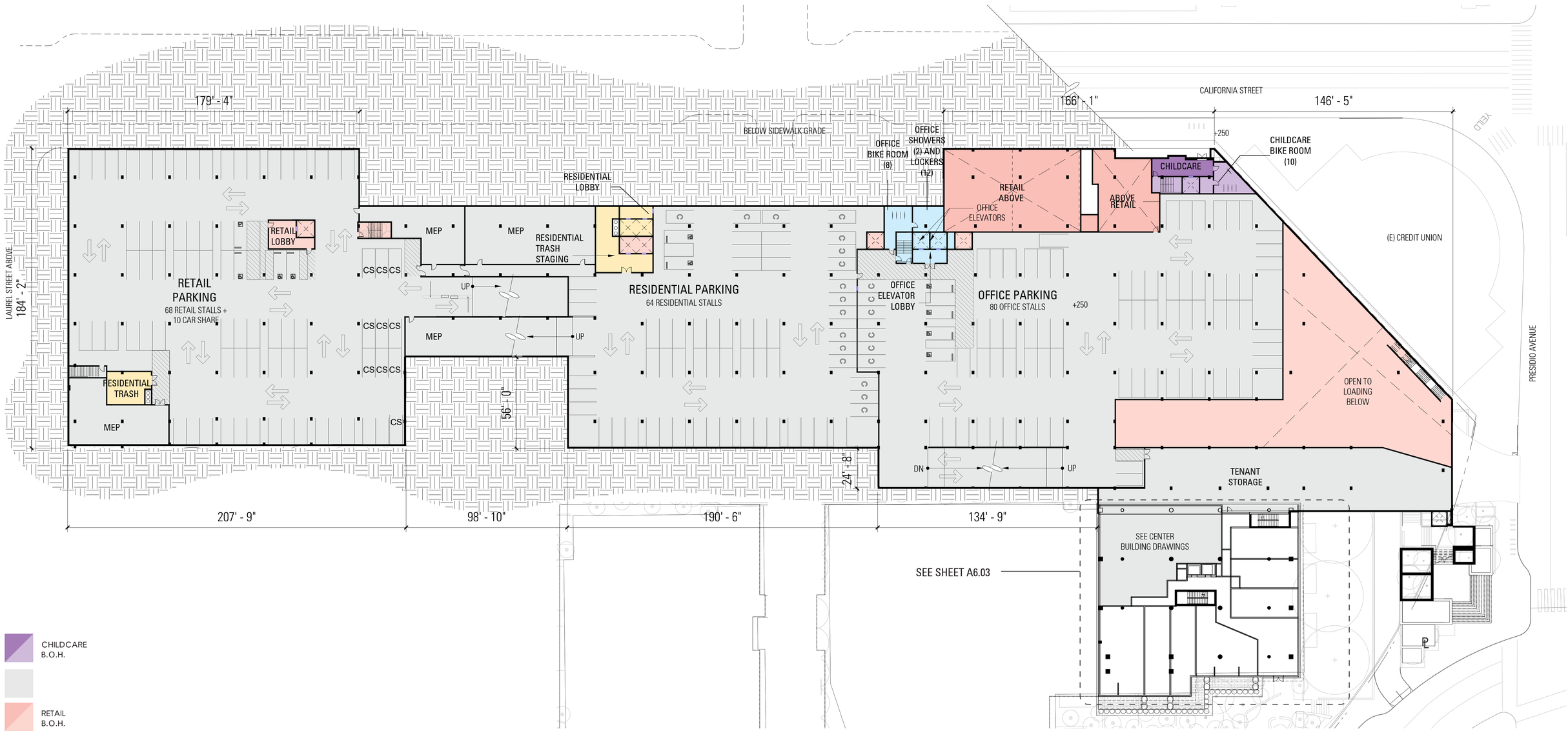
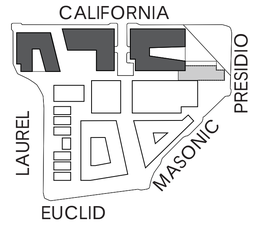



CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CALIFORNIA STREET PARKING GARAGE - LEVEL B2

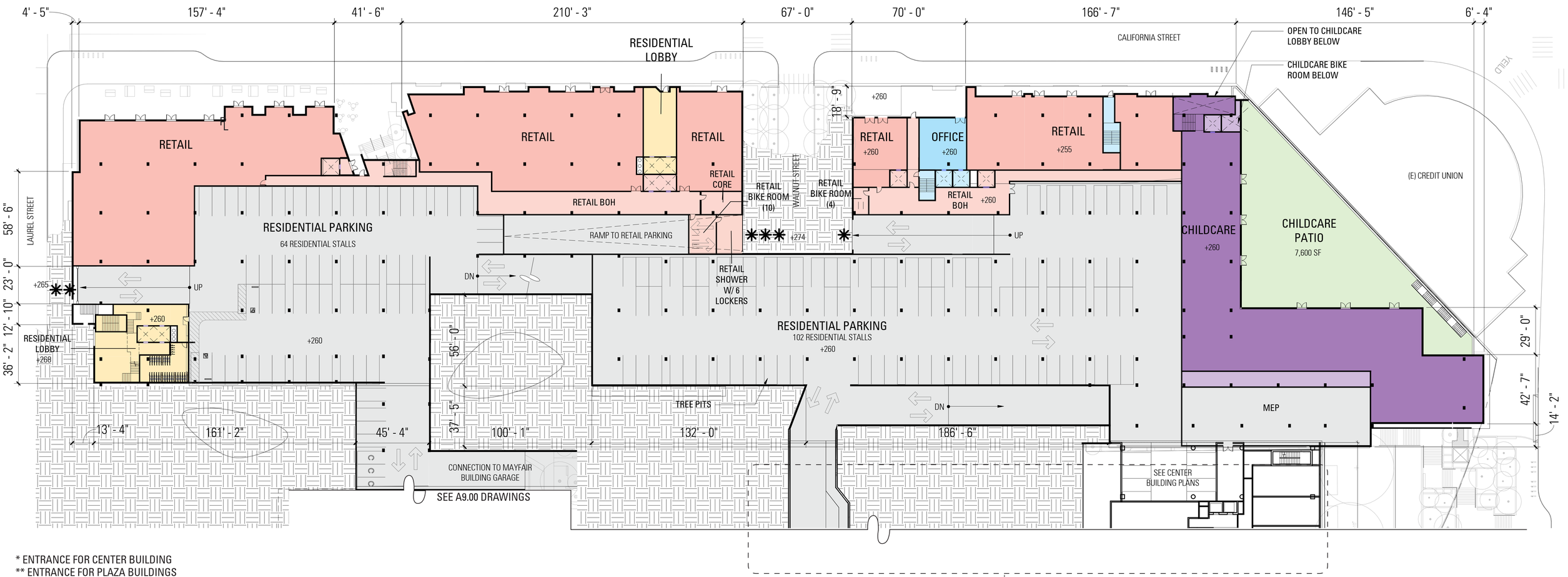
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15' 30' 60' 90'

N

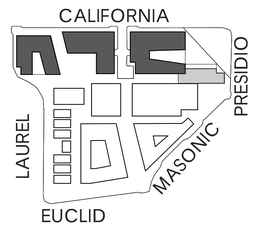
**A1.02**




* ENTRANCE FOR CENTER BUILDING
** ENTRANCE FOR PLAZA BUILDINGS
*** ENTRANCE FOR RETAIL PARKING AND CAR SHARE

| | |
|---|---|
| CHILDCARE USABLE | CHILDCARE B.O.H. |
| PARKING | |
| RETAIL USABLE | RETAIL B.O.H. |
| OFFICE | OFFICE, CORE |
| RESIDENTIAL HOMES | RESIDENTIAL CORE |
| LANDSCAPED ROOF | |

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

# CALIFORNIA STREET PARKING GARAGE - LEVEL B1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

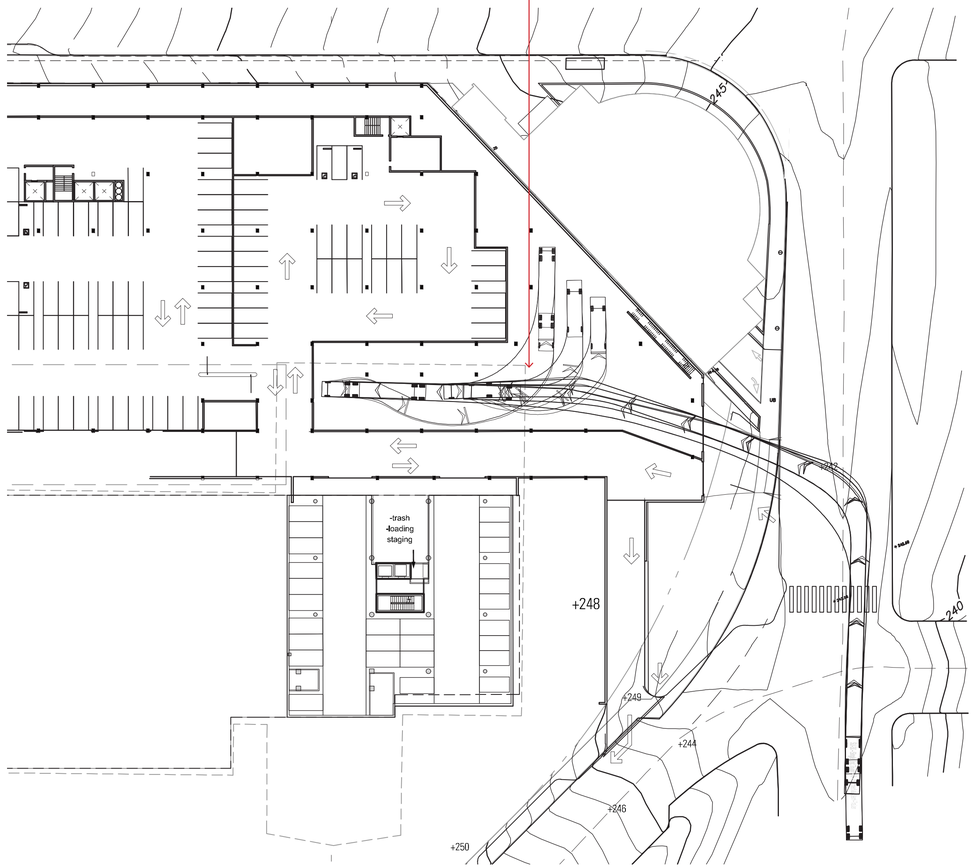
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15' 30' 60' 90'

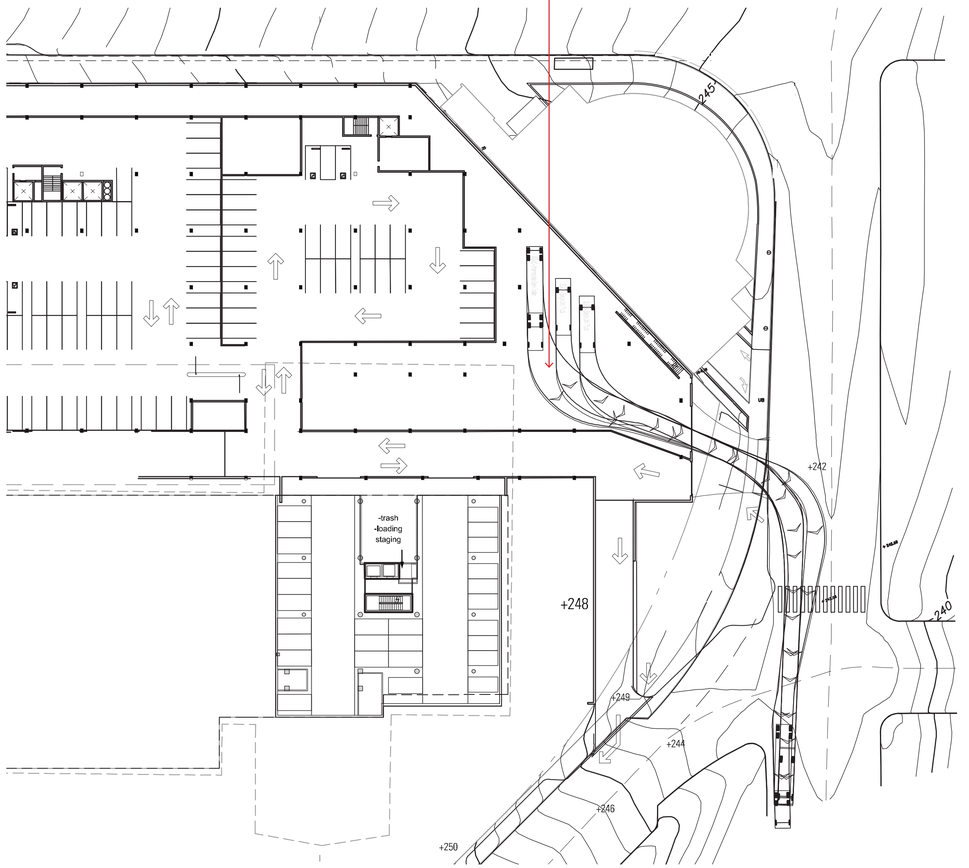
N

**A1.03**

2 SU-30 LOADING BAYS
1 WB-50 LOADING BAY

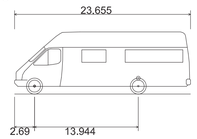



2 SU-30 LOADING BAYS
1 WB-50 LOADING BAY




## TRUCK SWEEPS - LOADING VEHICLES - IN

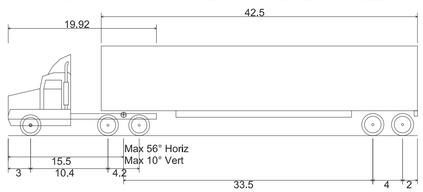
DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE
ONLY. FOR ARCHITECTURAL PLANS SEE A4 SERIES DRAWINGS



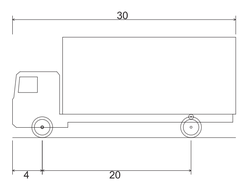

| 7.5t Panel Van | |
|---|---|
| Overall Length | 23.655ft |
| Overall Width | 7.192ft |
| Overall Body Height | 8.345ft |
| Min Body Ground Clearance | 1.038ft |
| Track Width | 6.119ft |
| Lock-to-lock time | 4.00s |
| Curb to Curb Turning Radius | 24.278ft |

## TRUCK SWEEPS - LOADING VEHICLES - OUT

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE
ONLY. FOR ARCHITECTURAL PLANS SEE A4 SERIES DRAWINGS




| WB-50 - Intermediate Semi-Trailer | |
|---|---|
| Overall Length | 55.000ft |
| Overall Width | 8.500ft |
| Overall Body Height | 12.052ft |
| Min Body Ground Clearance | 1.334ft |
| Max Track Width | 8.500ft |
| Lock-to-lock time | 6.00s |
| Max Steering Angle (Virtual) | 17.90° |




| SU-30 - Single Unit Truck | |
|---|---|
| Overall Length | 30.000ft |
| Overall Width | 8.000ft |
| Overall Body Height | 13.500ft |
| Min Body Ground Clearance | 1.367ft |
| Track Width | 8.000ft |
| Lock-to-lock time | 5.00s |
| Max Steering Angle (Virtual) | 31.80° |

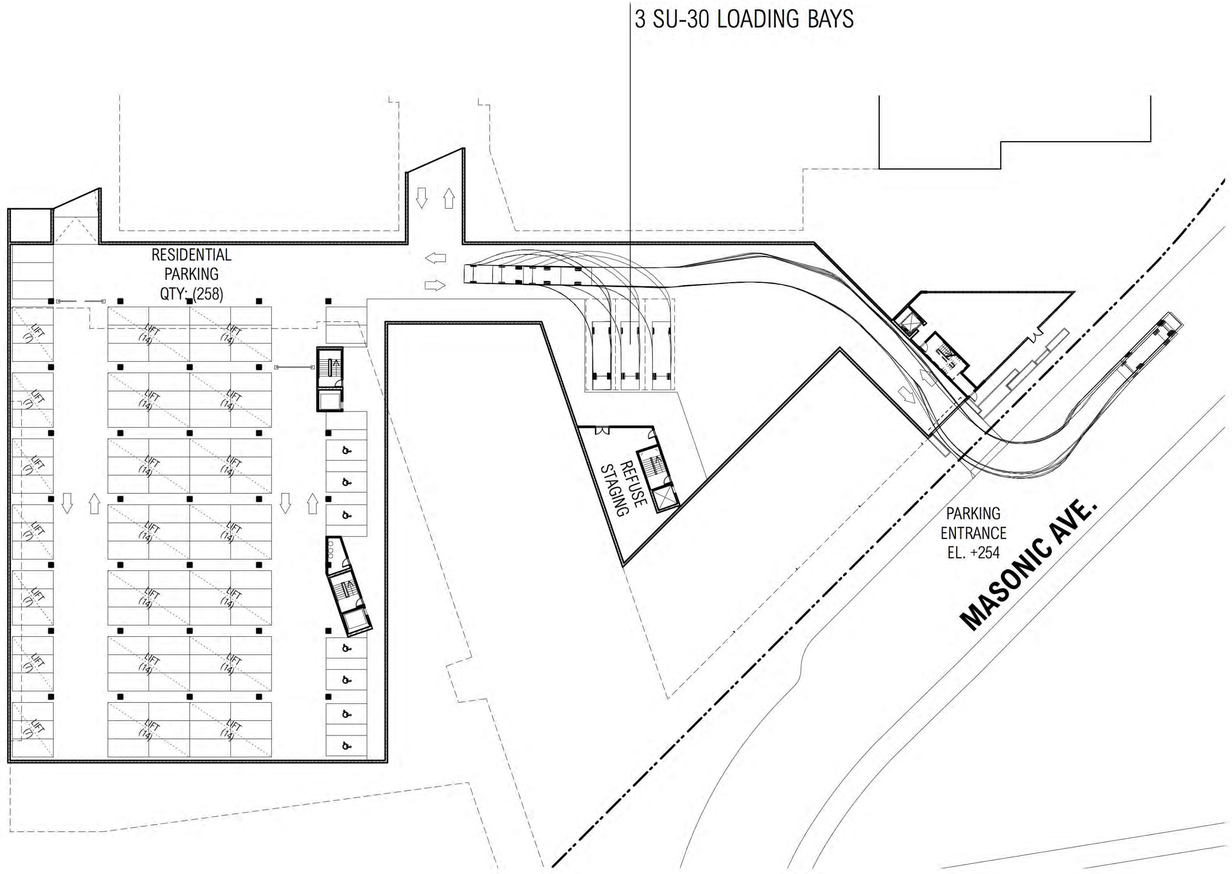
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

LOADING PLAN - LEVEL B3

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

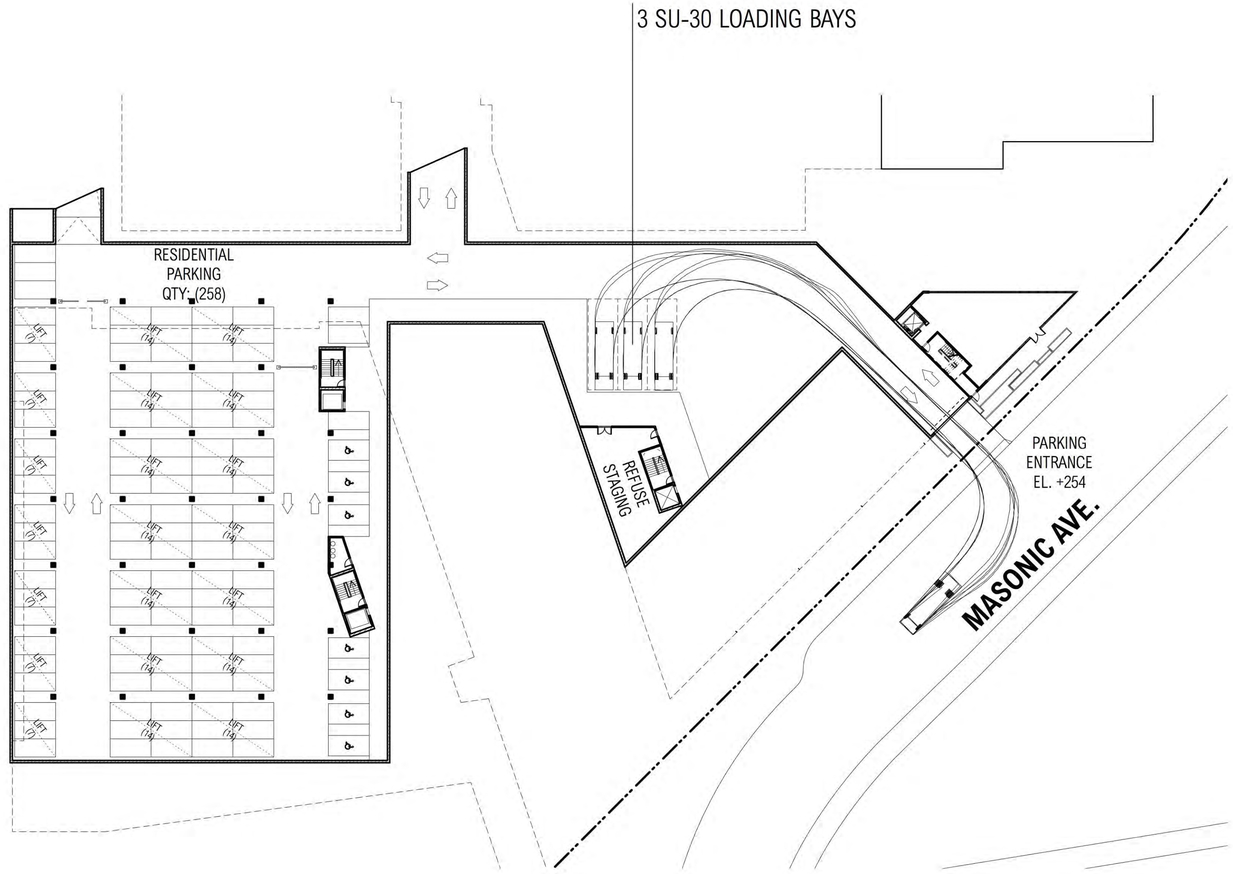
07.03.2019
PLANNING APPLICATION RESUBMITTAL

**A1.04**



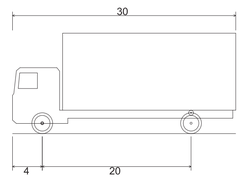

## TRUCK SWEEPS - LOADING VEHICLES - IN

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE ONLY.
FOR ARCHITECTURAL PLANS SEE A7 + A8 SERIES DRAWINGS




## TRUCK SWEEPS - LOADING VEHICLES - OUT

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE ONLY.
FOR ARCHITECTURAL PLANS SEE A7 + A8 SERIES DRAWINGS




| SU-30 - Single Unit Truck | |
|---|---|
| Overall Length | 30.000ft |
| Overall Width | 8.000ft |
| Overall Body Height | 13.500ft |
| Min Body Ground Clearance | 1.367ft |
| Track Width | 8.000ft |
| Lock-to-lock time | 5.00s |
| Max Steering Angle (Virtual) | 31.80° |

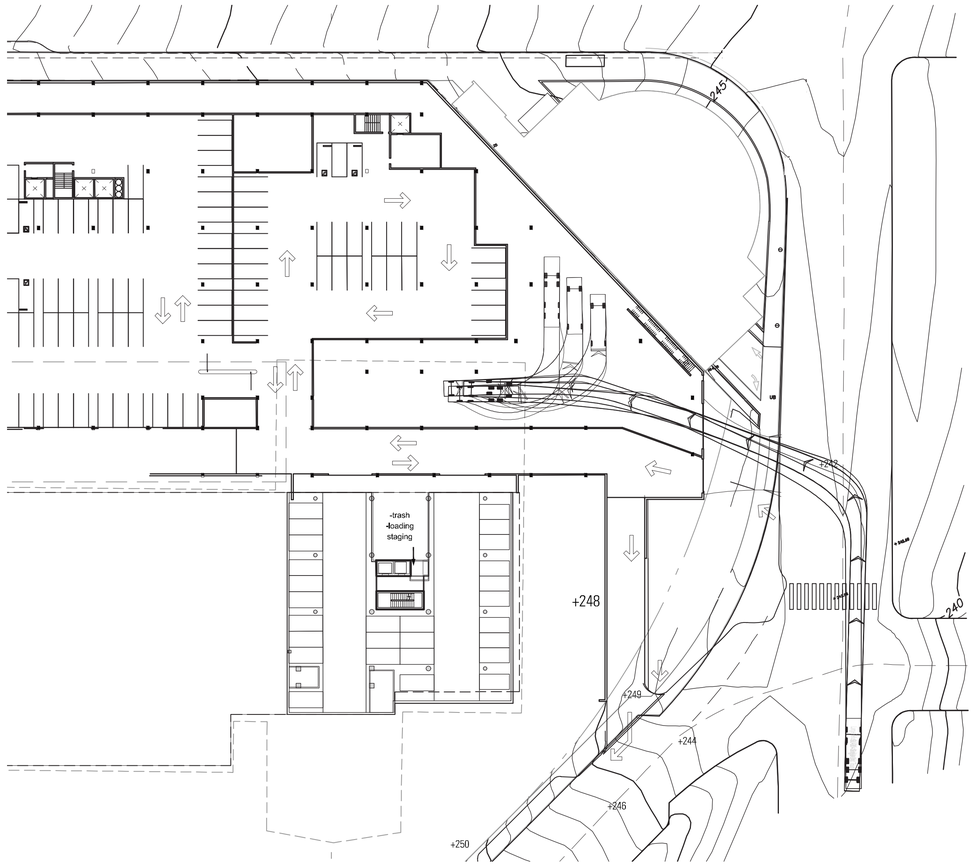
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

# LOADING PLAN - LEVEL B2

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

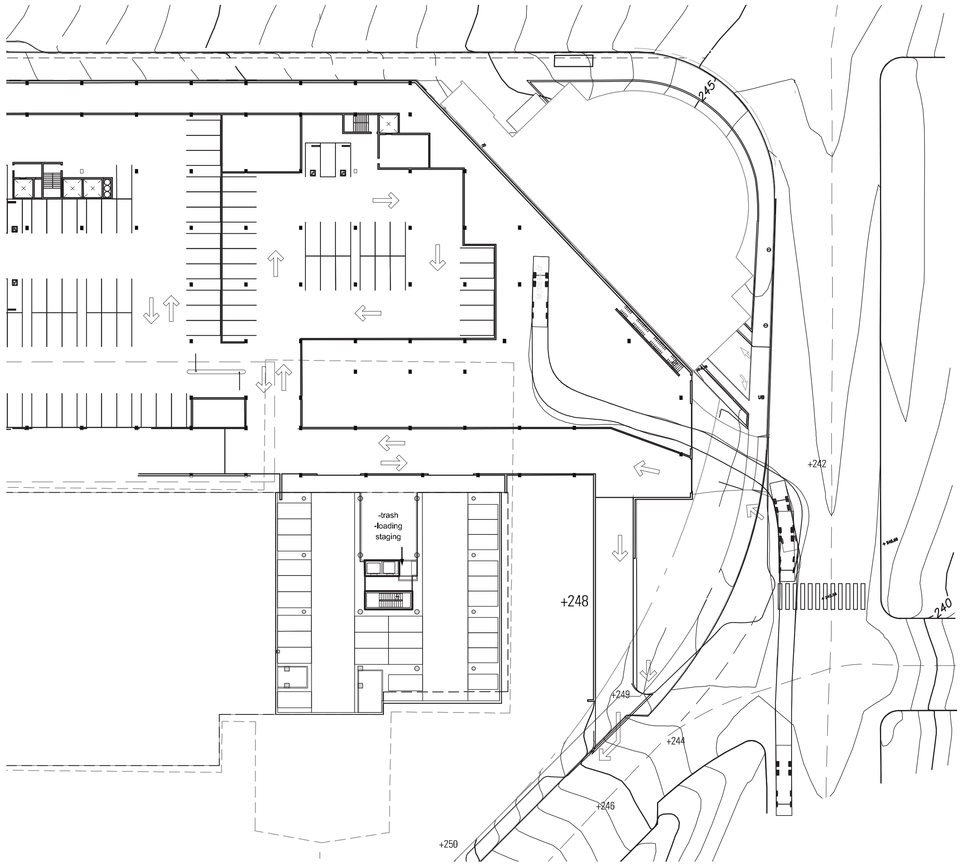
07.03.2019
PLANNING APPLICATION RESUBMITTAL

**A1.05**



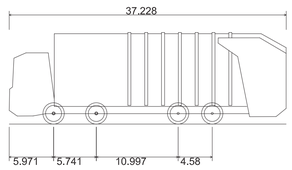

## TRUCK SWEEPS - WASTE COLLECTION - IN

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE
ONLY. FOR ARCHITECTURAL PLANS SEE A4 SERIES DRAWINGS




## TRUCK SWEEPS - WASTE COLLECTION - OUT

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE
ONLY. FOR ARCHITECTURAL PLANS SEE A4 SERIES DRAWINGS




| Large Refuse Vehicle (4 axle) | |
|---|---|
| Overall Length | 37.228ft |
| Overall Width | 8.202ft |
| Overall Body Height | 12.307ft |
| Min Body Ground Clearance | 0.996ft |
| Track Width | 8.202ft |
| Lock-to-lock time | 6.00s |
| Wall to Wall Turning Radius | 37.172ft |

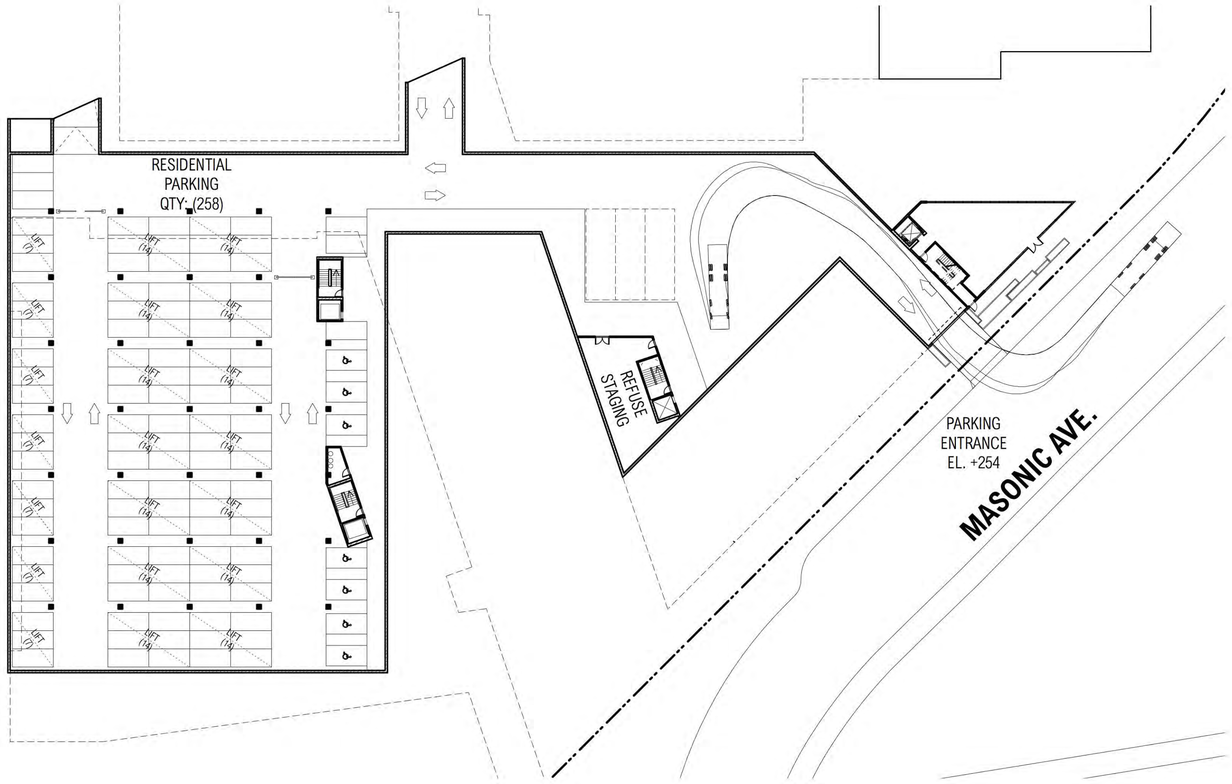
# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

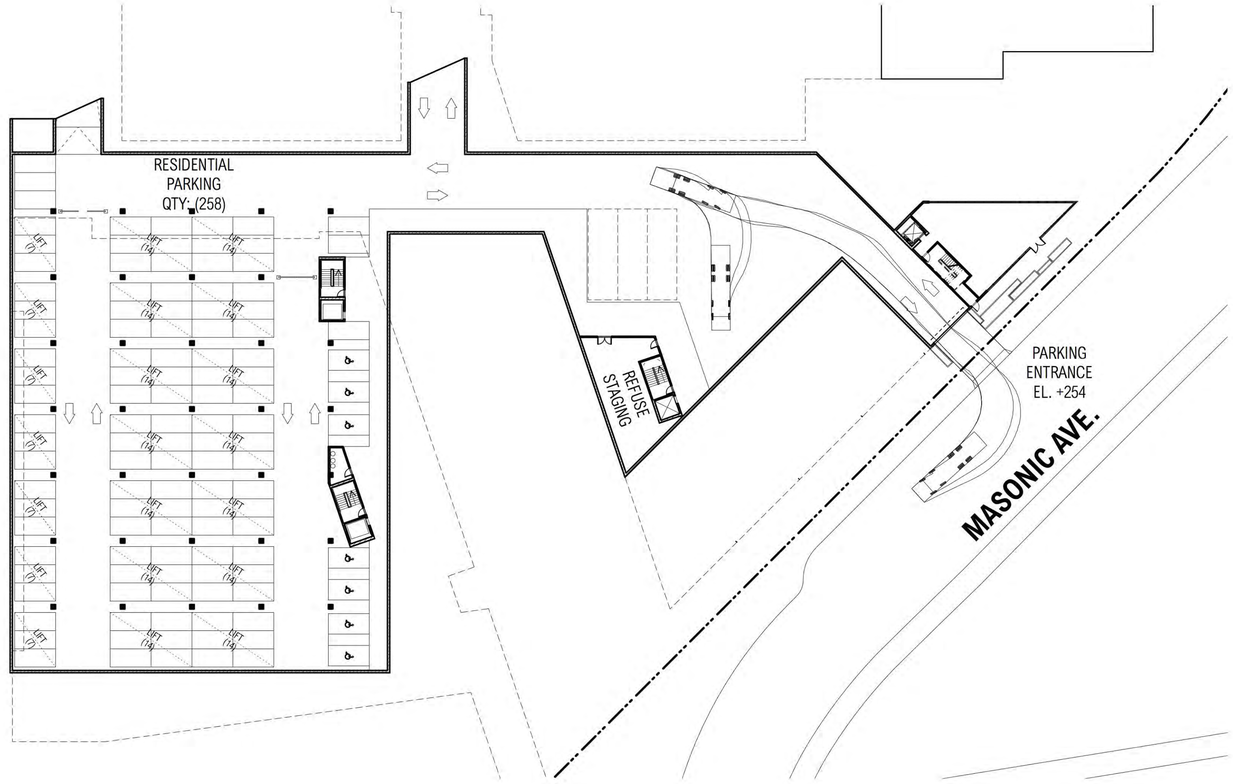
## REFUSE PLAN - LEVEL B3

**A1.06**



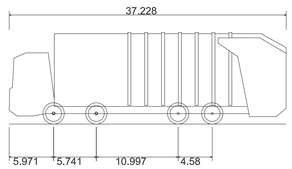

## TRUCK SWEEPS - WASTE COLLECTION - IN

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE ONLY.
FOR ARCHITECTURAL PLANS SEE A7 + A8 SERIES DRAWINGS




## TRUCK SWEEPS - WASTE COLLECTION - OUT

DRAWING DEMONSTRATES TRUCK TURNING COMPLIANCE ONLY.
FOR ARCHITECTURAL PLANS SEE A7 + A8 SERIES DRAWINGS




| Large Refuse Vehicle (4 axle) | |
|---|---|
| Overall Length | 37.228ft |
| Overall Width | 8.202ft |
| Overall Body Height | 12.307ft |
| Min Body Ground Clearance | 0.996ft |
| Track Width | 8.202ft |
| Lock-to-lock time | 6.00s |
| Wall to Wall Turning Radius | 37.172ft |

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

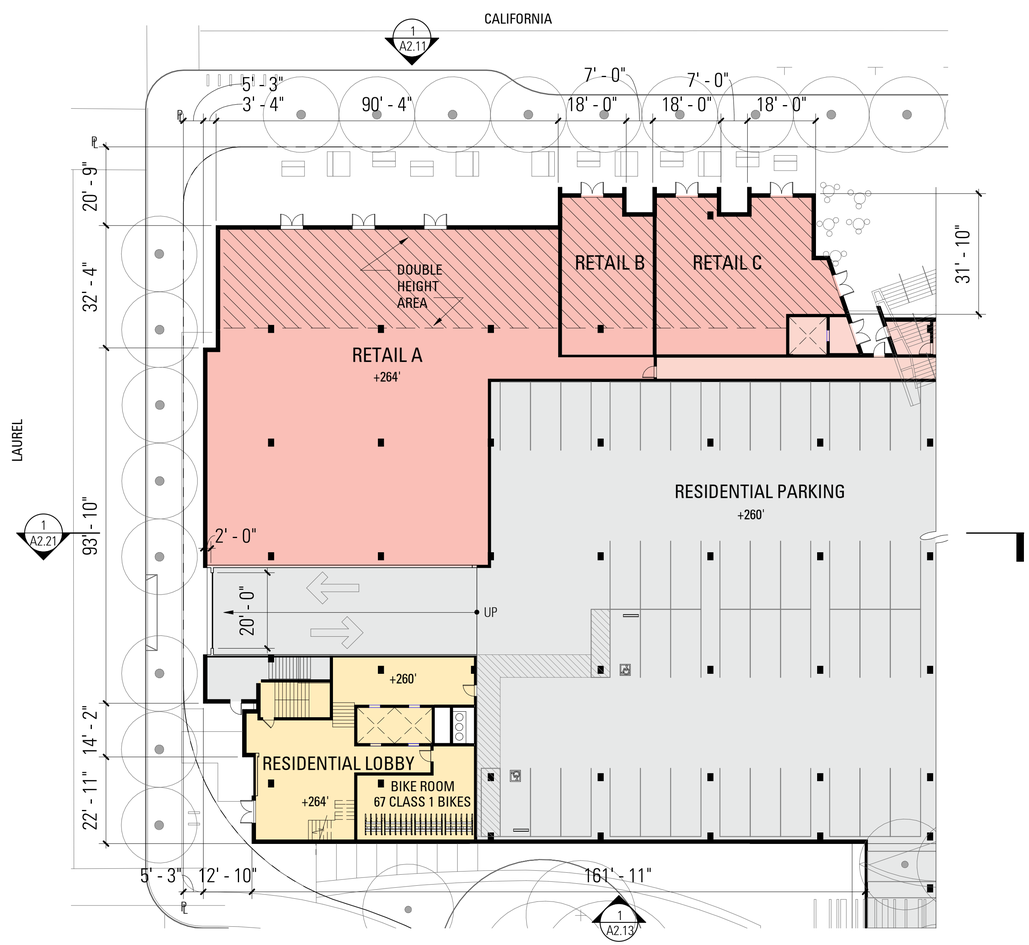
REFUSE PLAN - LEVEL B2

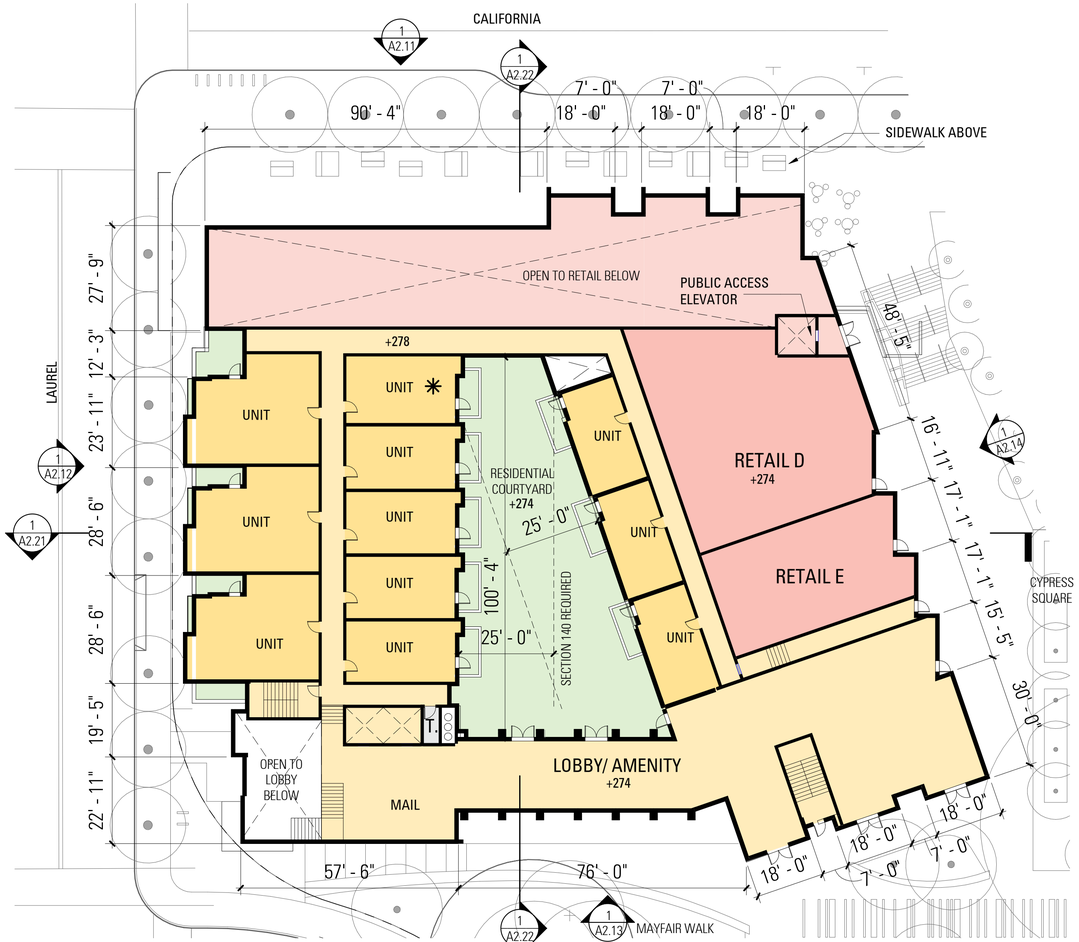
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**A1.07**

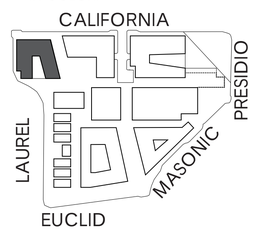
* RETAIL DEMISING IS CONCEPTUAL
AND FINAL LAYOUT MAY DIFFER.




CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




PLAN LEVEL B1 + 263' (F.F. VARIES ACROSS FLOOR LEVEL)
SEE SHEET A1.03 FOR MORE INFORMATION

PLAN LEVEL 1 + 274'

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

"PLAZA BLDG A" BUILDING PLANS - LEVEL B1 AND 1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10' 20' 40' 60'

N

**A2.00**

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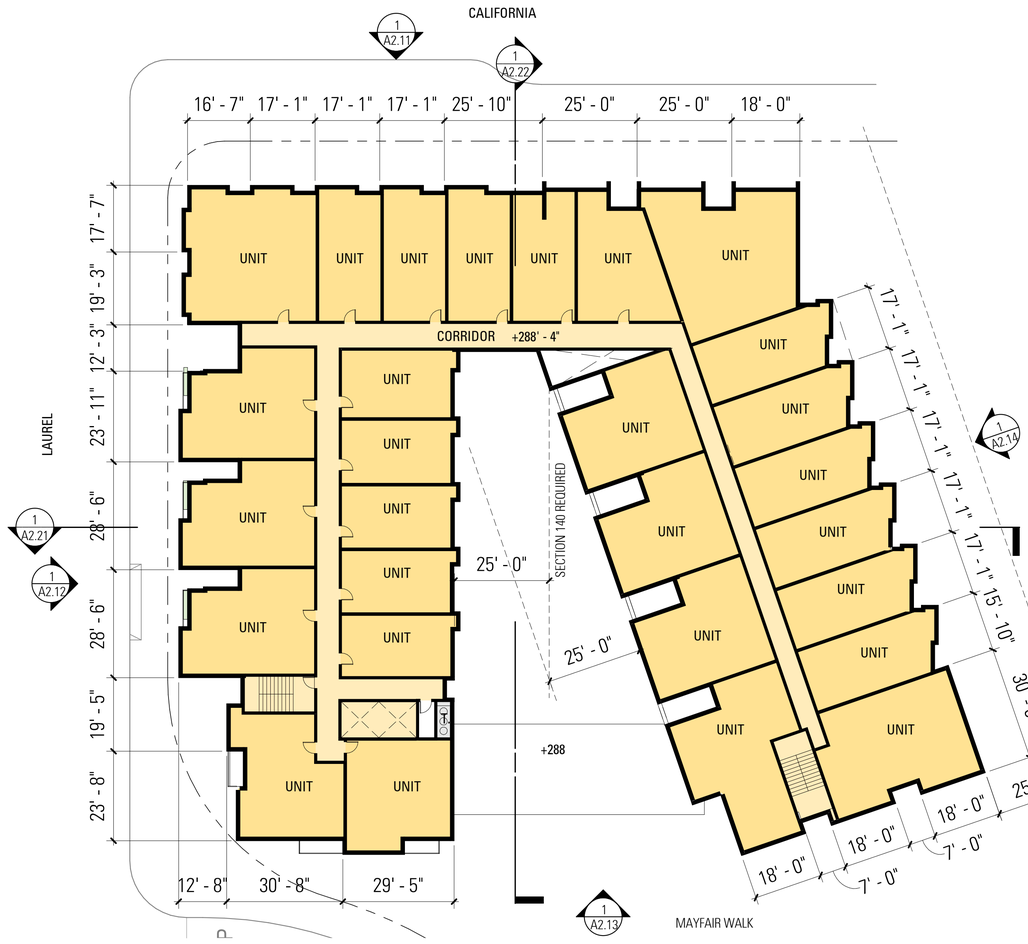


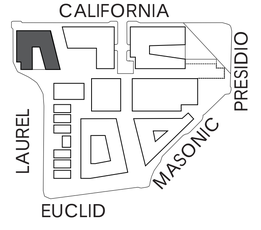

PLAN LEVEL 2 + 288.5’




PLAN LEVEL 3 +298.5’

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

“PLAZA BLDG A” BUILDING PLANS - LEVEL 2 AND 3

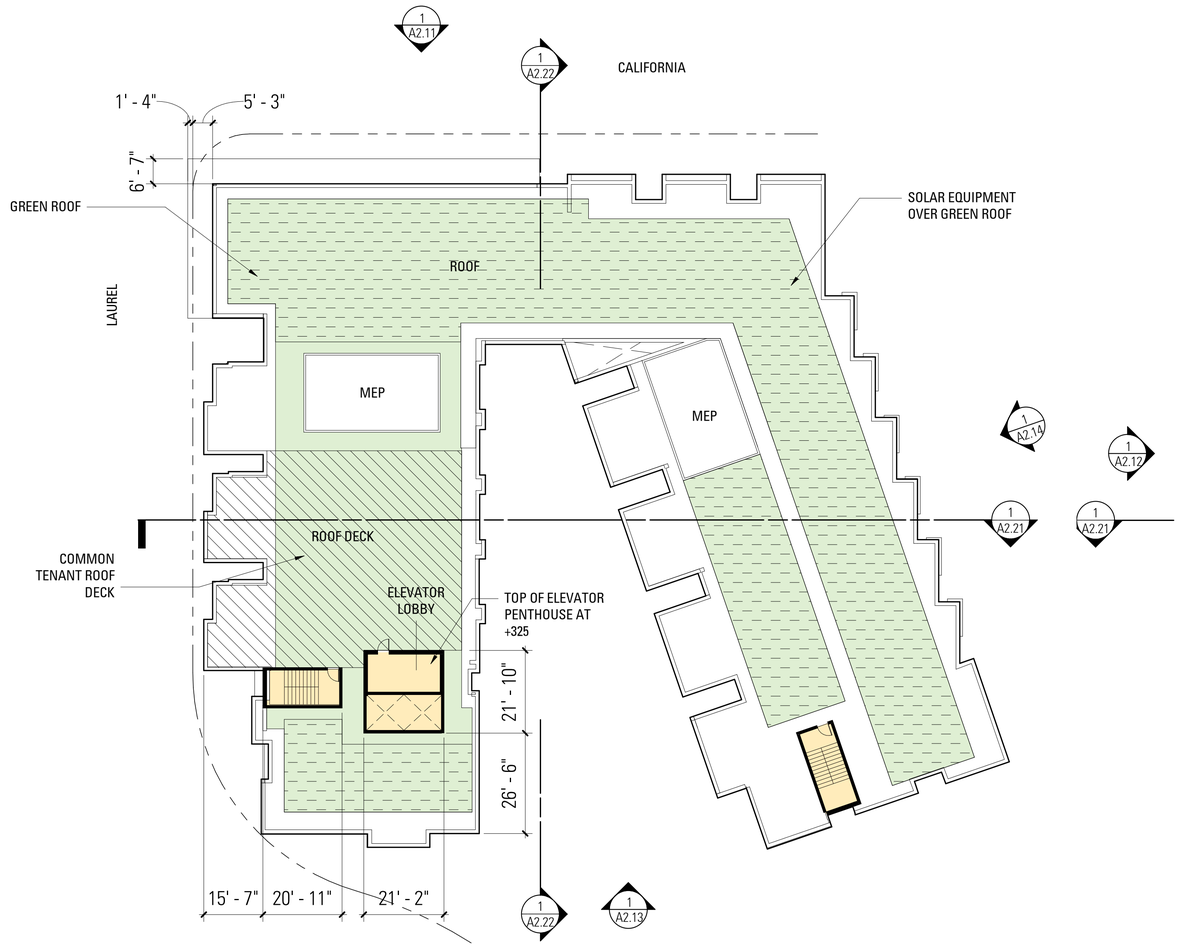
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10’ 20’ 40’ 60’

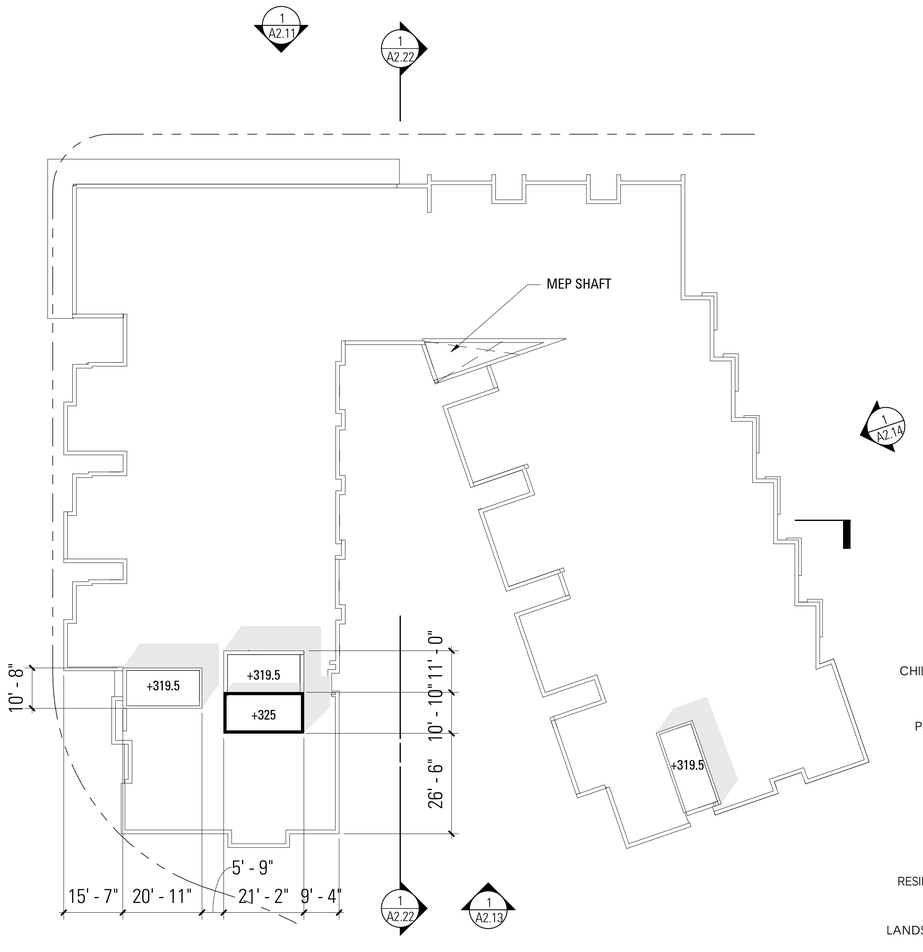
N

**A2.01**




## ROOF PLAN + 309.5’

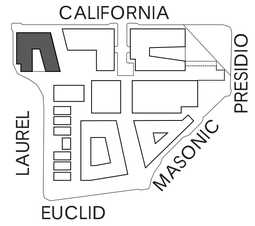
NOTE: MEP LAYOUT IS CONCEPTUAL




## PENTHOUSE PLAN + 328’

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

“PLAZA BLDG A” BUILDING PLANS - ROOF

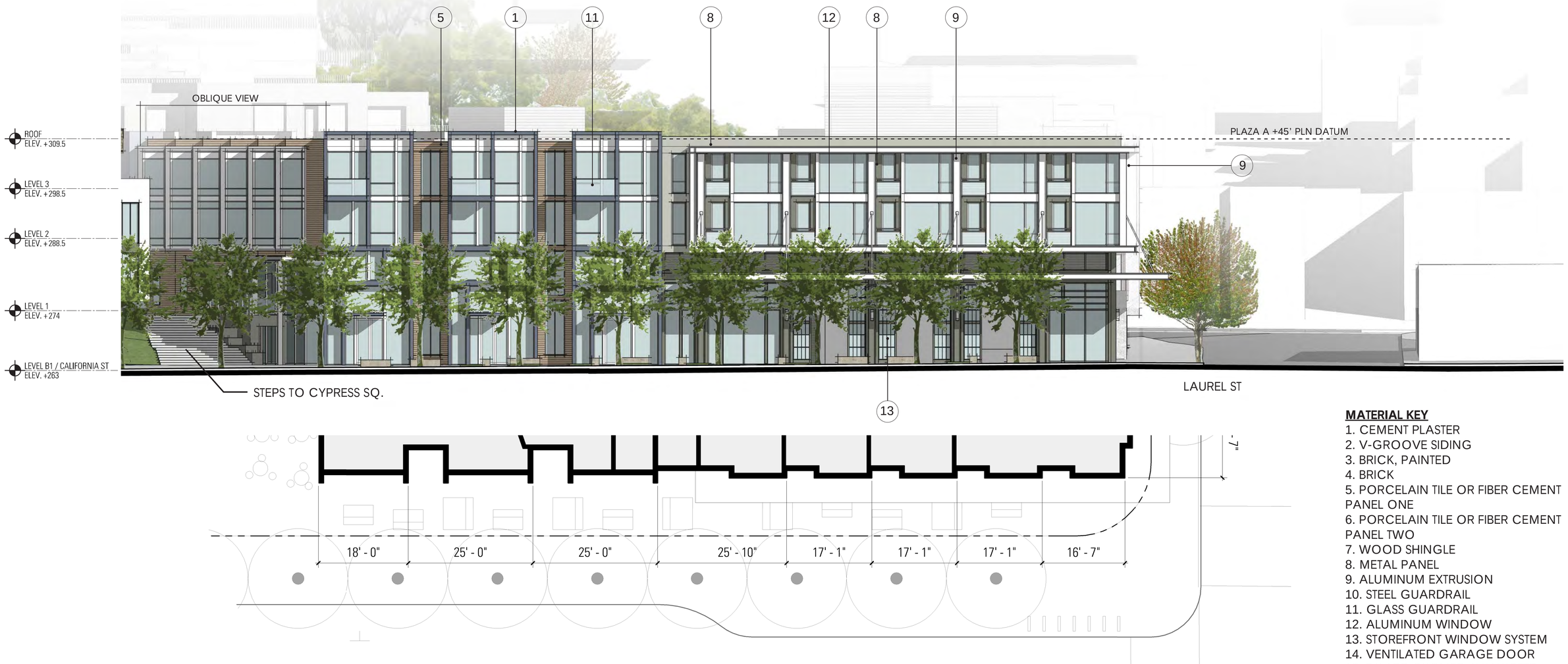
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10’ 20’ 40’ 60’

N

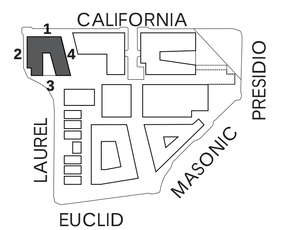
A2.02




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 1. CALIFORNIA STREET ELEVATION (NORTH) WITH ILLUSTRATIVE PLAN AT LEVEL 2




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG A" BUILDING ELEVATIONS

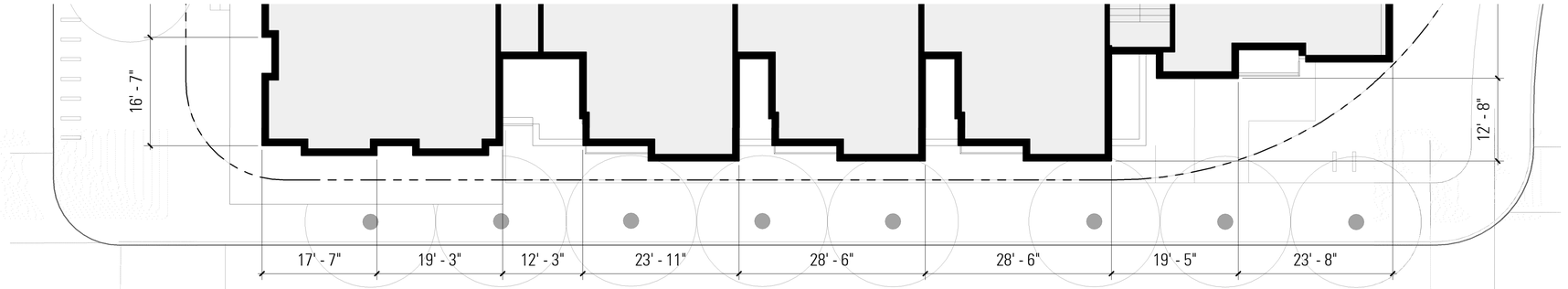
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A2.11**



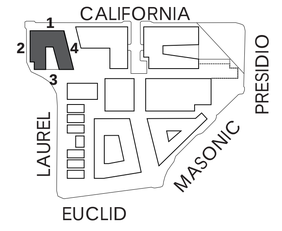




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 2. LAUREL STREET ELEVATION (WEST) WITH ILLUSTRATIVE PLAN AT LEVEL 2

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG A" BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

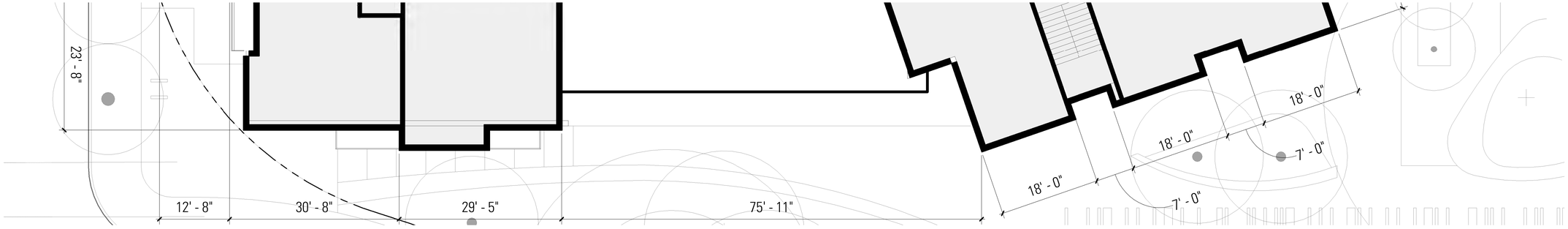
0 5' 10' 20' 30'

**A2.12**

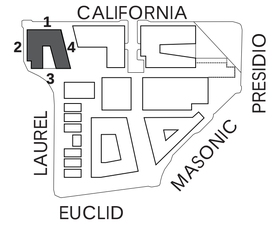



**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE




## 3. MAYFAIR DRIVE ELEVATION (SOUTH) WITH ILLUSTRATIVE PLAN AT LEVEL 2




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG A" BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

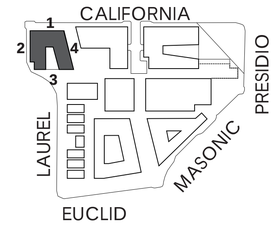
0 5' 10' 20' 30'

**A2.13**




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE




4. MARKET PLAZA ELEVATION (EAST) WITH ILLUSTRATIVE PLAN AT LEVEL 2

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

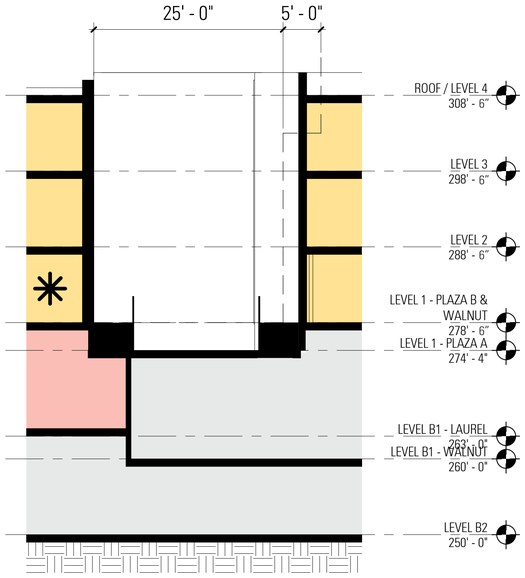
"PLAZA BLDG A" BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

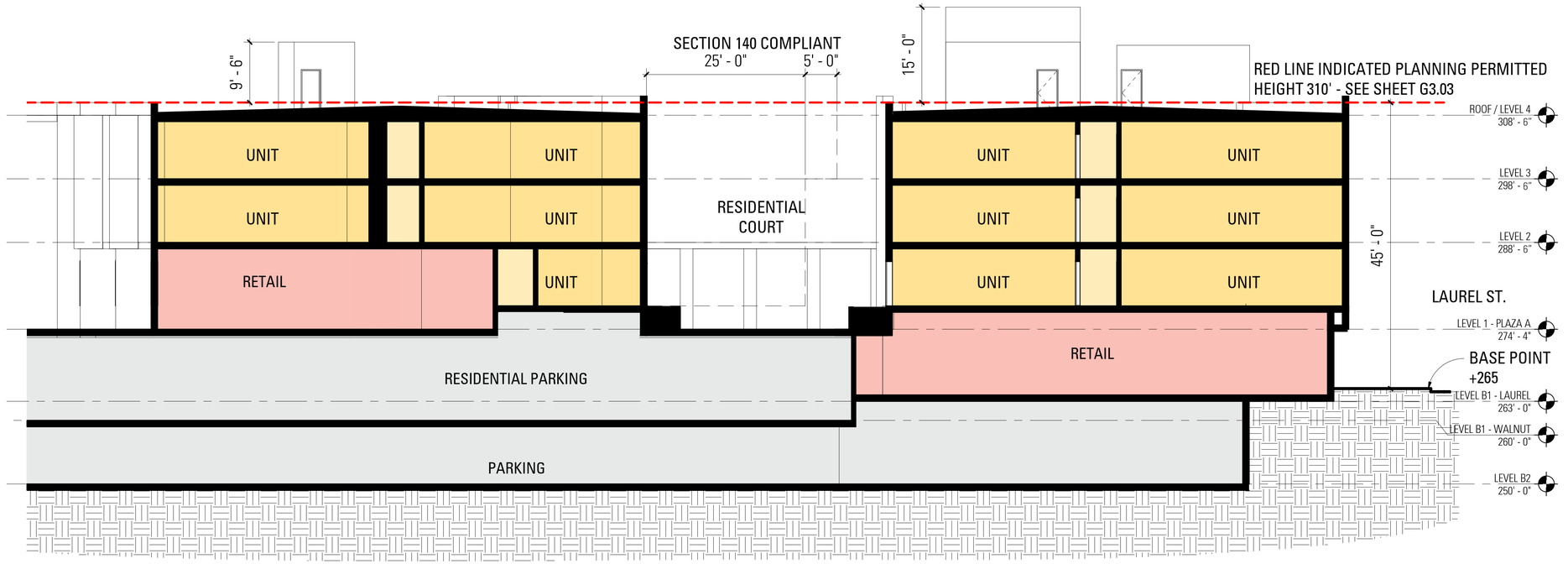
A2.14




UNIT REQUIRES MODIFICATION TO SECTION 140. 30' - 0" DEPTH REQUIRED

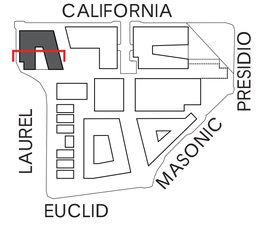
## 2. “PLAZA BLDG A” EAST/WEST SECTION LOOKING NORTH THRU NON-SECTION 140 COMPLIANT UNIT

1”=10’




## 1. “PLAZA BLDG A” EAST/WEST SECTION LOOKING SOUTH

1”=10’




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

“PLAZA BLDG A” BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5’ 10’ 20’ 30’

**A2.21**

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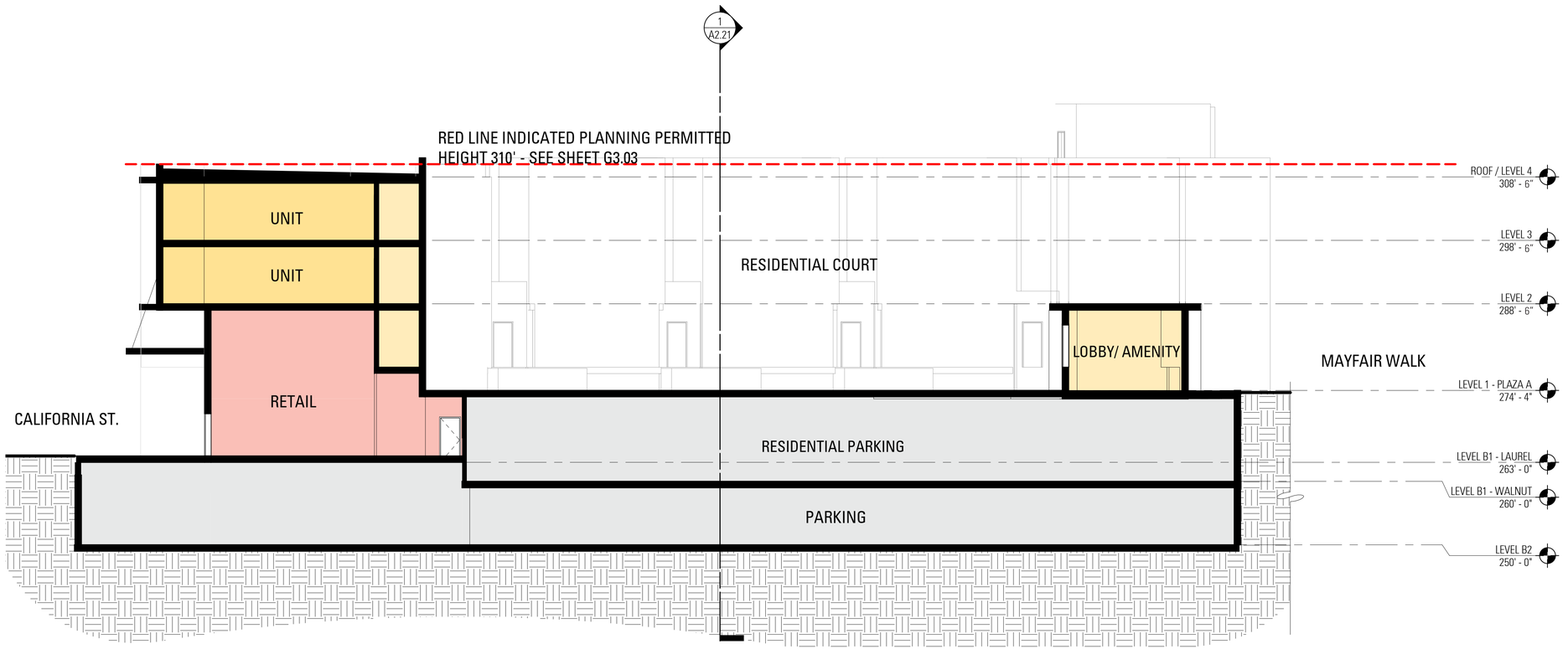
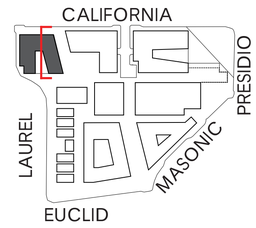



## 1. “PLAZA BLDG A” NORTH/SOUTH SECTION LOOKING EAST

1”=10’




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

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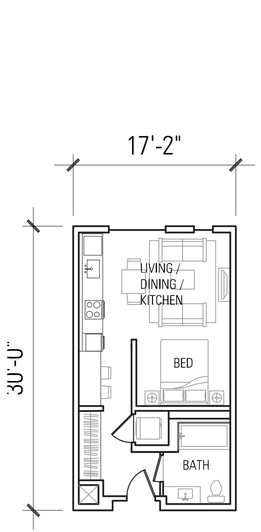
“PLAZA BLDG A” BUILDING SECTION

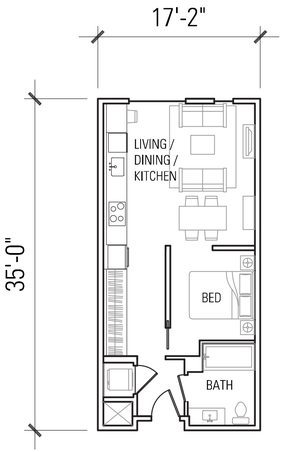
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5’ 10’ 20’ 30’

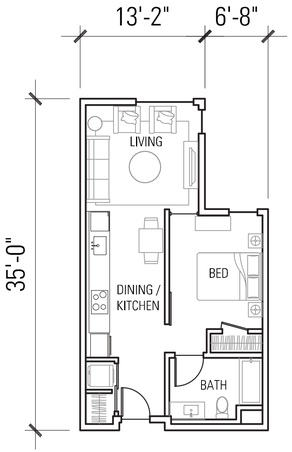
**A2.22**



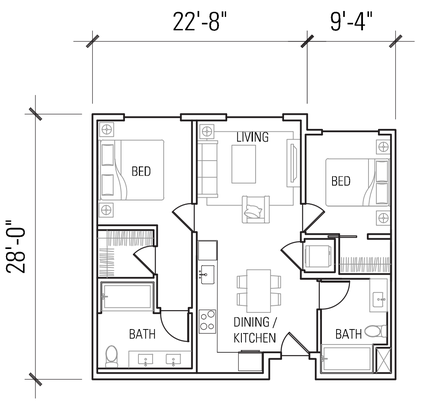

JUNIOR



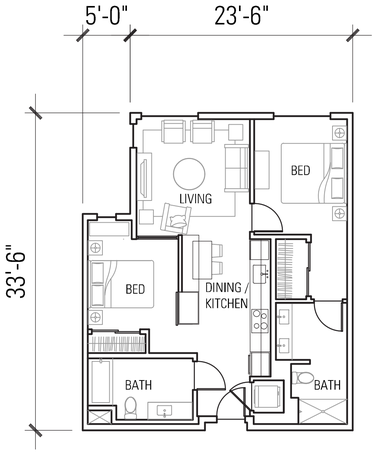

1-BEDROOM, A



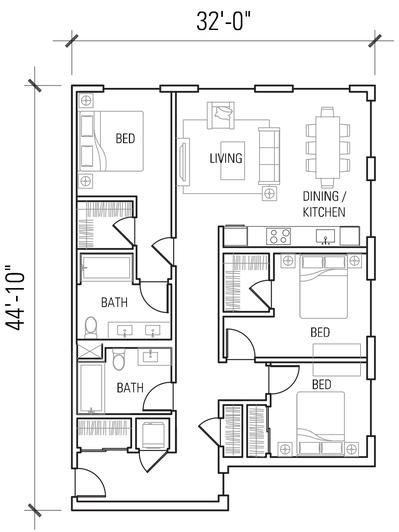

1-BEDROOM, B




2-BEDROOM, A




2-BEDROOM, B




3-BEDROOM

NOTE: UNITS ARE SHOWN FOR SCALE & REFERENCE ONLY. ADDITIONAL UNIT TYPES NOT SHOWN.



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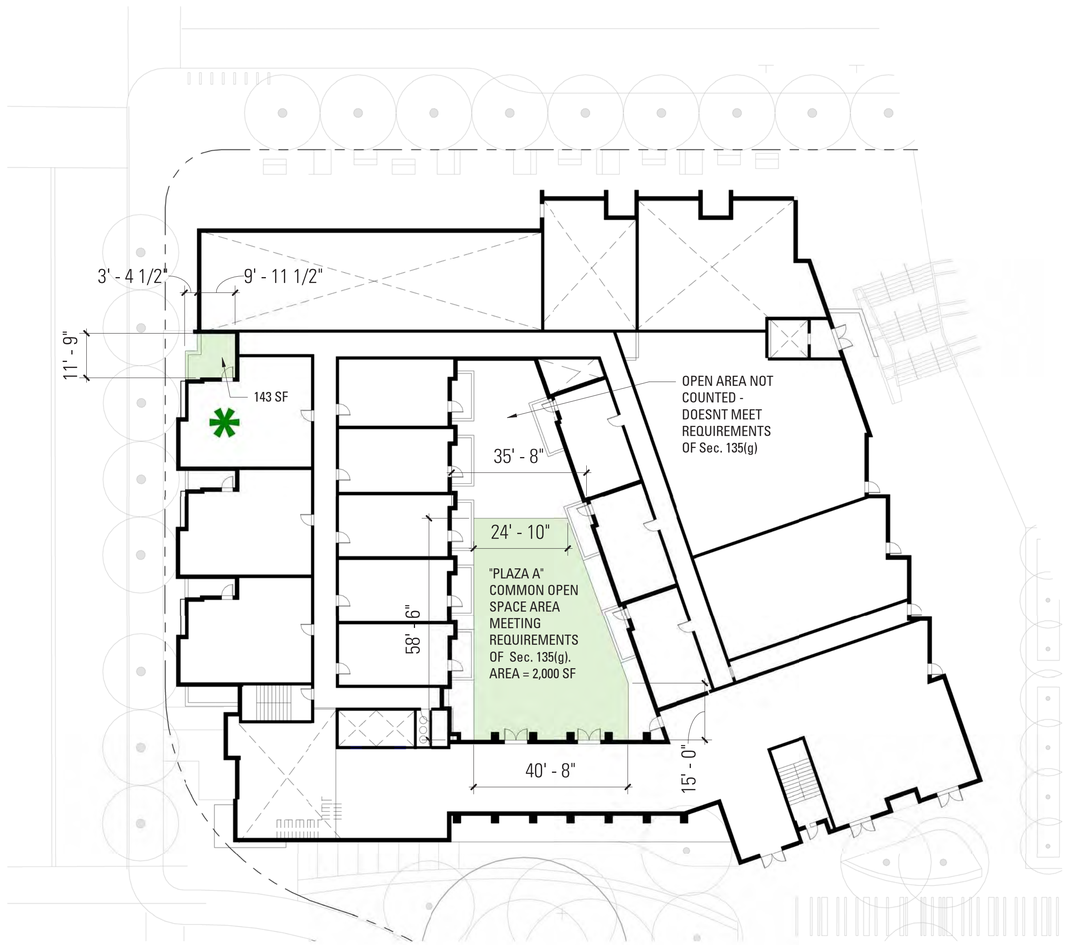
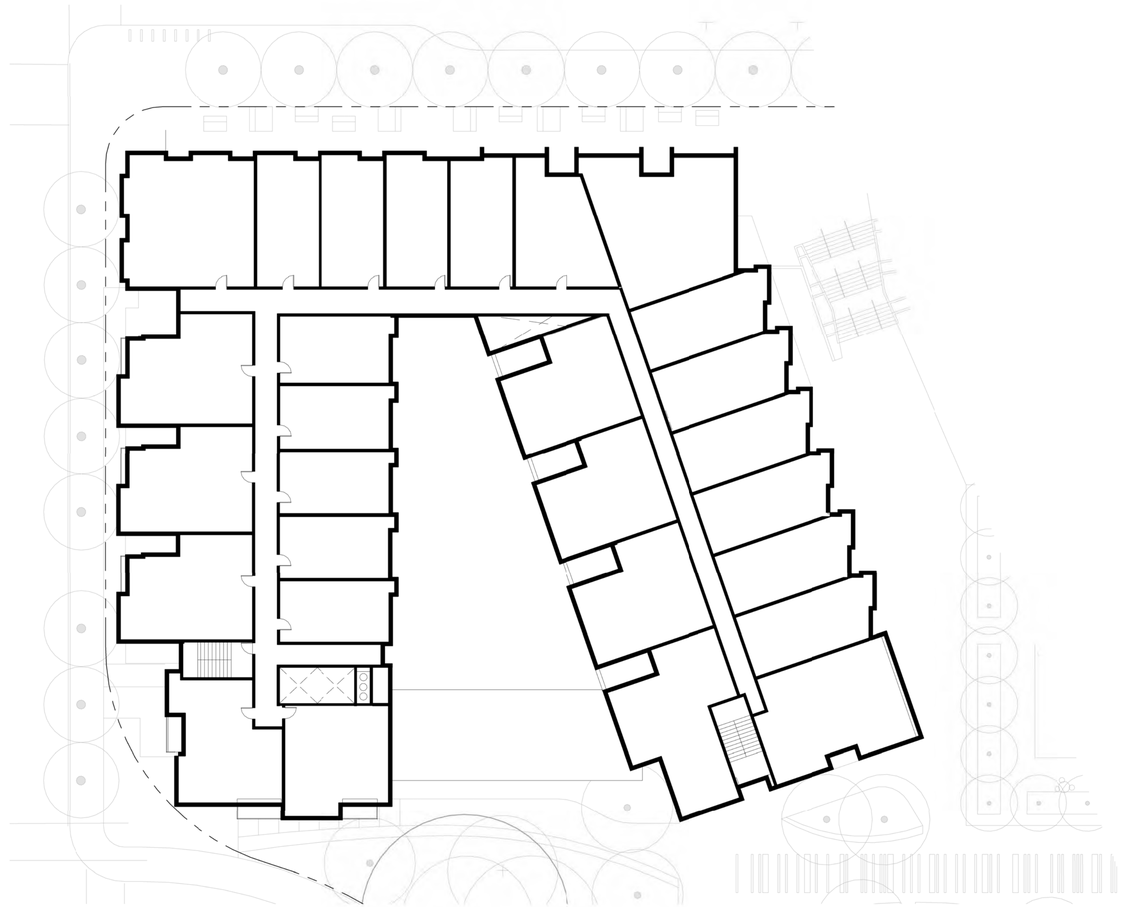



## LEVEL 1

1" = 20'-0"

**LEVEL 1 SUMMARY:**
COMMON: 2,000 SF
PRIVATE: 100 SF COMPLIANT / COUNTED

* UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)



## LEVEL 2

1" = 20'-0"

**LEVEL 2 SUMMARY:**
COMMON: 0 SF COMPLIANT
PRIVATE: 0 SF COMPLIANT

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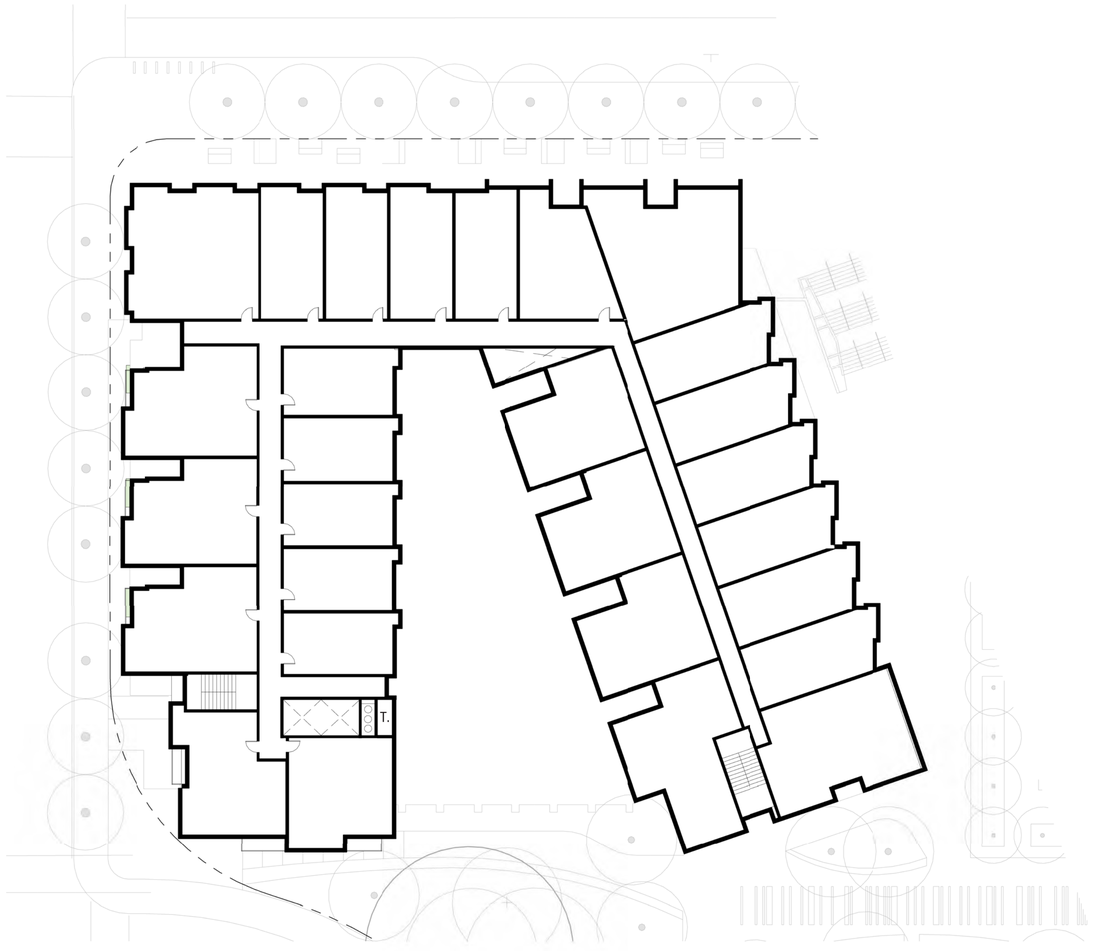


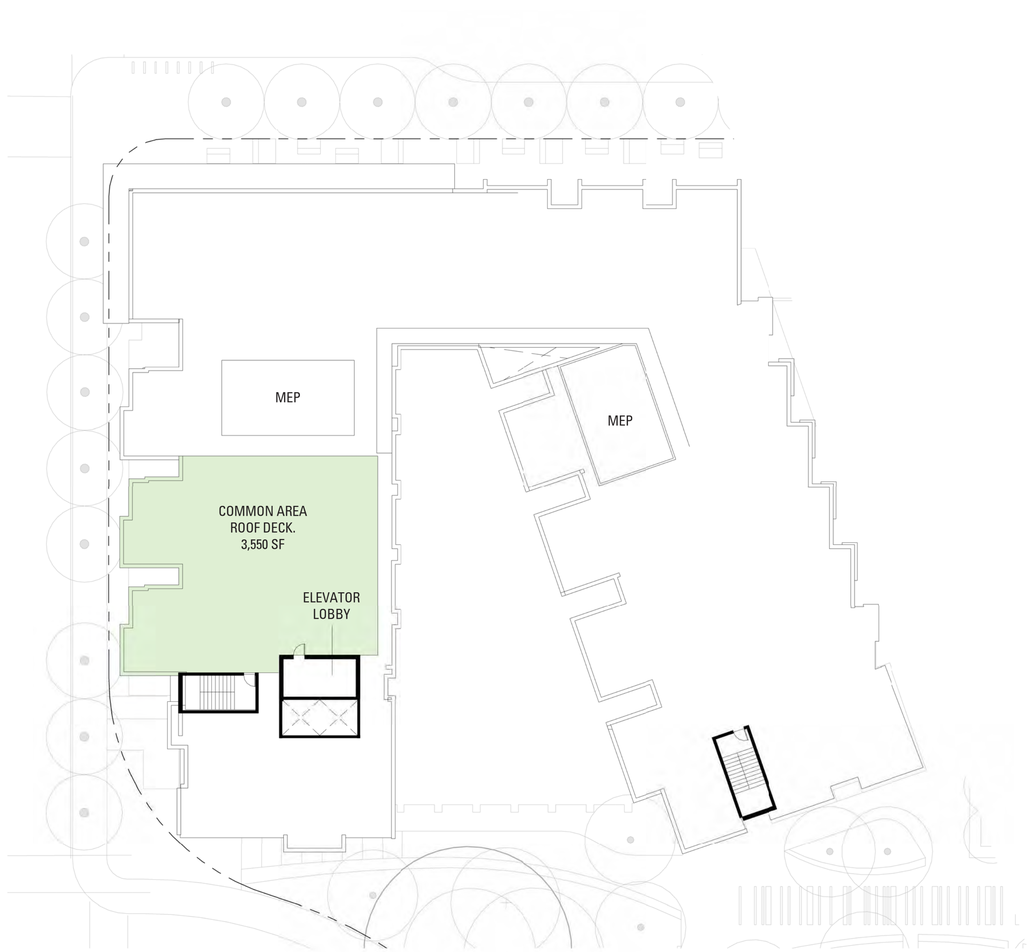

## LEVEL 3

1" = 20'-0"

**LEVEL 3 SUMMARY:**
COMMON: 0 SF COMPLIANT
PRIVATE: 0 SF COMPLIANT

**PLAZA A TOTALS:**
COMMON: 5,550 SF
PRIVATE: 100 SF COMPLIANT AND COUNTED

✱ UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)




## ROOF

1" = 20'-0"

**ROOF SUMMARY:**
COMMON: 3,550 SF
PRIVATE: 0 SF

da.rvt

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## "PLAZA BLDG A" OPEN SPACE DIAGRAMS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**A2.42**

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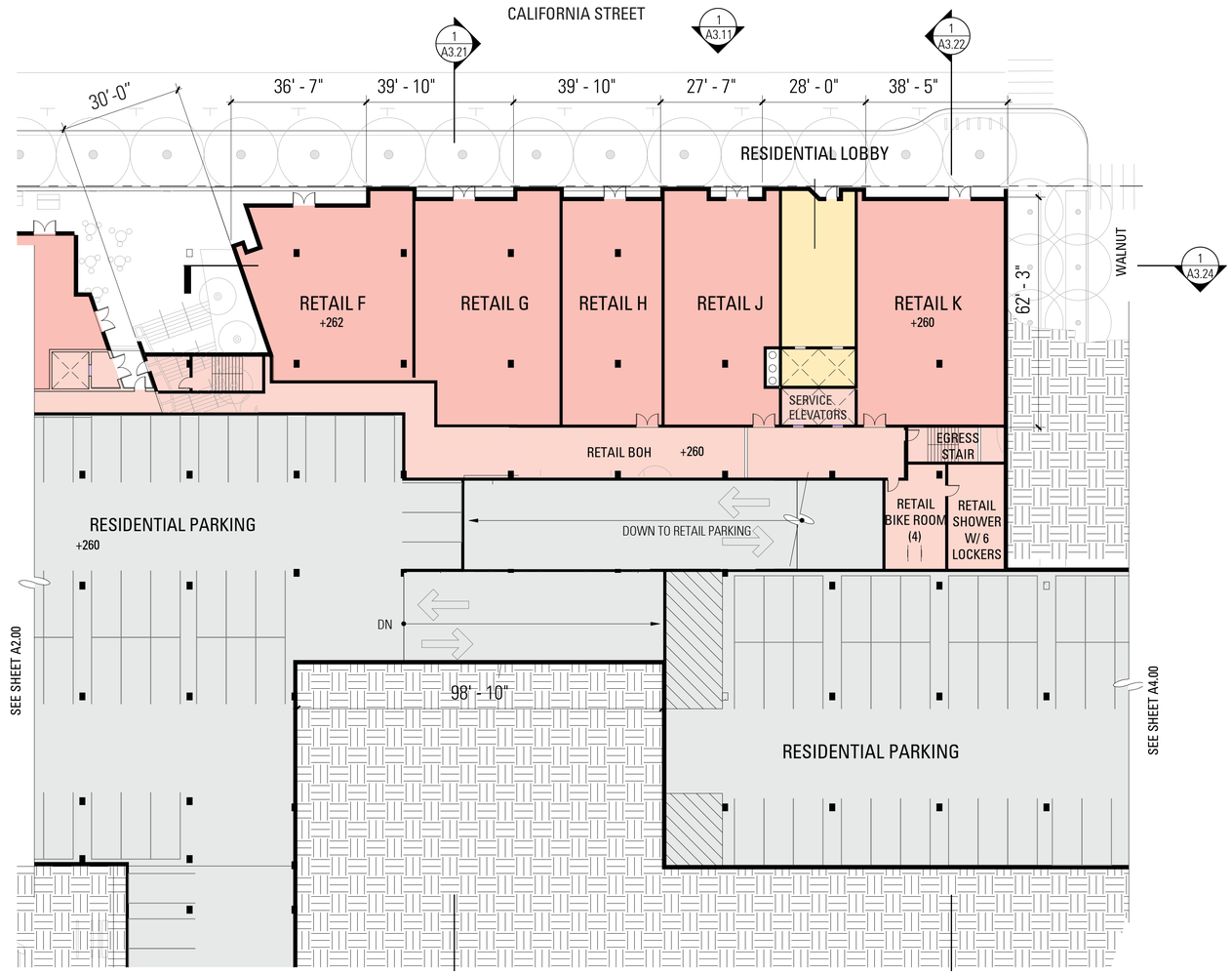
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

“PLAZA BLDG A” PERSPECTIVE

07.03.2019
PLANNING APPLICATION RESUBMITTAL

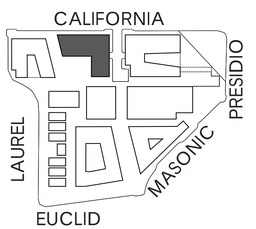
**A2.60**

* RETAIL DEMISING IS CONCEPTUAL AND FINAL LAYOUT MAY DIFFER.




CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## PLAN LEVEL B1 + 261' (F.F. VARIES ACROSS FLOOR LEVEL)

SEE SHEET A1.03 FOR MORE PARKING INFORMATION

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG B" BUILDING PLANS - LEVEL B1

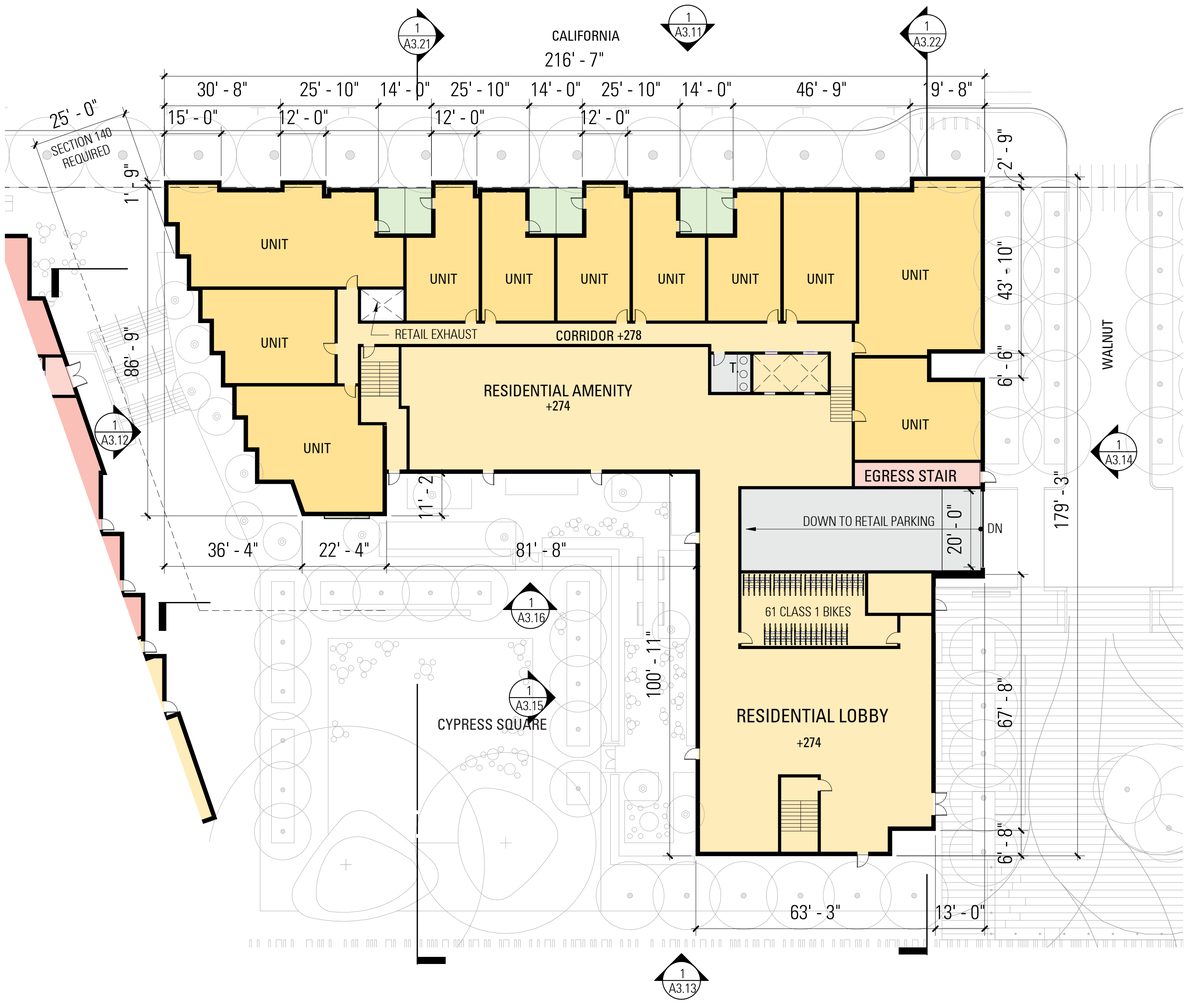
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

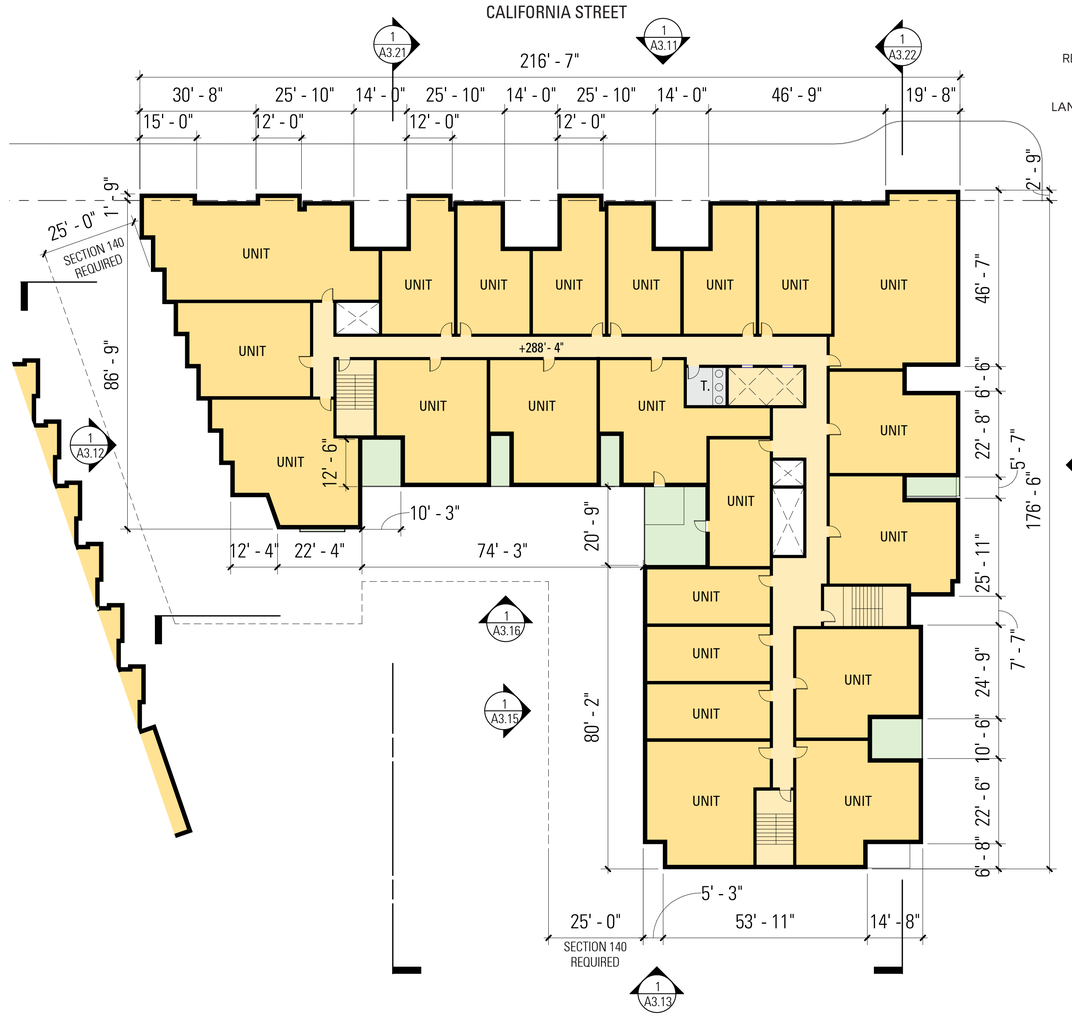
0 10' 20' 40' 60'

N

**A3.00**



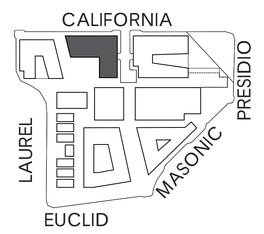

PLAN LEVEL 1 + 274’




PLAN LEVEL 2 + 288’

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

“PLAZA BLDG B” BUILDING PLANS - LEVEL 1 AND 2

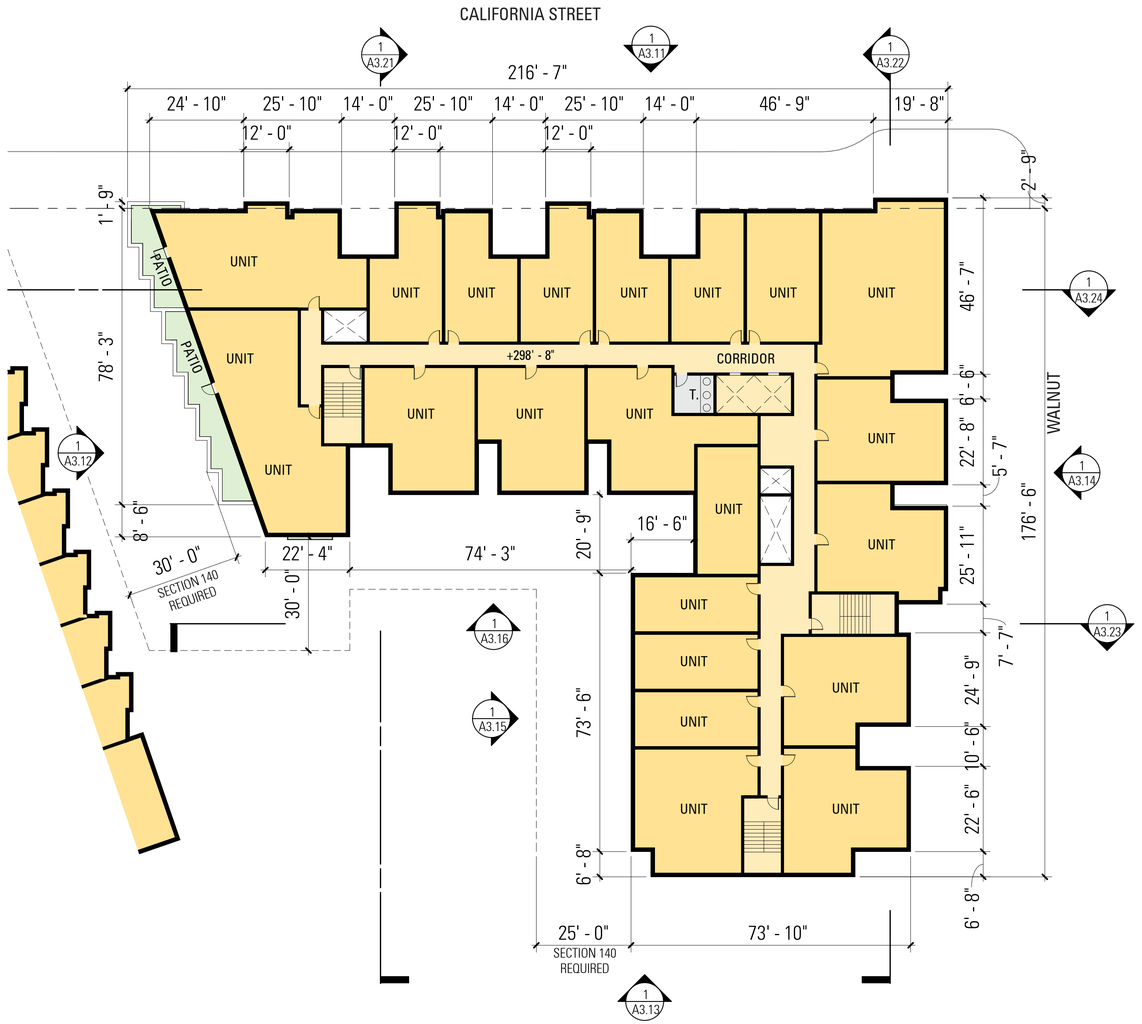
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

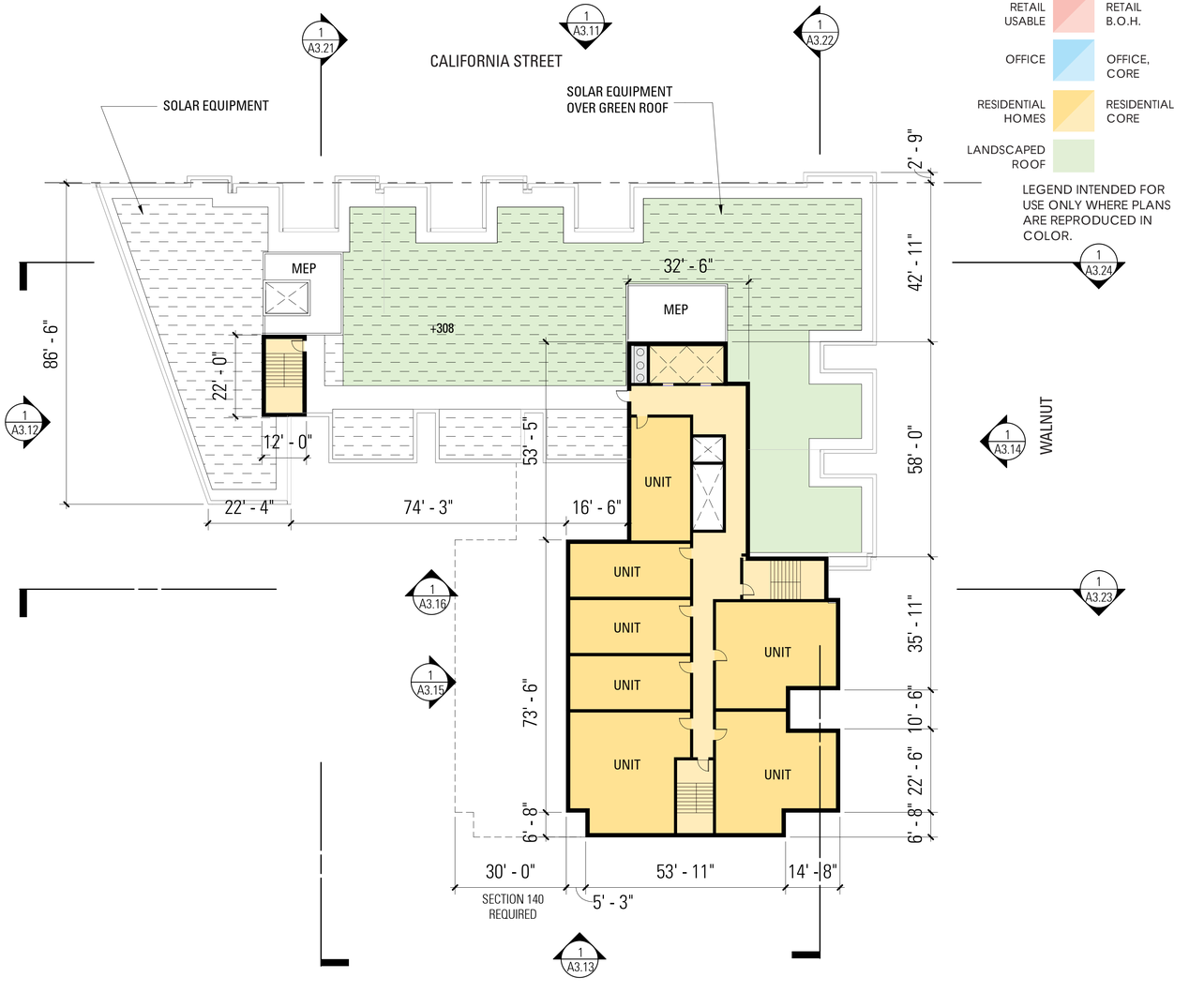
0 10’ 20’ 40’ 60’

N

**A3.01**




PLAN LEVEL 3 + 298’

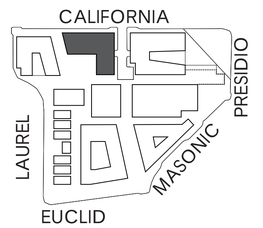



PLAN LEVEL 4 + 308.2’

NOTE: MEP LAYOUT IS CONCEPTUAL

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

“PLAZA BLDG B” BUILDING PLANS - LEVEL 3 AND 4

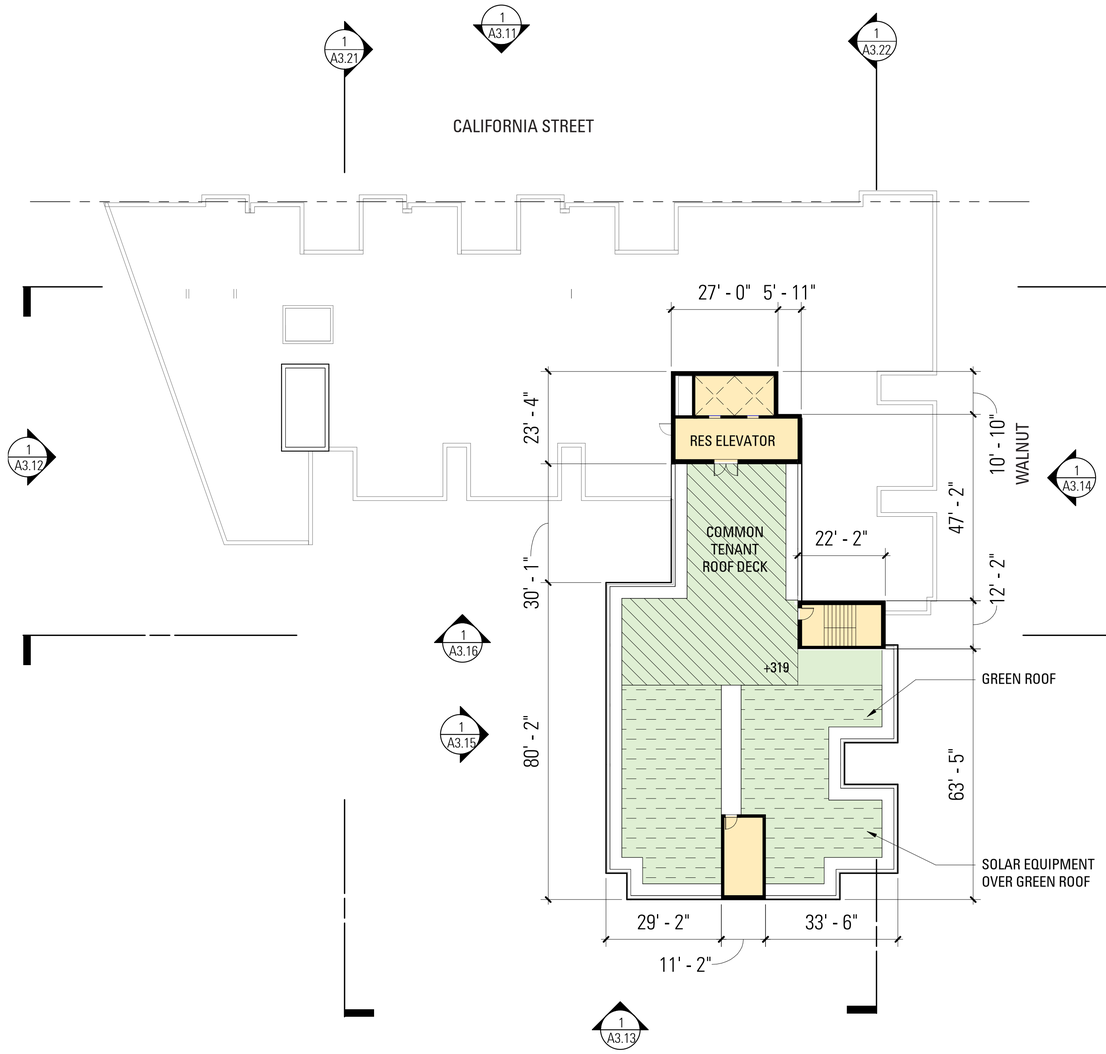
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10’ 20’ 40’ 60’

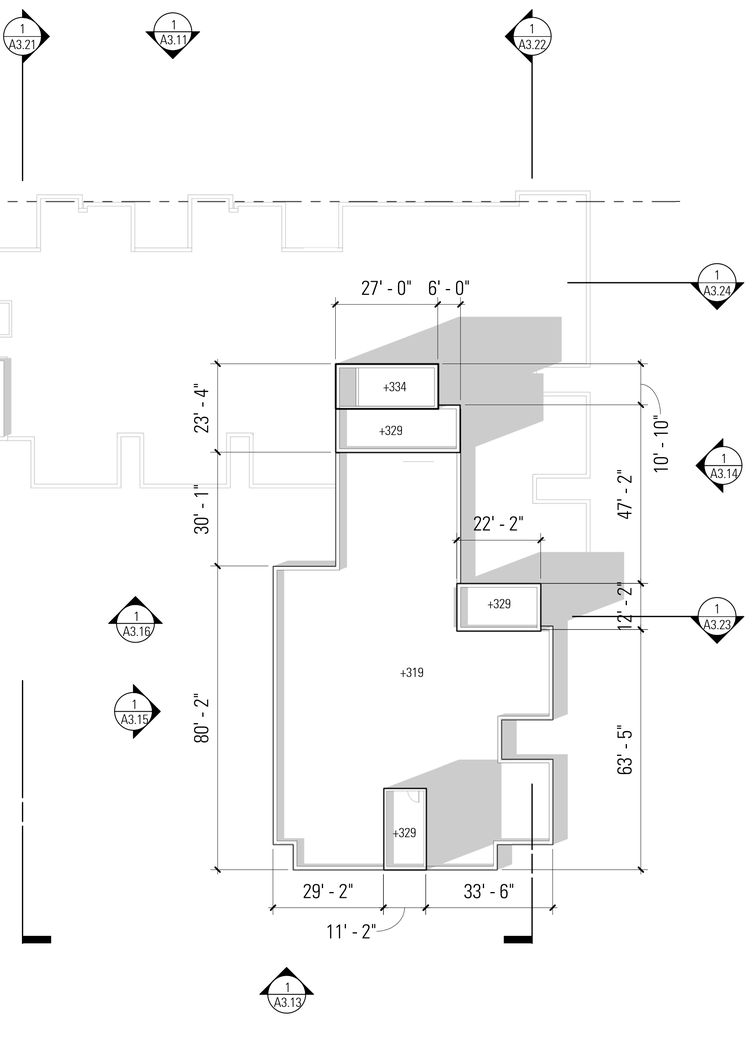
N

**A3.02**




## ROOF PLAN + 319’

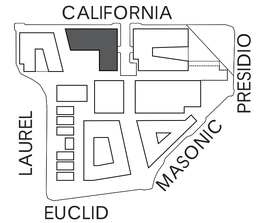
NOTE: MEP LAYOUT IS CONCEPTUAL




## PENTHOUSE PLAN + 329’

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

“PLAZA BLDG B” BUILDING ROOF PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10’ 20’ 40’ 60’

N

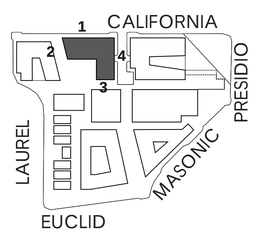
**A3.03**




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 1. CALIFORNIA STREET ELEVATION (NORTH) WITH ILLUSTRATIVE PLAN AT LEVEL 1




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

"PLAZA BLDG B" BUILDING ELEVATION

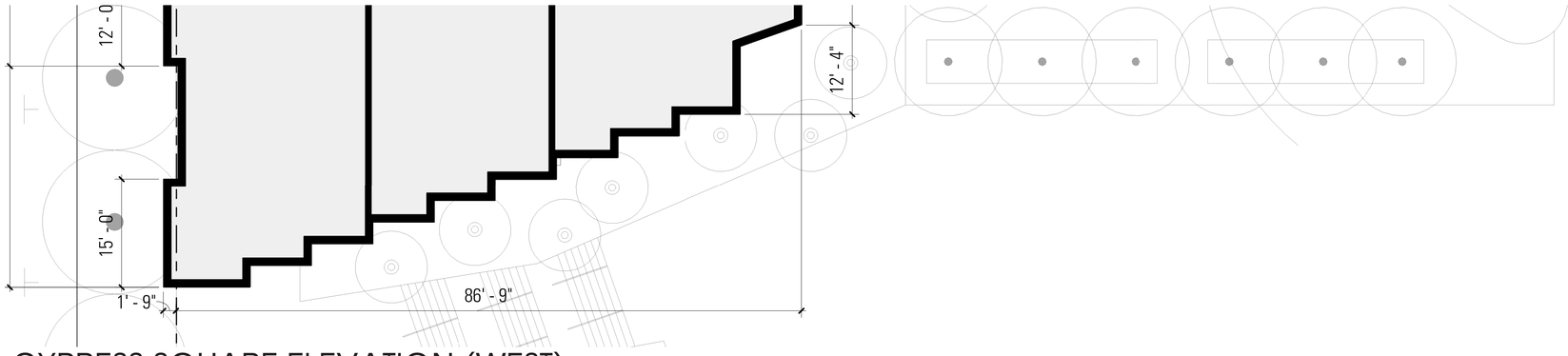
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A3.11**

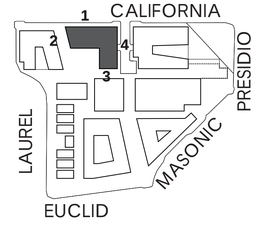



## 2. CYPRESS SQUARE ELEVATION (WEST) WITH ILLUSTRATIVE PLAN AT LEVEL 1

**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## "PLAZA BLDG B" BUILDING ELEVATION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

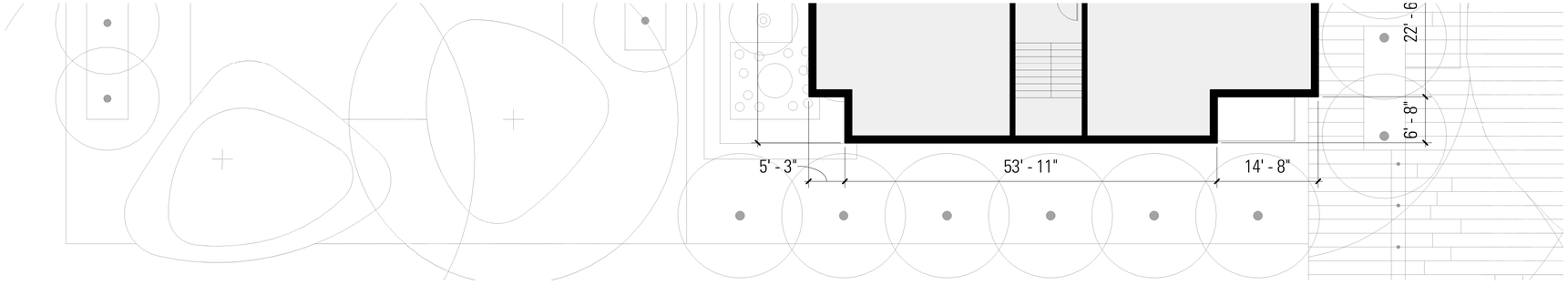
0 5' 10' 20' 30'

**A3.12**

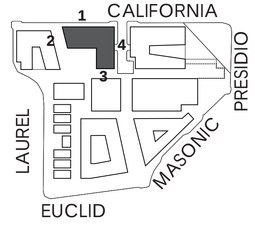



**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE




## 3. CYPRESS SQUARE ELEVATION (SOUTH) WITH ILLUSTRATIVE PLAN AT LEVEL 2




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## "PLAZA BLDG B" BUILDING ELEVATION

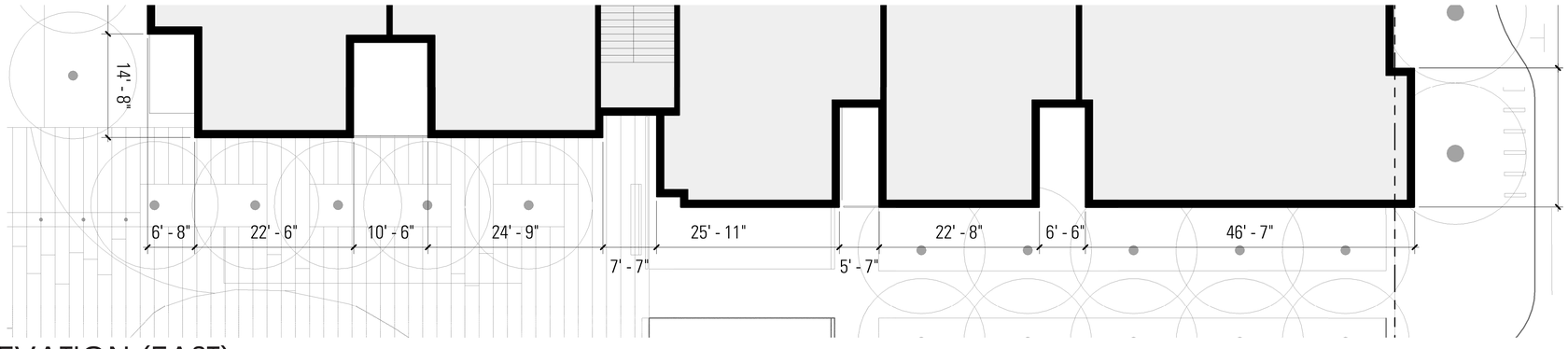
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A3.13**



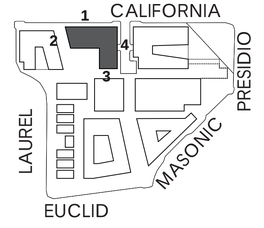




4. CYPRESS SQUARE ELEVATION (EAST) WITH ILLUSTRATIVE PLAN AT LEVEL 2

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04

**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG B" BUILDING ELEVATION

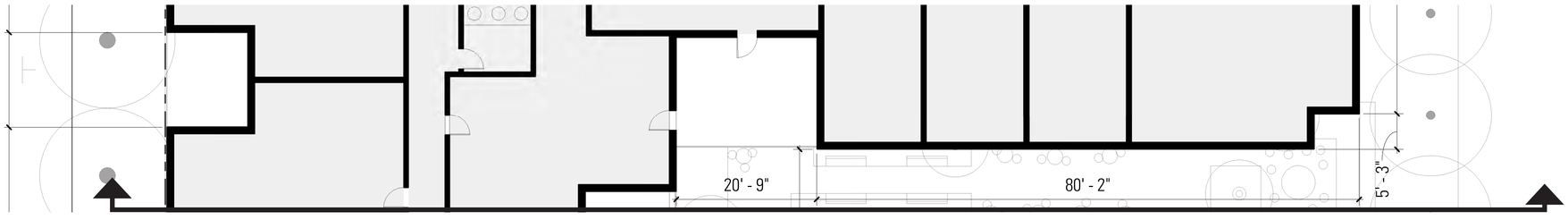
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A3.14**

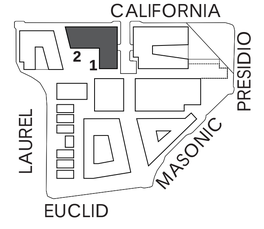



**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 1. CYPRESS SQUARE ELEVATION (WEST) WITH ILLUSTRATIVE PLAN AT LEVEL 2




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

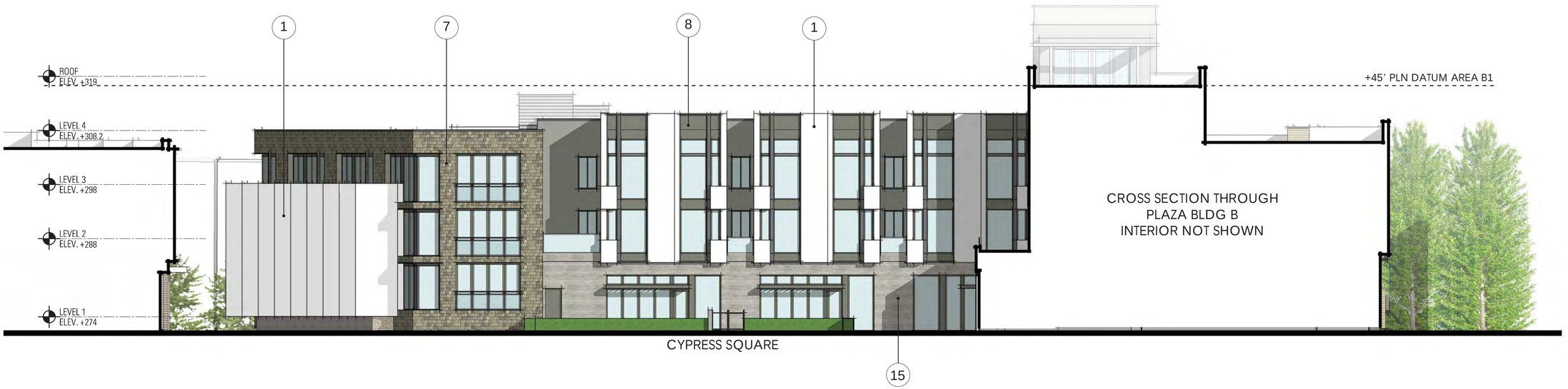
"PLAZA BLDG B" BUILDING ELEVATION

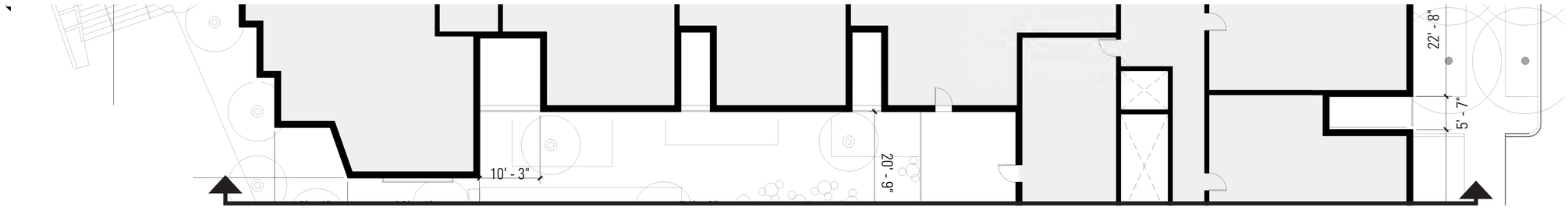
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

A3.15




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
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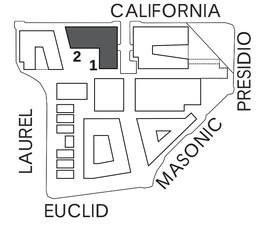
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 2. CYPRESS SQUARE ELEVATION (SOUTH) WITH ILLUSTRATIVE PLAN AT LEVEL 2




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG B" BUILDING ELEVATION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A3.16**

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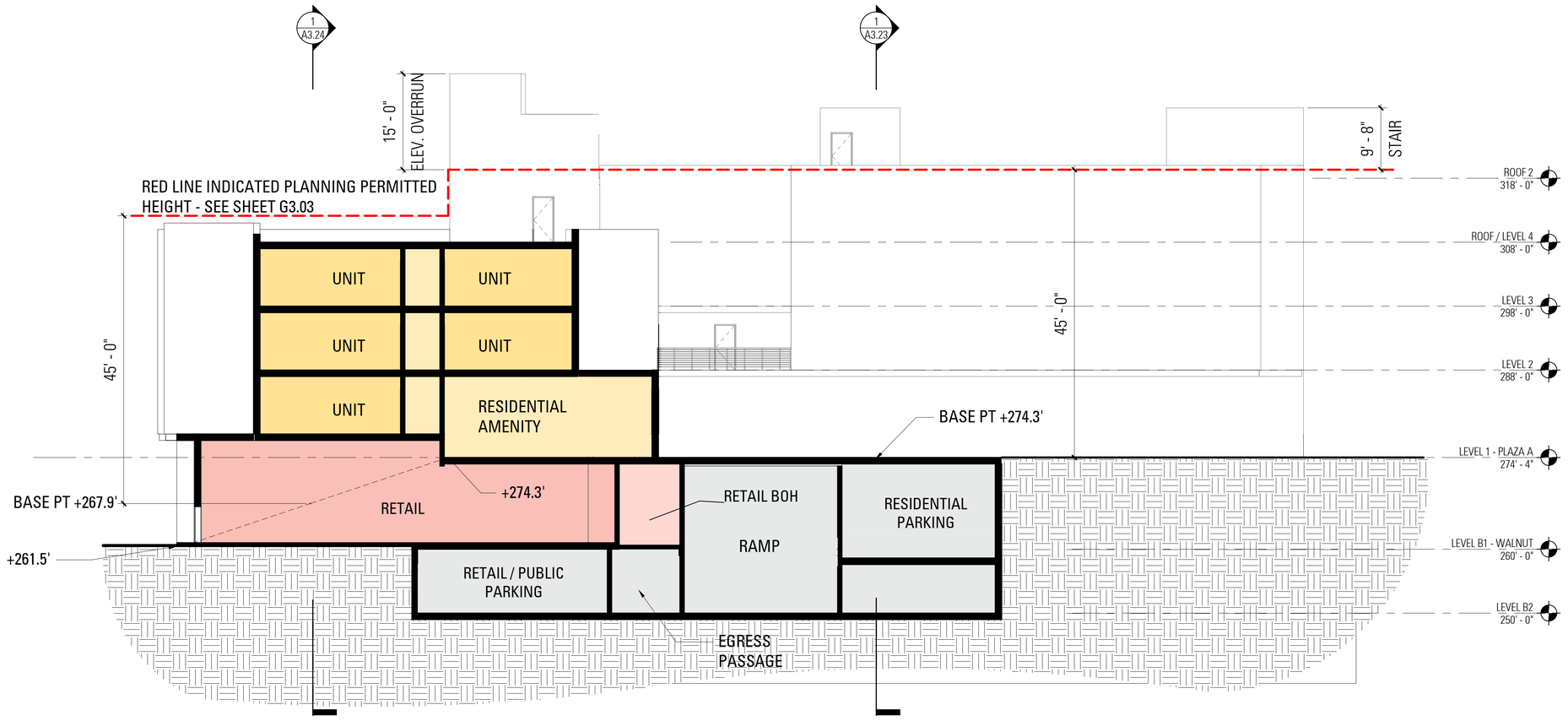
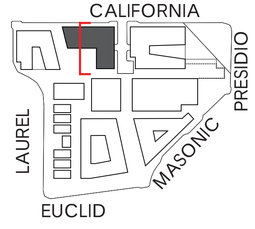



## 1. “PLAZA BLDG B” NORTH/ SOUTH SECTION LOOKING EAST

1”=10’




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

“PLAZA BLDG B” BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5’ 10’ 20’ 30’

**A3.21**

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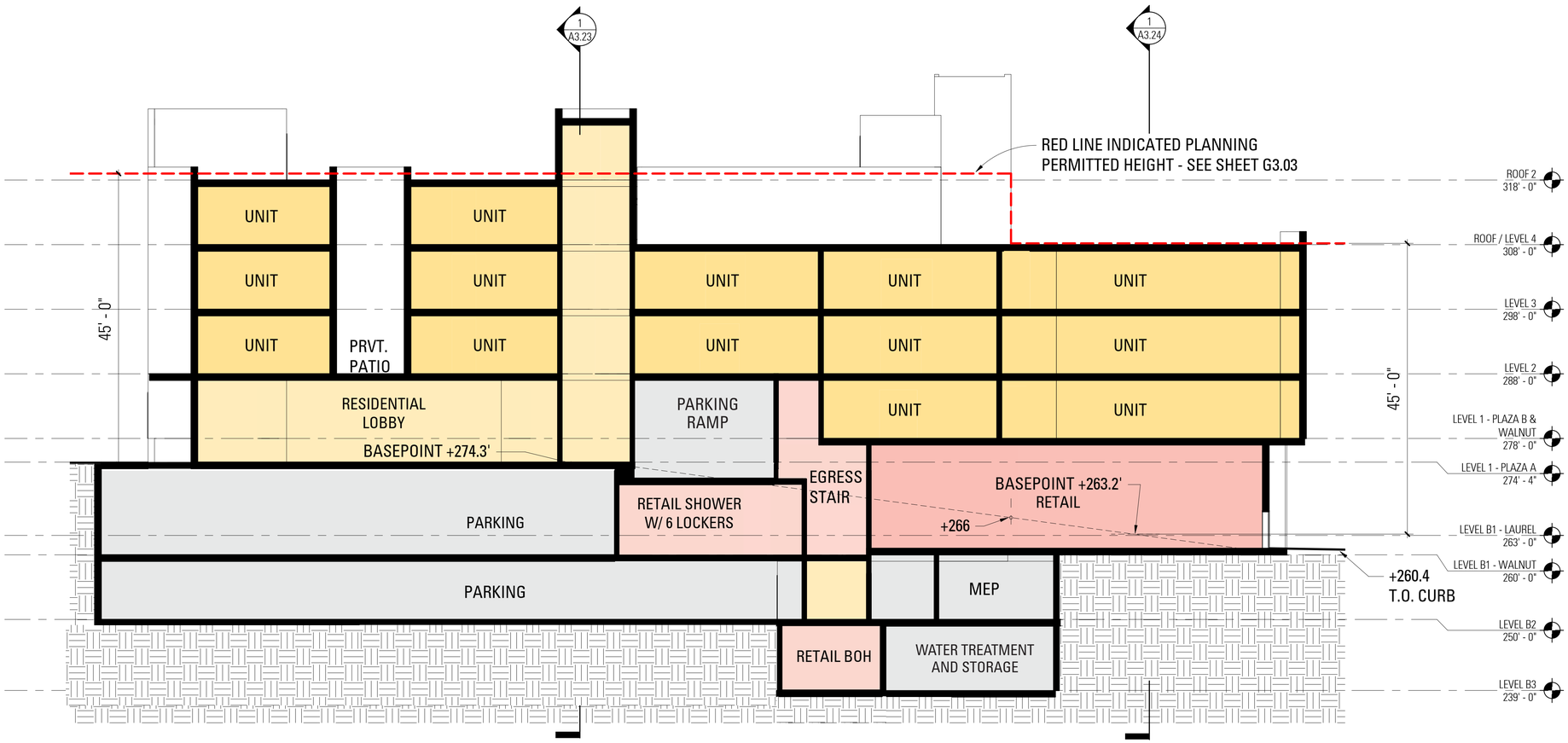
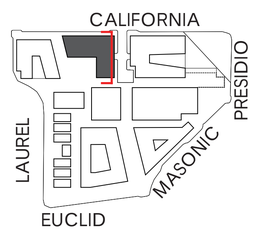



## 1. “PLAZA BLDG B” NORTH/ SOUTH SECTION LOOKING WEST

1”=10’

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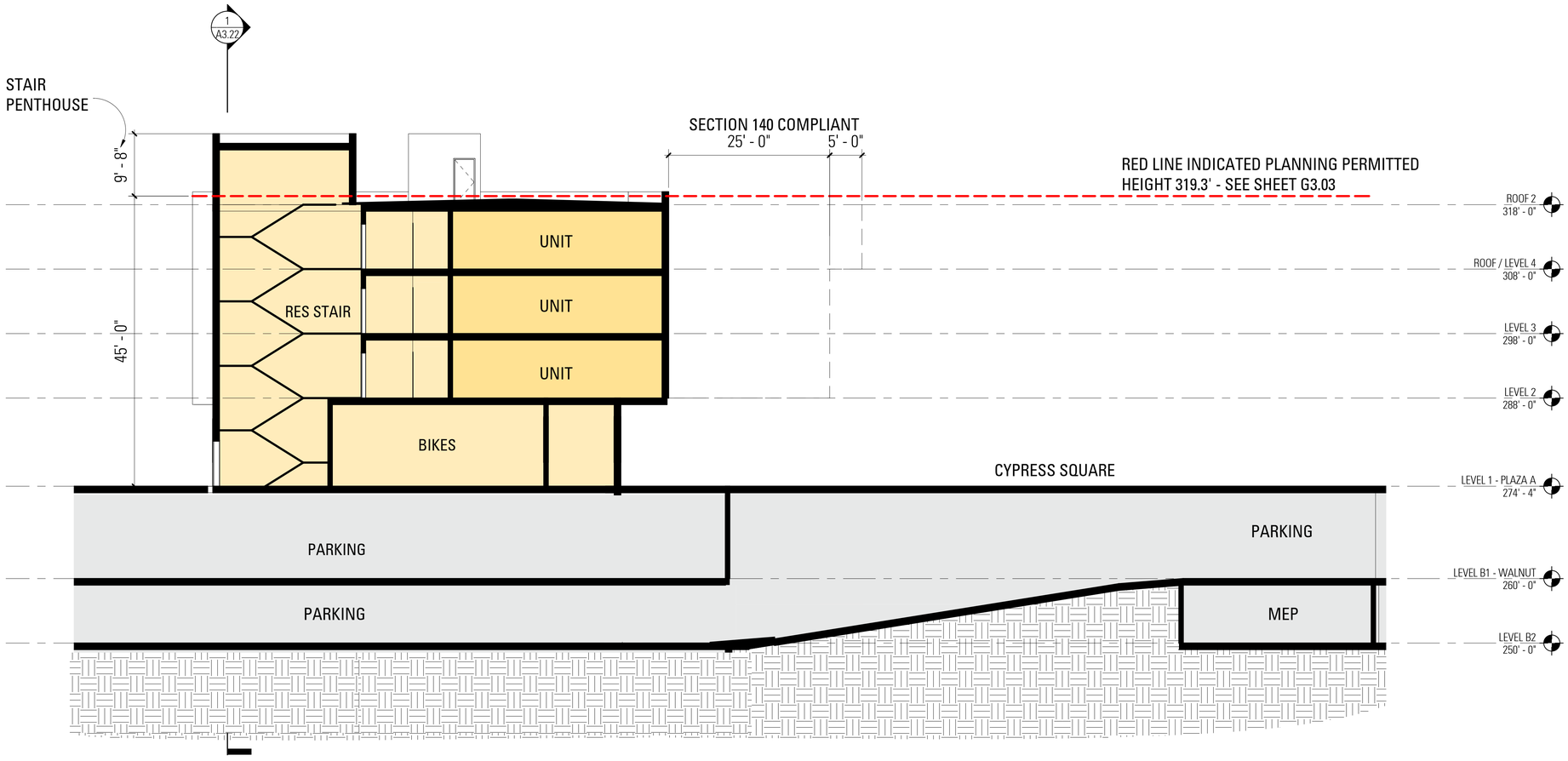
“PLAZA BLDG B” BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

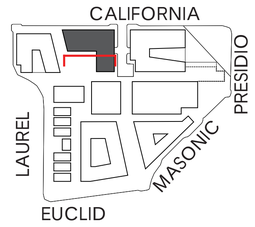
0 5’ 10’ 20’ 30’

**A3.22**




## 1. “PLAZA BLDG B” NORTH/ SOUTH SECTION LOOKING SOUTH

1”=10’




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

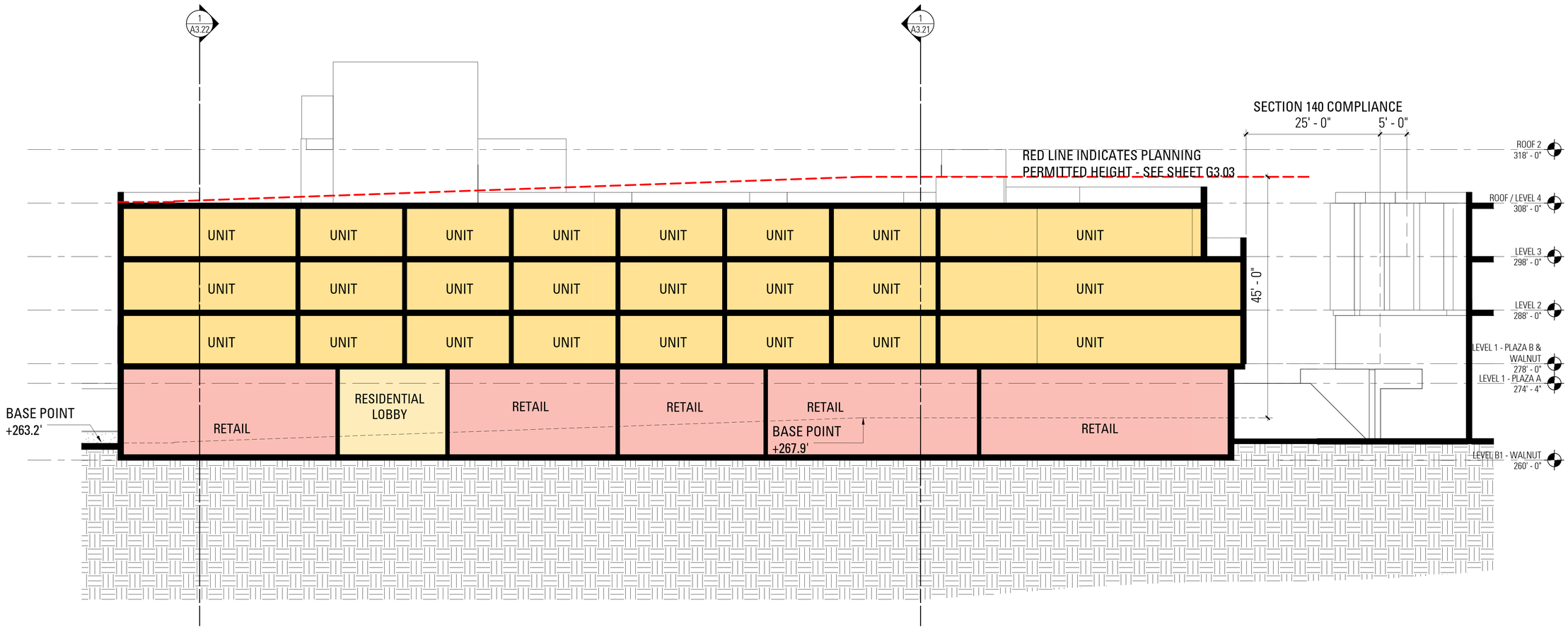
“PLAZA BLDG B” BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

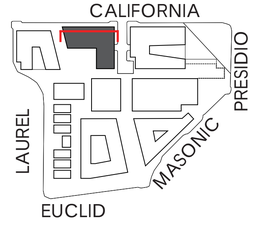
0 5’ 10’ 20’ 30’

**A3.23**




## 1. “PLAZA BLDG B” NORTH/ SOUTH SECTION LOOKING SOUTH

1”=10’




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

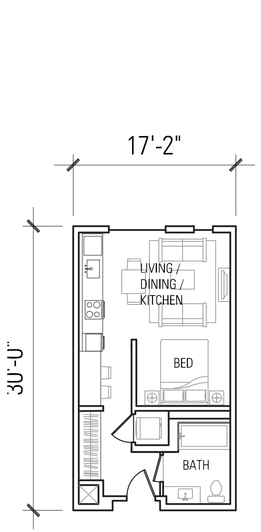
“PLAZA BLDG B” BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

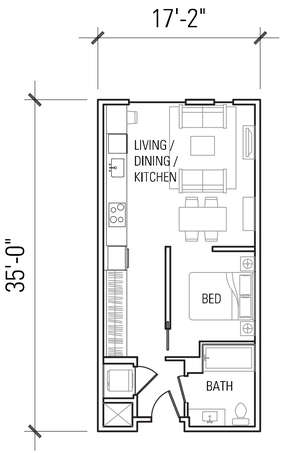
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

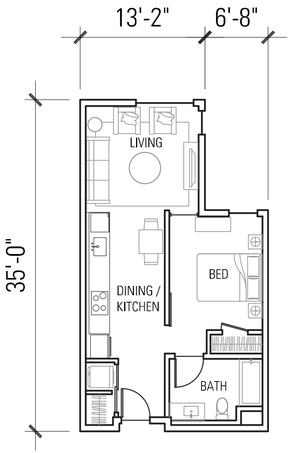
A3.24



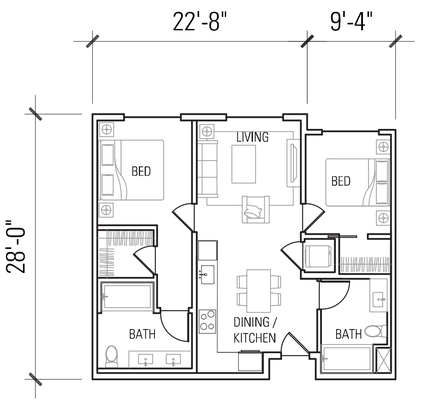

JUNIOR



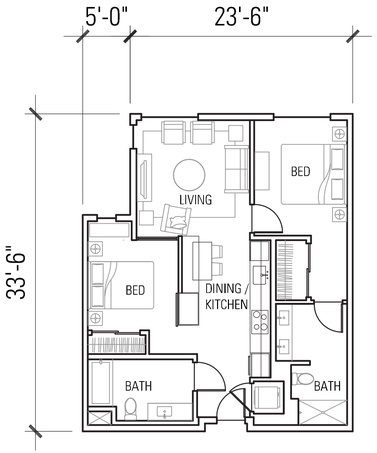

1-BEDROOM, A



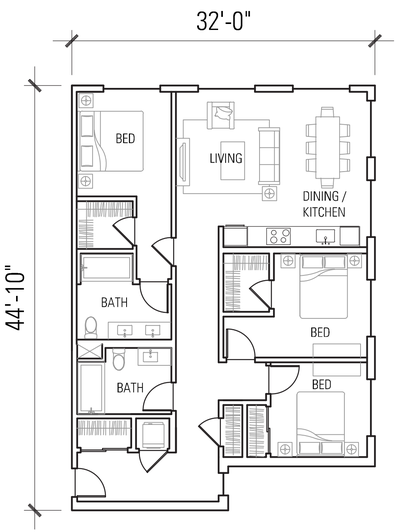

1-BEDROOM, B




2-BEDROOM, A




2-BEDROOM, B




3-BEDROOM

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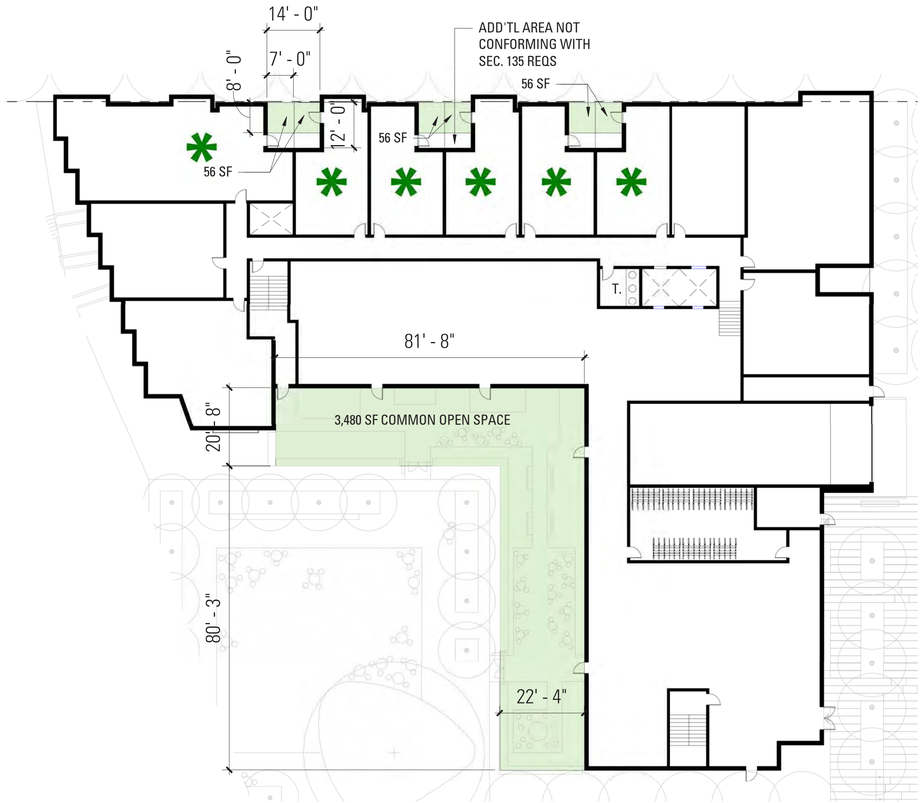
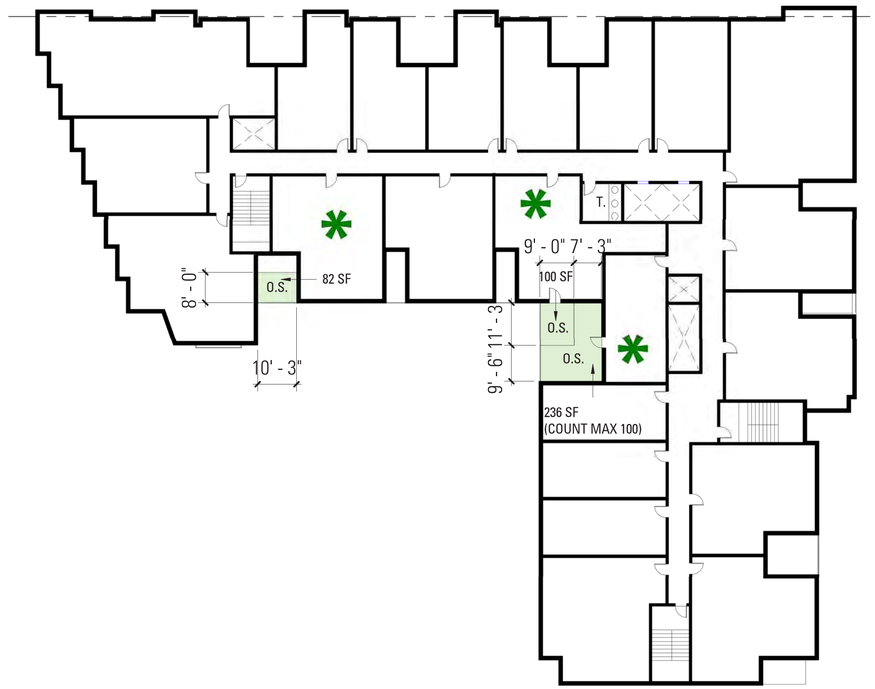



## LEVEL 1 - PLAZA B OPEN SPACE

1" = 20'-0"




## LEVEL 2 - PLAZA B OPEN SPACE

1" = 20'-0"

**LEVEL 1 SUMMARY:**
COMMON: 3,480 SF
PRIVATE: 336 SF

**LEVEL 2 SUMMARY:**
COMMON: 0 SF
PRIVATE: 282 SF

✱ UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)

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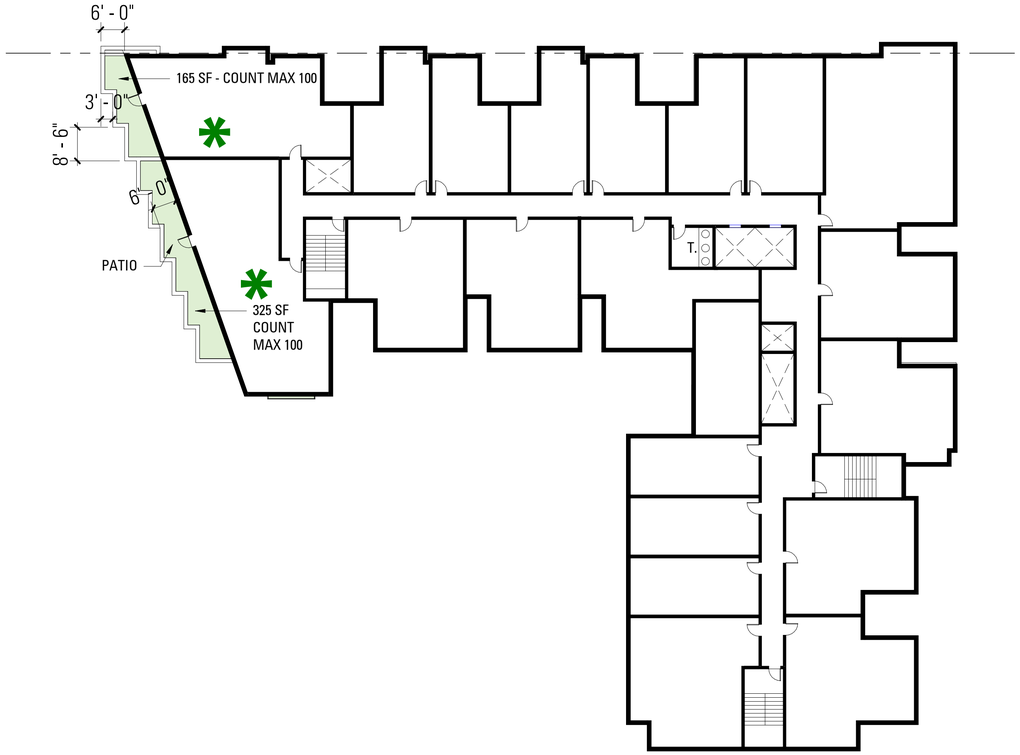
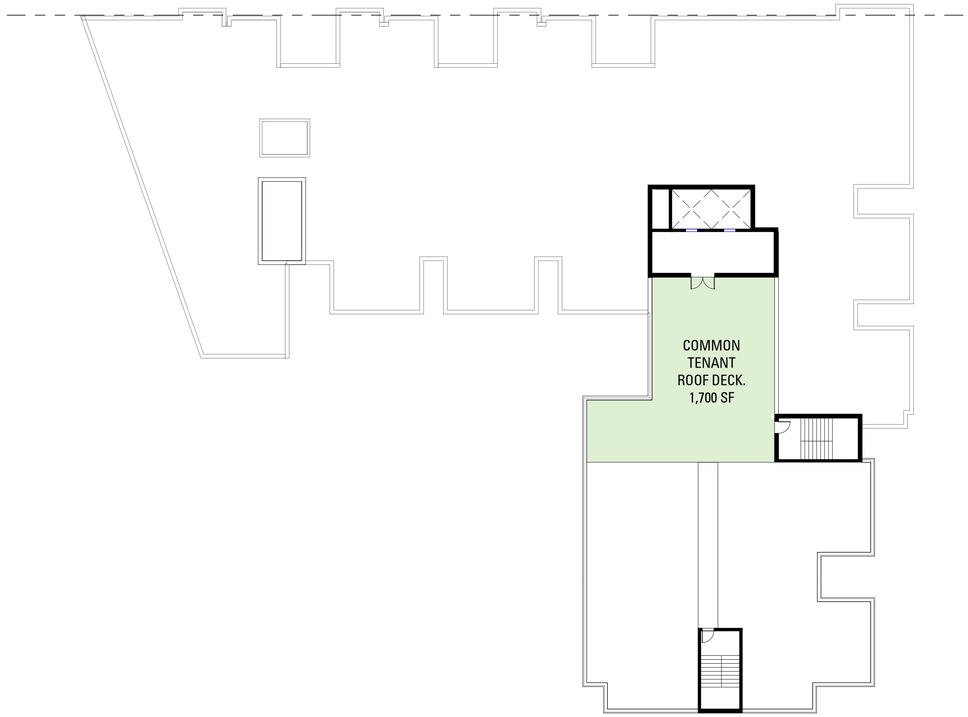



## LEVEL 3 - PLAZA B +299'

1" = 20'-0"




## ROOF 2 PLAZA B OPEN SPACE

1" = 20'-0"

**LEVEL 3 SUMMARY:**
COMMON: 0 SF
PRIVATE: 200 SF COMPLIANT AND COUNTED

**PLAZA B TOTALS:**
COMMON: 5,180 SF
PRIVATE: 818 SF COMPLIANT AND COUNTED

* UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)

**ROOF SUMMARY:**
COMMON: 1,700 SF
PRIVATE: 0 SF



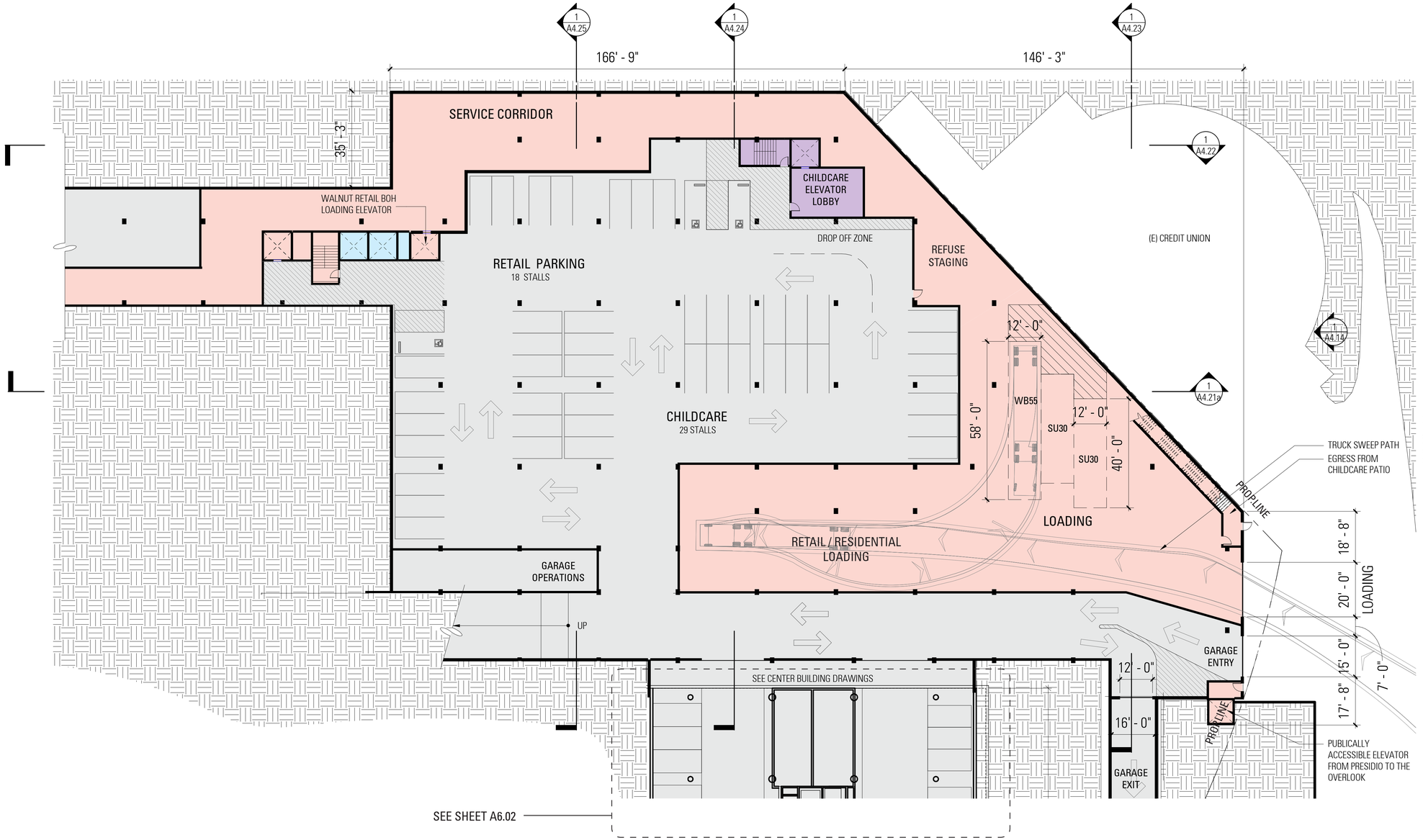

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"PLAZA BLDG B" PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**A3.60**




CHILDCARE USABLE
CHILDCARE B.O.H.
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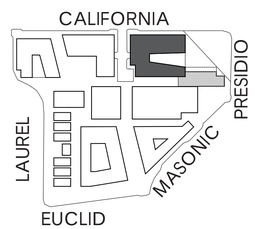
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## PLAN LEVEL B3 +239

SEE SHEET A1.01 FOR MORE INFORMATION

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

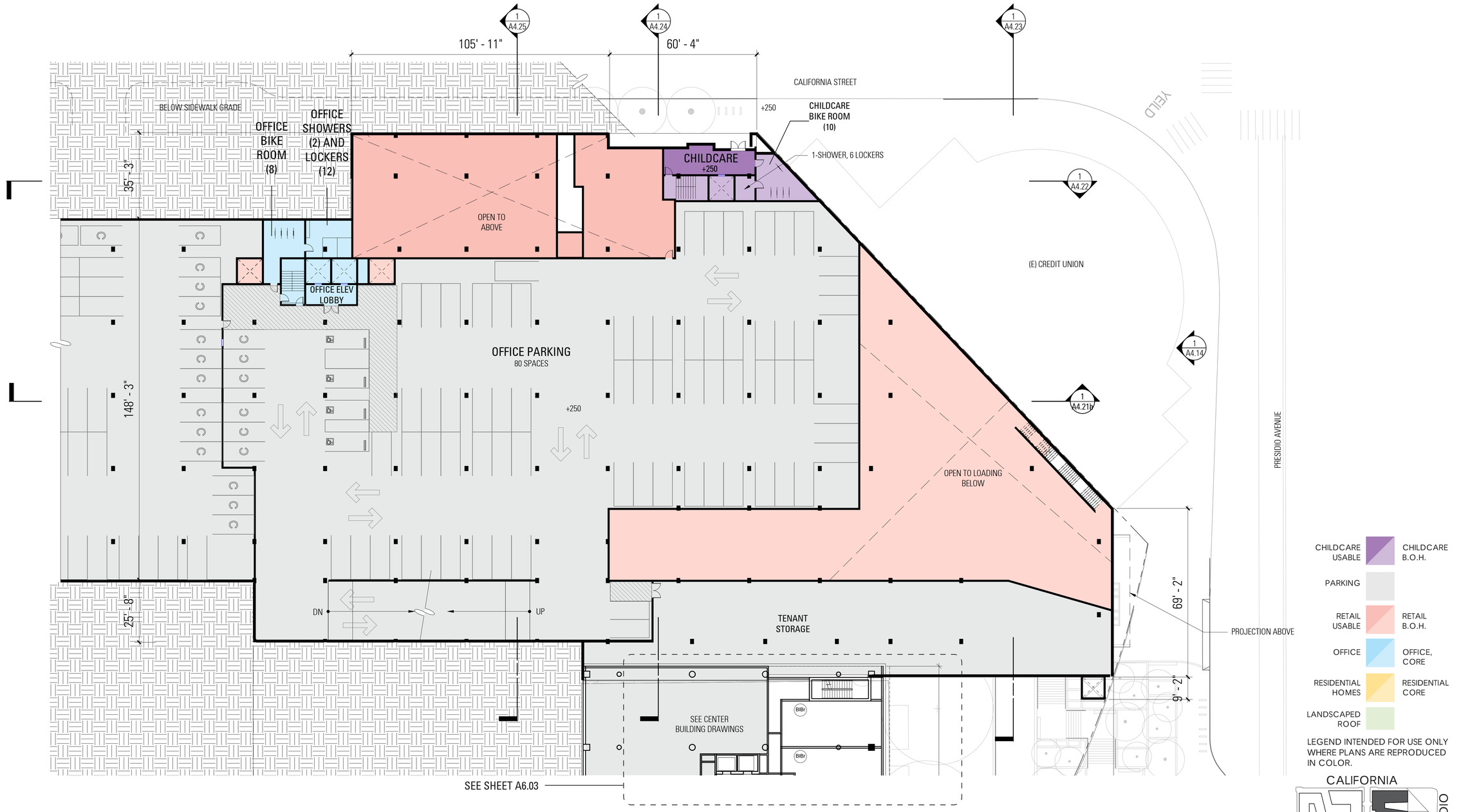
"WALNUT" OFFICE BUILDING PLANS - LEVEL B3

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10' 20' 40' 60'

N

**A4.00**

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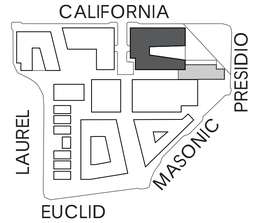
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# PLAN LEVEL B2 +250

SEE SHEET A1.02 FOR MORE INFORMATION

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"WALNUT" OFFICE BUILDING PLANS - LEVEL B2

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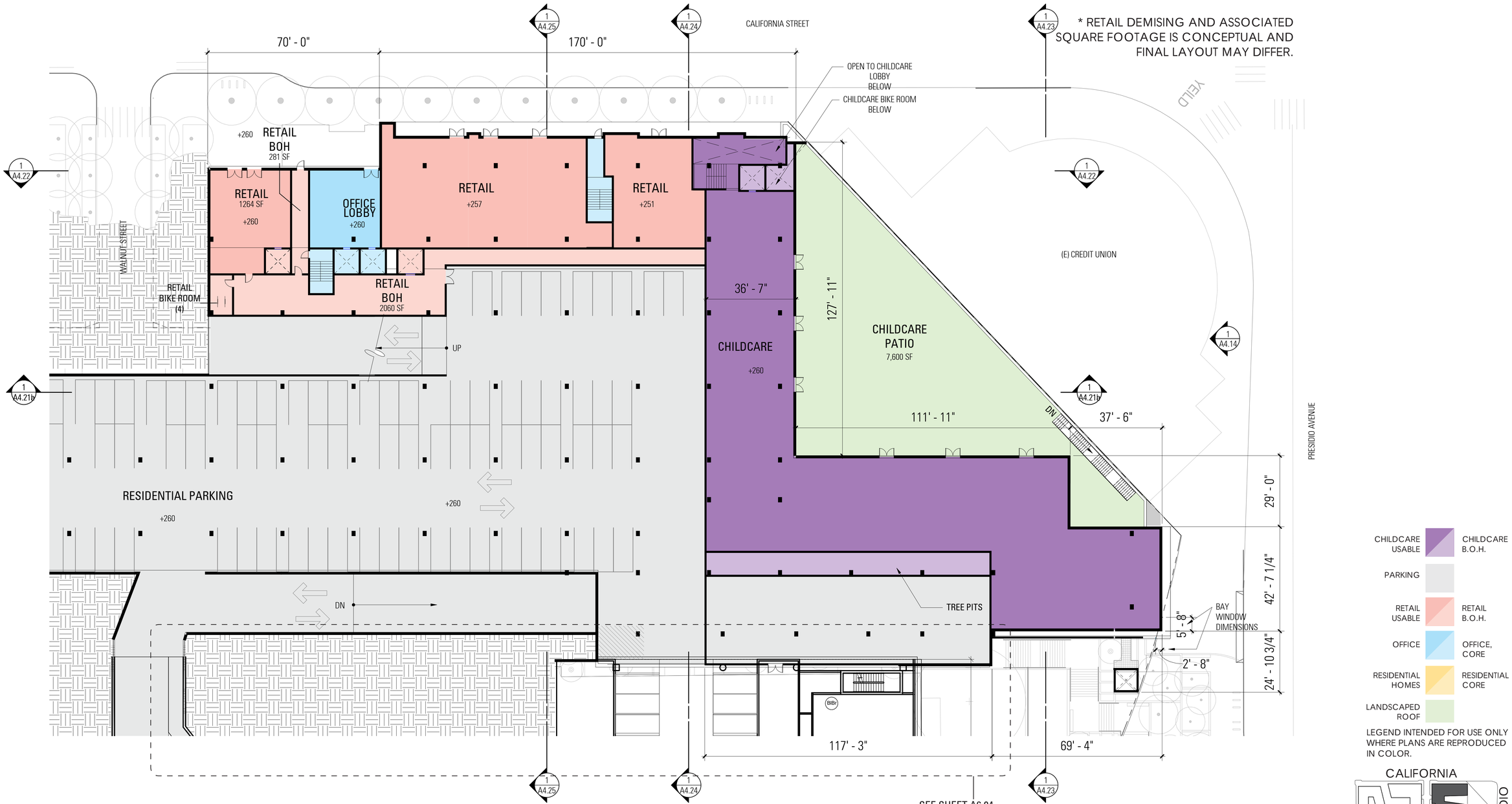
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10' 20' 40' 60'

N

**A4.01**

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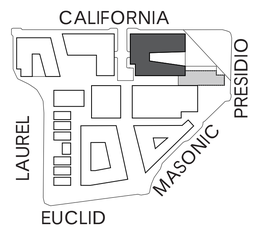
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## PLAN LEVEL B1 +260' (F.F. VARIES ACROSS FLOOR LEVEL)

SEE SHEET A1.03 FOR MORE INFORMATION

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

"WALNUT" OFFICE BUILDING PLANS - B1

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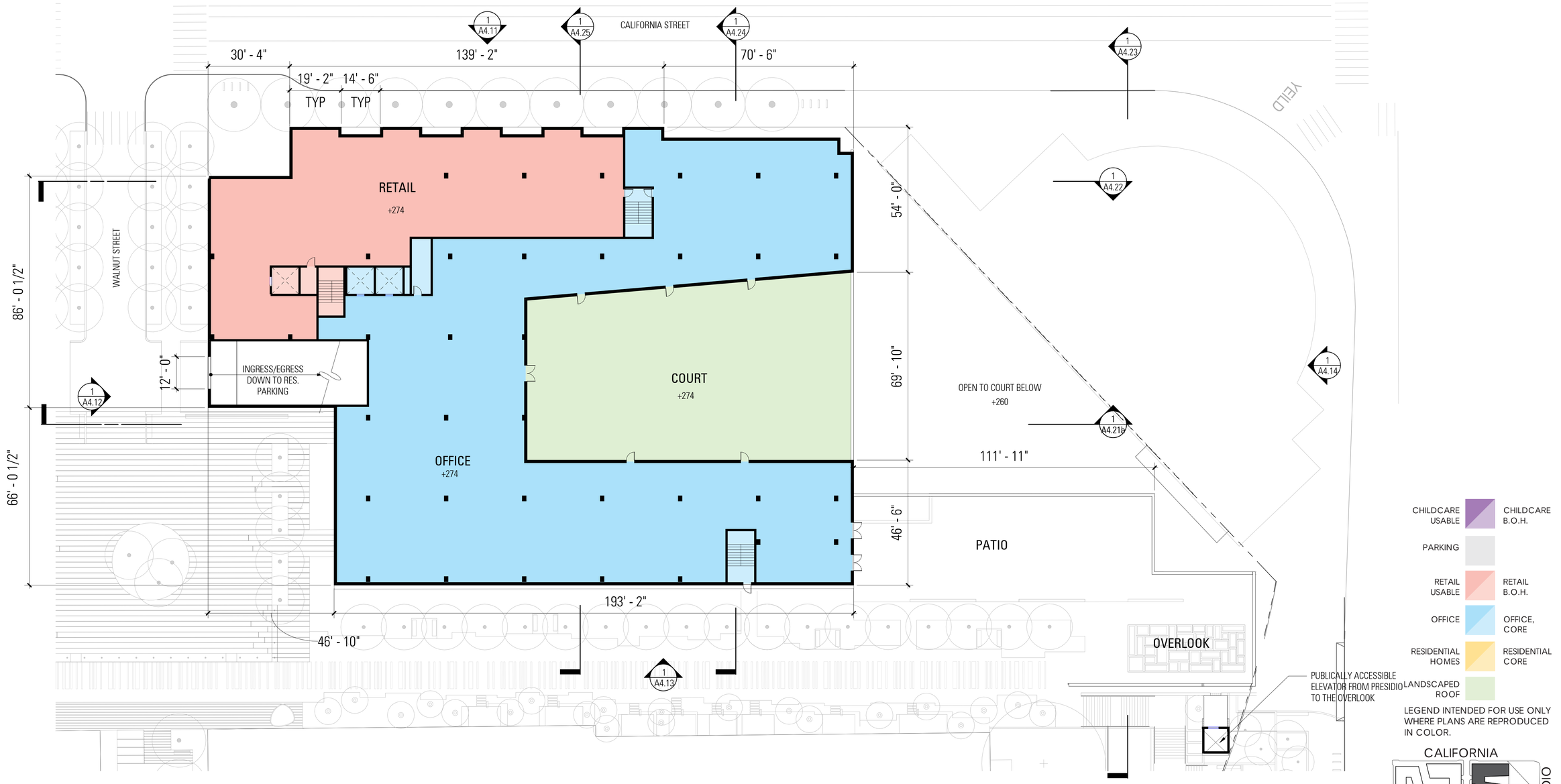
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10' 20' 40' 60'

N

**A4.02**

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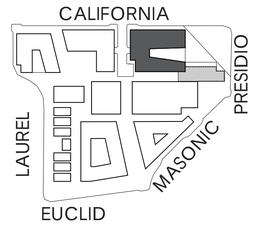
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## PLAN LEVEL 1 +274'

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# "WALNUT" OFFICE BUILDING PLANS - LEVEL 1

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10' 20' 40' 60'

**A4.03**

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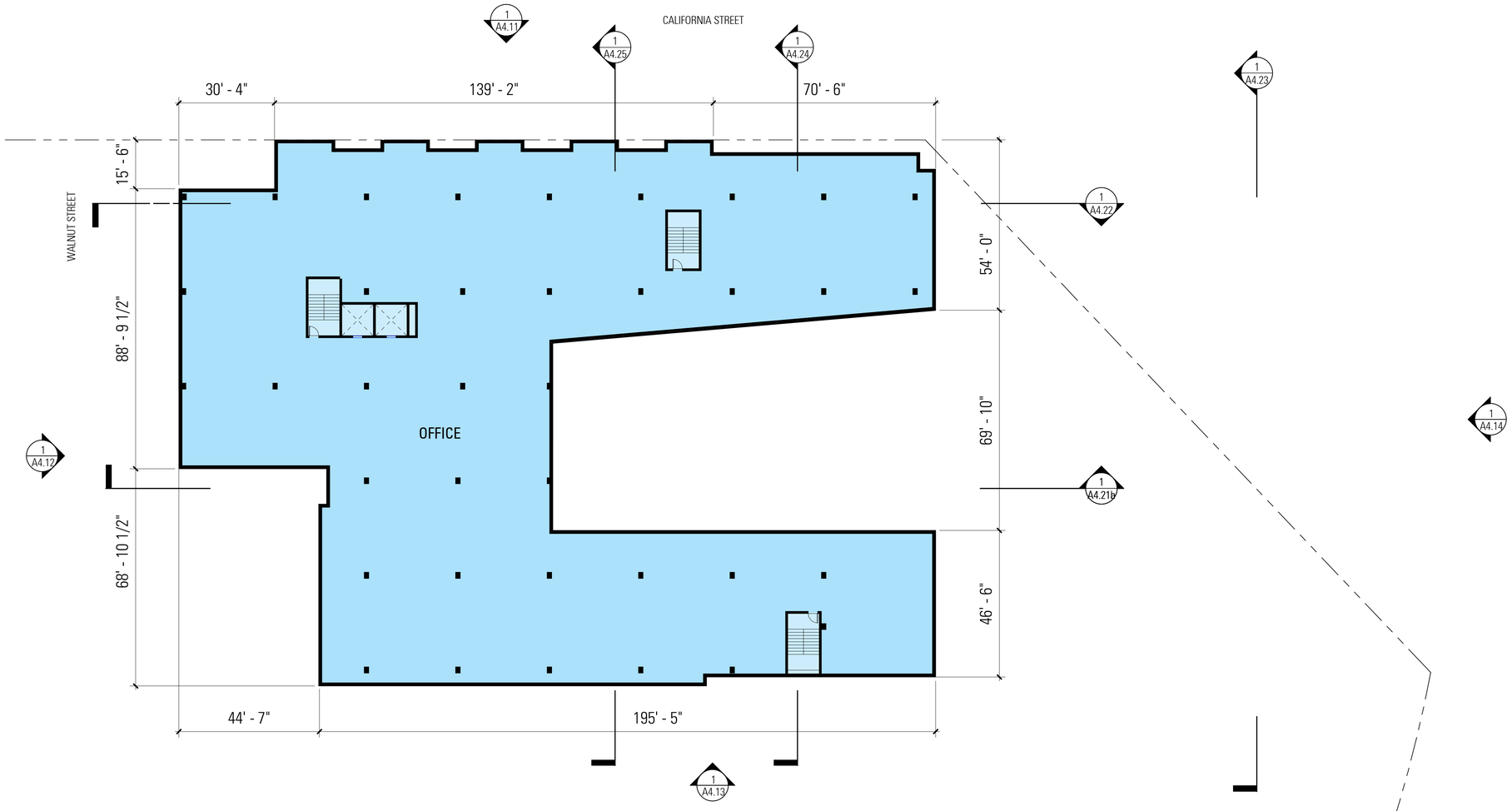


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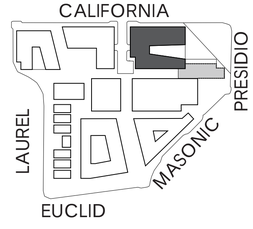
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# PLAN LEVEL 2 +291’

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“WALNUT” OFFICE BUILDING PLANS - LEVEL 2

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10’ 20’ 40’ 60’

**A4.04**

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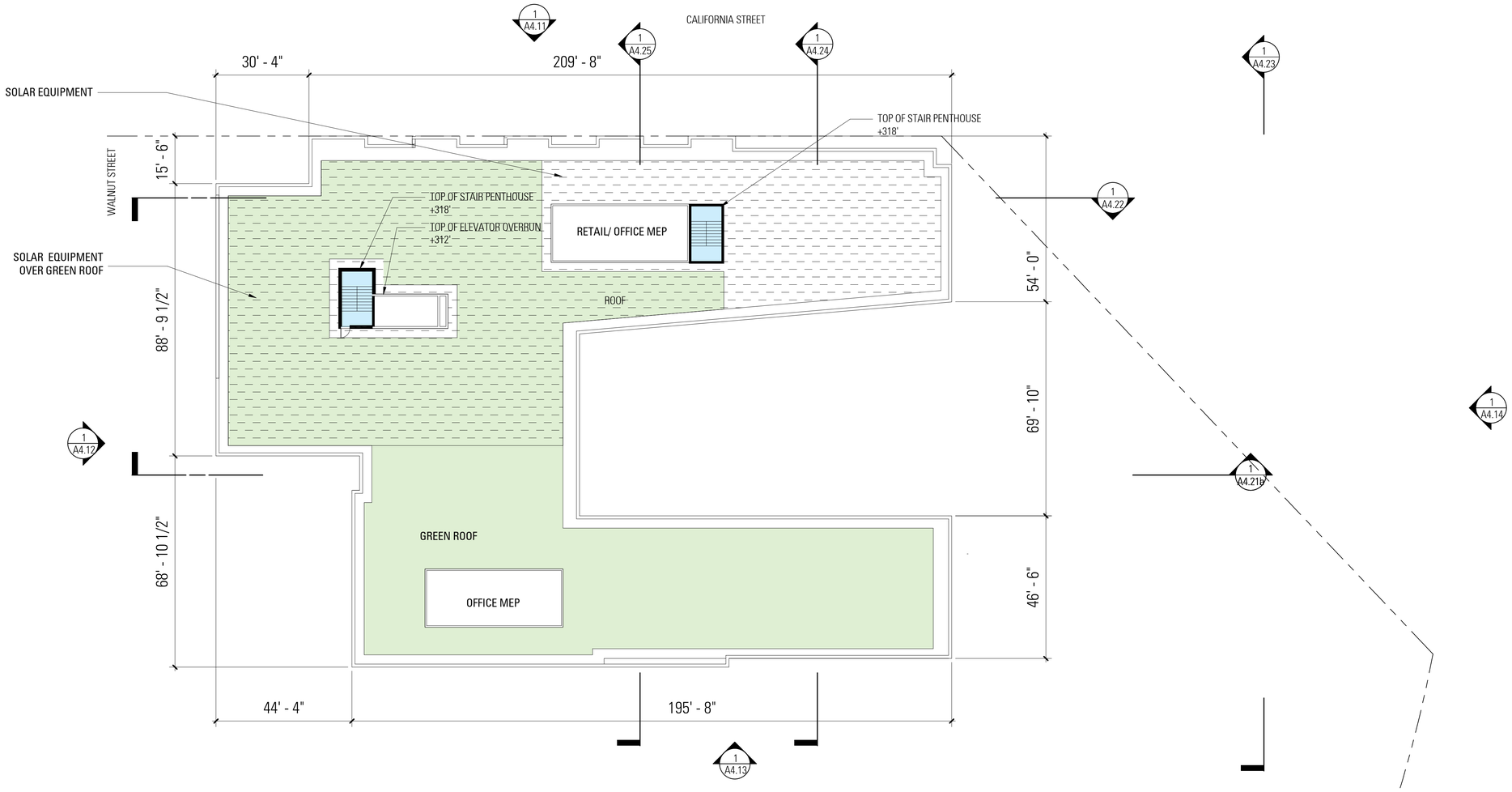


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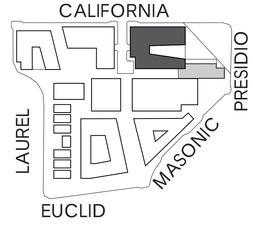
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## ROOF PLAN +307’

NOTE: MEP LAYOUT IS CONCEPTUAL

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“WALNUT” OFFICE BUILDING PLANS - LEVEL ROOF

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 10’ 20’ 40’ 60’

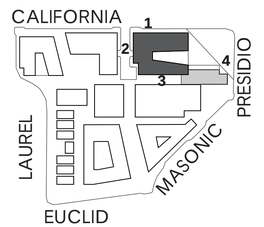
**A4.05**




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 1. CALIFORNIA STREET ELEVATION (NORTH) WITH ILLUSTRATIVE PLAN AT LEVEL 2




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

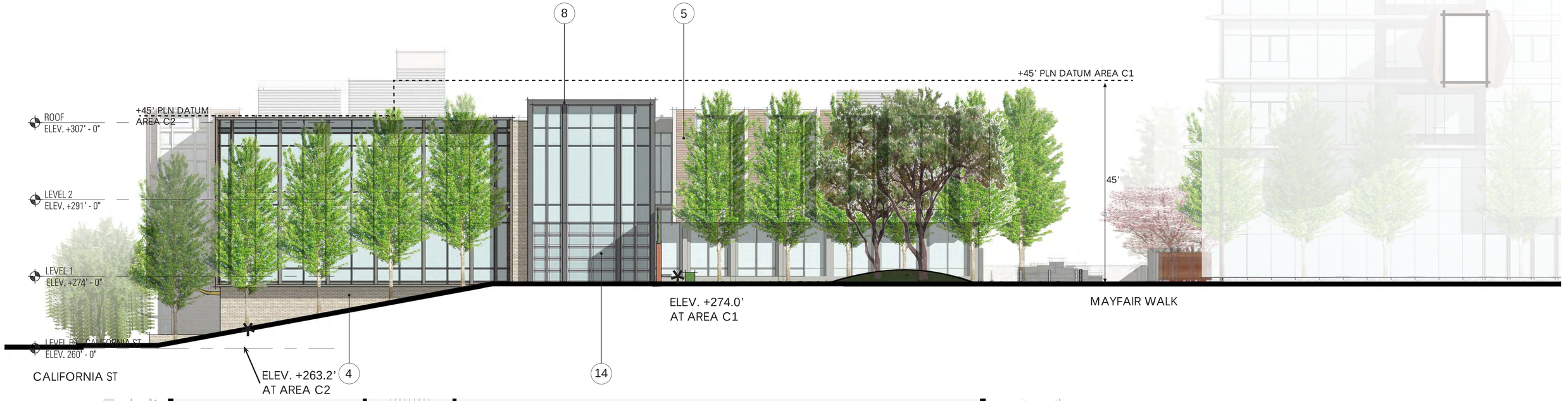
"WALNUT" OFFICE BUILDING ELEVATIONS

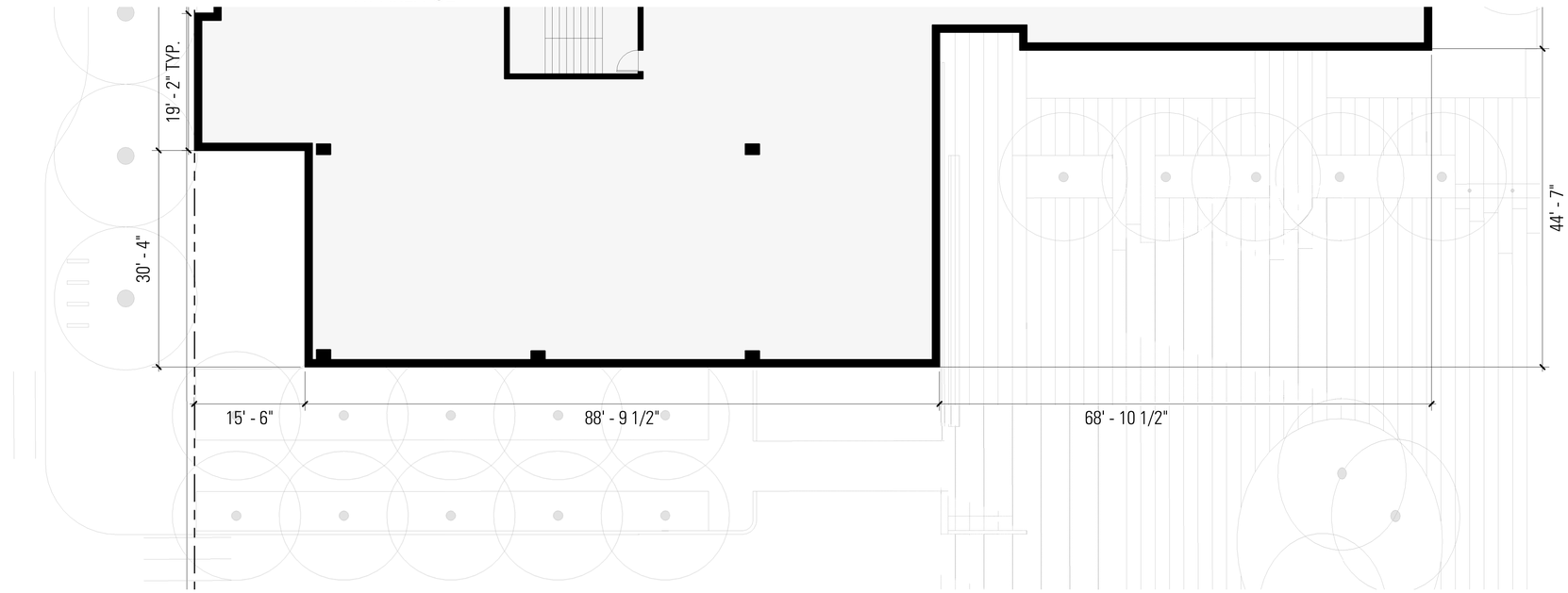
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

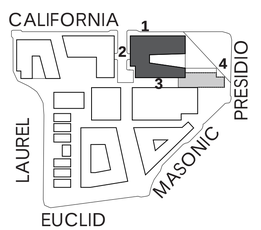
**A4.11**



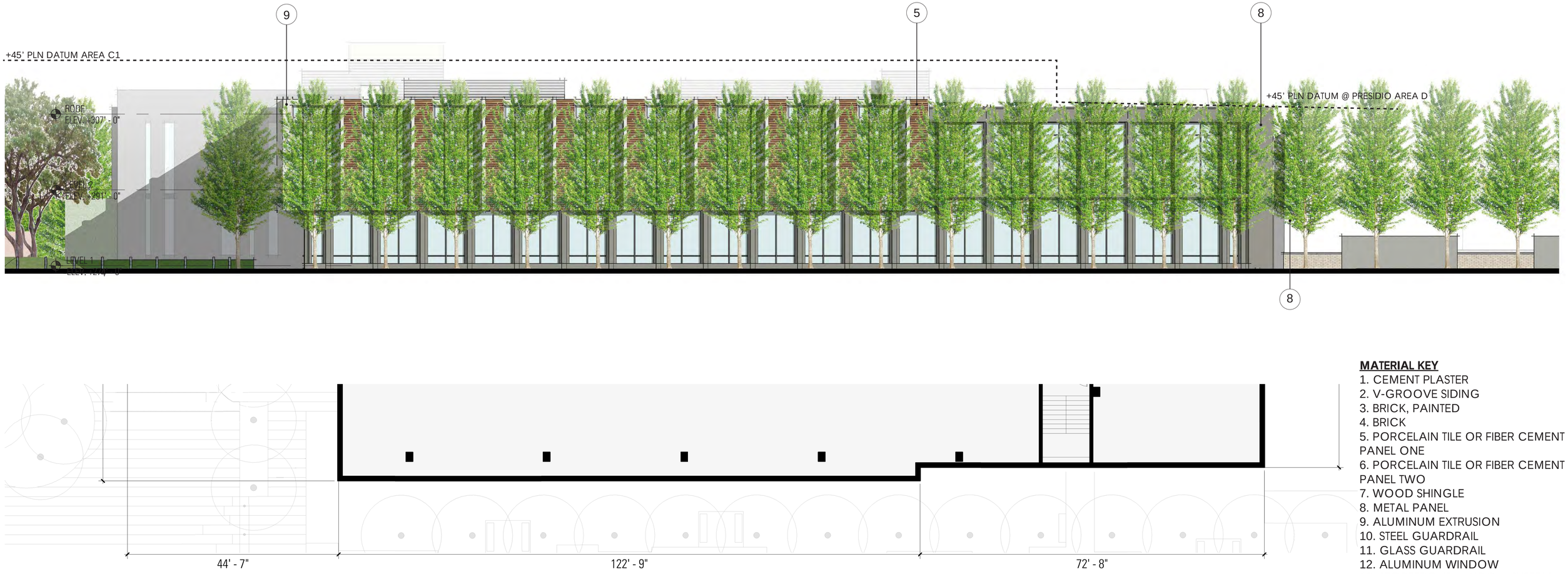

**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE




## 2. WALNUT STREET ELEVATION (WEST) WITH ILLUSTRATIVE PLAN AT LEVEL 2

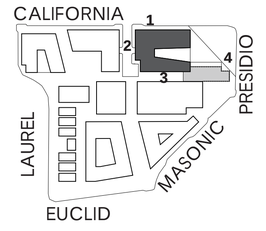
*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 3. MAYFAIR WALK ELEVATION (SOUTH) WITH ILLUSTRATIVE PLAN AT LEVEL 2

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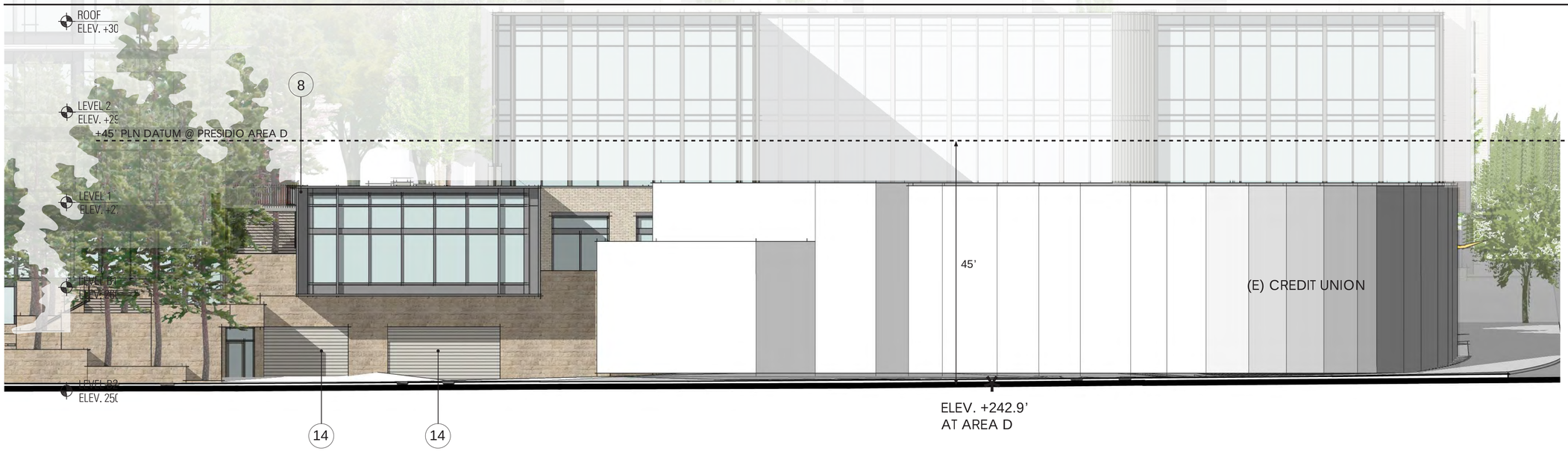
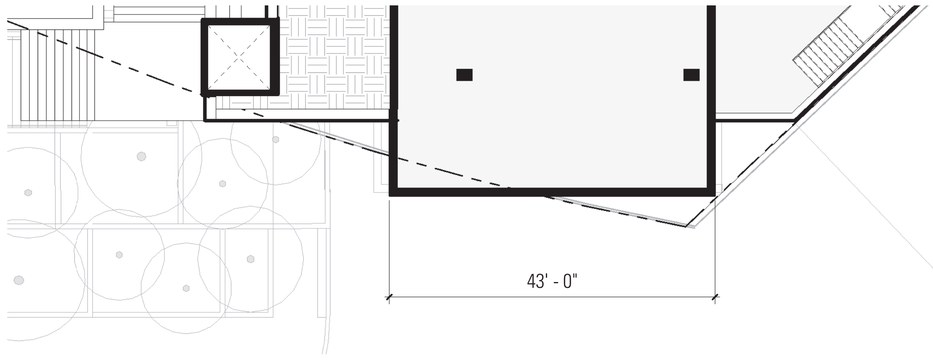
"WALNUT" OFFICE BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A4.13**



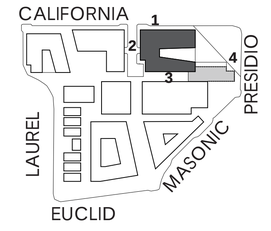




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 4-A. PRESIDIO ELEVATION (EAST) WITH ILLUSTRATIVE PLAN AT LEVEL B1

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04

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"WALNUT" OFFICE BUILDING ELEVATIONS

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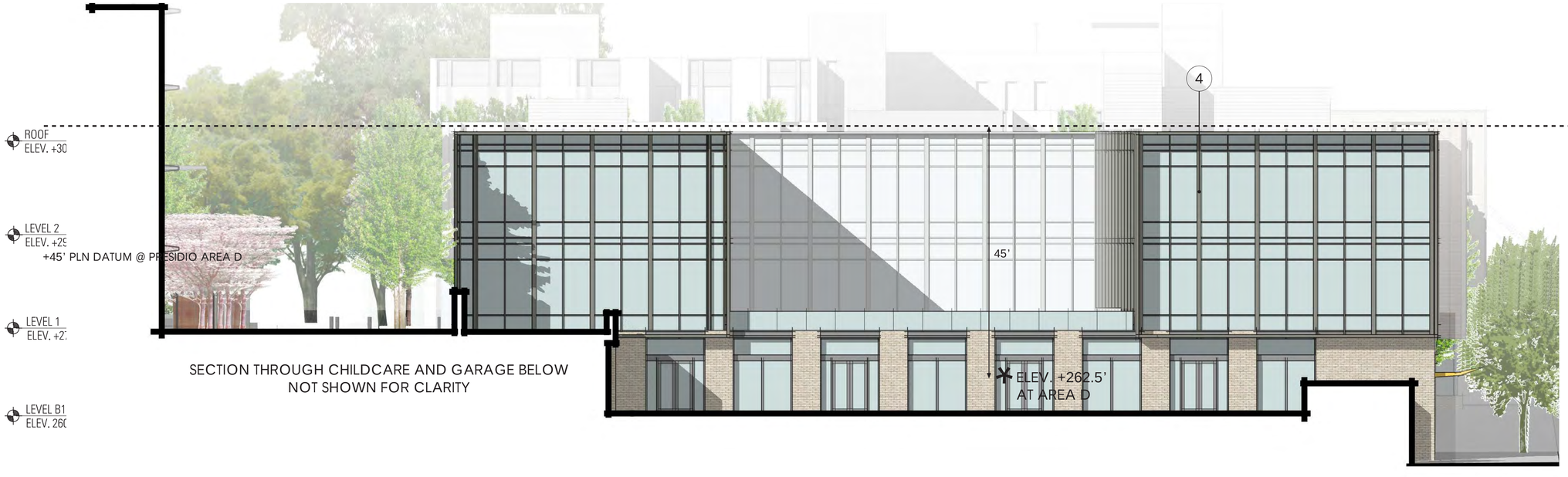
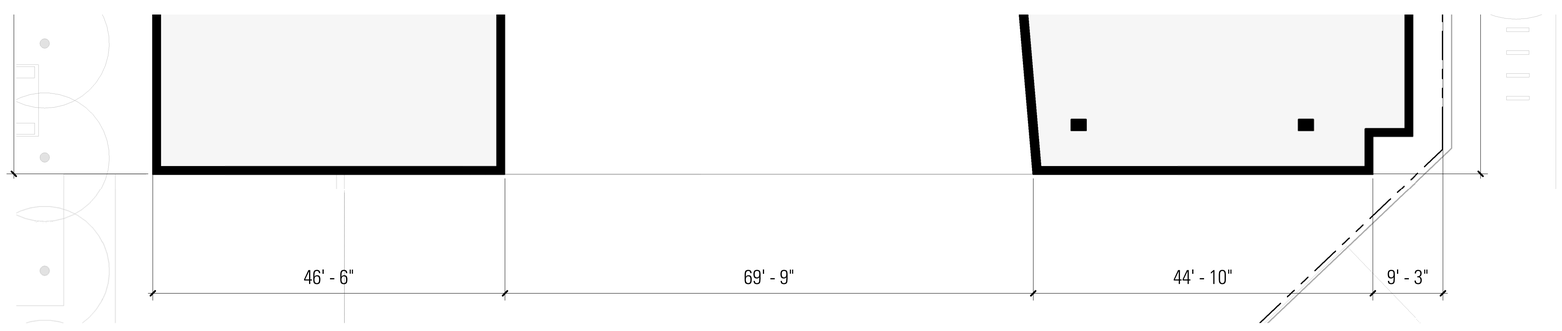
07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**A4.14**




SECTION THROUGH CHILDCARE AND GARAGE BELOW
NOT SHOWN FOR CLARITY

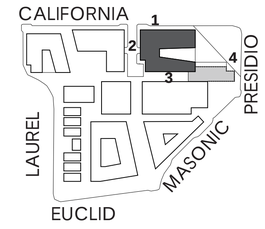



**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 4-B. PRESIDIO ELEVATION (EAST) WITH ILLUSTRATIVE PLAN AT LEVEL 2

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04

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"WALNUT" OFFICE BUILDING ELEVATIONS

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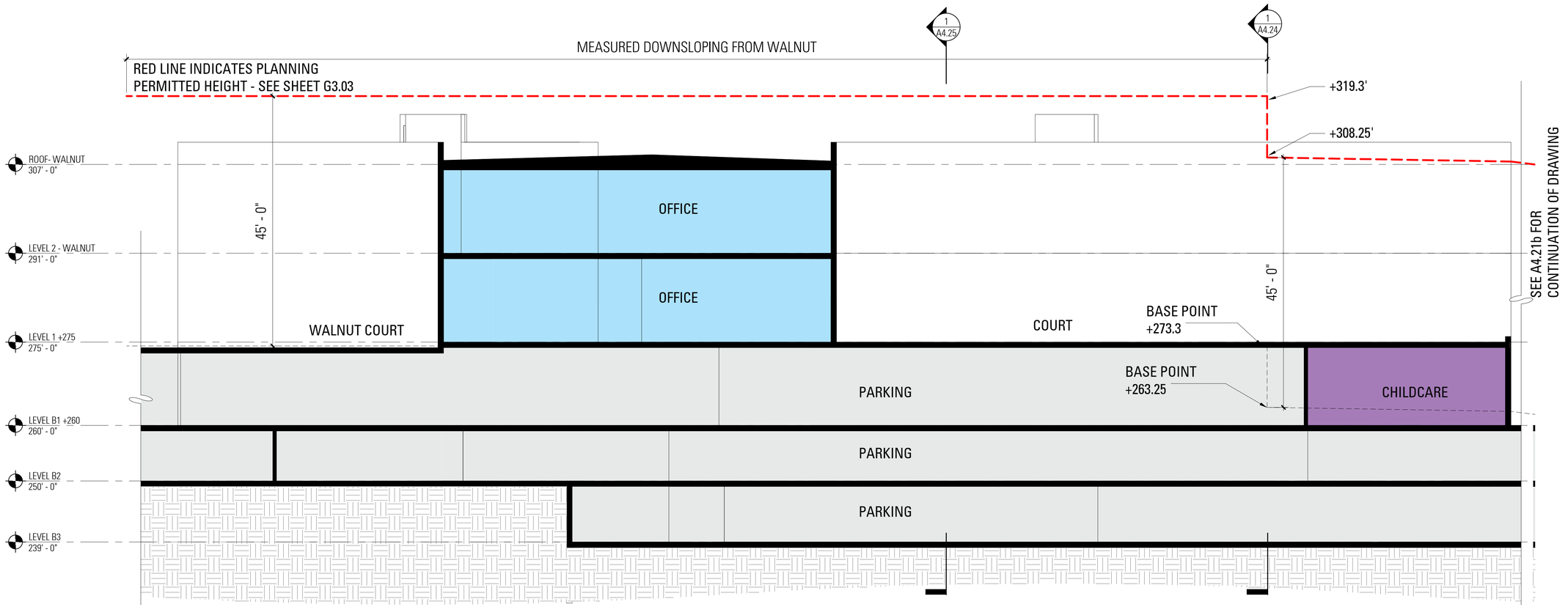
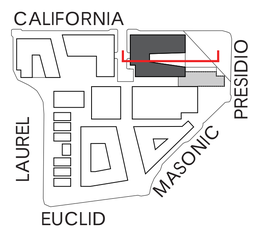
0 5' 10' 20' 30'

**A4.15**




## 1A. “WALNUT” EAST/WEST SECTION A LOOKING NORTH

1”=10’

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“WALNUT” OFFICE BUILDING SECTION

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0 5’ 10’ 20’ 30’

**A4.21a**

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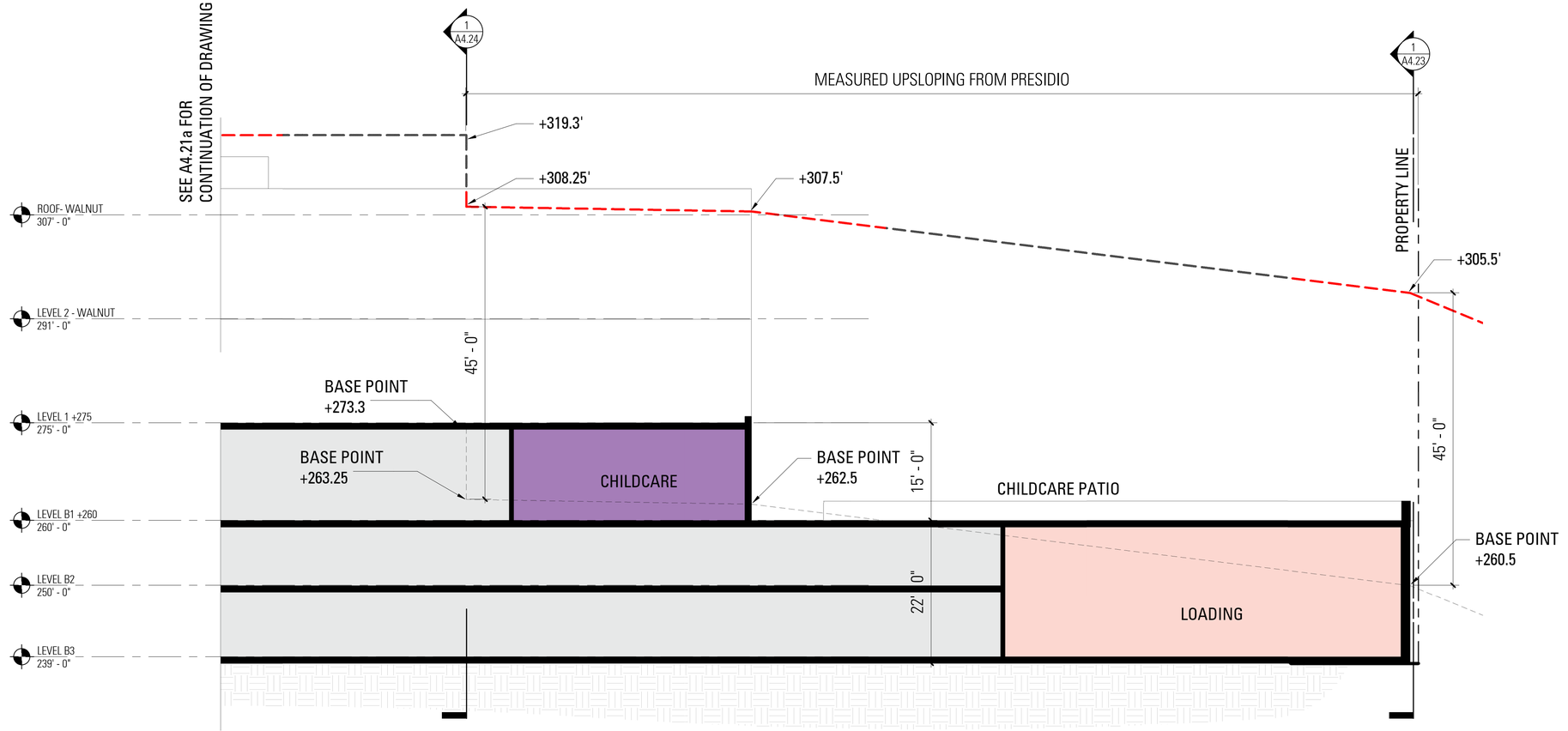
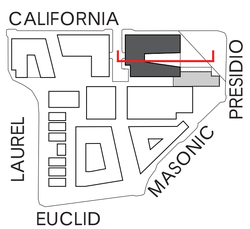



## 1B. “WALNUT” EAST/WEST SECTION B LOOKING NORTH

1”=10’

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“WALNUT” OFFICE BUILDING SECTION

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0 5’ 10’ 20’ 30’

**A4.21b**

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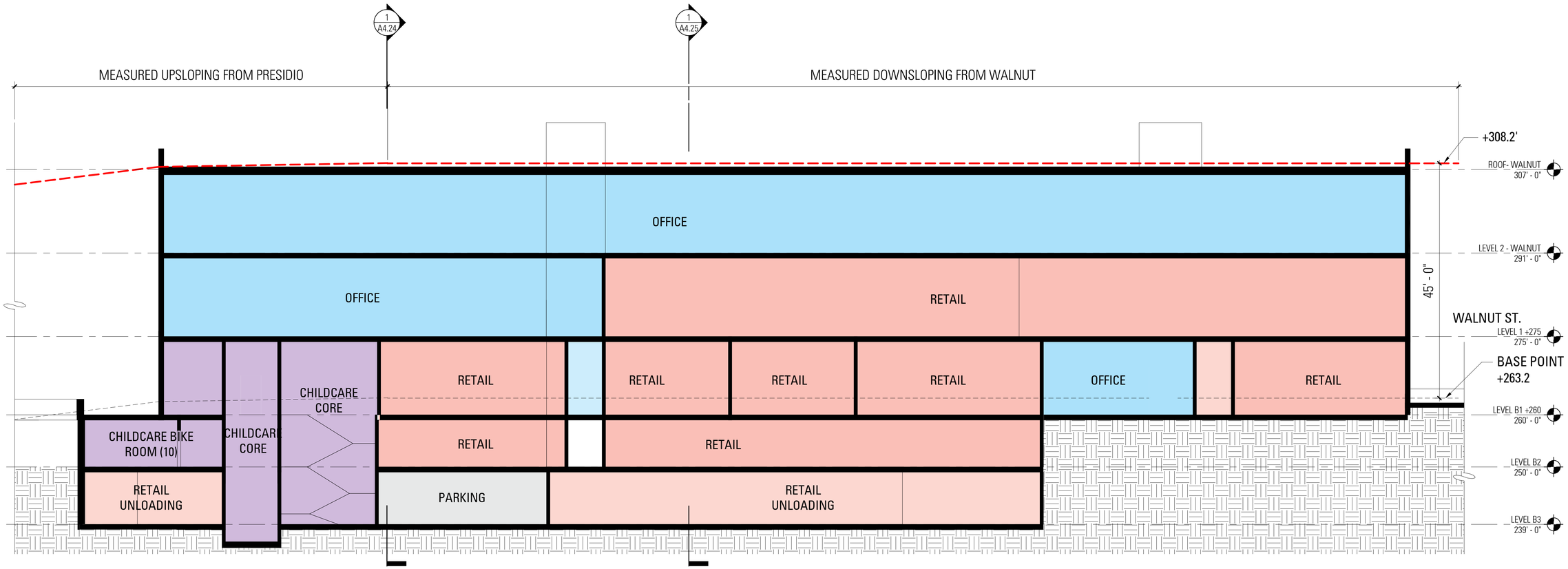
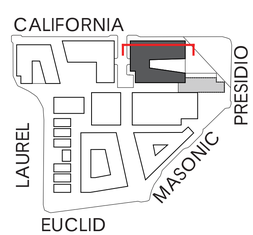



## 1. “WALNUT” EAST/WEST SECTION LOOKING SOUTH

1”=10’

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0 5’ 10’ 20’ 30’

A4.22

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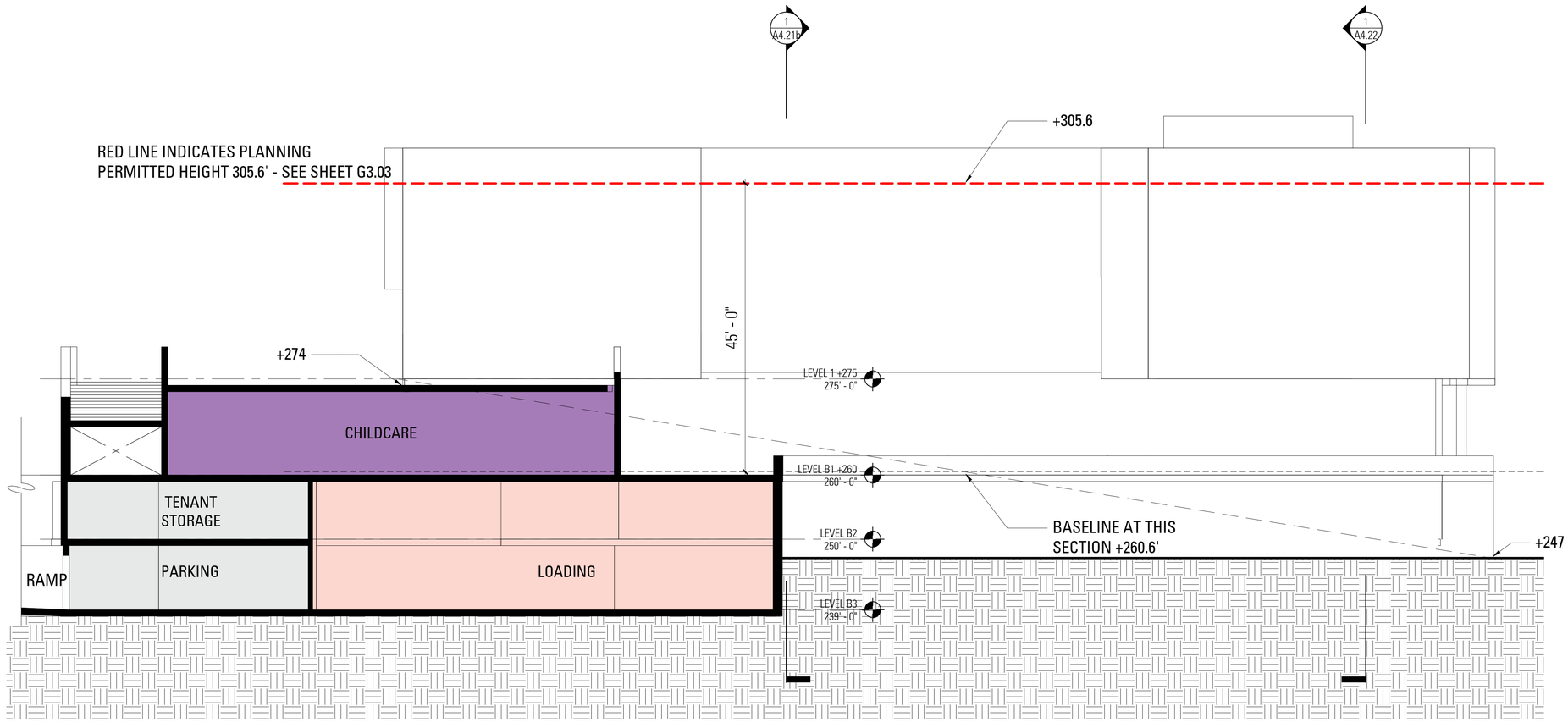
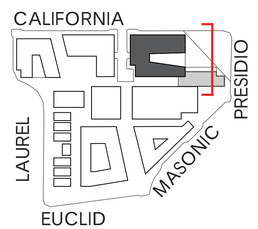



## 1. “WALNUT” NORTH/SOUTH SECTION THROUGH OVERLOOK

1”=10’

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“WALNUT” OFFICE BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

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0 5’ 10’ 20’ 30’

**A4.23**

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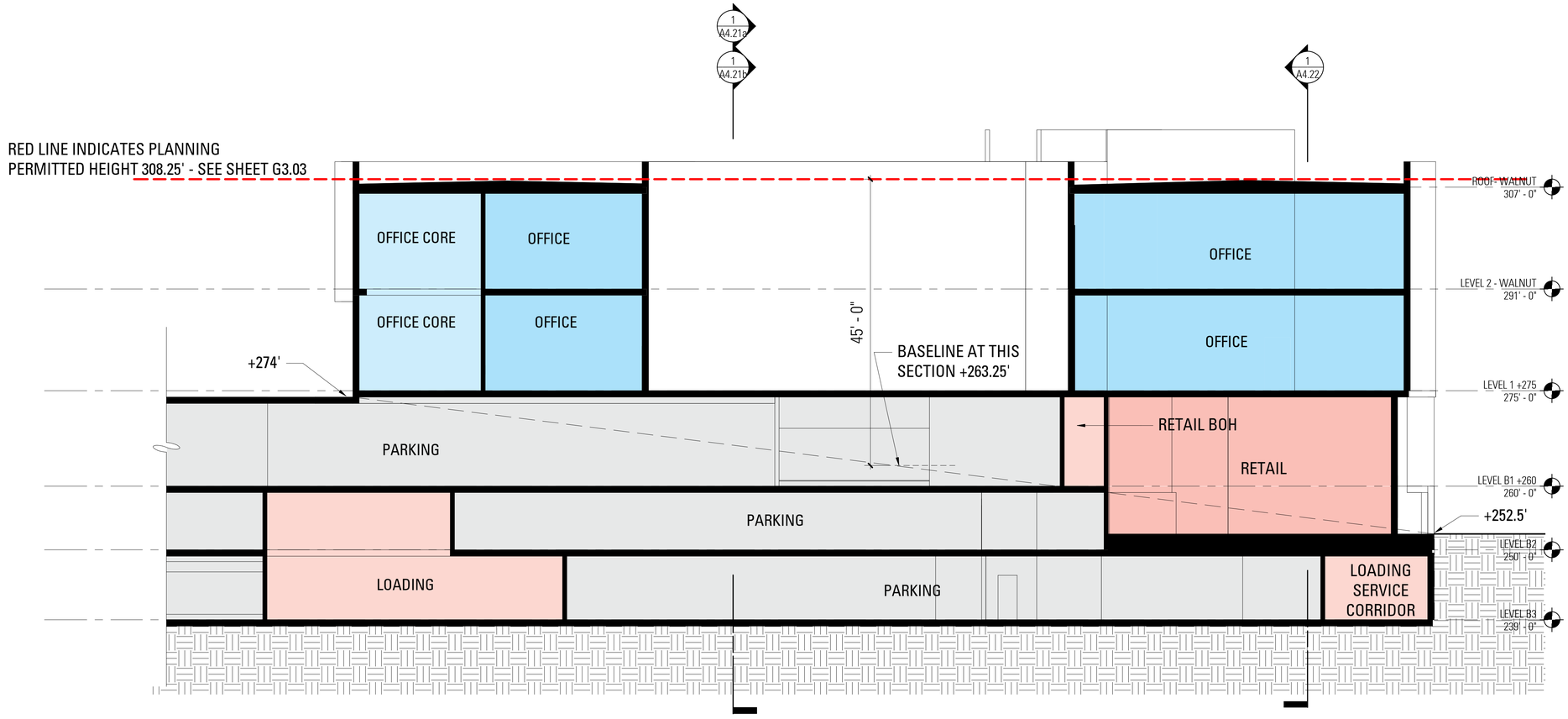
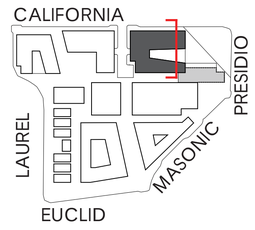



## 1. “WALNUT” NORTH/SOUTH SECTION

1”=10’




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

“WALNUT” OFFICE BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5’ 10’ 20’ 30’

**A4.24**

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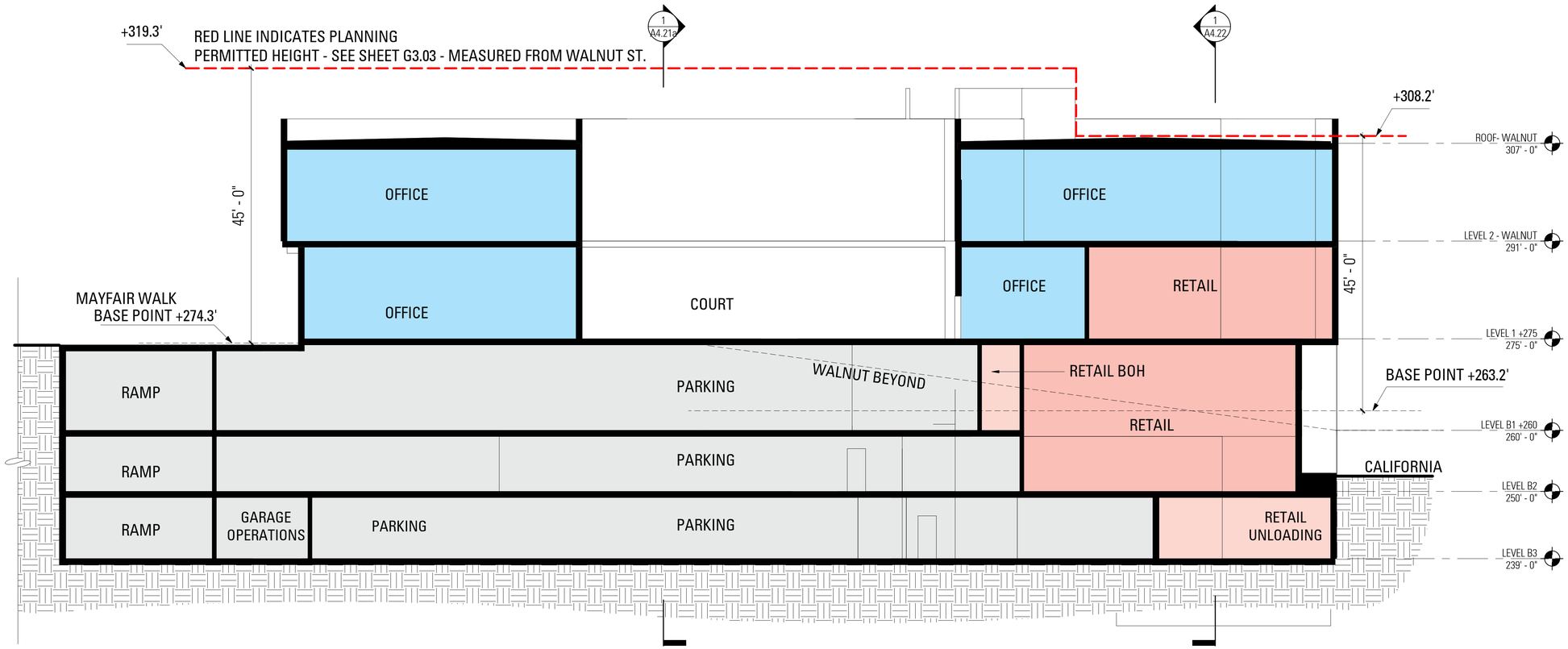
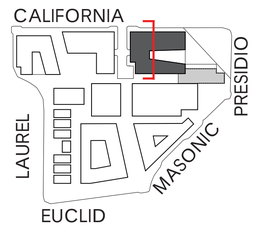



## 1. “WALNUT” NORTH/SOUTH SECTION

1”=10’




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

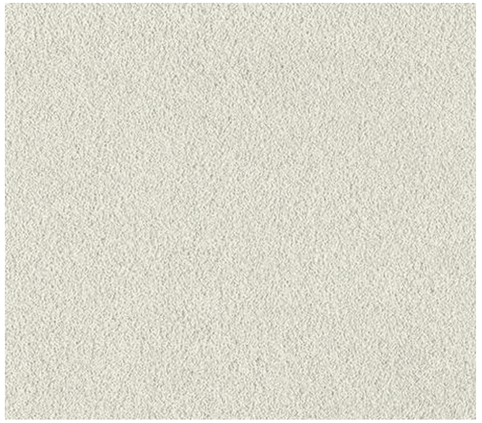
“WALNUT” OFFICE BUILDING SECTION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5’ 10’ 20’ 30’

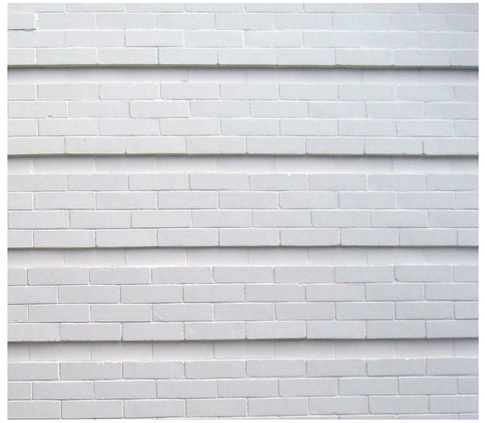
**A4.25**



1 CEMENT PLASTER



2 V-GROOVE SIDING



3 BRICK, PAINTED



4 BRICK



5 PORCELAIN TILE OR FIBER CEMENT PANEL ONE



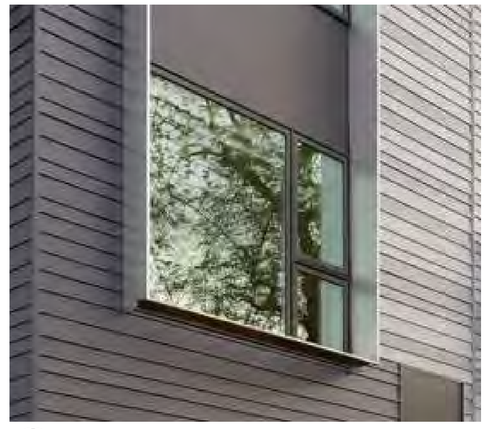
6 PORCELAIN TILE OR FIBER CEMENT PANEL TWO



7 WOOD SHINGLE



8 METAL PANEL



9 ALUMINUM EXTRUSION



10 STEEL GUARDRAIL



11 GLASS GUARDRAIL



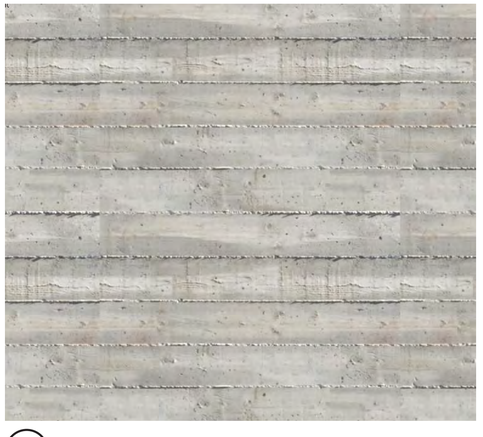
12 ALUMINUM WINDOW



13 STOREFRONT WINDOW SYSTEM



14 VENTILATED GARAGE DOOR



15 BOARD FORMED CONCRETE

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

NOTE: NOT ALL COLORS REPRESENTED

MATERIAL BOARD

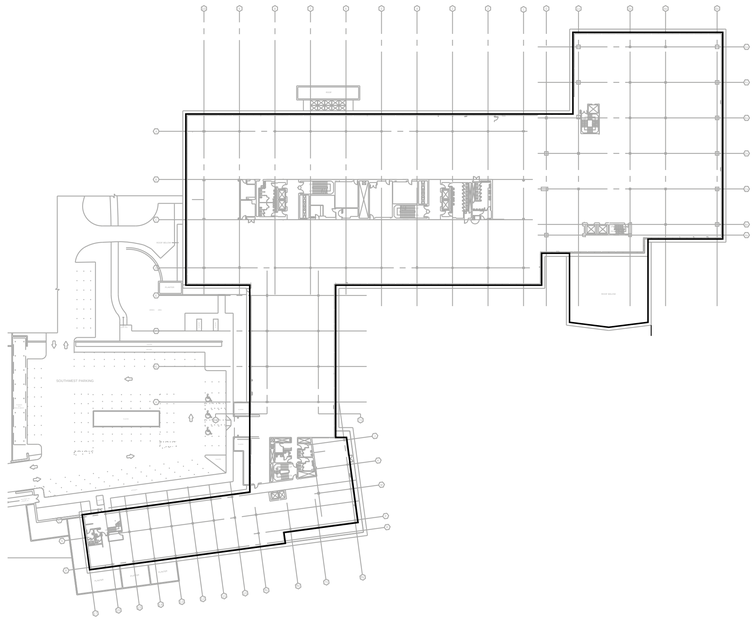
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**A4.50**

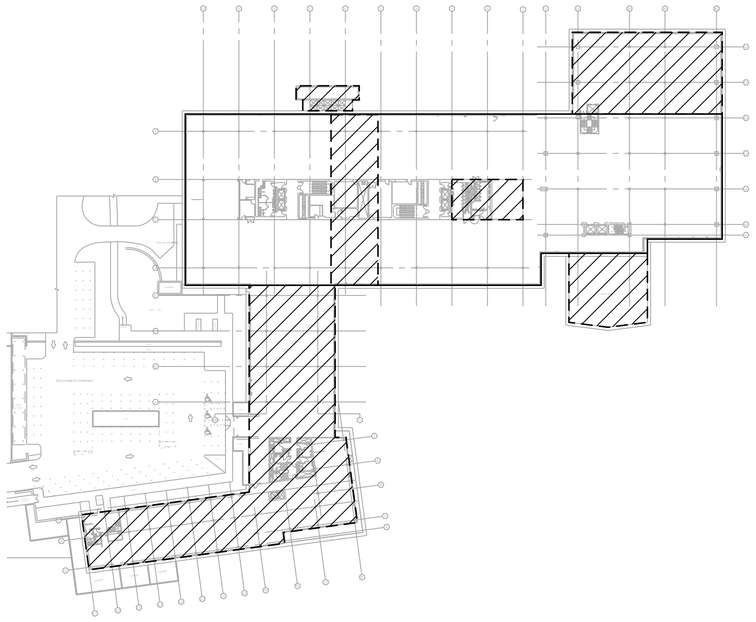
## EXISTING BUILDING

362,300 GSF
(not including parking or annex)



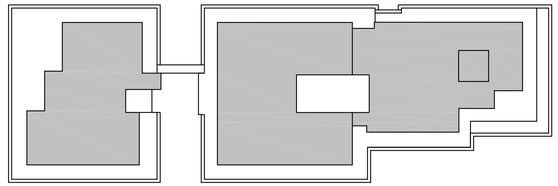
## PROPOSED DEMOLITION

186,000 GSF DEMOLISHED
(not including parking)



## PROPOSED BUILDING

321,400 GSF
(not including parking)



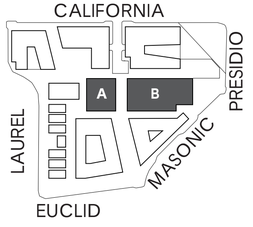
CENTER A

CENTER B

EXISTING

PROPOSED DEMOLITION

PROPOSED ADDITION




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EXISTING CONDITIONS + PROPOSED ADAPTATION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

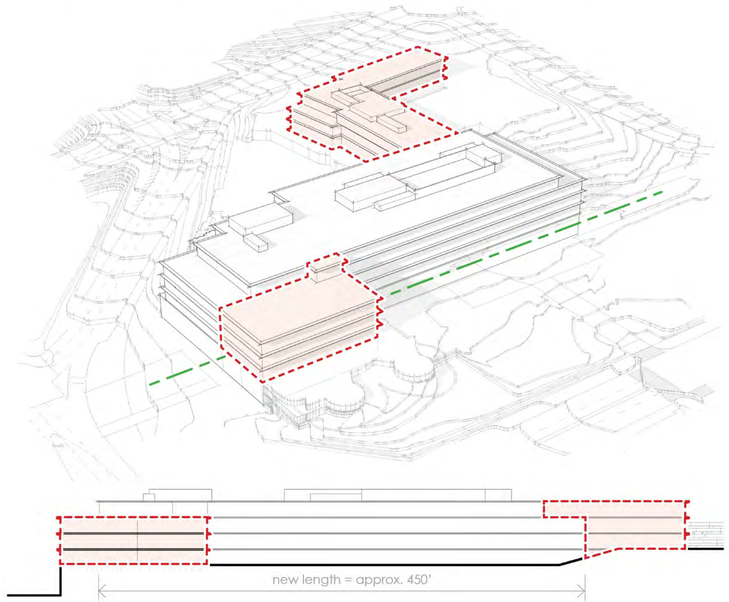
7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

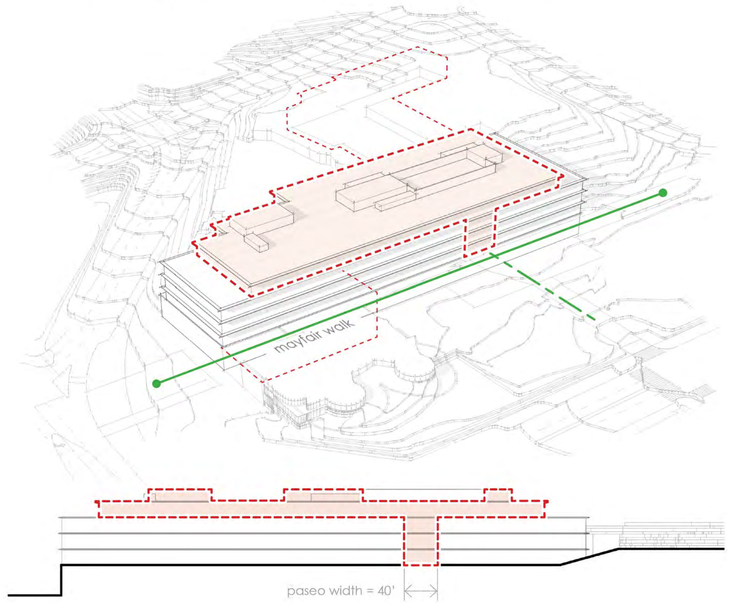
N

**A6.00**

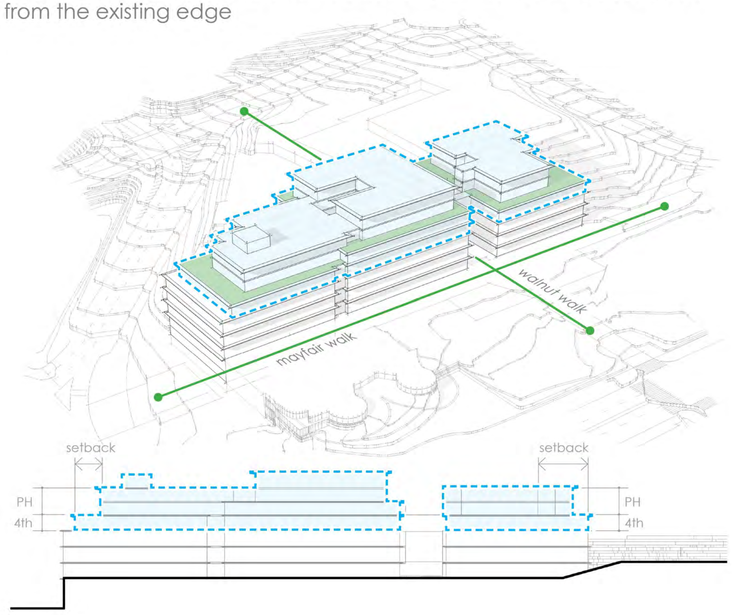
**1** Partial demolition of existing structure, freeing up Mayfair Walk axis



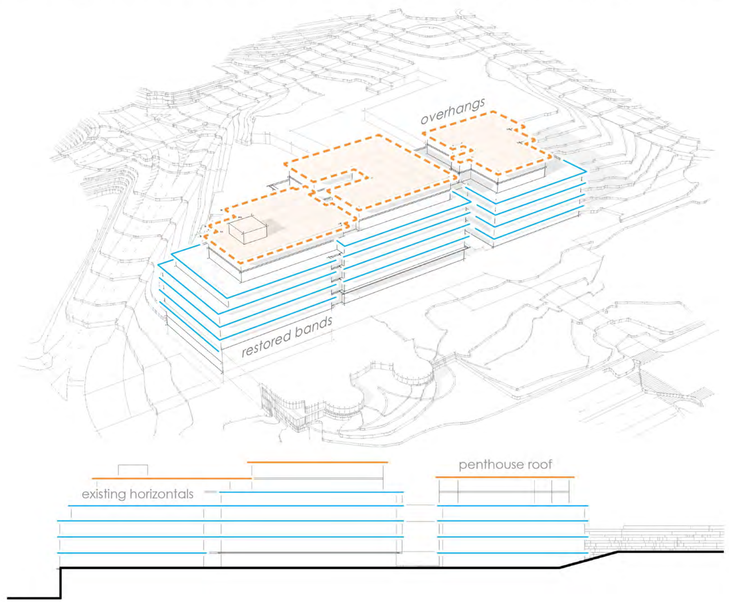

**2** Remove existing 4th floor and cut opening for Walnut Walk axis



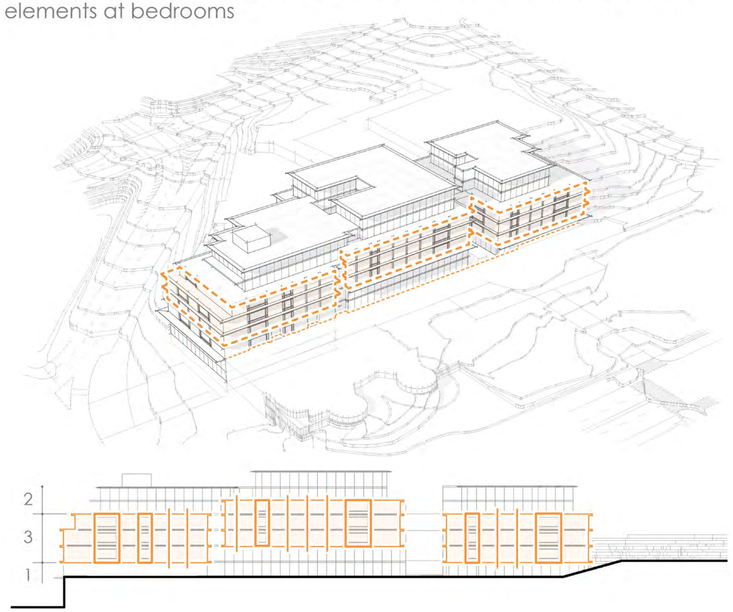

**3** Rebuild 4th floor and add two additional 'penthouse' floors set back from the existing edge



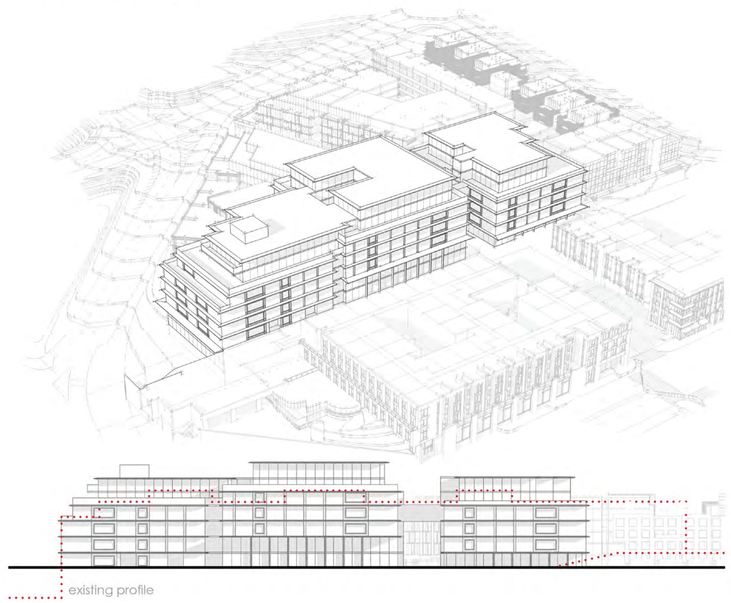

**4** Restore horizontal bands and add warm soffits to penthouse overhangs




**5** Articulate with low-iron glass, recesses at demising walls and windows elements at bedrooms




**6** Completed design




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

ADAPTIVE REUSE STRATEGY

PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.01**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL B3 PLAN - elev. 239'-6"

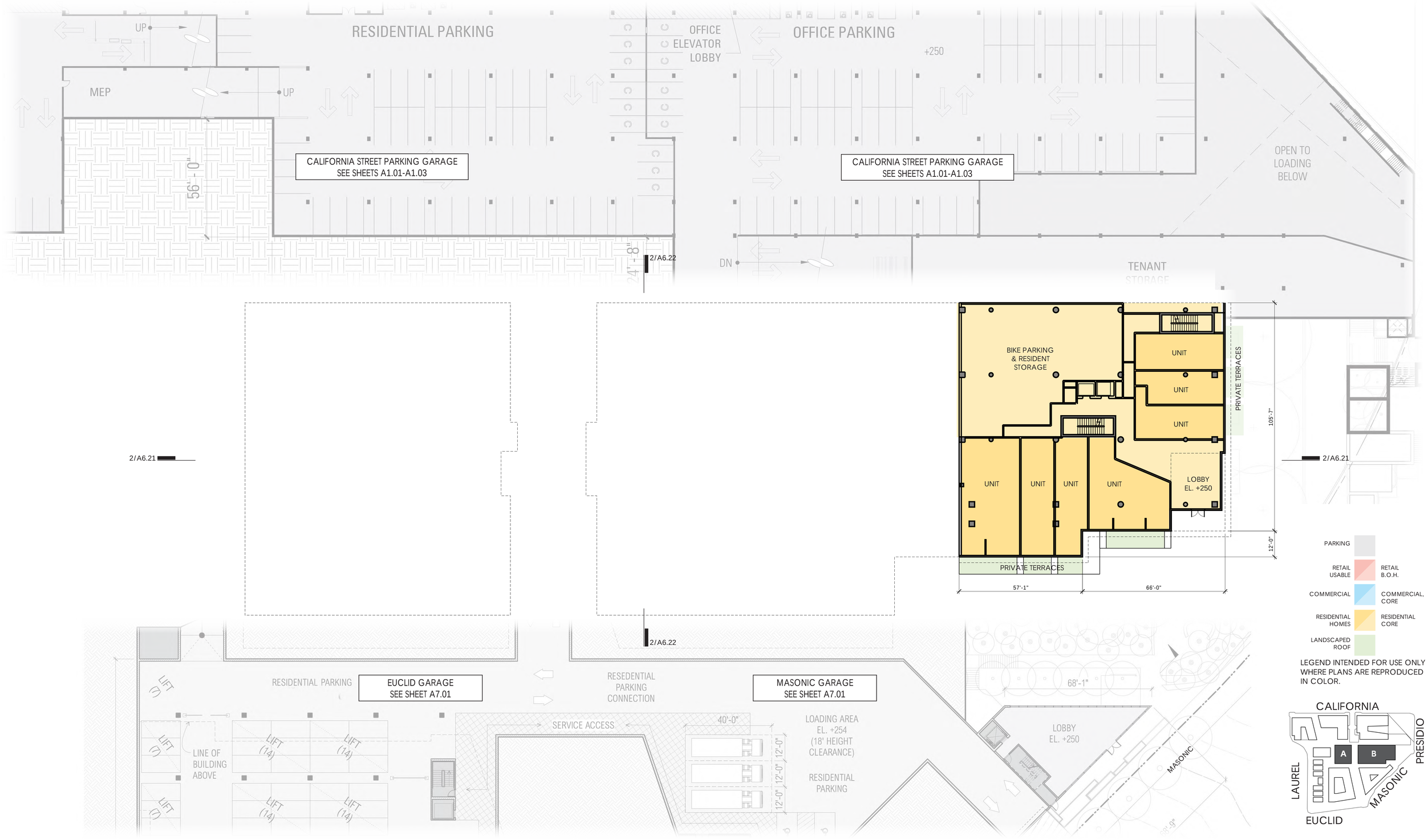
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.02**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER B: LEVEL B2 PLAN - elev. 250'-0"

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.03**

RAMP TO RETAIL PARKING

RETAIL BIKE ROOM (10)

+274

UP

DN

CHILDCARE

+260

CHILDCARE PATIO

7,600 SF

CALIFORNIA STREET PARKING GARAGE
SEE SHEETS A1.01-A1.03

RESIDENTIAL PARKING

CALIFORNIA STREET PARKING GARAGE
SEE SHEETS A1.01-A1.03

56'-0"

5"

TREE PITS

2/A6.22

MEP

106'-10"

2/A6.21

DRIVE-WAY

LOBBY

LOBBY

STORAGE

PARKING 6 SPACES

BIKE PARK-ING

BIKE PARKING

UNIT

UNIT

UNIT

UNIT

UNIT

UNIT

UNIT

UNIT

UNIT

OPEN TO BELOW

80'-11"

2/A6.21

PARKING

RETAIL USABLE

RETAIL B.O.H.

COMMERCIAL

COMMERCIAL, CORE

RESIDENTIAL HOMES

RESIDENTIAL CORE

LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.

2/A6.22

RESIDENTIAL PARKING

EUCLID GARAGE
SEE SHEET A7.01

RESEDENTIAL PARKING CONNECTION

MASONIC GARAGE
SEE SHEET A7.01

LIFT (7)

LIFT (14)

LINE OF BUILDING ABOVE

SERVICE ACCESS

40'-0"

LOADING AREA EL. +254 (18' HEIGHT CLEARANCE)

12'-0"

RESIDENTIAL PARKING

68'-1"

LOBBY EL. +250

MASONIC

CALIFORNIA

PRESIDIO

LAUREL

MASONIC

EUCLID

A

B

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER B: LEVEL B1 PLAN - elev. 260'-6"

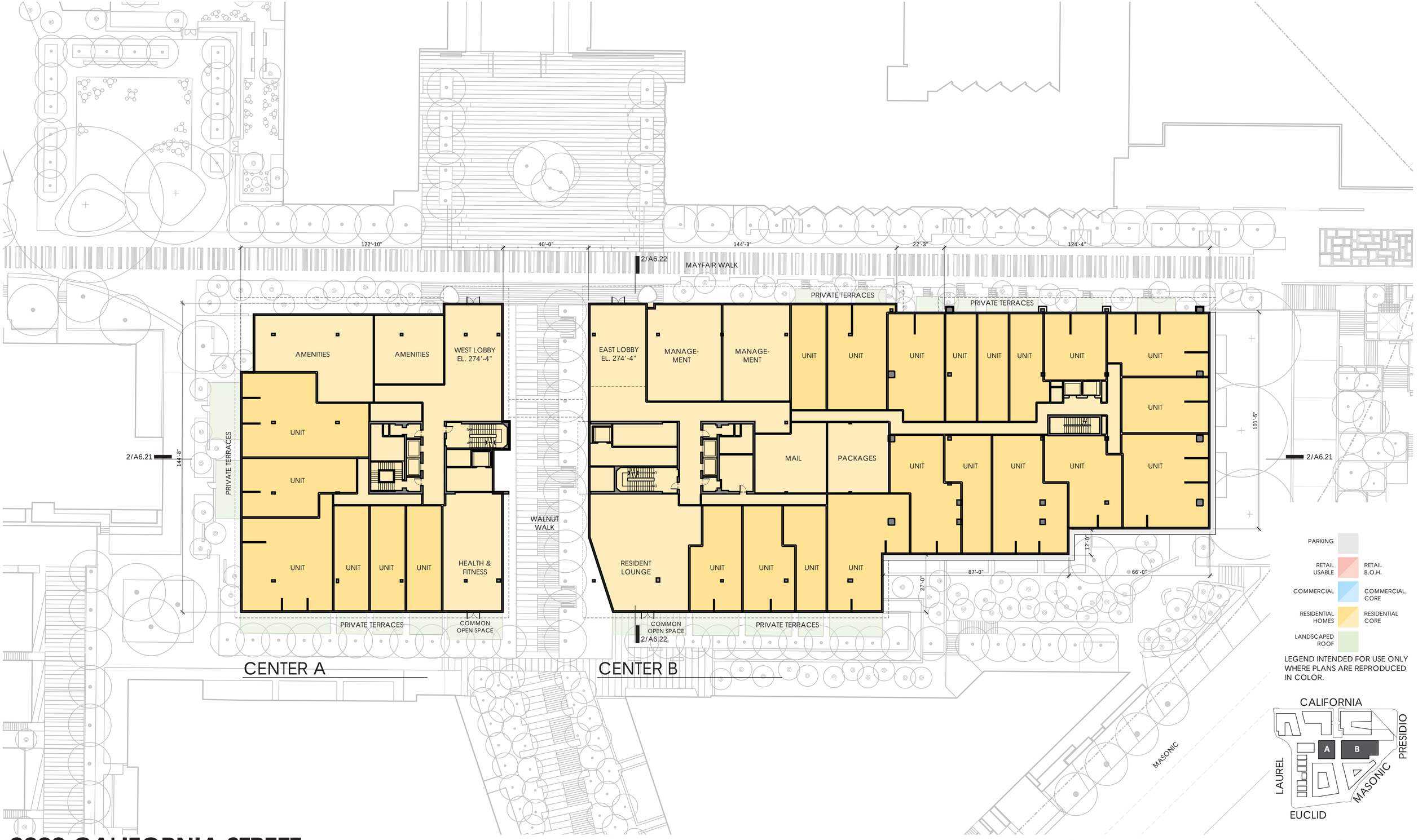
PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

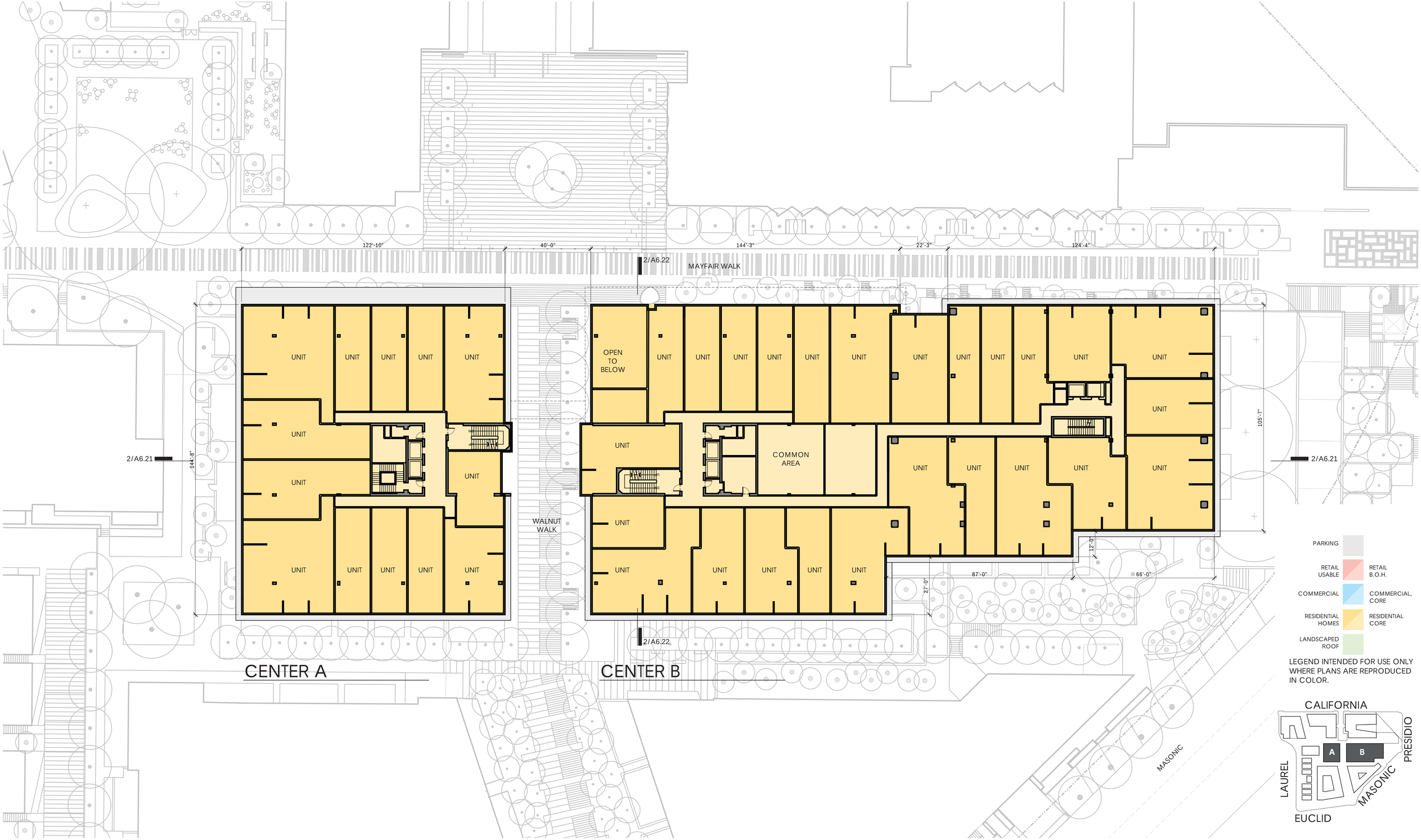
7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.04**


122'-10"
40'-0"
144'-3"
22'-3"
124'-4"
2/A6.22
MAYFAIR WALK
PRIVATE TERRACES
PRIVATE TERRACES
AMENITIES
AMENITIES
WEST LOBBY
EL. 274'-4"
EAST LOBBY
EL. 274'-4"
MANAGE-
MENT
MANAGE-
MENT
UNIT
UNIT
UNI




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL L2 PLAN - elev. 288'-2"

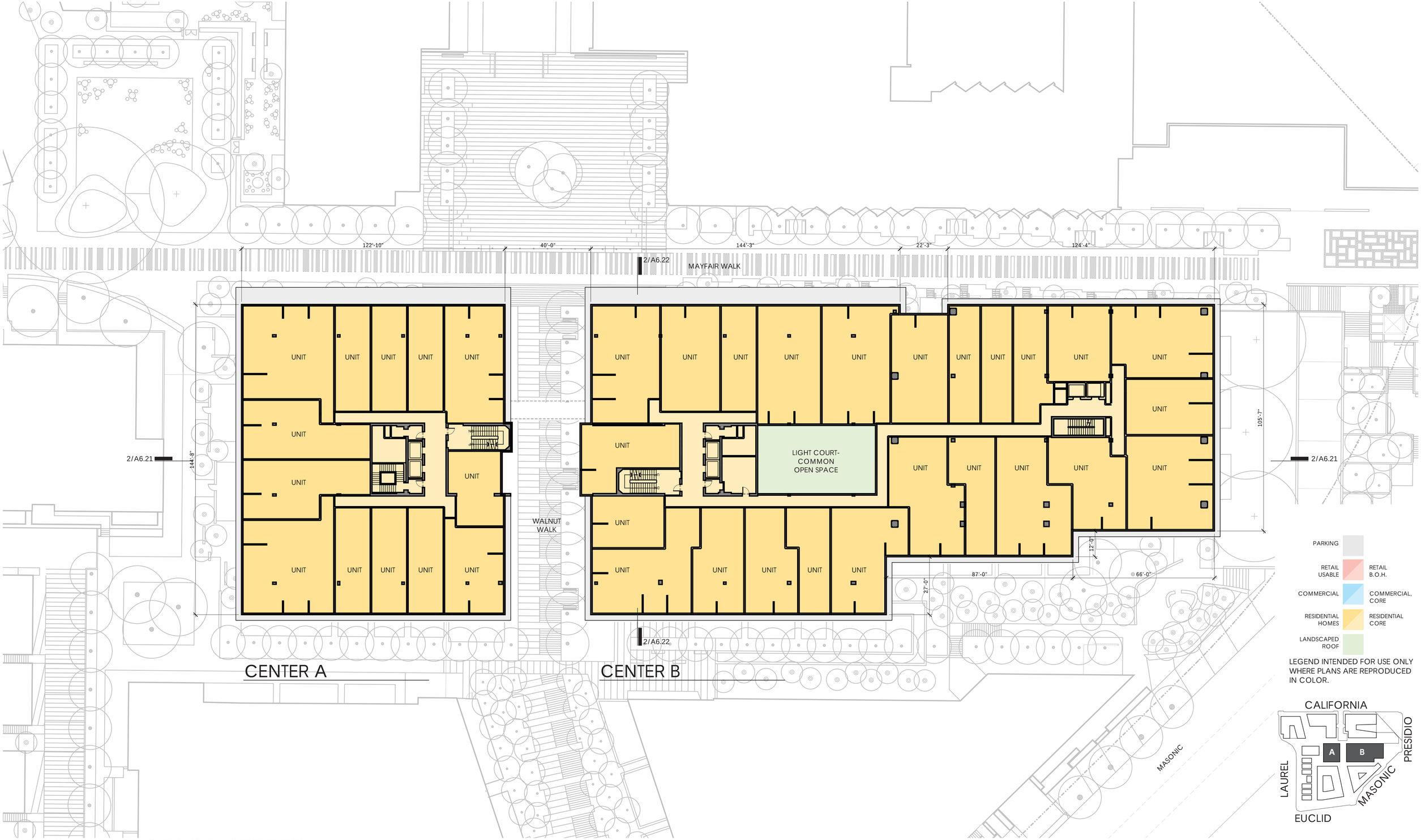
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.06**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL L3 PLAN - elev. 302'-0"

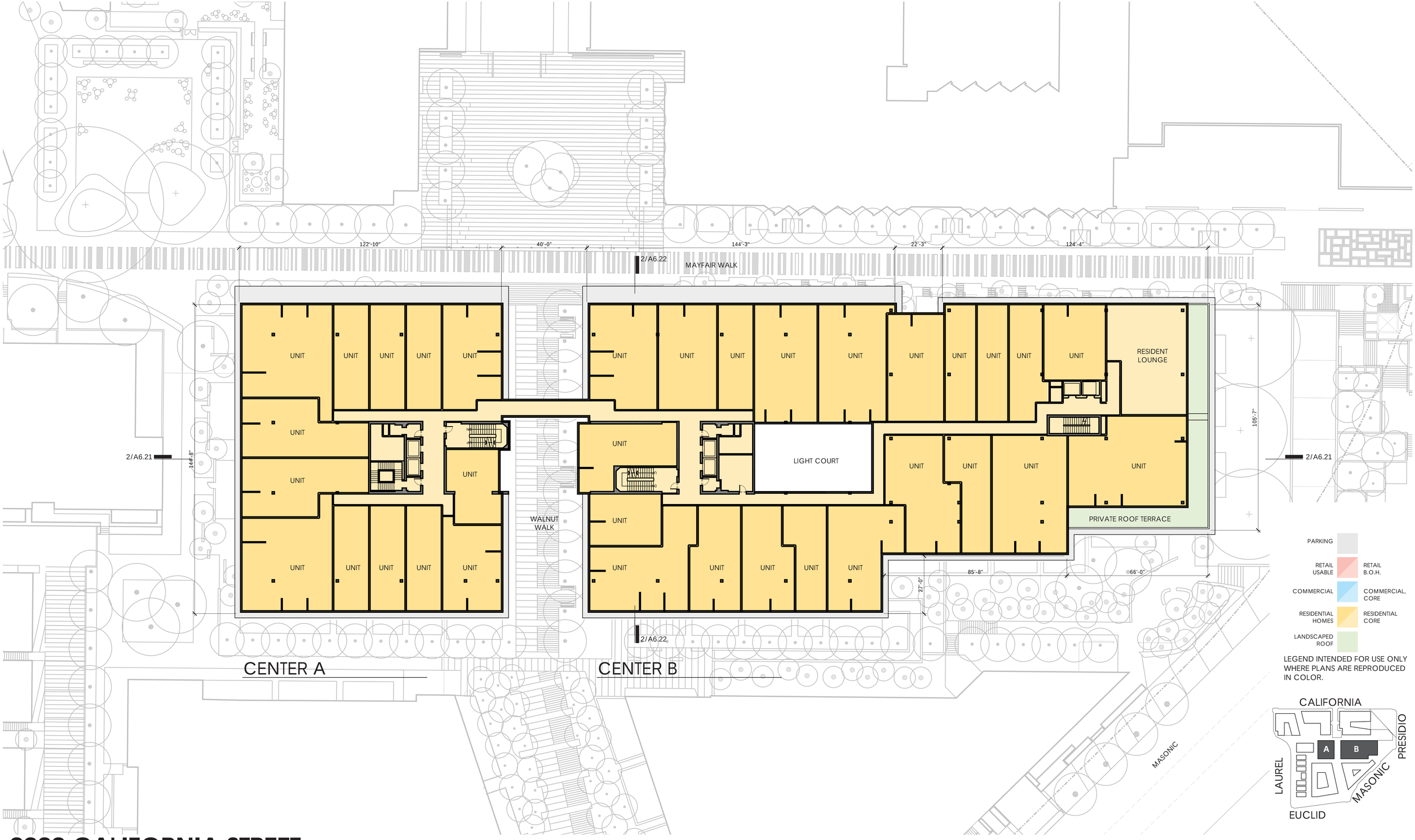
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.07**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL L4 PLAN - elev. 315'-10"

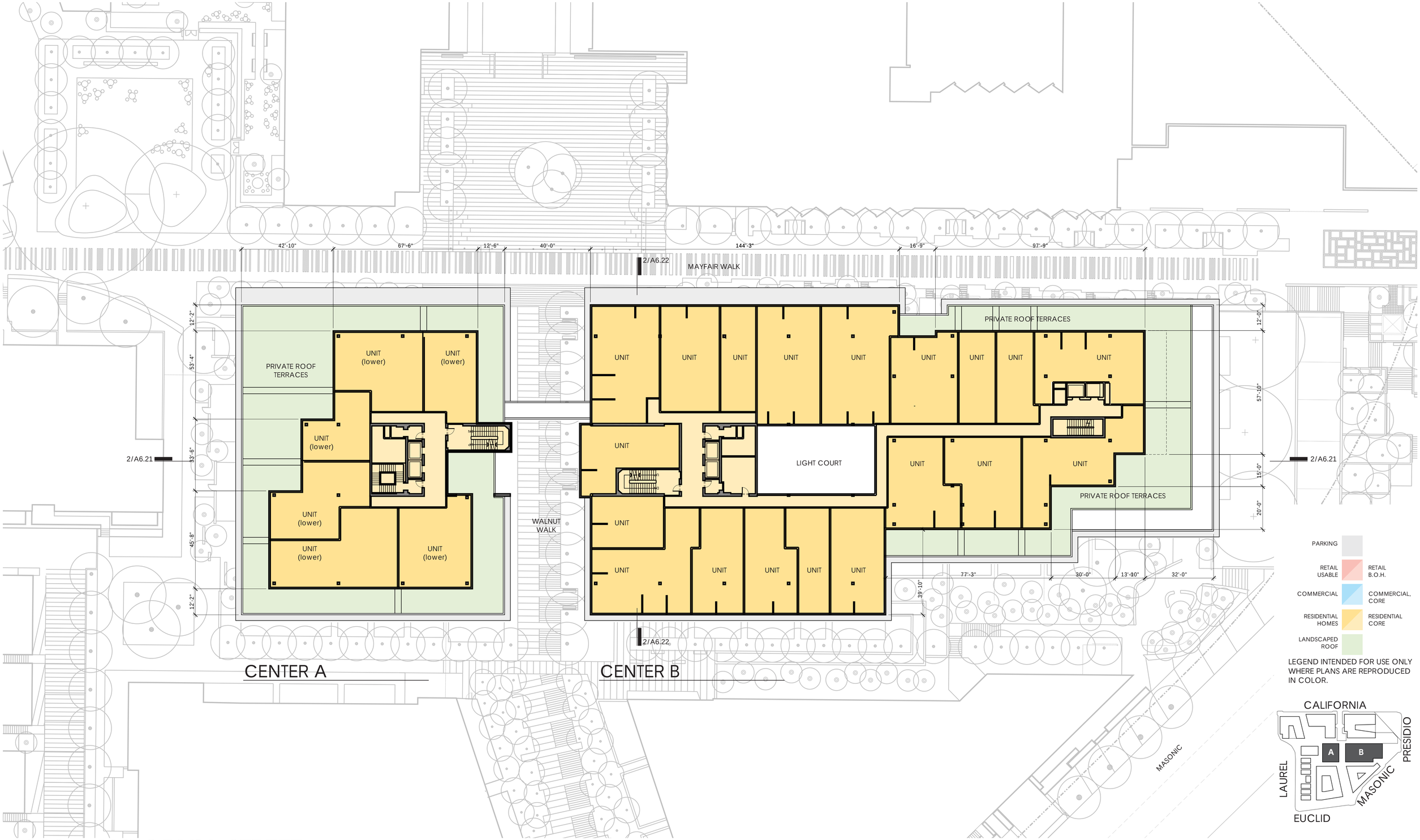
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.08**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL L5 PLAN - elev. 329'-0"

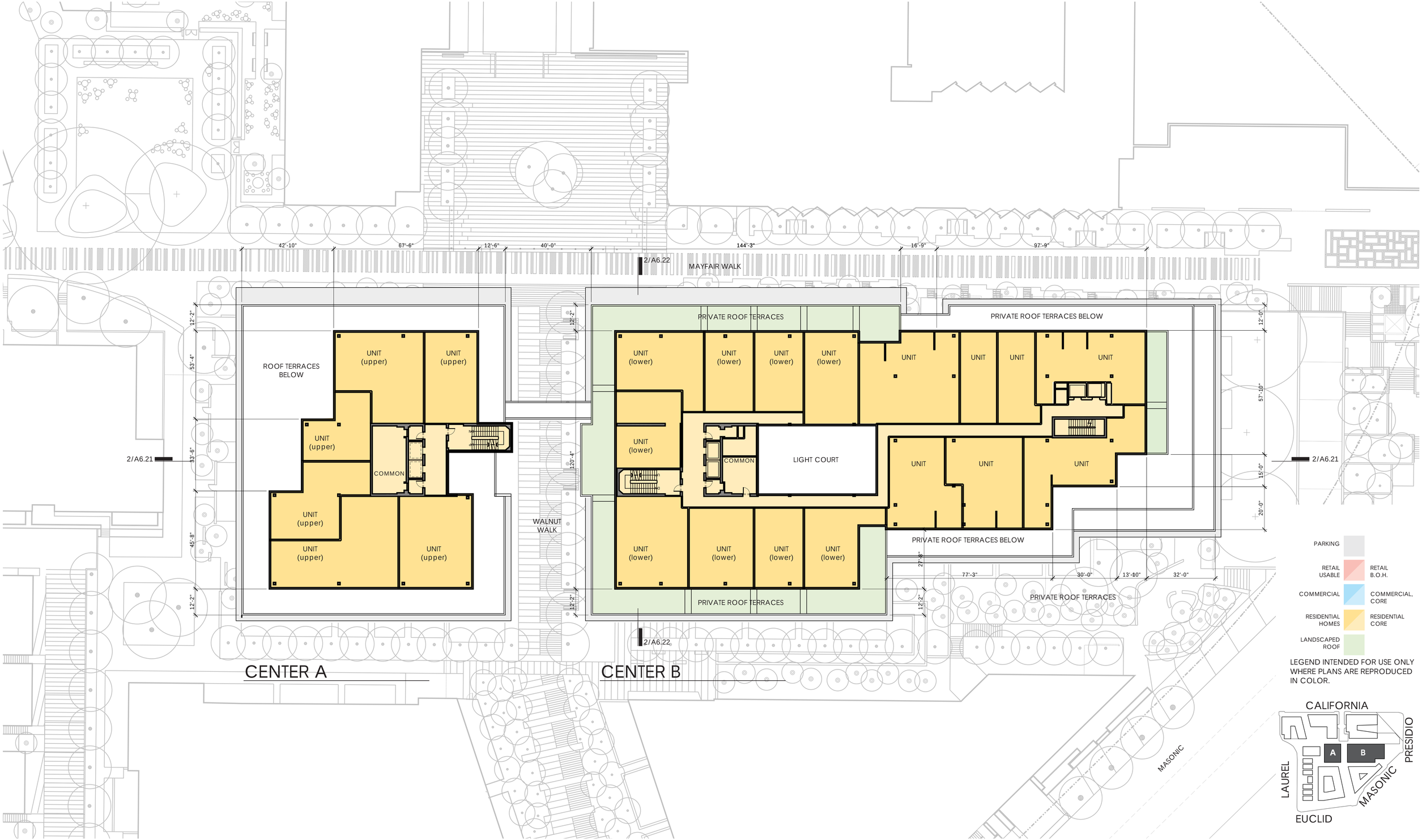
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.09**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL L6 PLAN - elev. 340'-9"

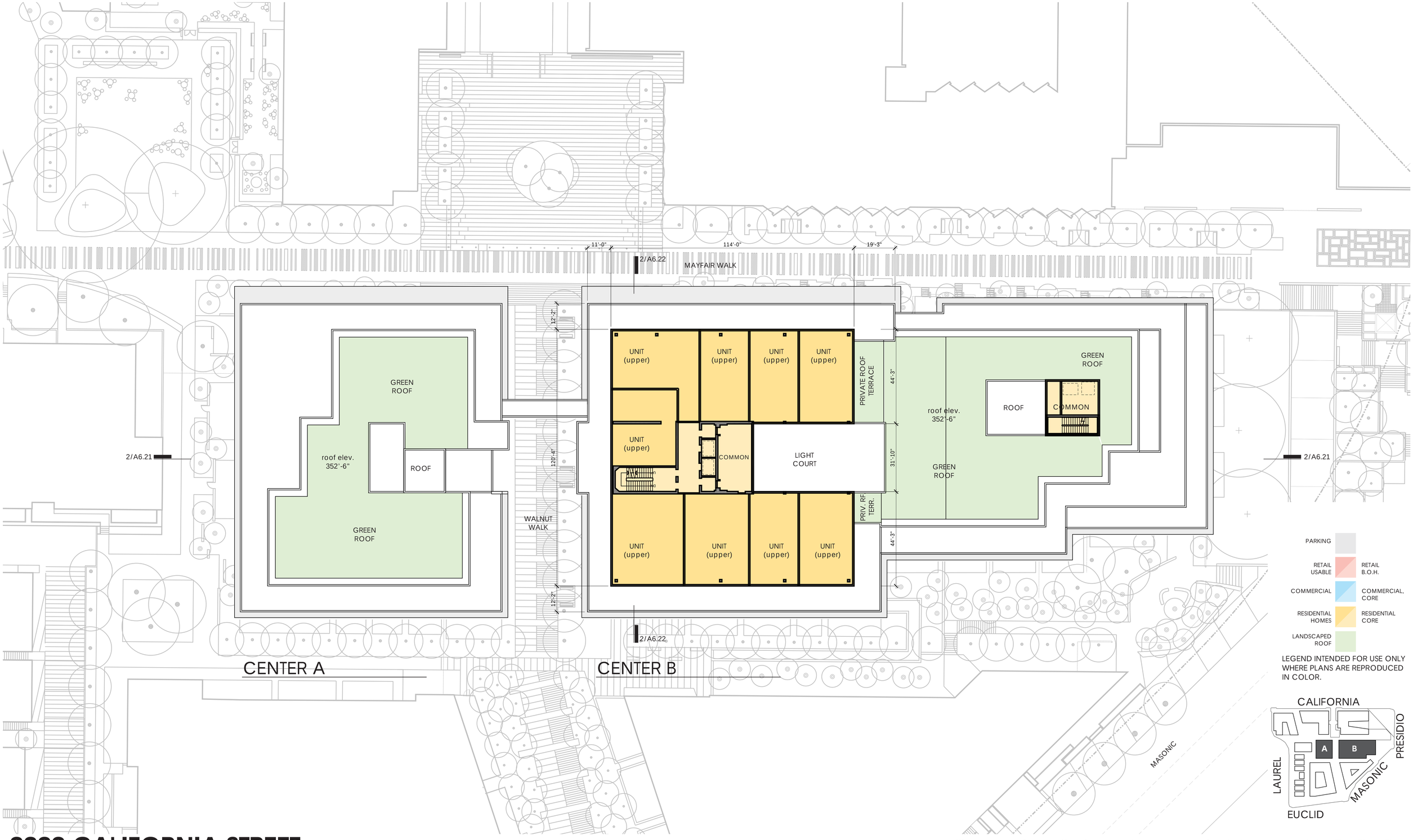
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.10**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: LEVEL L7 PLAN - ELEV. 352'-6"

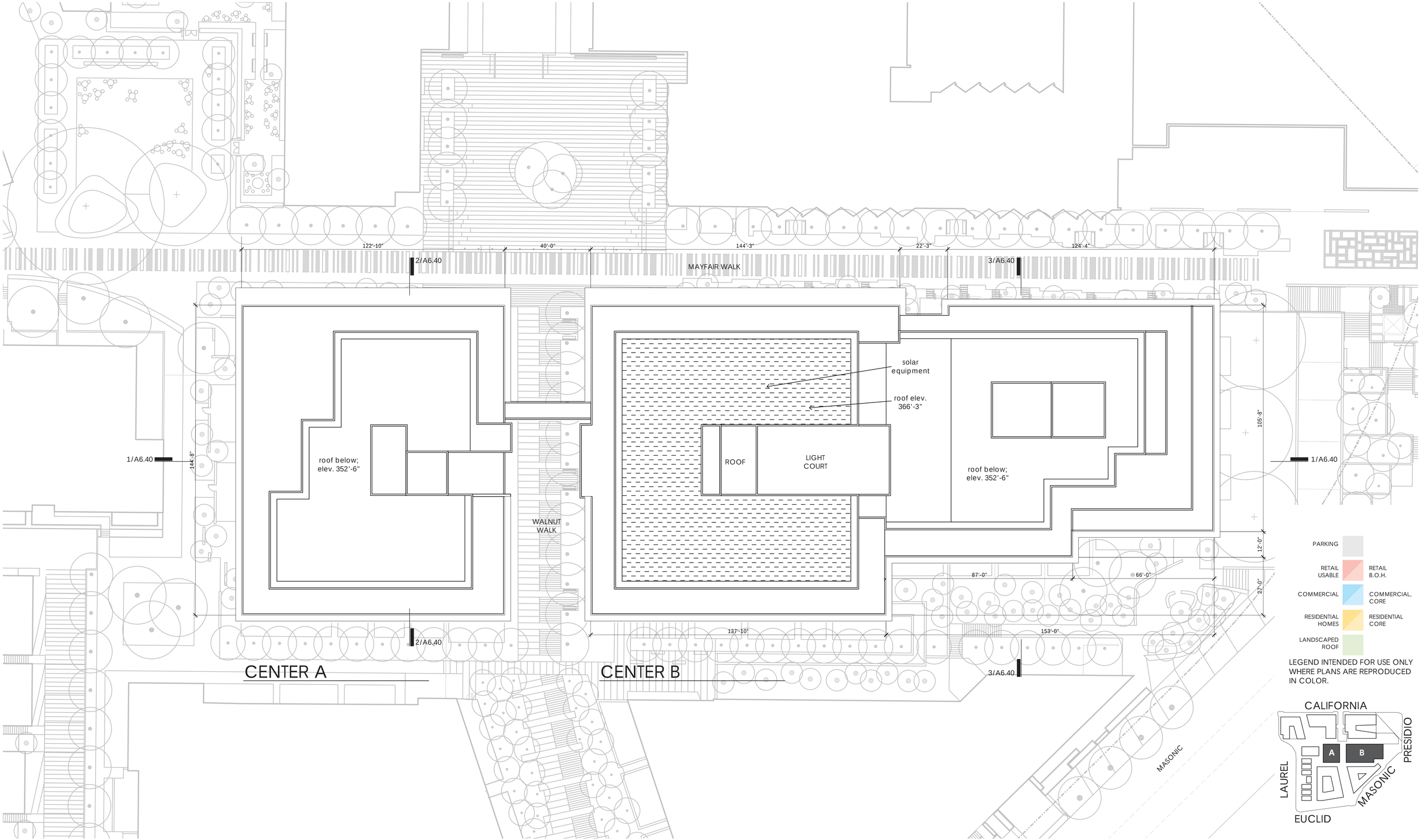
PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.11**




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B: ROOF PLAN - elev. 366'-3"

PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.12**

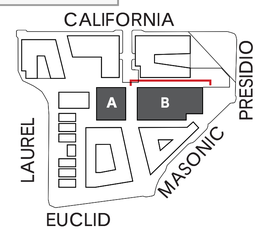



illustrative plan @ level 6

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER B - NORTH ELEVATION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

**A6.13**

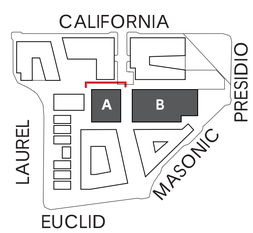



illustrative plan @ level 6

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A - NORTH ELEVATION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

**A6.14**

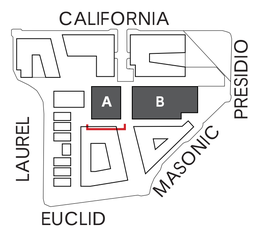



illustrative plan @ level 5

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A - SOUTH ELEVATION

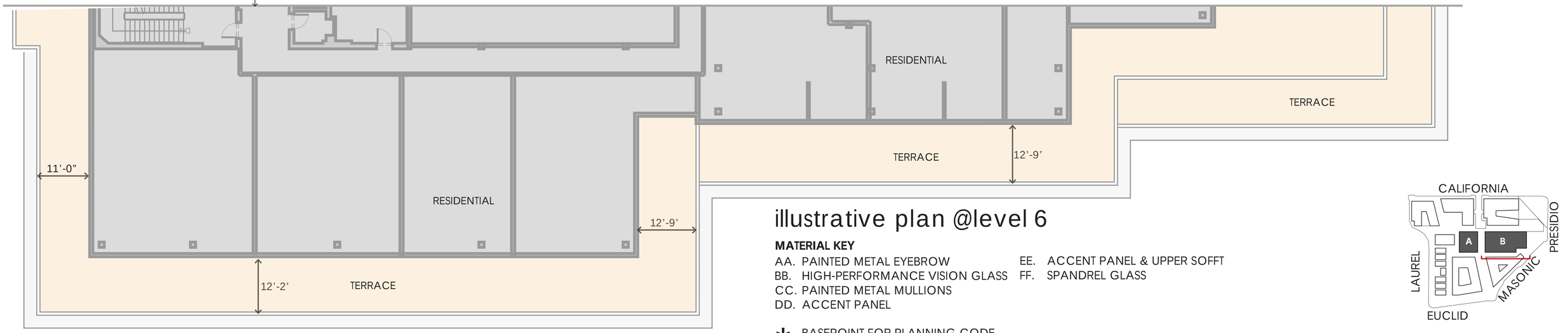
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

**A6.15**







## illustrative plan @level 6

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER B - SOUTH ELEVATION

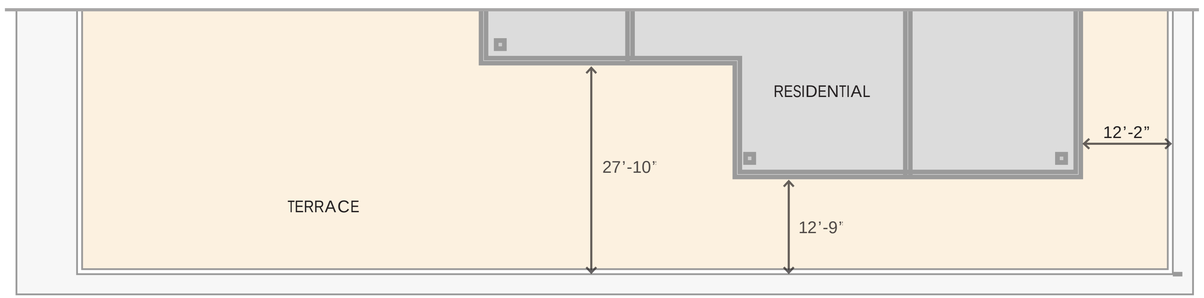
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

**A6.16**



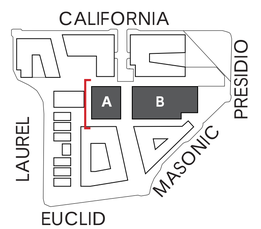




illustrative plan @ level 5

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A - WEST ELEVATION

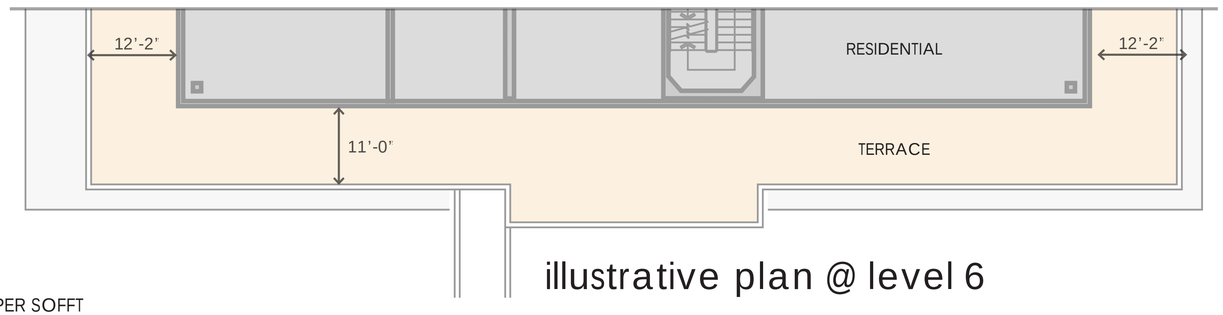
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

**A6.17**



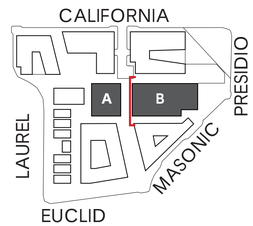




illustrative plan @ level 6

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER B - WEST ELEVATION

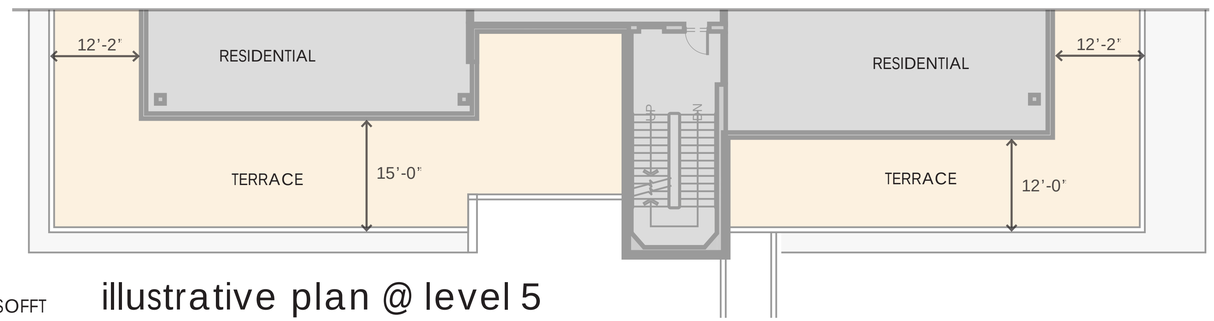
PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

**A6.18**



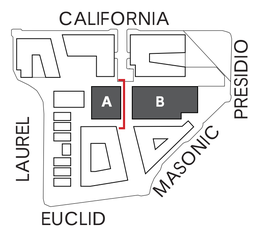




illustrative plan @ level 5

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A - EAST ELEVATION

PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

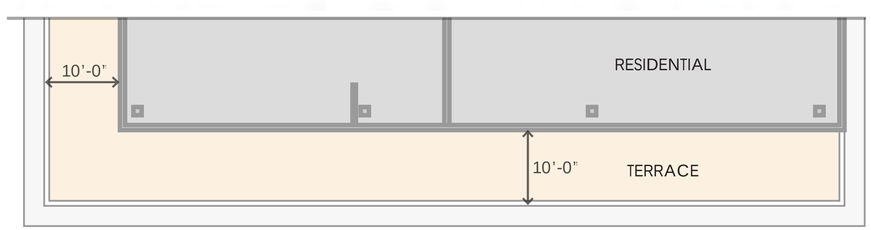
**A6.19**



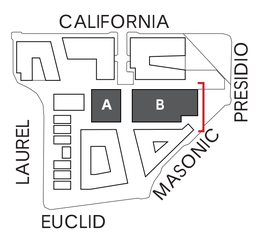

**MATERIAL KEY**

AA. PAINTED METAL EYEBROW
BB. HIGH-PERFORMANCE VISION GLASS
CC. PAINTED METAL MULLIONS
DD. ACCENT PANEL
EE. ACCENT PANEL & UPPER SOFFT
FF. SPANDREL GLASS

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT - SEE SHT. G3.04




illustrative plan @ level 4




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

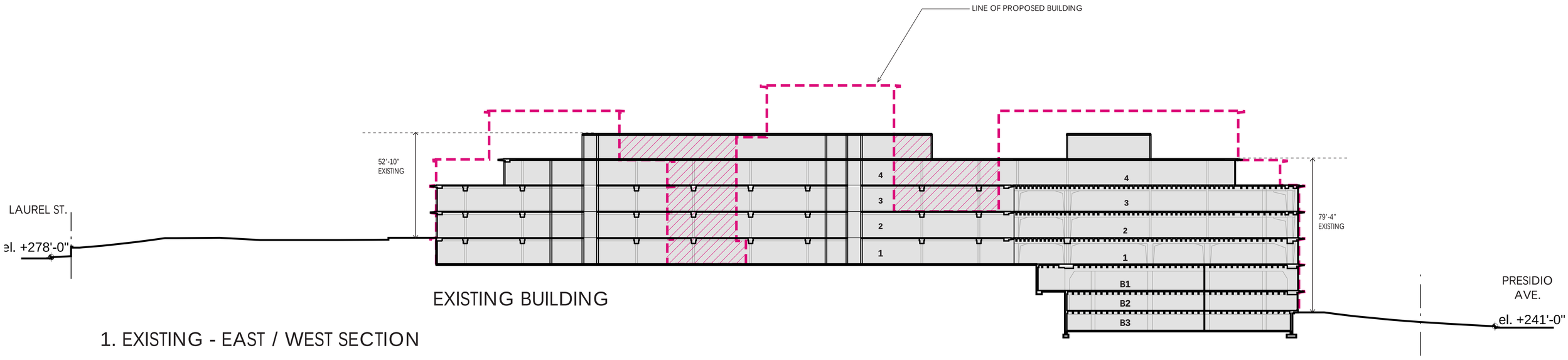
## CENTER B - EAST ELEVATION

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

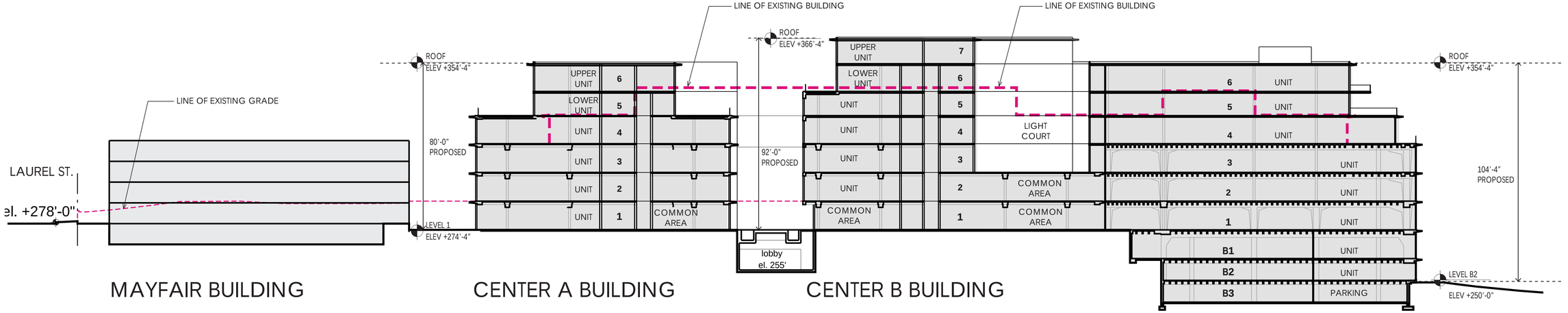
0 5' 10' 20' 30'

**A6.20**



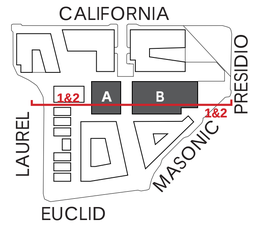

EXISTING BUILDING

1. EXISTING - EAST / WEST SECTION




MAYFAIR BUILDING CENTER A BUILDING CENTER B BUILDING

2. PROPOSED - EAST / WEST SECTION




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

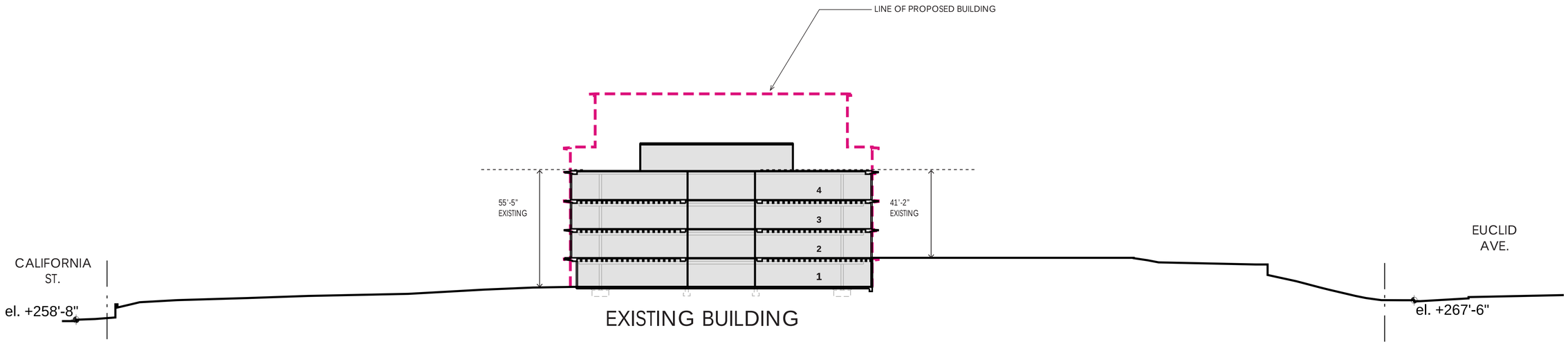
## CENTER A + B: EXISTING & PROPOSED SITE SECTIONS

PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

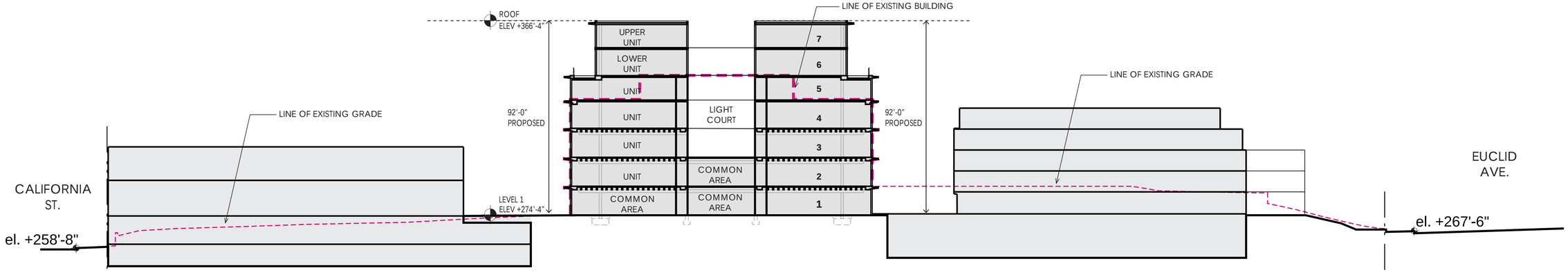
7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

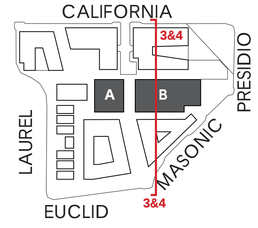
**A6.21**




1. EXISTING - NORTH / SOUTH SECTION




2. PROPOSED - NORTH / SOUTH SECTION




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

# CENTER A + B: EXISTING & PROPOSED SITE SECTIONS

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

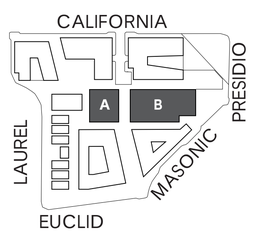
**A6.22**




1. ILLUSTRATIVE UNIT PLANS - CENTER A




2. ILLUSTRATIVE UNIT PLANS - CENTER B




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

CENTER A & B - ILLUSTRATIVE UNIT PLANS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 5' 10' 20' 30'

N

**A6.30**

# SUMMARY OF OPEN SPACE COMPLIANCE FOR CENTER A/B

| | CENTER A | | CENTER B | |
|---|---|---|---|---|
| | COMMON OPEN SPACE | PRIVATE OPEN SPACE | COMMON OPEN SPACE | PRIVATE OPEN SPACE |
| | | | | |
| L6 | 0 | 0 | 0 | 1200 |
| L5 | 0 | 600 | 0 | 700 |
| L4 | 0 | 0 | 750 | 100 |
| L3 | 0 | 0 | 0 | 0 |
| L1 | 435 | 600 | 525 | 1200 |
| B2 | 0 | 0 | 0 | 700 |
| TOTAL (SF) | 435 | 1200 | 1275 | 3900 |
| | | COMPLIANT UNITS = 12 | | COMPLIANT UNITS = 39 |



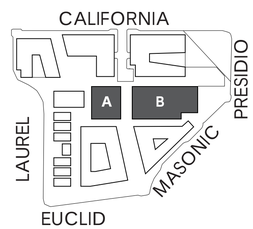

EACH PRIVATE OPEN SPACE IS 100 SF
(8'-4" X 12' MINIMUM)

CENTER A

CENTER B

**CENTER A**
**B2 SUMMARY**
COMMON: NONE
PRIVATE: NONE

**CENTER B**
**B2 SUMMARY**
COMMON: NONE
PRIVATE: 7 UNITS * 100 SF = 700 SF




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

CENTER A & B - BUILDING OPEN SPACE - LEVEL B2 PLAN - elev. 250'-0"

PRADO GROUP SKS JAMES CORNER FIELD OPERATIONS MSLA ARUP BAR architects JENSEN SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

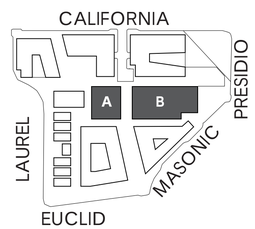
N

**A6.40**




CENTER A

CENTER B




**CENTER A**
**L1 SUMMARY**
COMMON: 435 SF
PRIVATE: 6 UNITS * 100 SF = 600 SF

**CENTER B**
**L1 SUMMARY**
COMMON: 525 SF
PRIVATE: 12 UNITS * 100 SF = 1,200 SF

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B - BUILDING OPEN SPACE - LEVEL L1 PLANS - elev. 274'-4"

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

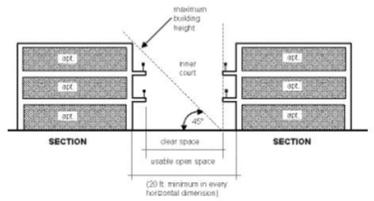
N

**A6.41**

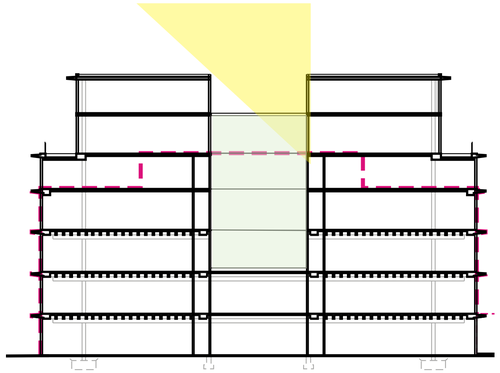
**(g) Common Usable Open Space: Additional Standards.**

(1) **Minimum Dimensions and Minimum Area.** Any space credited as common usable open space shall be at least 15 feet in every horizontal dimension and shall have a minimum area of 300 square feet.

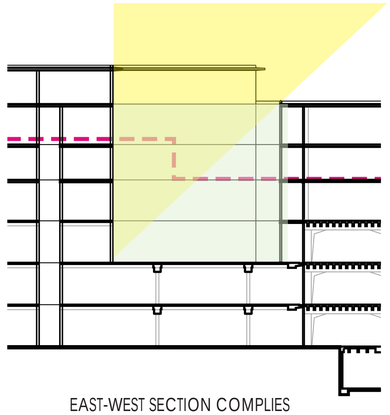
(2) **Use of Inner Courts.** The area of an inner court, as defined by this Code, may be credited as common usable open space, if the enclosed space is not less than 20 feet in every horizontal dimension and 400 square feet in area; and if (regardless of the permitted obstructions referred to in Subsection 135(c) above) the height of the walls and projections above the court on at least three sides (or 75 percent of the perimeter, whichever is greater) is such that no point on any such wall or projection is higher than one foot for each foot that such point is horizontally distant from the opposite side of the clear space in the court. Exceptions from these requirements for certain qualifying historic buildings may be permitted, subject to the requirements and procedures of Section 307(h) of this Code.



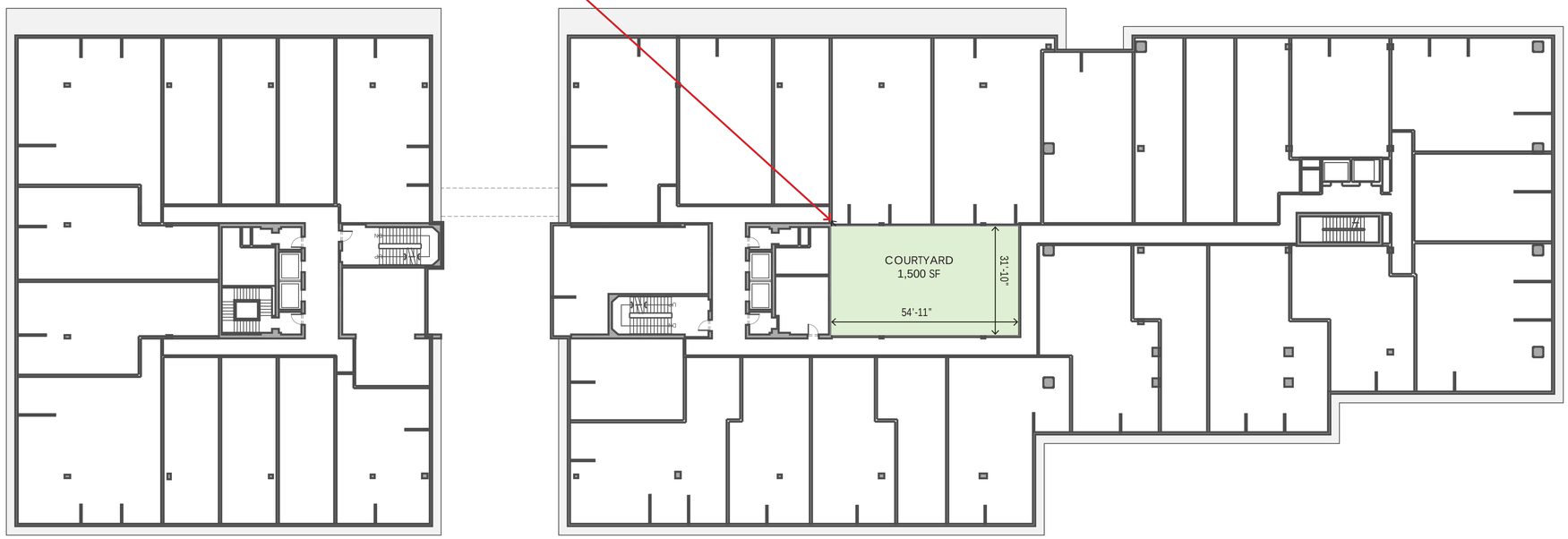

THIS COURTYARD DOES NOT COUNT TOWARDS COMMON OPEN SPACE PER SF PLANNING CODE SECTION 135(G)2



NORTH-SOUTH SECTION DOES NOT COMPLY WITHTHE 45-DEGREE RULE

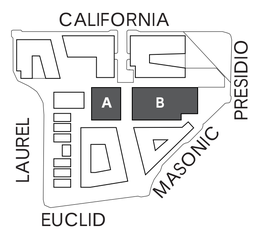


EAST-WEST SECTION COMPLIES WITHTHE 45-DEGREE RULE




CENTER A

CENTER B




**CENTER A**
**L3 SUMMARY**
COMMON: NONE
PRIVATE: NONE

**CENTER B**
**L3 SUMMARY**
COMMON: 0 SF
PRIVATE: NONE

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B - BUILDING OPEN SPACE - LEVEL L3 PLANS - elev. 302'-0"

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

N

**A6.42**

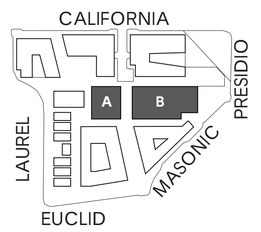



750 SF (15' X 50')
COMMON OPEN SPACE

EACH PRIVATE OPEN SPACE IS 100 SF
(8'-4" X 12' MINIMUM)

CENTER A

CENTER B




**CENTER A**
**L5 SUMMARY**
COMMON: NONE
PRIVATE: NONE

**CENTER B**
**L5 SUMMARY**
COMMON: 750 SF
PRIVATE: 1 UNITS * 100 SF = 100 SF

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

CENTER A & B - BUILDING OPEN SPACE - LEVEL L4 PLANS - elev. 315'-10"

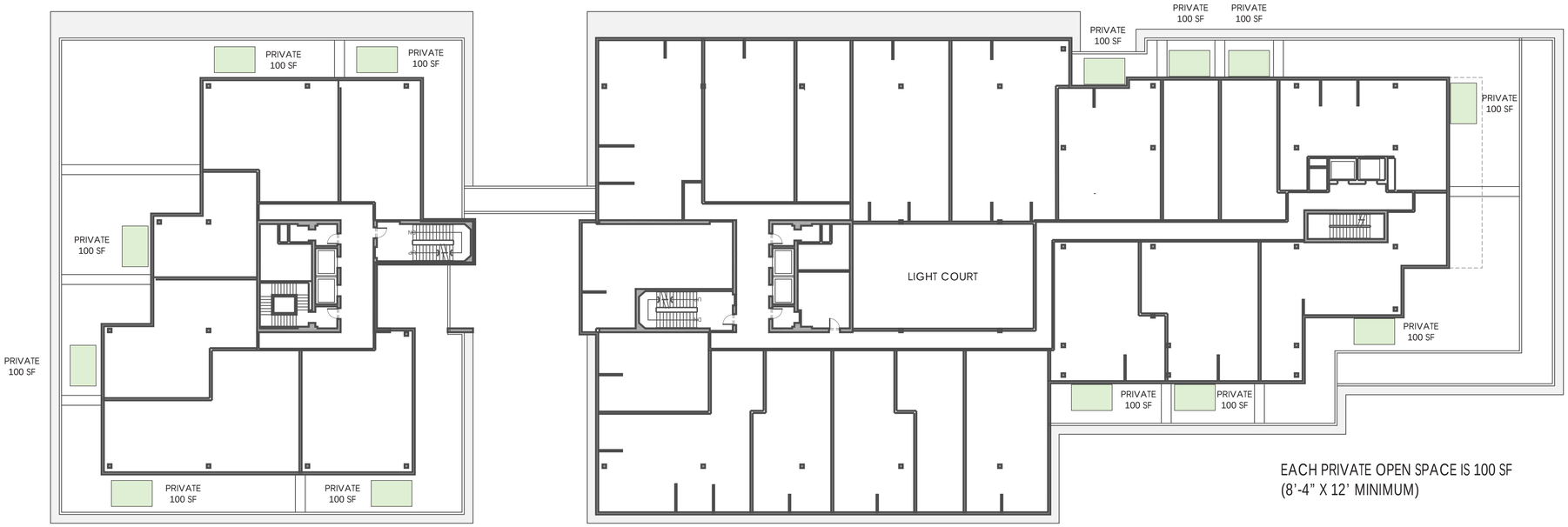
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

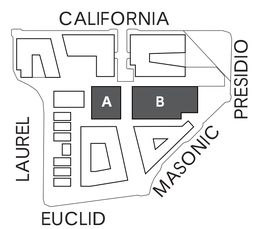
N

**A6.43**




CENTER A

CENTER B




**CENTER A**
**L5 SUMMARY**
COMMON: NONE
PRIVATE: 6 UNITS * 100 SF = 600 SF

**CENTER B**
**L5 SUMMARY**
COMMON: NONE
PRIVATE: 7 UNITS * 100 SF = 700 SF

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B - BUILDING OPEN SPACE - LEVEL L5 PLANS - elev. 329'-0"

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

0 10' 20' 40' 60'

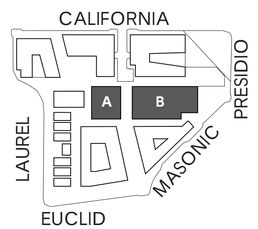
N

**A6.44**




CENTER A

CENTER B




**CENTER A**
**L6 SUMMARY**
COMMON: NONE
PRIVATE: NONE

**CENTER B**
**L6 SUMMARY**
COMMON: NONE
PRIVATE: 12 UNITS * 100 SF = 1,200 SF

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## CENTER A & B - BUILDING OPEN SPACE - LEVEL L6 PLANS - elev. 340'-9"

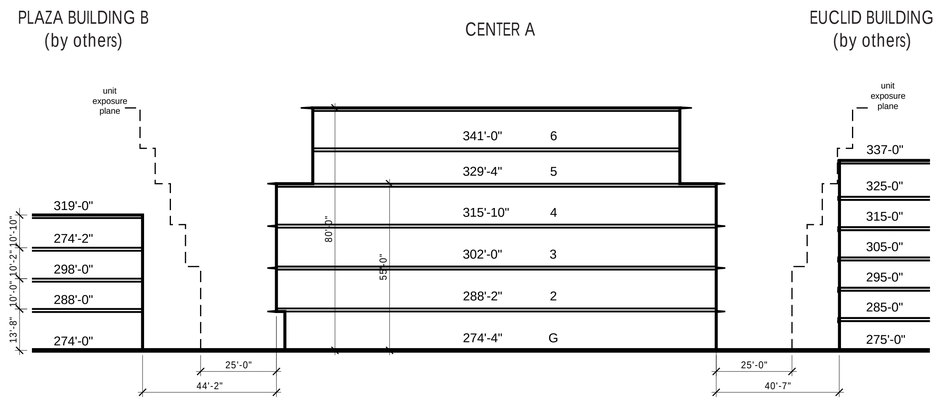
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

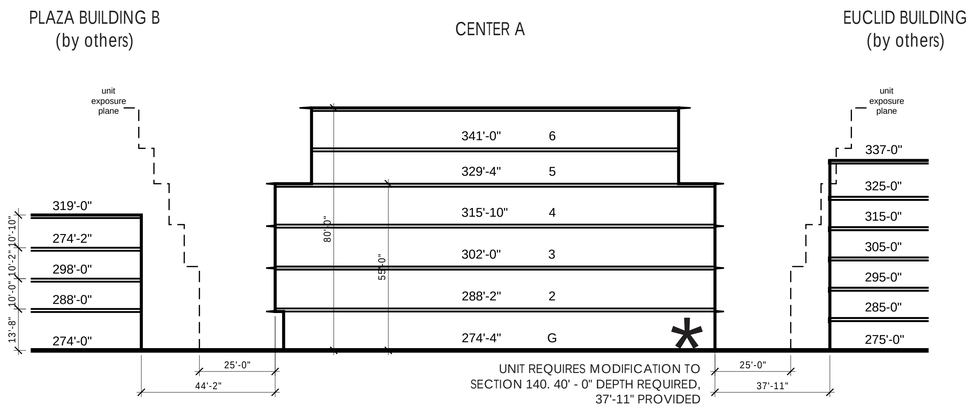
0 10' 20' 40' 60'

N

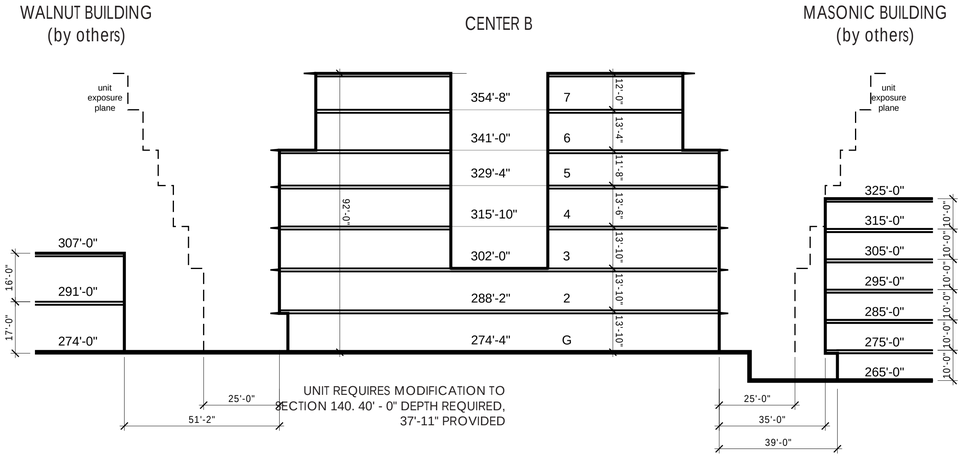
**A6.45**



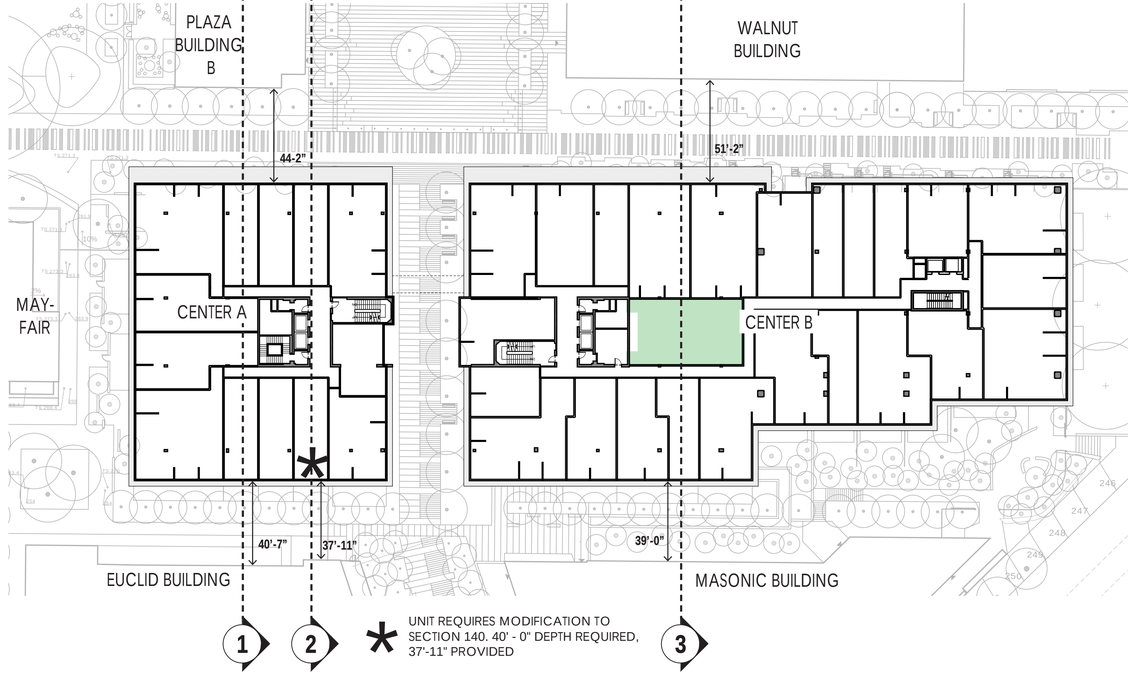

1. NORTH-SOUTH SECTION - CENTER A




2. NORTH-SOUTH SECTION - CENTER A




3. NORTH-SOUTH SECTION - CENTER B




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

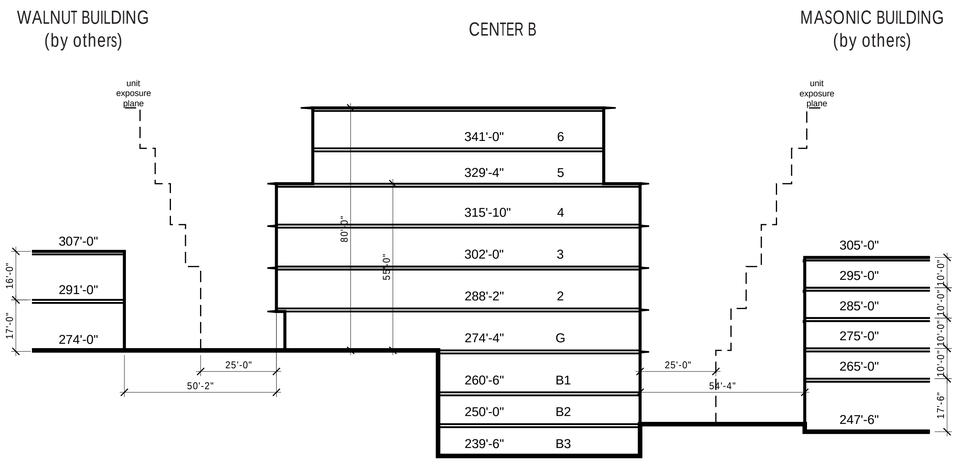
## CENTER A & B - UNIT EXPOSURE SECTIONS

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

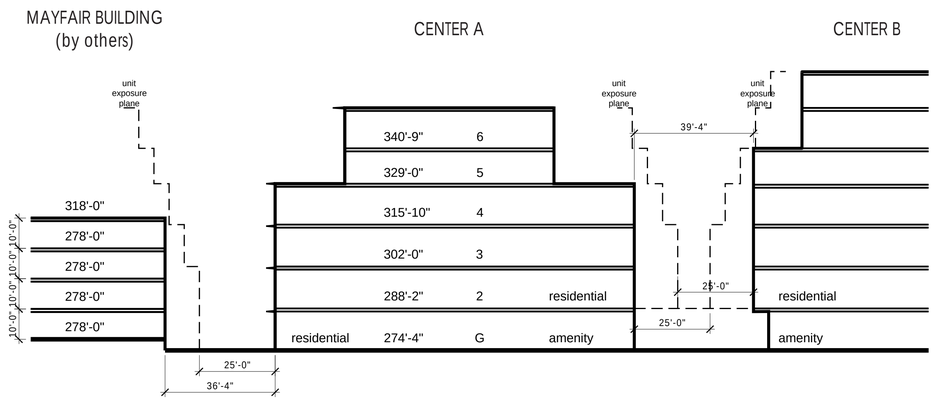
0 10' 20' 40' 60'

N

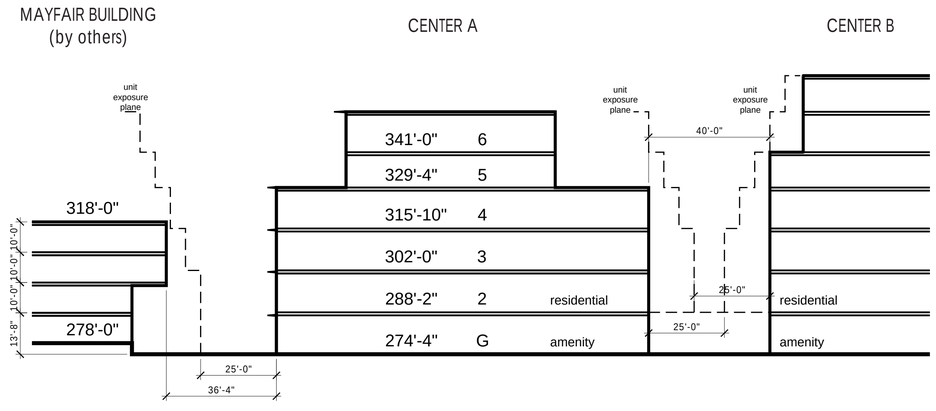
**A6.46**



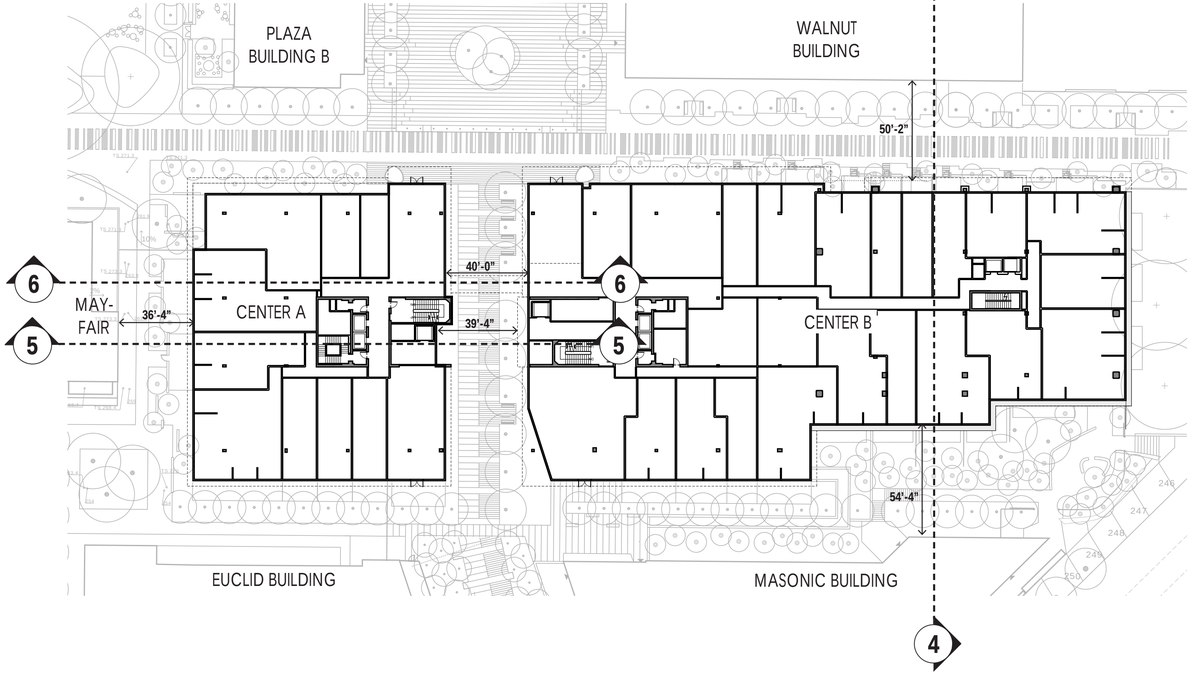

4. NORTH-SOUTH SECTION
CENTER A




5. EAST-WEST SECTION - CENTER A & B




6. EAST-WEST SECTION - CENTER A & B




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

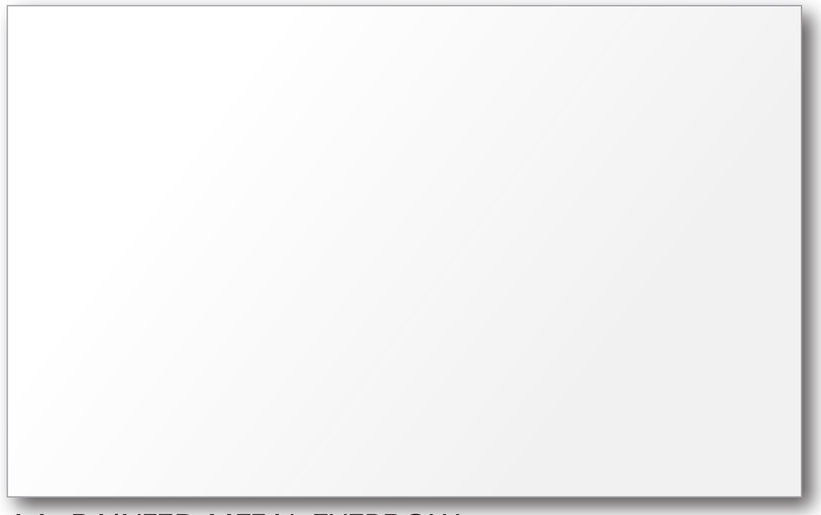
## CENTER A & B - UNIT EXPOSURE SECTIONS

7.3.2019
PLANNING APPLICATION SUBMITTAL (REVISED)

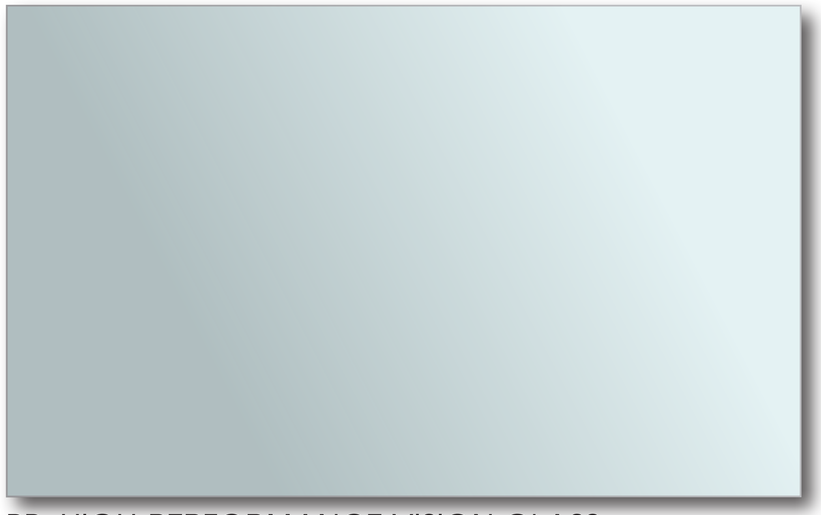
0 10' 20' 40' 60'

N

A6.47



AA. PAINTED METAL EYEBROW



BB. HIGH-PERFORMANCE VISION GLASS



CC. PAINTED METAL MULLIONS



DD. ACCENT PANEL



EE. ACCENT PANEL & UPPER SOFFIT



FF. SPANDREL GLASS



WALNUT COURT



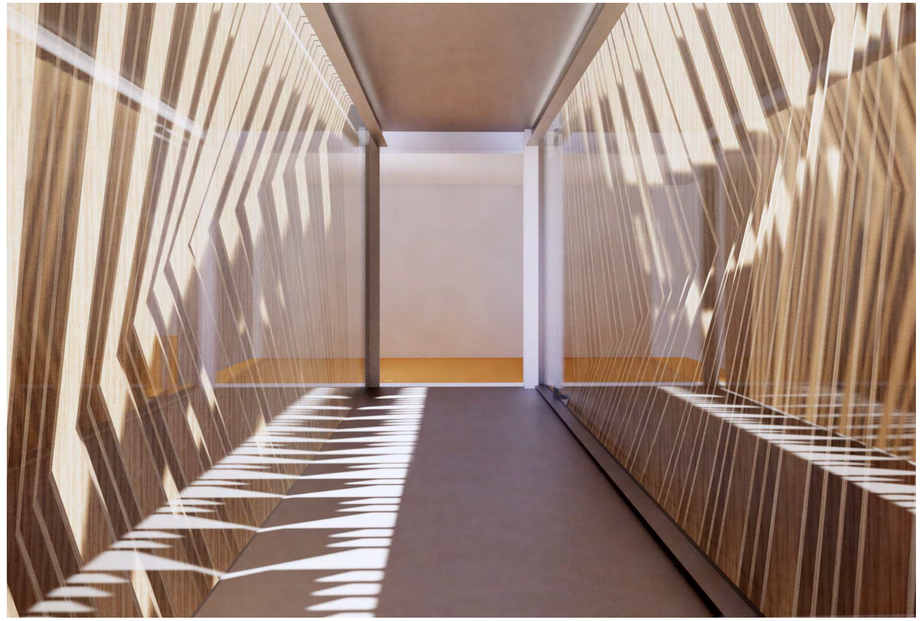
BRIDGE - EXTERIOR DETAIL



BRIDGE - EXTERIOR DETAIL



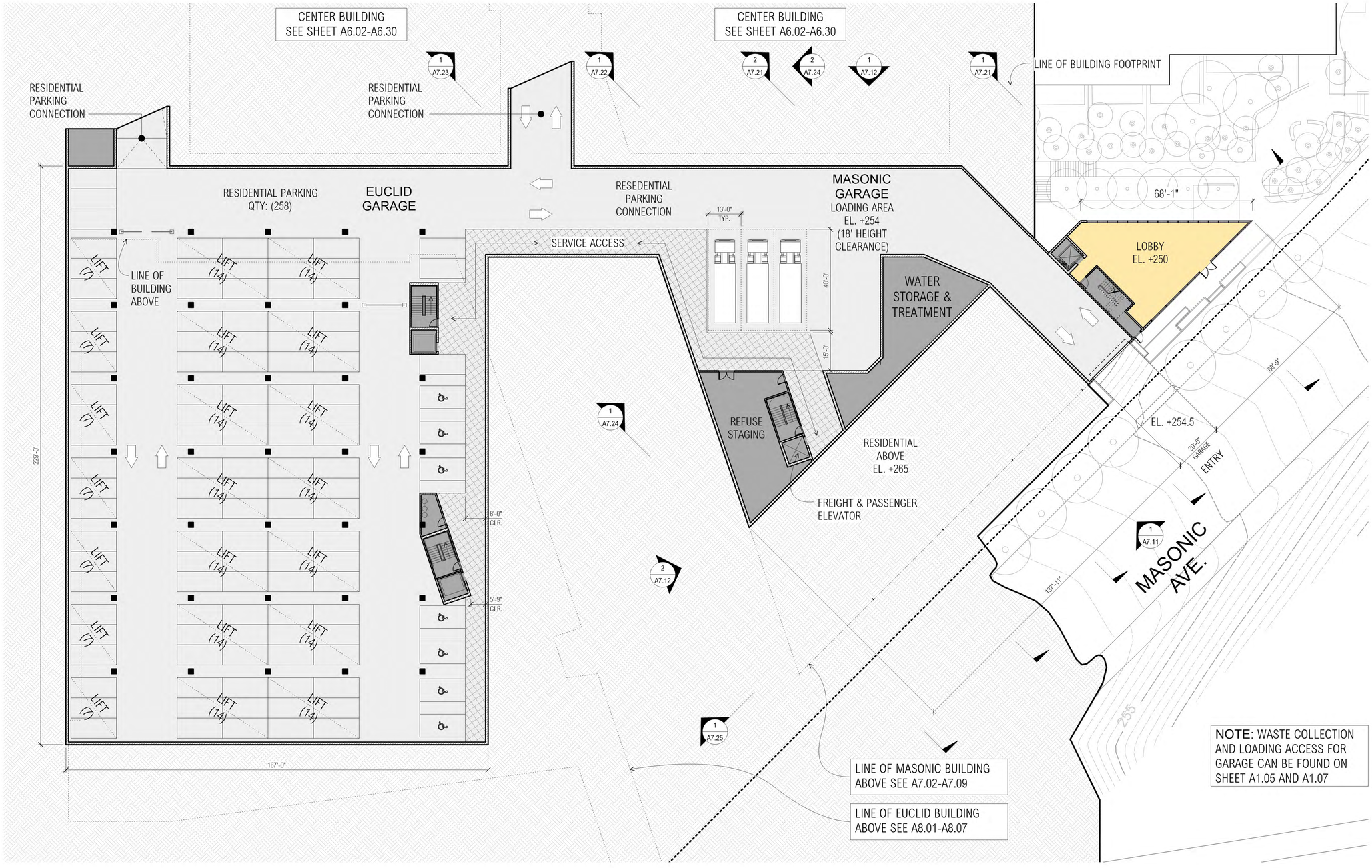
BRIDGE - EXTERIOR DETAIL



BRIDGE - INTERIOR VIEW



MAYFAIR WALK




PARKING

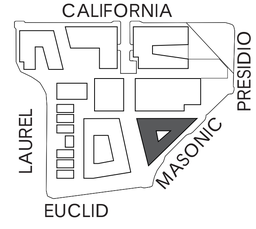
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**1 MASONIC BUILDING PLAN - B1 (EL +254)**
1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING PLAN - B1

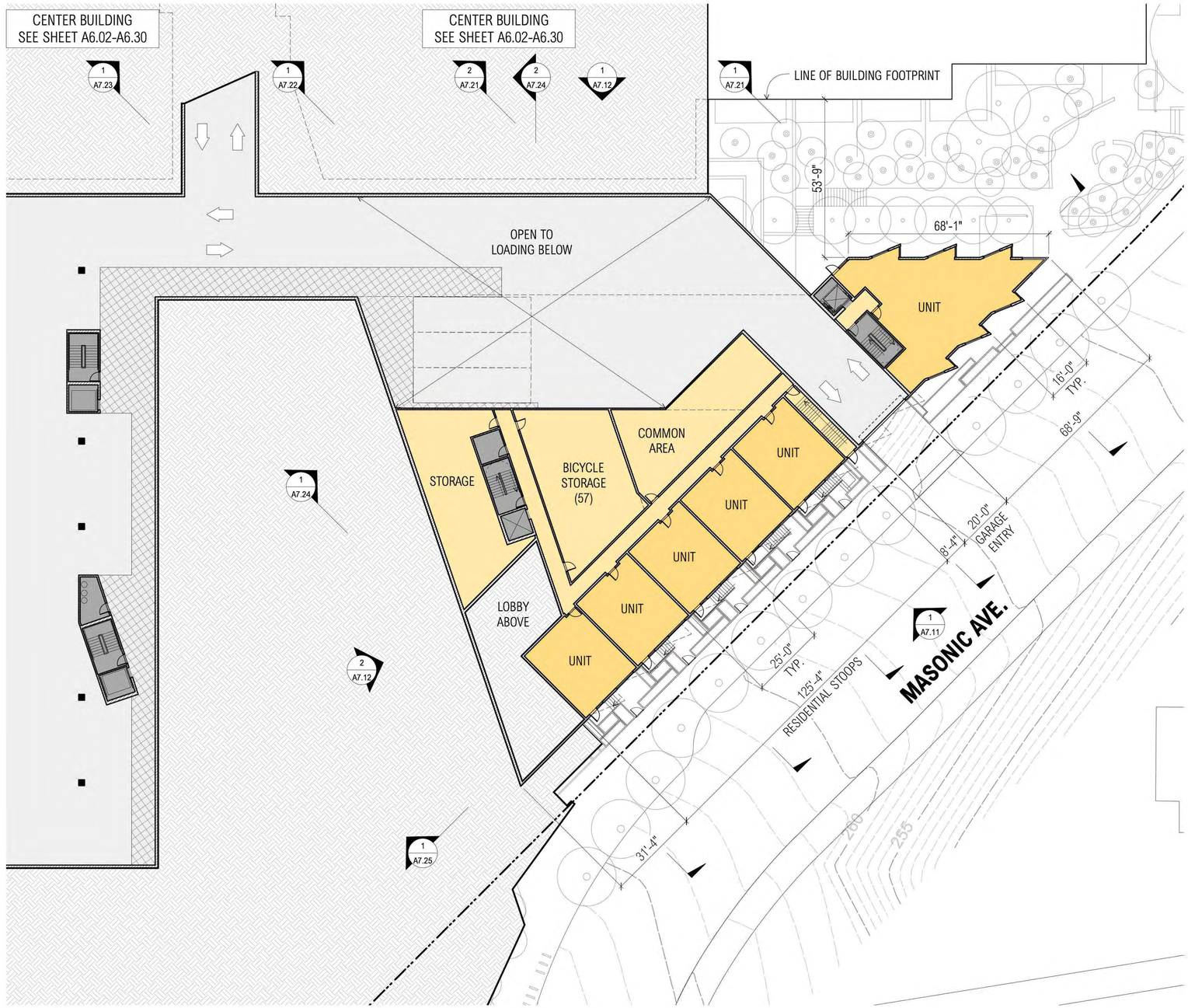
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A7.01**




PARKING

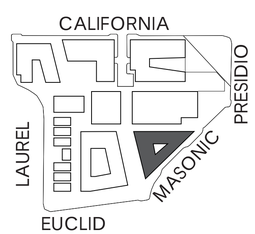
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**1 MASONIC BUILDING PLAN - LEVEL 1 (EL +265)**
1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING PLAN - LEVEL 1

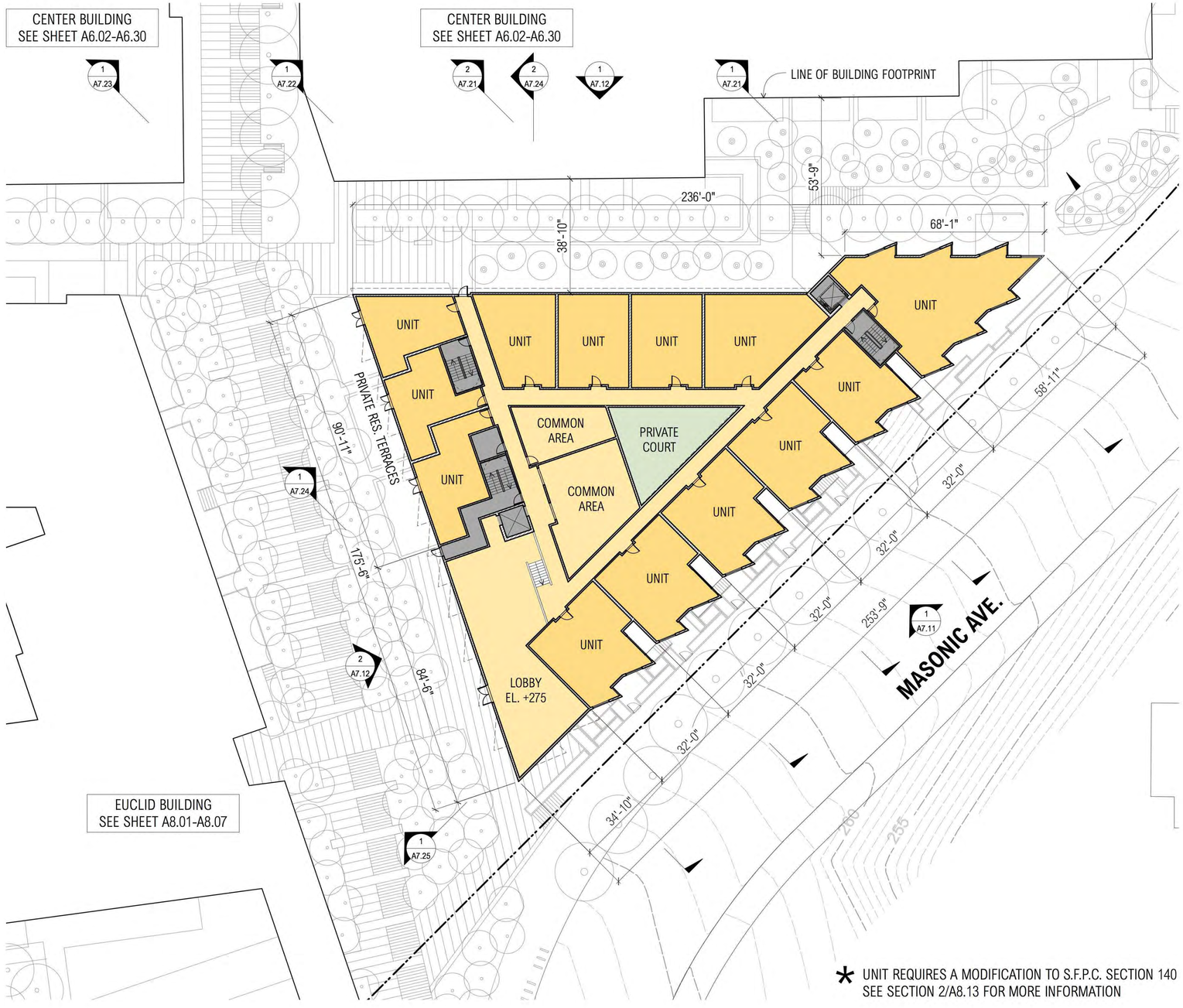
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A7.02**




* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A8.13 FOR MORE INFORMATION

PARKING

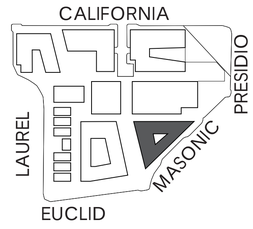
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**1 MASONIC BULIDING PLAN - LEVEL 2 (+275)**
1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING PLAN - LEVEL 2

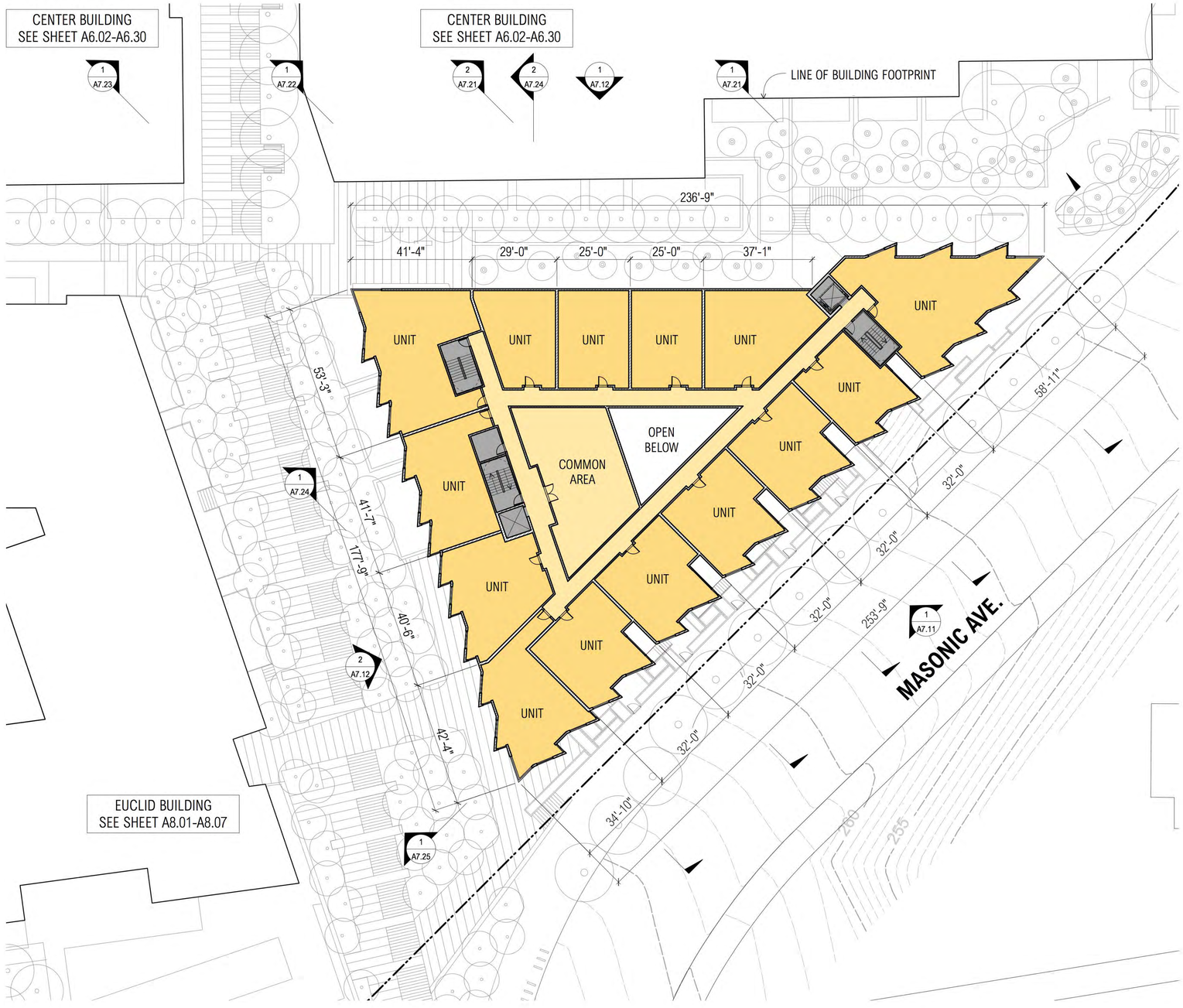
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

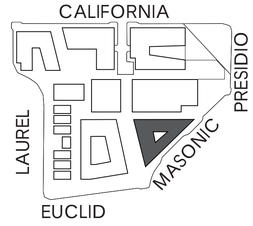
**A7.03**




**1 MASONIC BULIDING PLAN - LEVEL 3 (+285)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## MASONIC BUILDING PLAN - LEVEL 3

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A7.04**




## 1 MASONIC BULIDING PLAN - LEVEL 4 (+295)

1" = 20 ft

PARKING

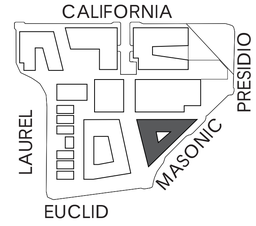
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING PLAN - LEVEL 4

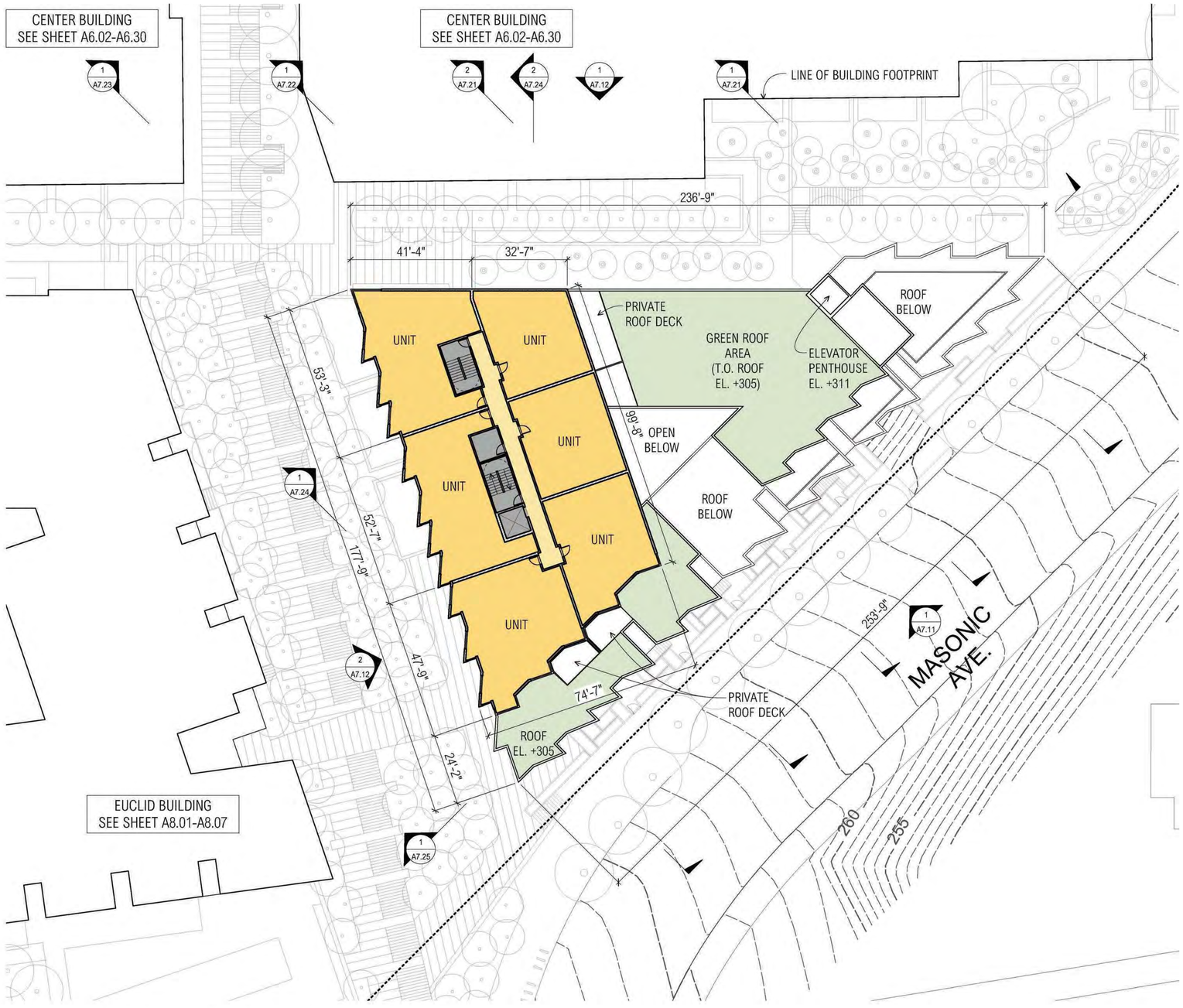
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

A7.05




PARKING

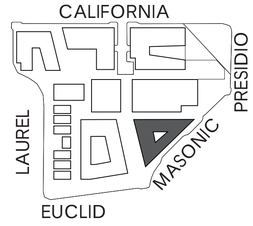
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**1 MASONIC BULIDING PLAN - LEVEL 5 (+305)**
1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING PLAN - LEVEL 5

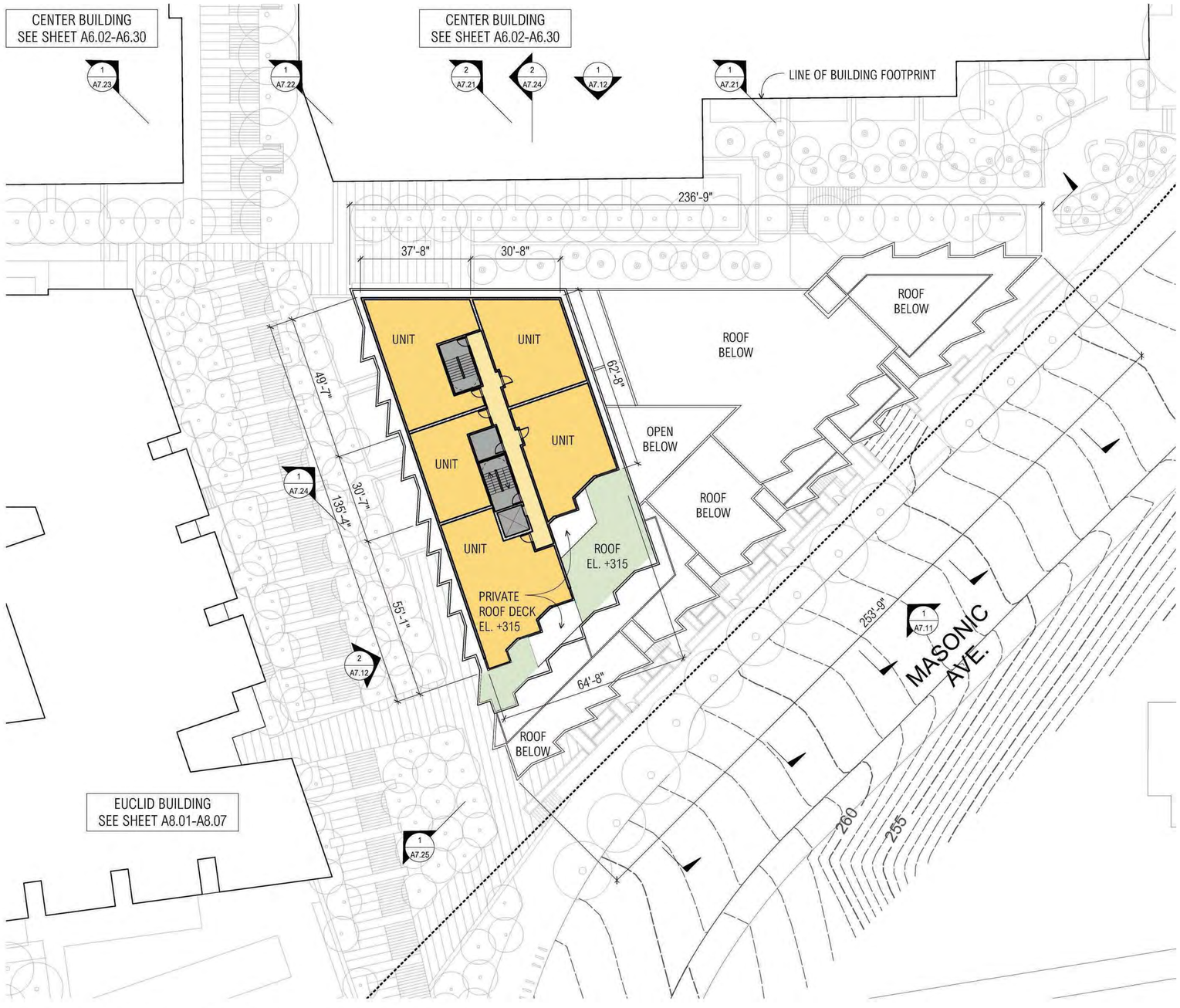
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A7.06**




PARKING

RETAIL USABLE

RETAIL B.O.H.

COMMERCIAL

COMMERCIAL, CORE

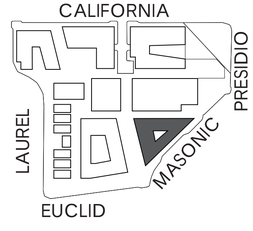
RESIDENTIAL HOMES

RESIDENTIAL CORE

LANDSCAPED ROOF

OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**1 MASONIC BULIDING PLAN - LEVEL 6 (+315)**
1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING PLAN - LEVEL 6

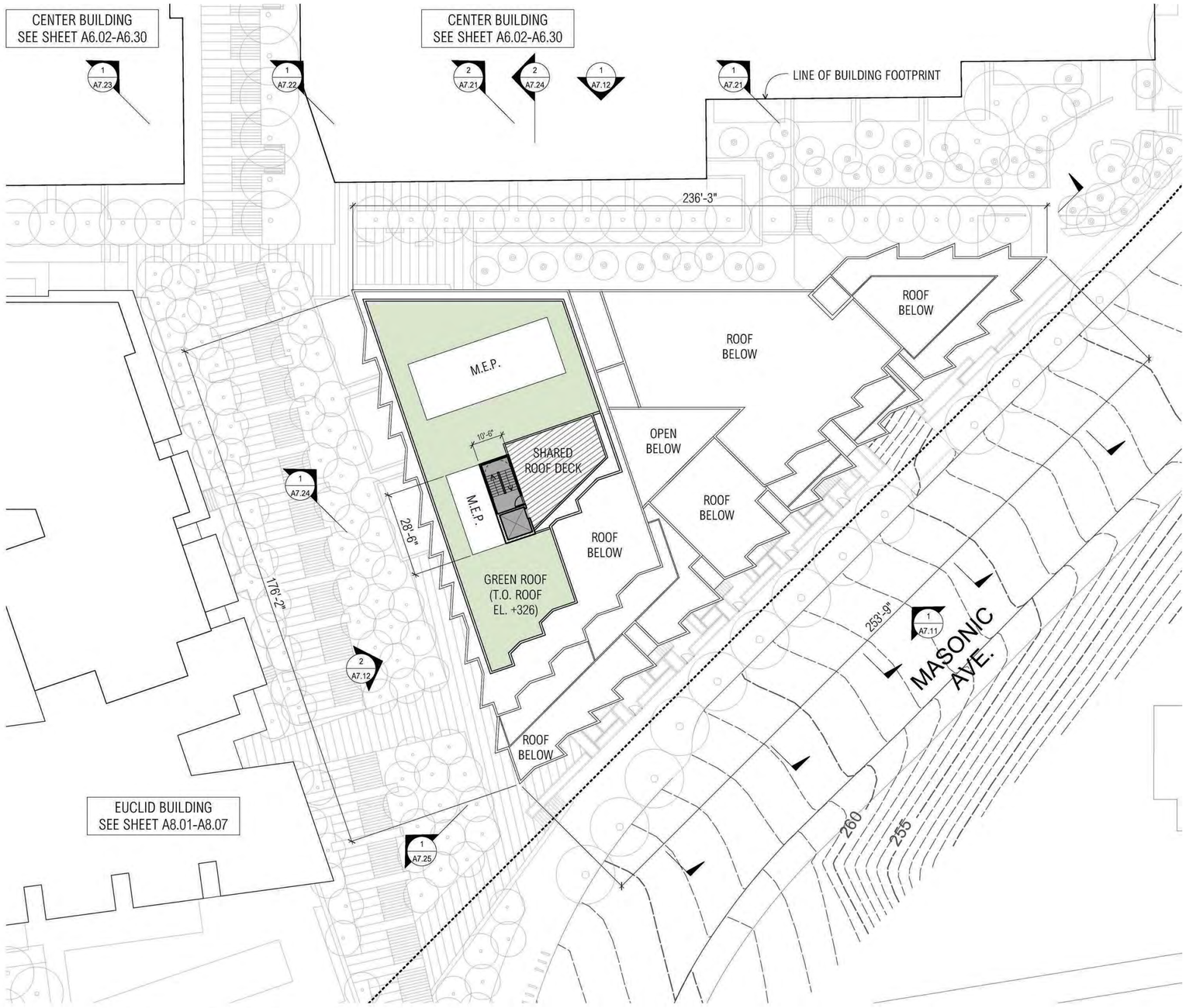
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

A7.07




1 **MASONIC BULIDING ROOF PLAN (+325)**
1" = 20 ft

PARKING

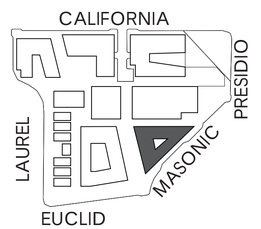
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

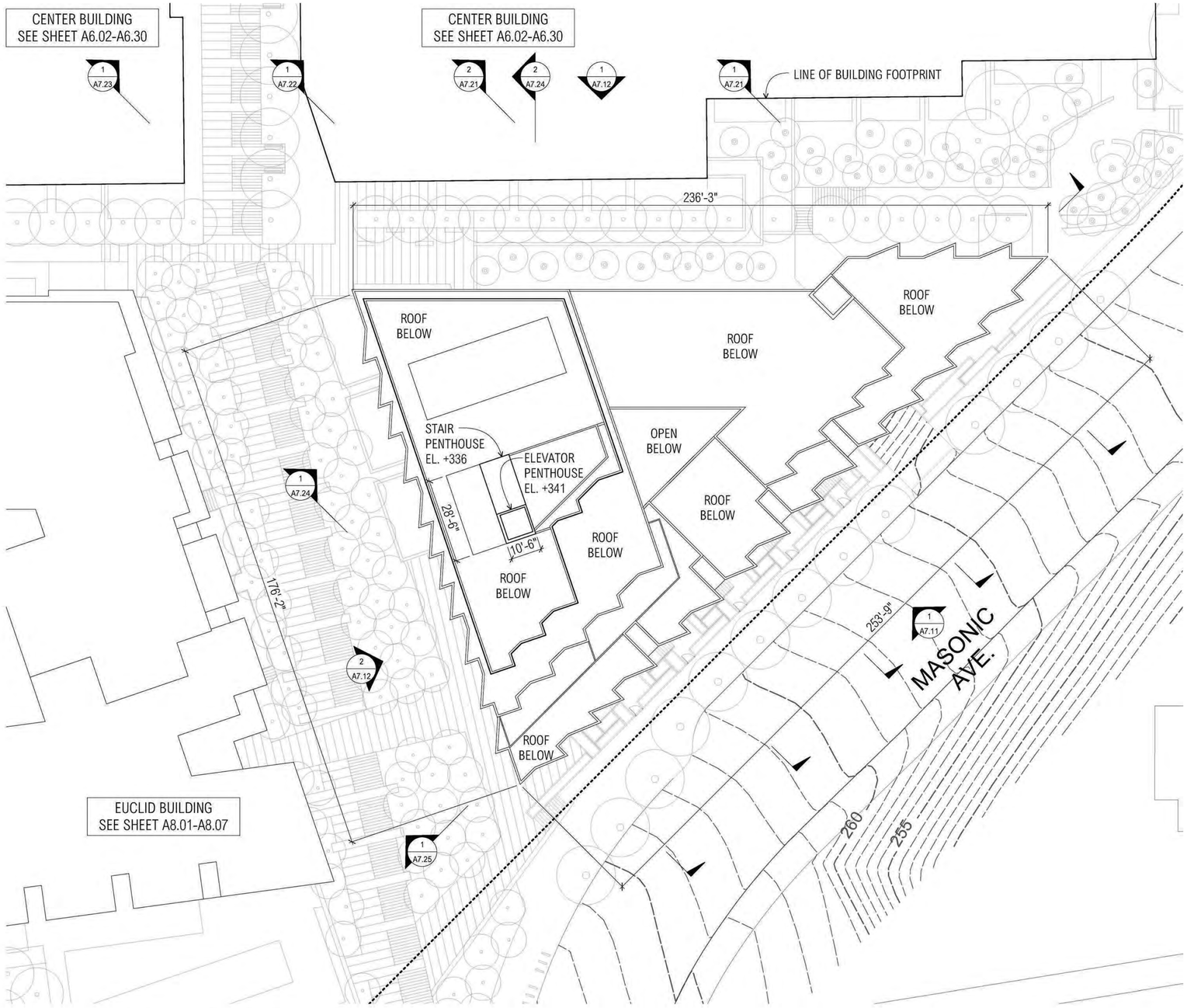
## MASONIC BUILDING ROOF PLAN

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A7.08**




## 1 MASONIC BULIDING ROOF PLAN (+341)

1" = 20 ft

PARKING

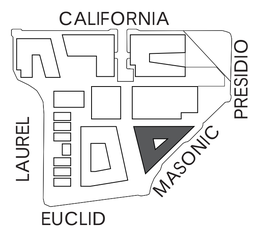
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MASONIC BUILDING ROOF PLAN

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

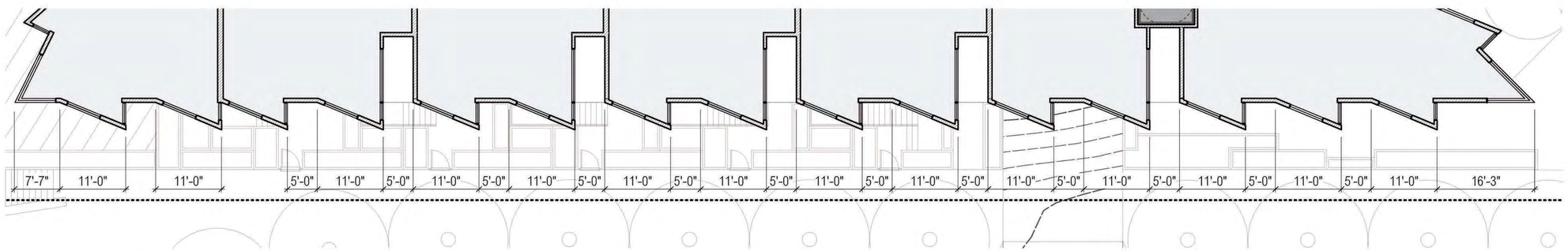
N

**A7.09**




## 2 SOUTH ELEVATION - MASONIC AVE.

1" = 10 ft




## 1 ILLUSTRATIVE PLAN @ LEVEL 3 (EL. +285)

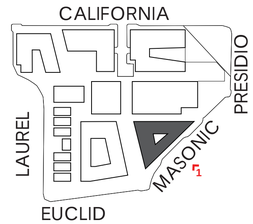
1" = 10 ft

### MATERIALS KEY

- A. CEMENT BOARD SIDING
- B. CEMENT PLASTER
- C. METAL PANEL
- D. ALUMINUM WINDOW
- E. ALUMINUM & GLASS STOREFRONT SYSTEM
- F. METAL GARAGE DOOR
- G. STEEL GUARDRAIL / SCREEN
- H. COMPOSITE WOOD PLANK SIDING
- I. GREEN WALL
- J. METAL FASCIA / SUNSHADE
- K. ARCHITECTURAL CONCRETE
- L. SLAT SCREEN / RAIL
- M. BOARD AND BATTEN SIDING
- N. WOOD SHINGLES
- O. WOOD SIDING
- P. BRICK

### SHEET NOTE

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MASONIC BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

A7.11




**2 WEST ELEVATION**
1" = 10 ft



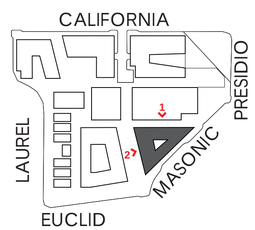

**1 NORTH ELEVATION**
1" = 10 ft

## MATERIALS KEY

- A. CEMENT BOARD SIDING
- B. CEMENT PLASTER
- C. METAL PANEL
- D. ALUMINUM WINDOW
- E. ALUMINUM & GLASS STOREFRONT SYSTEM
- F. METAL GARAGE DOOR
- G. STEEL GUARDRAIL / SCREEN
- H. COMPOSITE WOOD PLANK SIDING
- I. GREEN WALL
- J. METAL FASCIA / SUNSHADE
- K. ARCHITECTURAL CONCRETE
- L. SLAT SCREEN / RAIL
- M. BOARD AND BATTEN SIDING
- N. WOOD SHINGLES
- O. WOOD SIDING
- P. BRICK

## SHEET NOTE

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

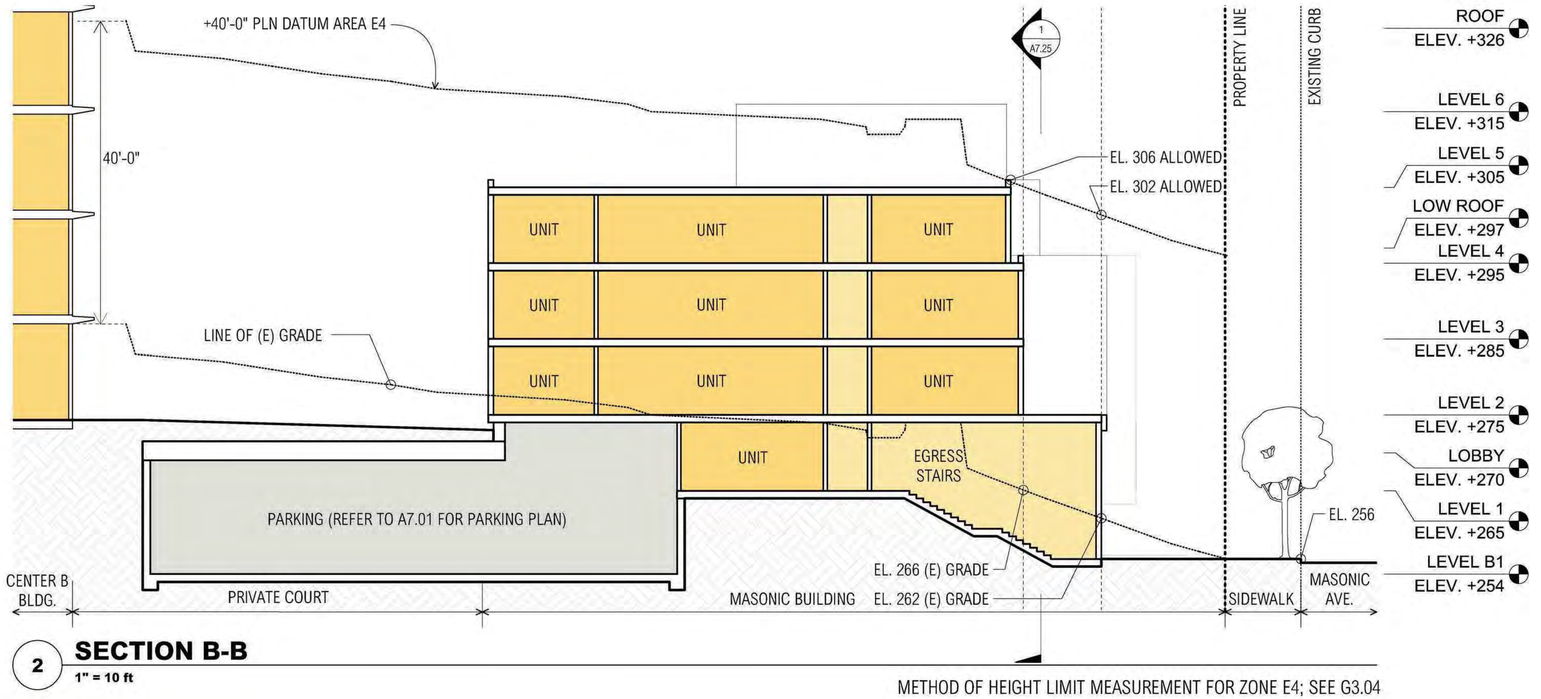
MASONIC BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

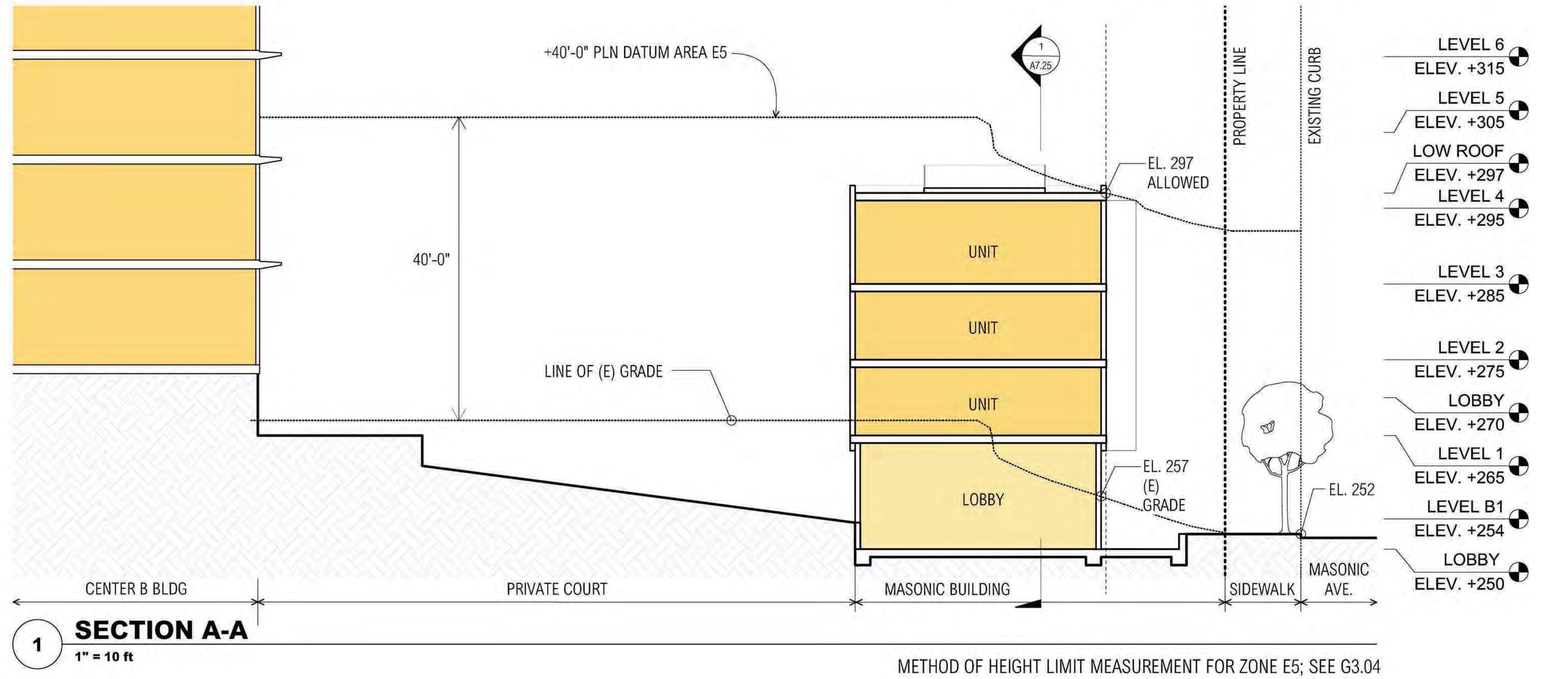
N

**A7.12**



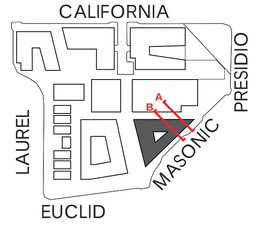

**2 SECTION B-B**
1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE E4; SEE G3.04




**1 SECTION A-A**
1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE E5; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## MASONIC BUILDING SECTIONS

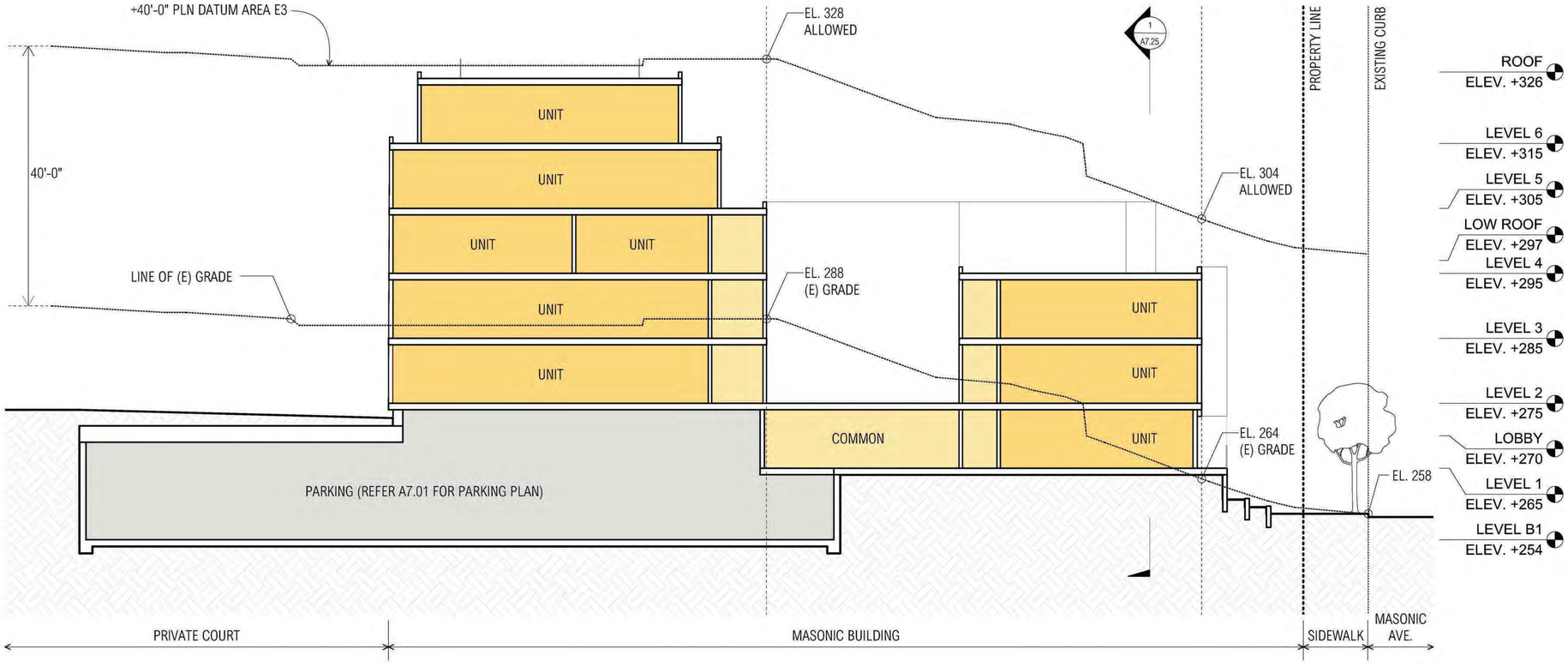
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

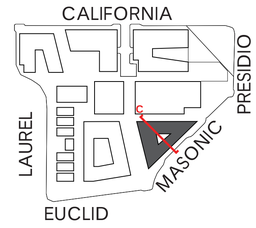
N

**A7.21**




1 **SECTION C-C**
1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE E3; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

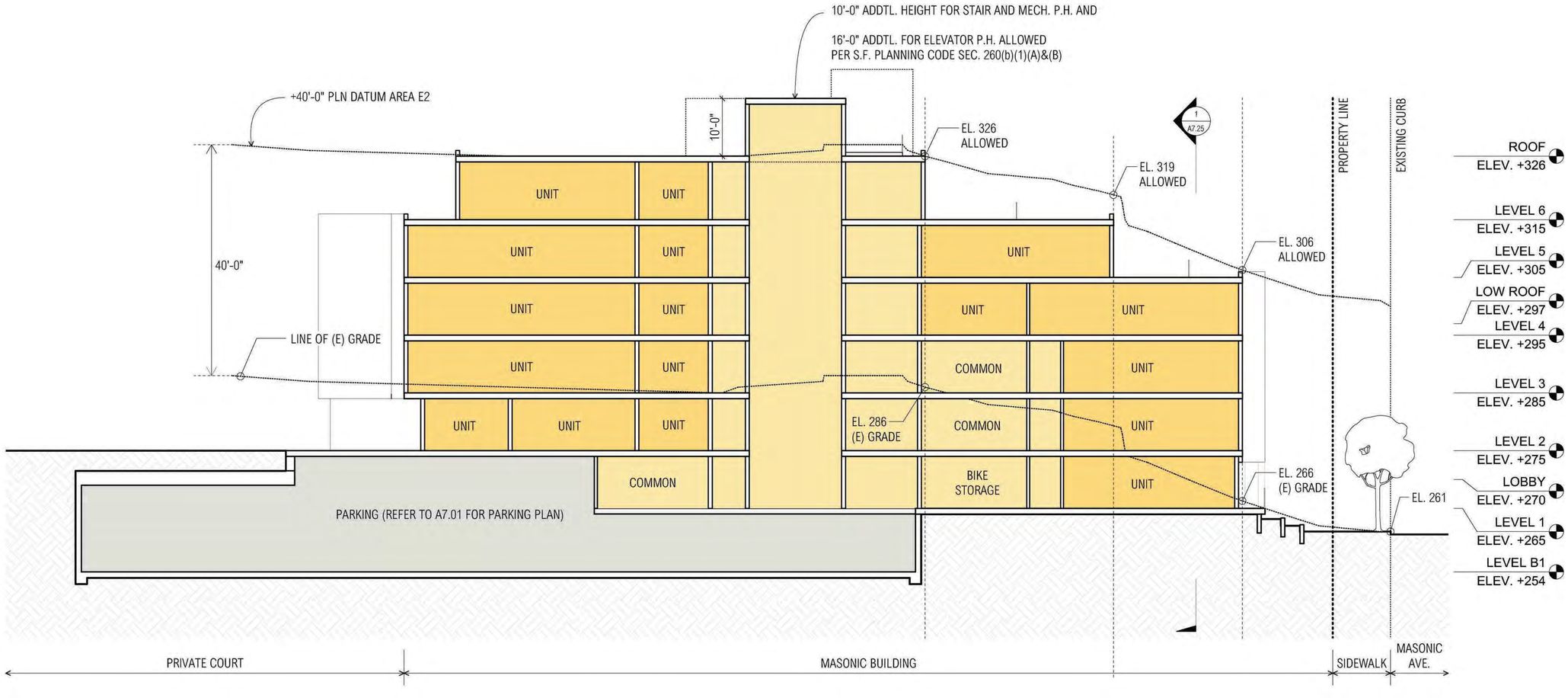
## MASONIC BUILDING SECTIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

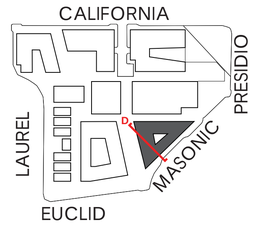
N

**A7.22**




1 **SECTION D-D**
1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE E2; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

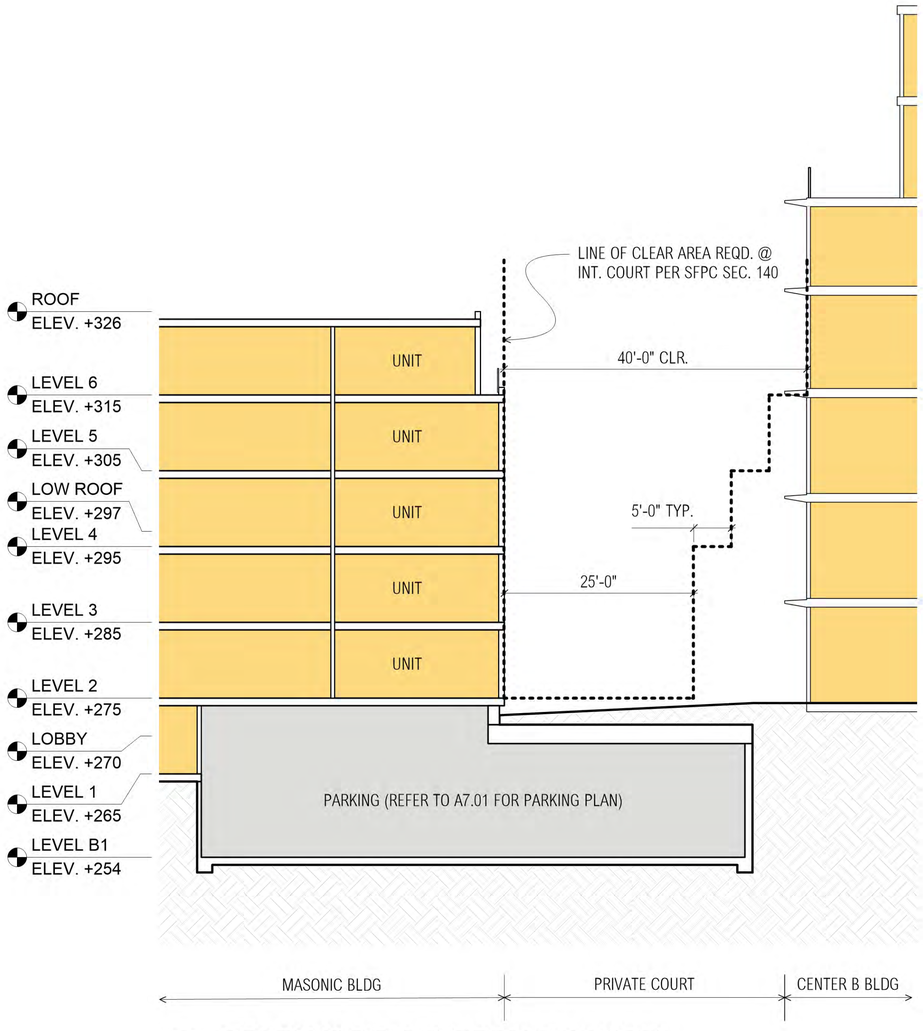
## MASONIC BUILDING SECTIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

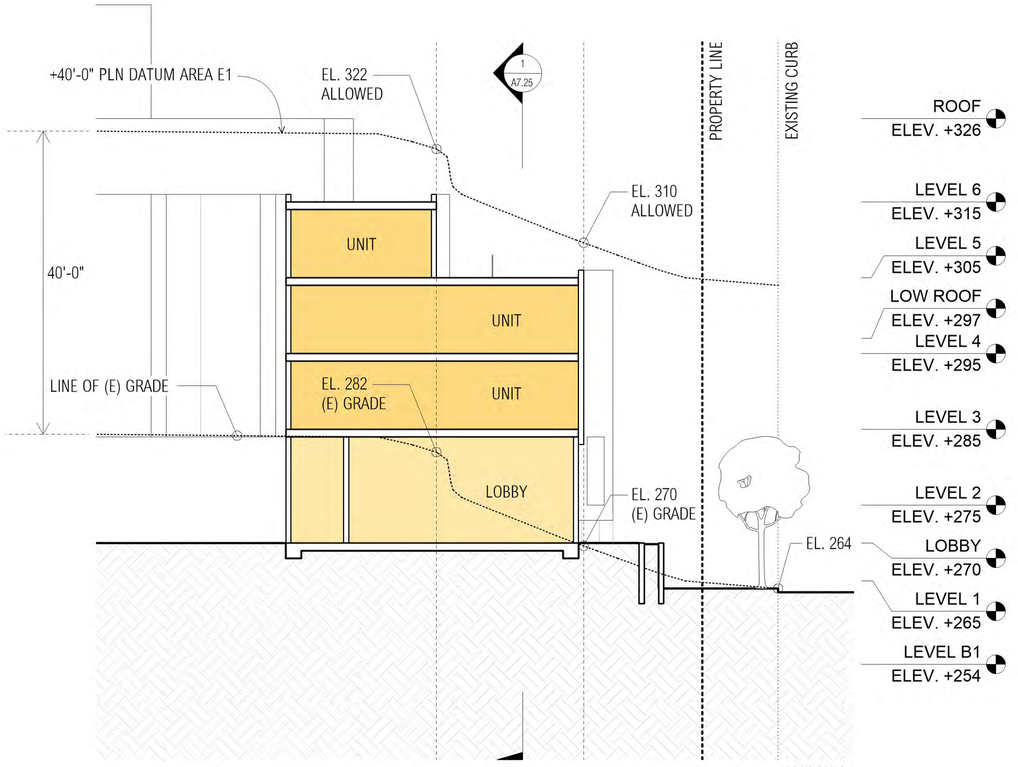
0 5' 10' 20' 30'

N

**A7.23**

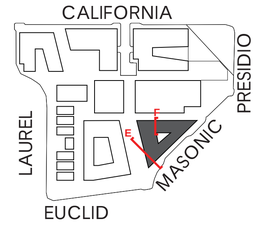



**2 SECTION F-F @ INTERIOR COURT**
1" = 10 ft




**1 SECTION E-E**
1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE E1; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

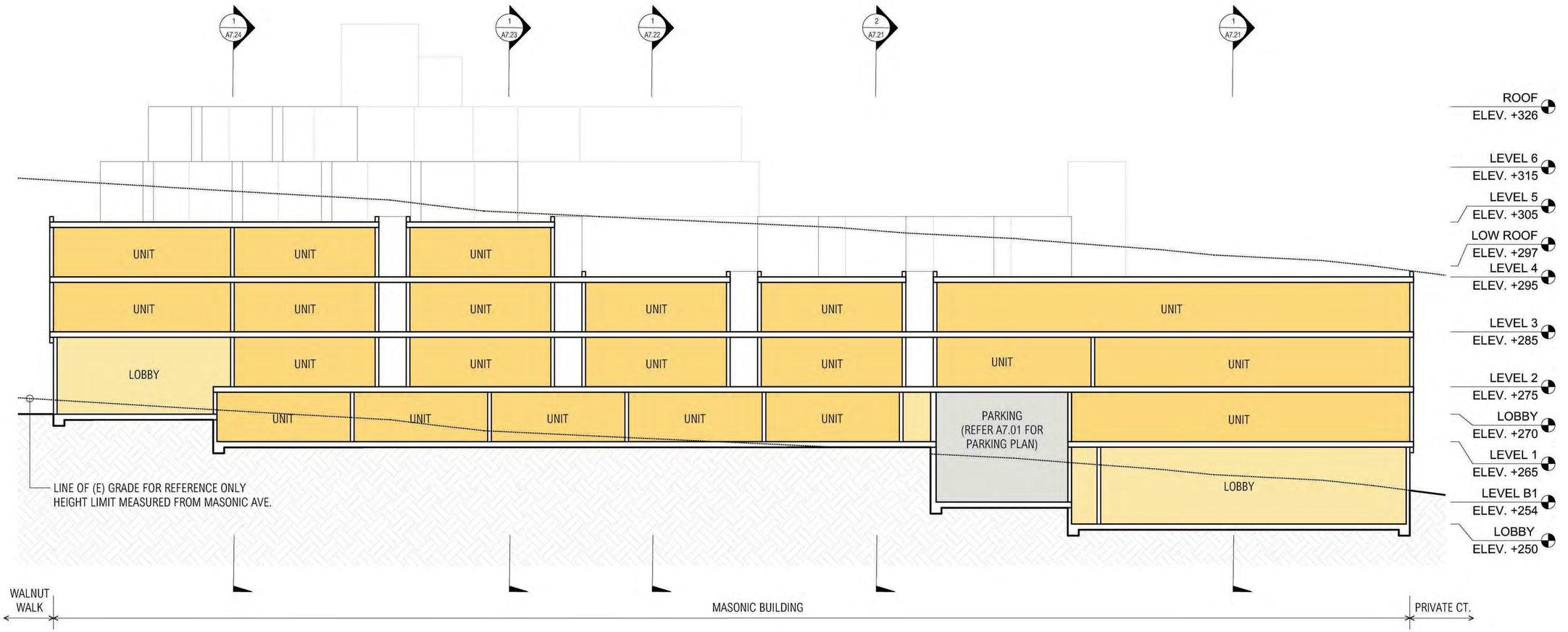
## MASONIC BUILDING SECTIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

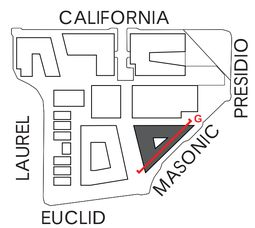
N

**A7.24**




## 1 SECTION G-G

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MASONIC BUILDING SECTIONS

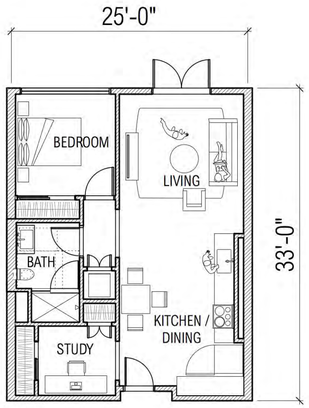
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

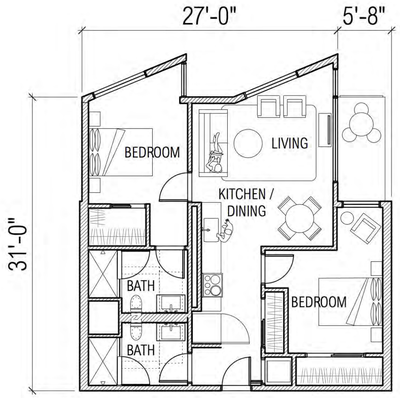
0 5' 10' 20' 30'

N

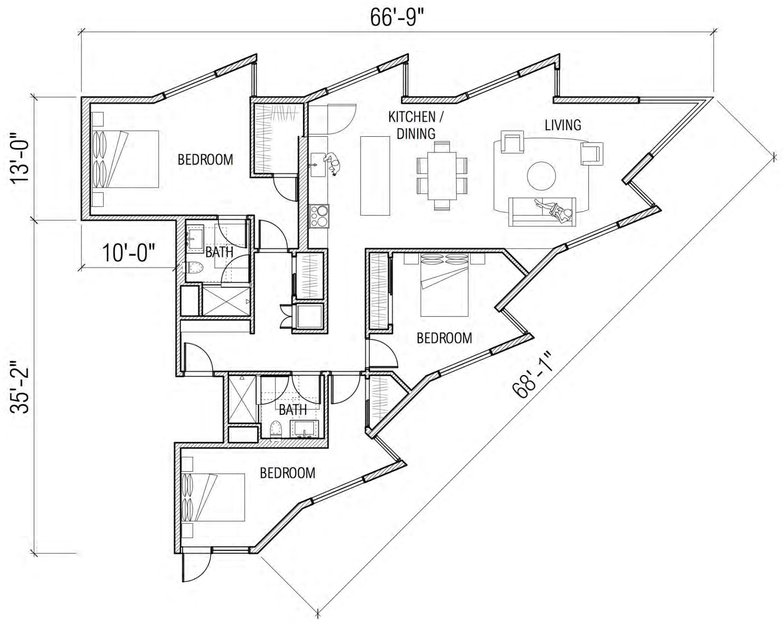
**A7.25**




1-BEDROOM

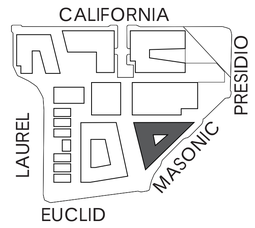



2-BEDROOM




3-BEDROOM

NOTE: UNITS ARE SHOWN FOR SCALE & REFERENCE ONLY. ADDITIONAL UNIT TYPES NOT SHOWN.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

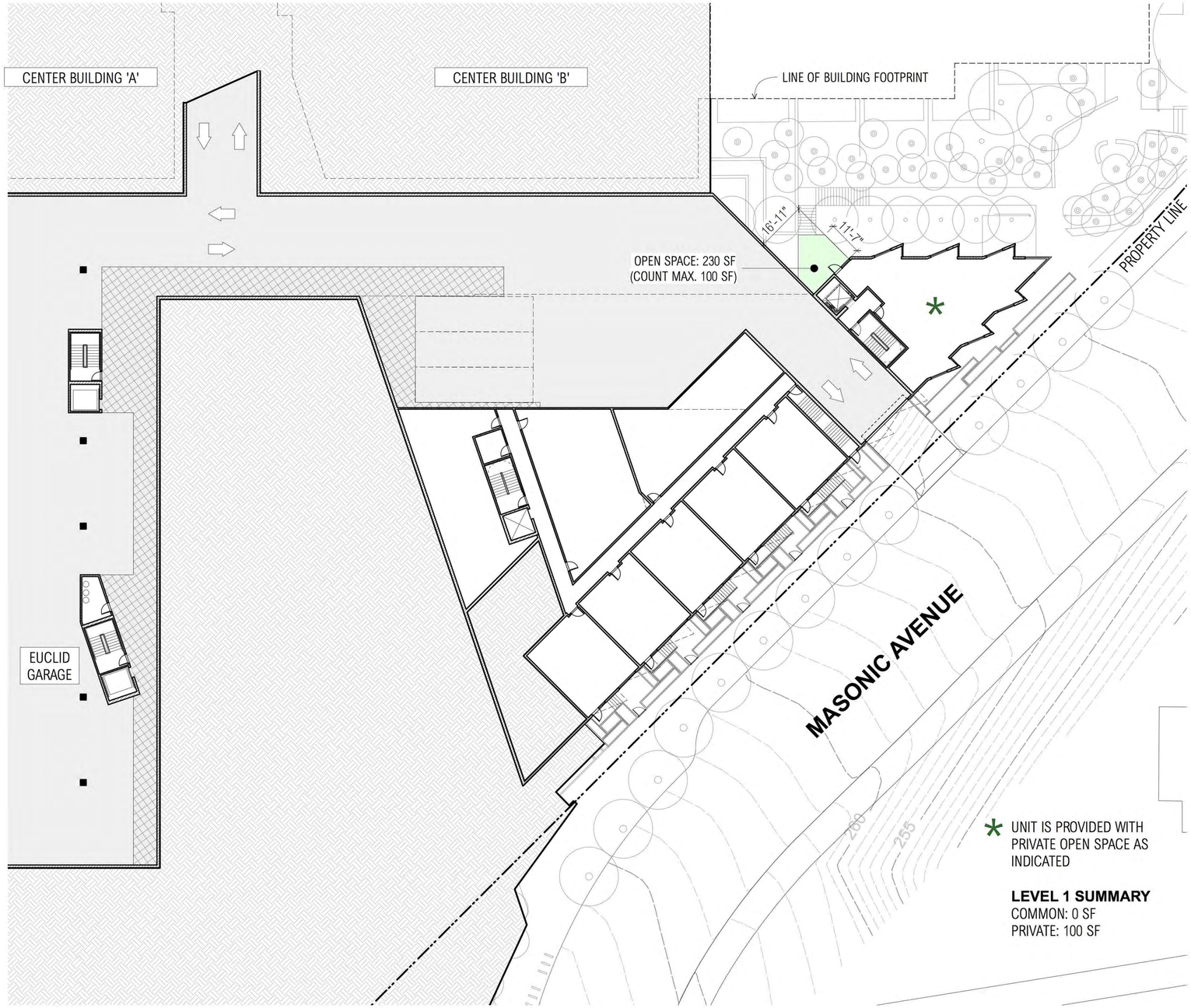
# MASONIC TYPICAL UNIT PLANS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 4' 8' 16' 24'

N

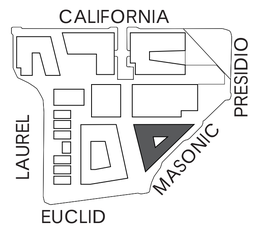
**A7.30**




1 **MASONIC BUILDING OPEN SPACE - LEVEL 1 (+265)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## MASONIC BUILDING OPEN SPACE - LEVEL 1

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

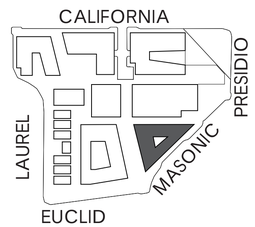
**A7.41**




1 **MASONIC BUILDING OPEN SPACE - LEVEL 2 (+275)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## MASONIC BUILDING OPEN SPACE - LEVEL 2

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

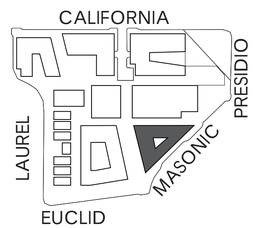
**A7.42**




1 **MASONIC BUILDING OPEN SPACE - LEVEL 4 (+295)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## MASONIC BUILDING OPEN SPACE - LEVEL 4

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

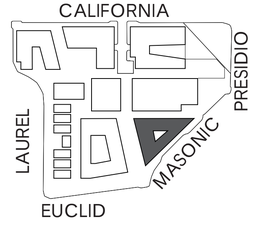
**A7.43**




1 **MASONIC BUILDING OPEN SPACE - LEVEL 5 (+305)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## MASONIC BUILDING OPEN SPACE - LEVEL 5

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

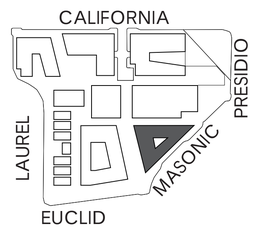
**A7.44**




1 **MASONIC BUILDING OPEN SPACE - LEVEL 6 (+315)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## MASONIC BUILDING OPEN SPACE - LEVEL 6

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

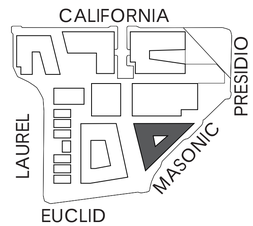
**A7.45**




1 **MASONIC BUILDING OPEN SPACE - ROOF LEVEL (+325)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

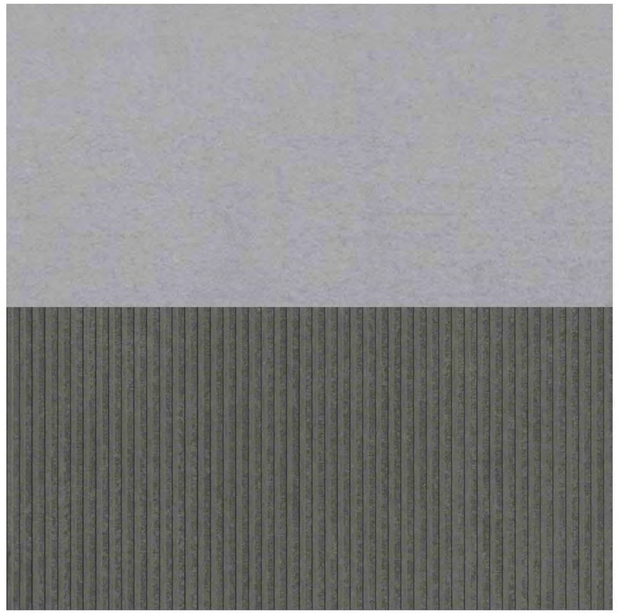
## MASONIC BUILDING OPEN SPACE - ROOF

07.03.2019
PLANNING APPLICATION SUBMITTAL

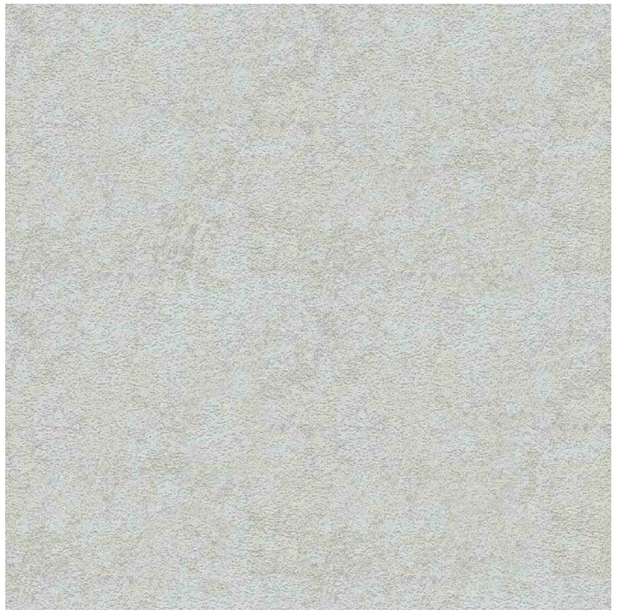
0 10' 20' 40' 60'

N

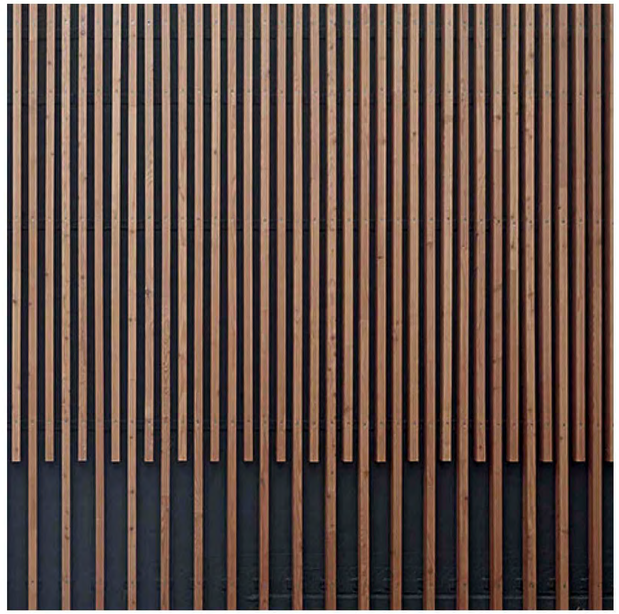
**A7.46**



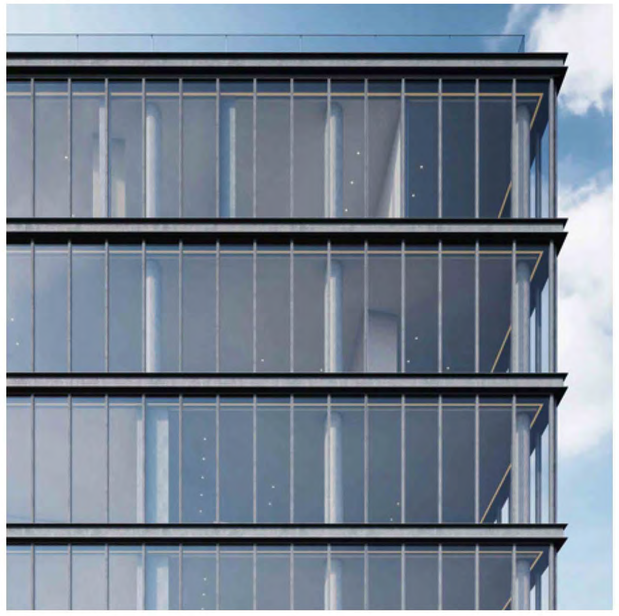
A CEMENT BOARD



B CEMENT PLASTER



L SLAT SCREEN



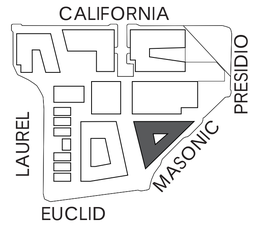
D E ALUMINUM STOREFRONT WINDOW SYSTEM



G STEEL GUARDRAIL



K ARCHITECTURAL CONCRETE PLANTERS




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MASONIC MATERIAL PALETTE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A7.50**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MASONIC BULDING PERSPECTIVE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A7.60**




PARKING

RETAIL USABLE

RETAIL B.O.H.

COMMERCIAL

COMMERCIAL, CORE

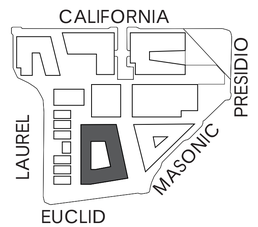
RESIDENTIAL HOMES

RESIDENTIAL CORE

LANDSCAPED ROOF

OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A8.13 FOR MORE INFORMATION

1 **EUCLID BUILDING PLAN - LEVEL 1 (EL. +275)**
1" = 20 ft

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

EUCLID BUILDING PLAN - LEVEL 1

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.01**




PARKING

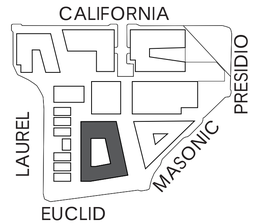
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A8.13 FOR MORE INFORMATION

1 **EUCLID BUILDING PLAN - LEVEL 2 (EL. +285)**
1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

EUCLID BUILDING PLAN - LEVEL 2

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.02**




PARKING

RETAIL USABLE

RETAIL B.O.H.

COMMERCIAL

COMMERCIAL, CORE

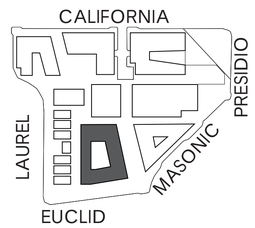
RESIDENTIAL HOMES

RESIDENTIAL CORE

LANDSCAPED ROOF

OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## 1 EUCLID BUILDING PLAN - LEVEL 3 (EL. +295)

1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING PLAN - LEVEL 3

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

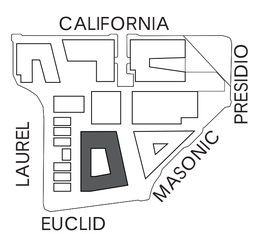
A8.03




1 **EUCLID BUILDING PLAN - LEVEL 4 (EL. +305)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

EUCLID BUILDING PLAN - LEVEL 4

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.04**




PARKING

RETAIL USABLE

RETAIL B.O.H.

COMMERCIAL

COMMERCIAL, CORE

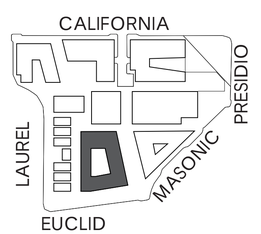
RESIDENTIAL HOMES

RESIDENTIAL CORE

LANDSCAPED ROOF

OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## 1 EUCLID BUILDING PLAN - LEVEL 5 (EL. +315)

1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING PLAN - LEVEL 5

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

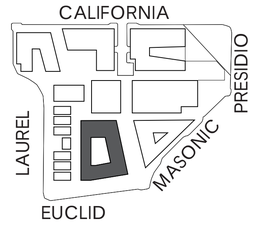
A8.05




1 **EUCLID BUILDING PLAN - LEVEL 6 (EL. +325)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

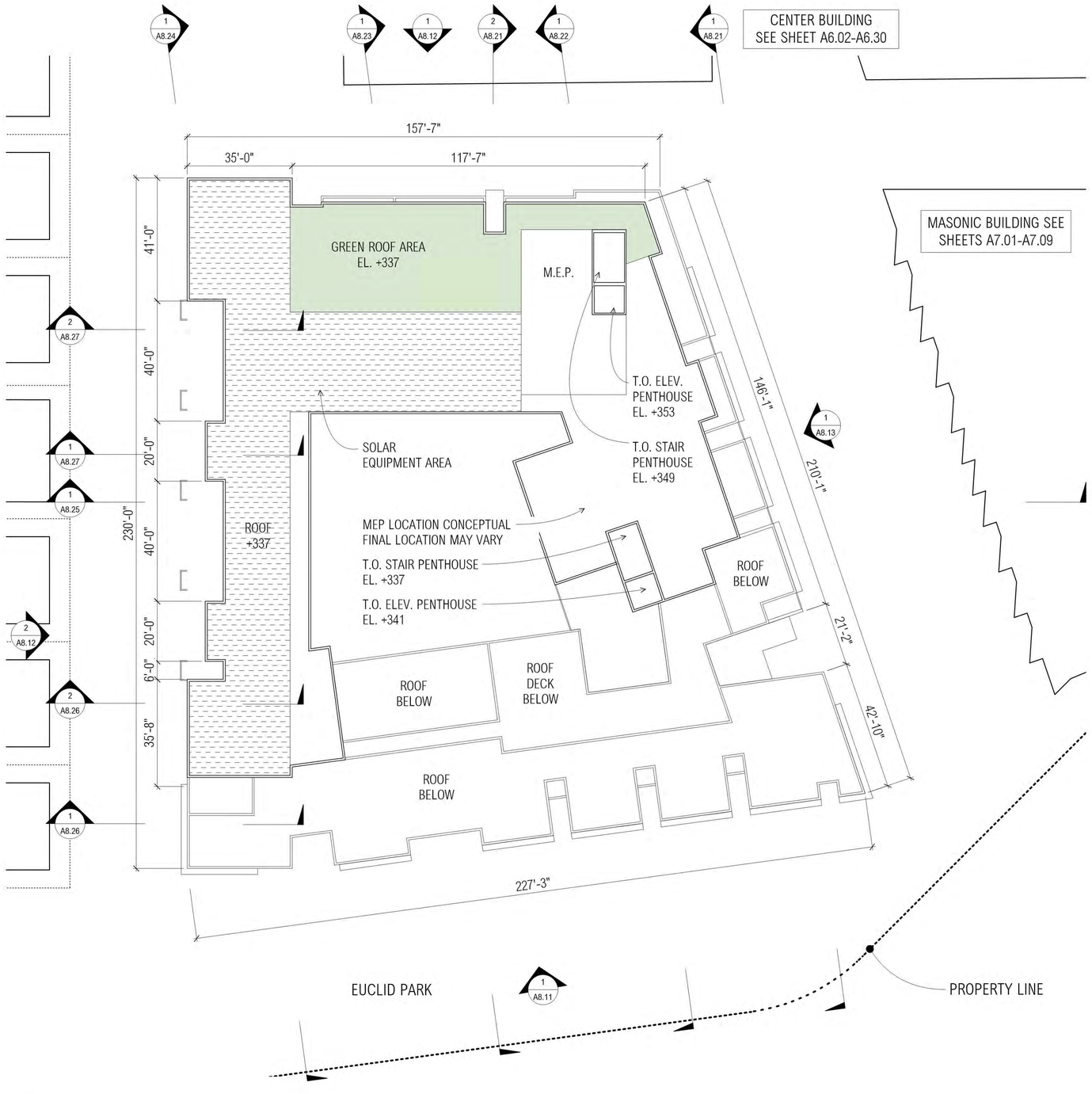
EUCLID BUILDING PLAN - LEVEL 6

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.06**




PARKING

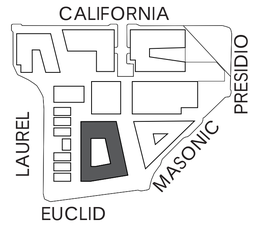
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## 1 EUCLID BUILDING ROOF PLAN (EL. +337)

1" = 20 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING ROOF PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

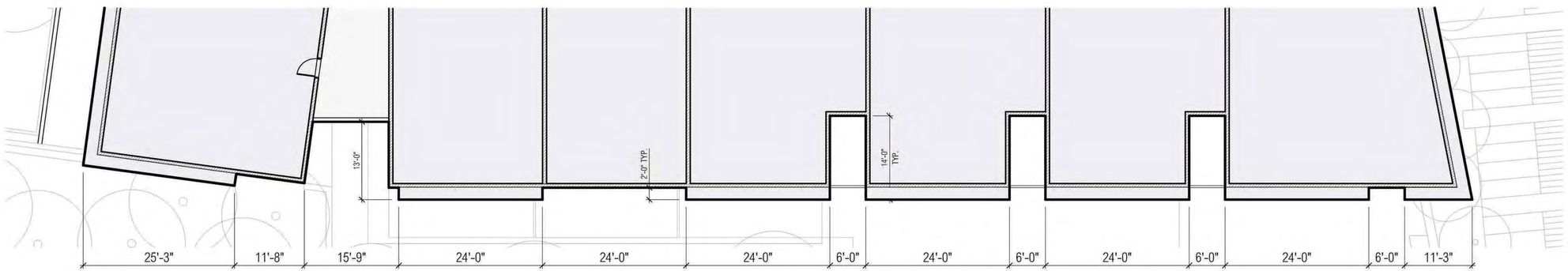
N

A8.07




## 2 SOUTH ELEVATION - EUCLID AVE

1" = 10 ft




## 1 ILLUSTRATIVE PLAN @ LEVEL 3 (EL. +295)

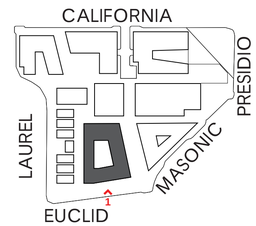
1" = 10 ft

## MATERIALS KEY

- A. CEMENT BOARD SIDING
- B. CEMENT PLASTER
- C. METAL PANEL
- D. ALUMINUM WINDOW
- E. ALUMINUM & GLASS STOREFRONT SYSTEM
- F. METAL GARAGE DOOR
- G. STEEL GUARDRAIL / SCREEN
- H. COMPOSITE WOOD PLANK SIDING
- I. GREEN WALL
- J. METAL FASCIA / SUNSHADE
- K. ARCHITECTURAL CONCRETE
- L. SLAT SCREEN / RAIL
- M. BOARD AND BATTEN SIDING
- N. WOOD SHINGLES
- O. WOOD SIDING
- P. BRICK

## SHEET NOTE

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

EUCLID BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

A8.11




## 2 WEST ELEVATION

1" = 10 ft




## 1 NORTH ELEVATION

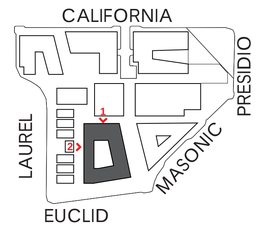
1" = 10 ft

## MATERIALS KEY

- A. CEMENT BOARD SIDING
- B. CEMENT PLASTER
- C. METAL PANEL
- D. ALUMINUM WINDOW
- E. ALUMINUM & GLASS STOREFRONT SYSTEM
- F. METAL GARAGE DOOR
- G. STEEL GUARDRAIL / SCREEN
- H. COMPOSITE WOOD PLANK SIDING
- I. GREEN WALL
- J. METAL FASCIA / SUNSHADE
- K. ARCHITECTURAL CONCRETE
- L. SLAT SCREEN / RAIL
- M. BOARD AND BATTEN SIDING
- N. WOOD SHINGLES
- O. WOOD SIDING
- P. BRICK

## SHEET NOTE

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

EUCLID BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

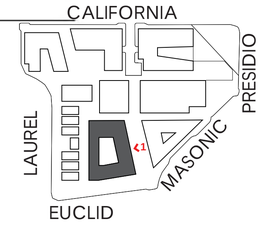
A8.12

| MATERIALS KEY | | SHEET NOTE |
|---|---|---|
| A. CEMENT BOARD SIDING | H. COMPOSITE WOOD PLANK SIDING | * BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04 |
| B. CEMENT PLASTER | I. GREEN WALL | |
| C. METAL PANEL | J. METAL FASCIA / SUNSHADE | |
| D. ALUMINUM WINDOW | K. ARCHITECTURAL CONCRETE | |
| E. ALUMINUM & GLASS STOREFRONT SYSTEM | L. SLAT SCREEN / RAIL | |
| F. METAL GARAGE DOOR | M. BOARD AND BATTEN SIDING | |
| G. STEEL GUARDRAIL / SCREEN | N. WOOD SHINGLES | |
| | O. WOOD SIDING | |
| | P. BRICK | |




## 1 EAST ELEVATION

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

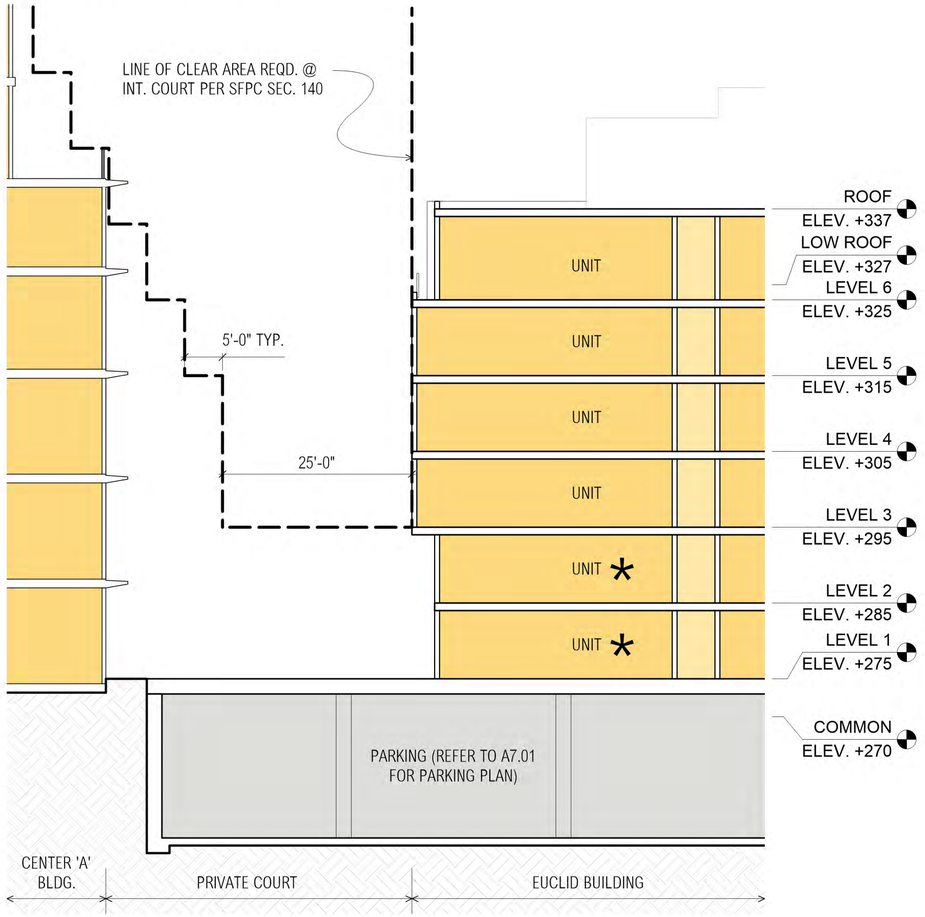
07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

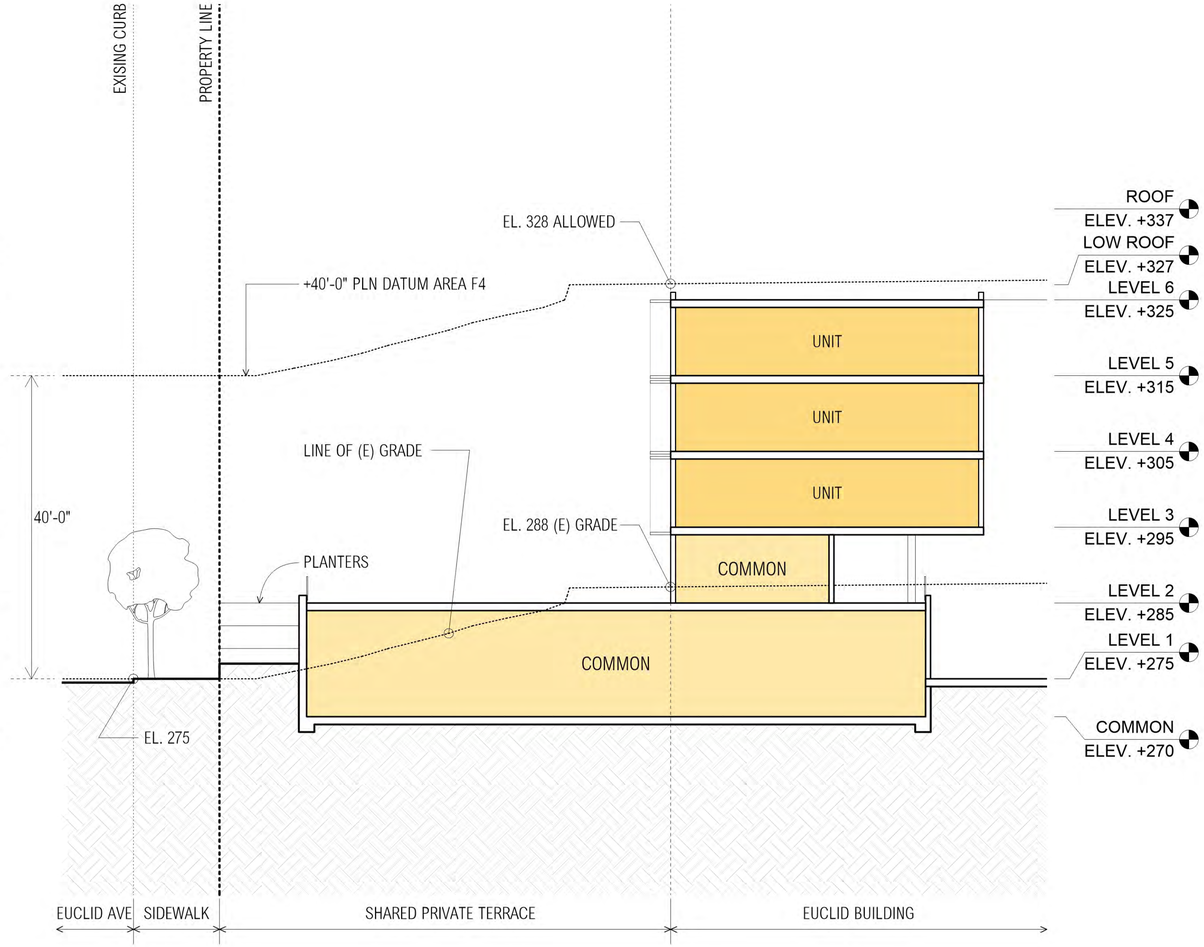
A8.13

* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A9.12 FOR MORE INFORMATION




## 2 SECTION F-F @ INTERIOR COURT

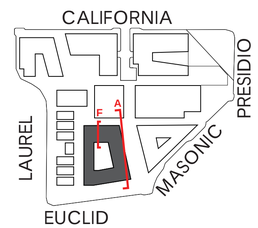
1" = 10 ft




## 1 SECTION A-A

1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE F4; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING SECTIONS

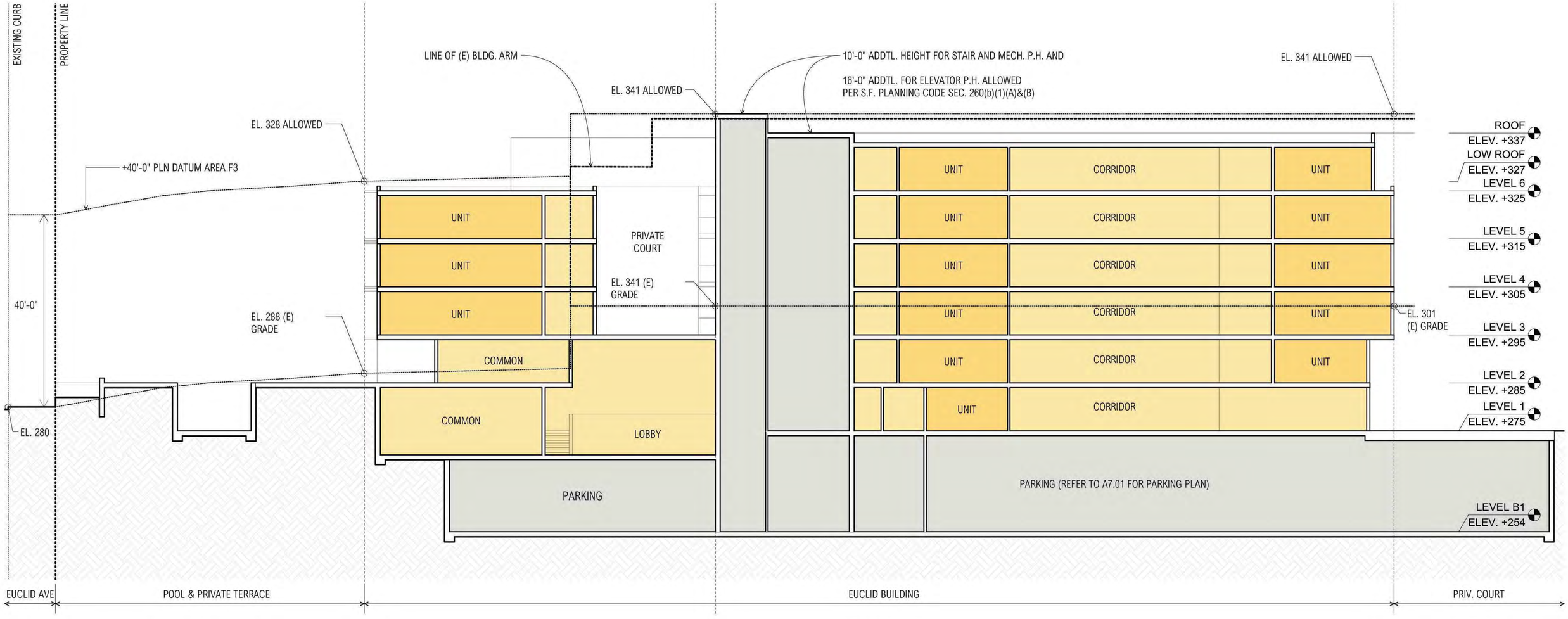
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

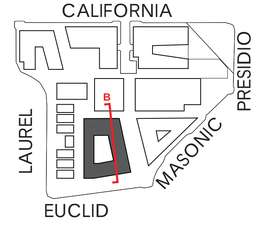
A8.21




## 1 SECTION B-B

1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE F3; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING SECTIONS

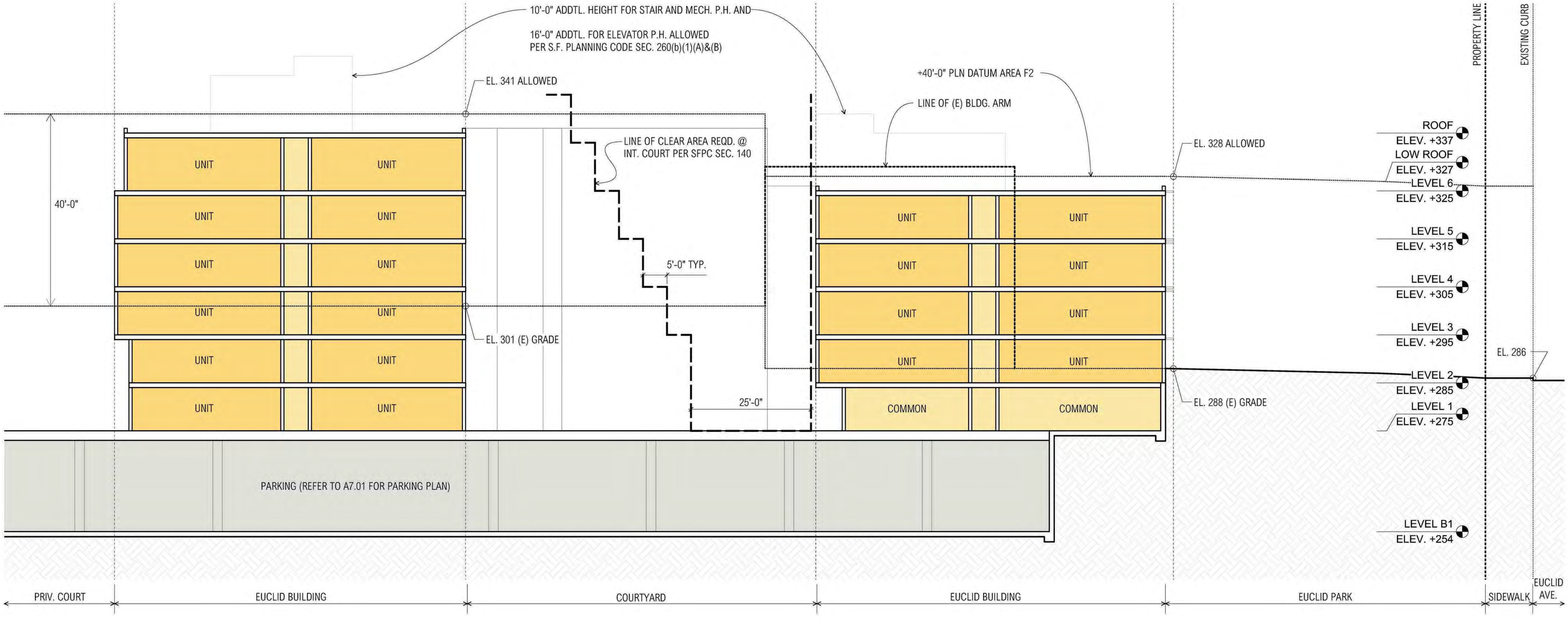
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

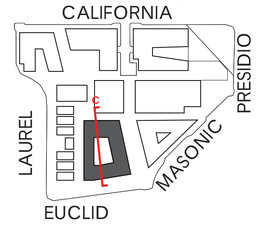
A8.22




## 1 SECTION C-C

1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE F2; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

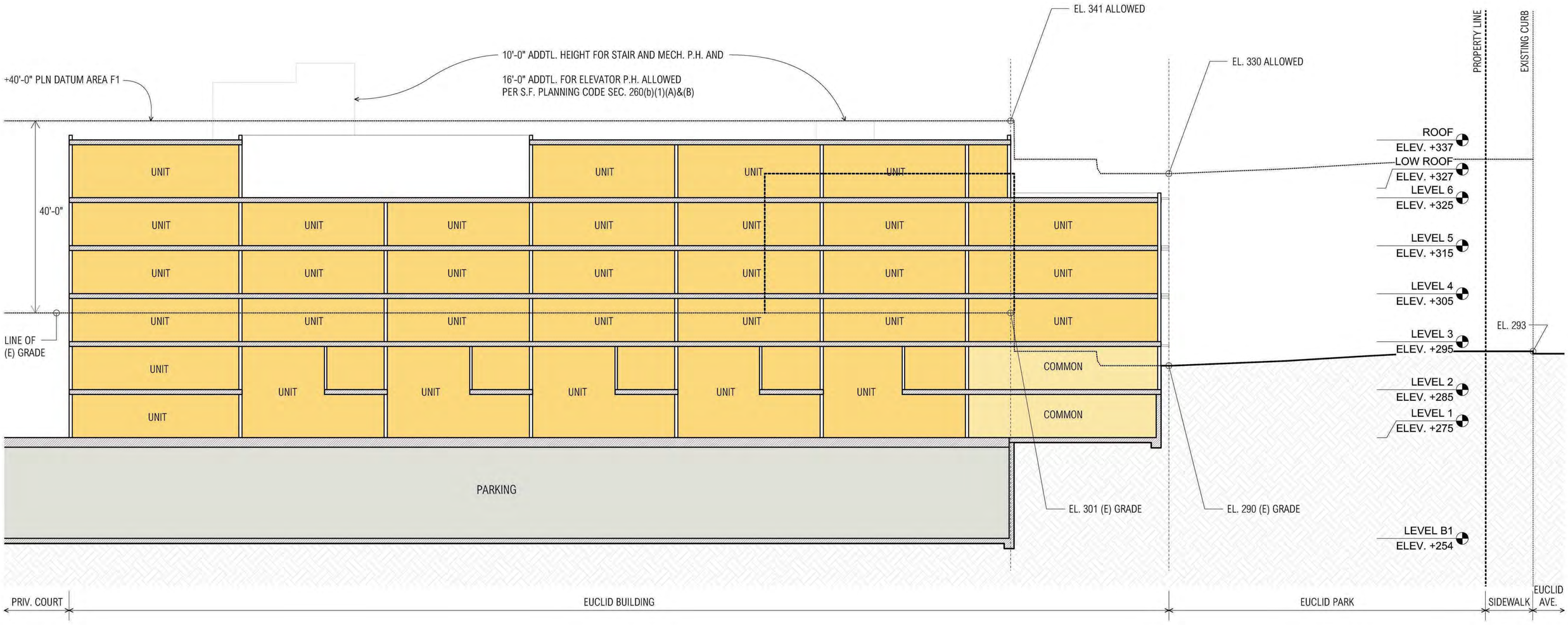
07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

## EUCLID BUILDING SECTIONS

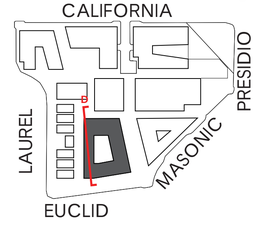
**A8.23**




## 1 SECTION D-D

1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE F1; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

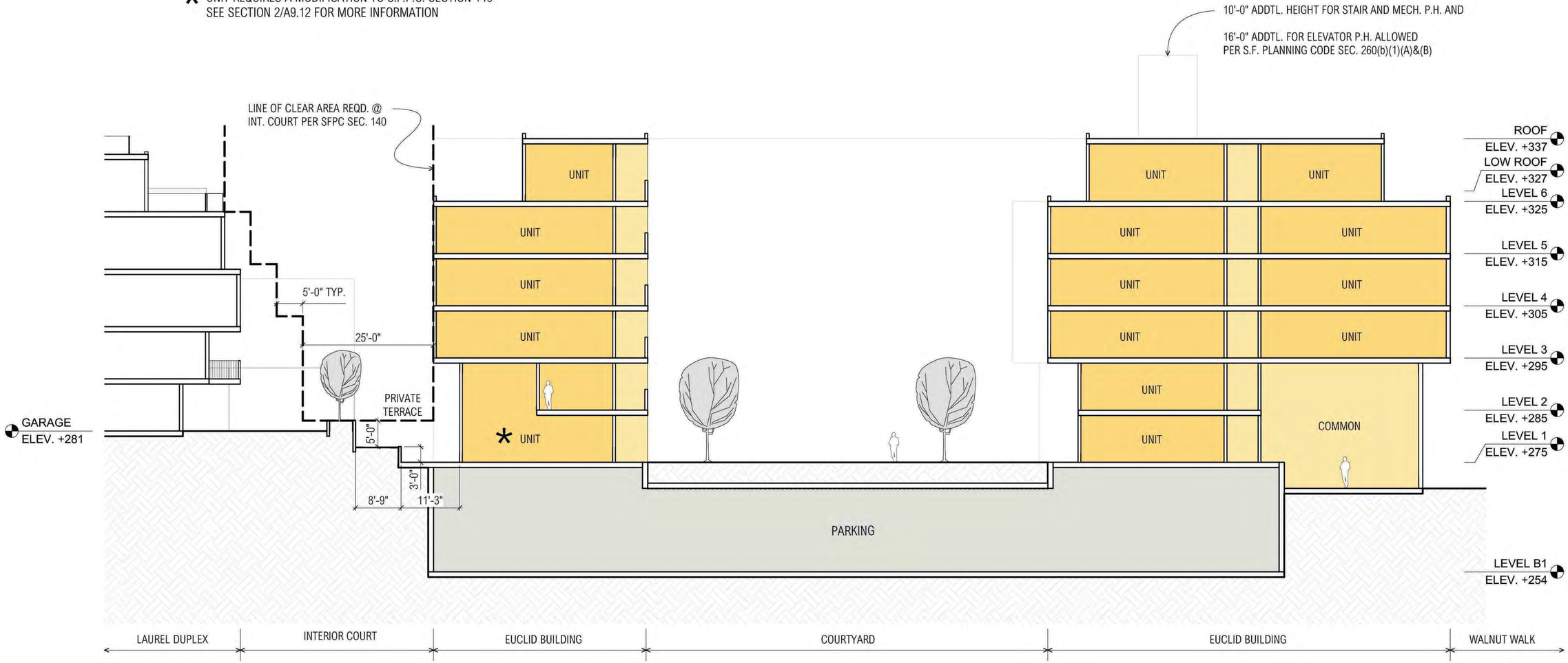
07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

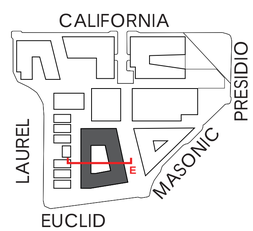
N

**A8.24**

* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A9.12 FOR MORE INFORMATION




## 1 SECTION E-E
1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

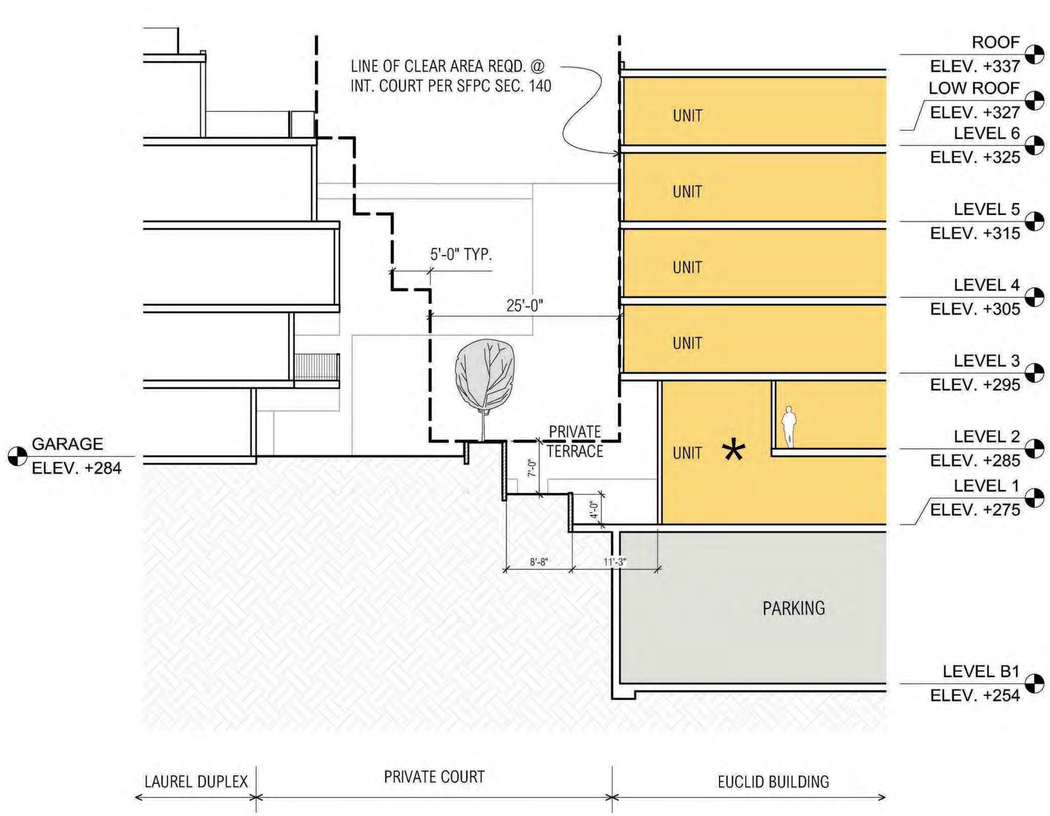
07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

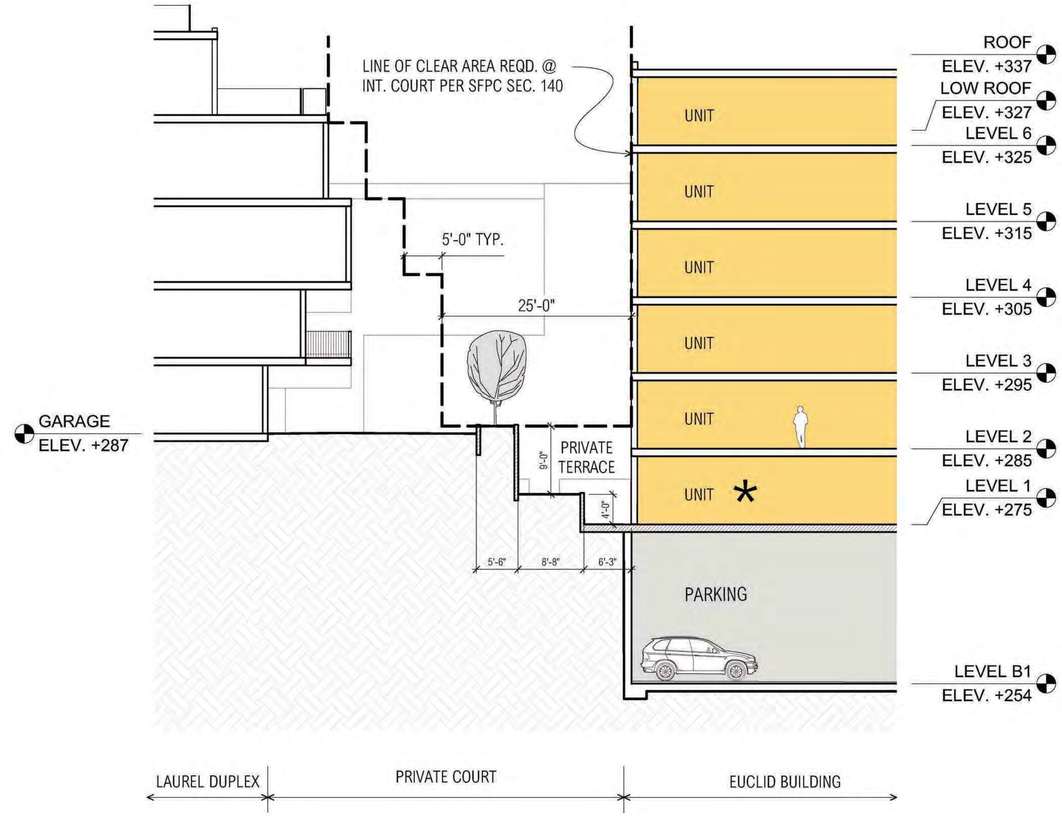
N

A8.25

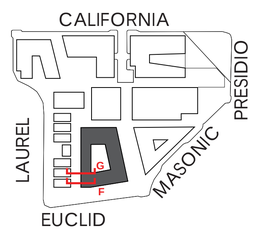
* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A9.12 FOR MORE INFORMATION




## 2 SECTION G-G
1" = 10 ft




## 1 SECTION F-F
1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING SECTIONS

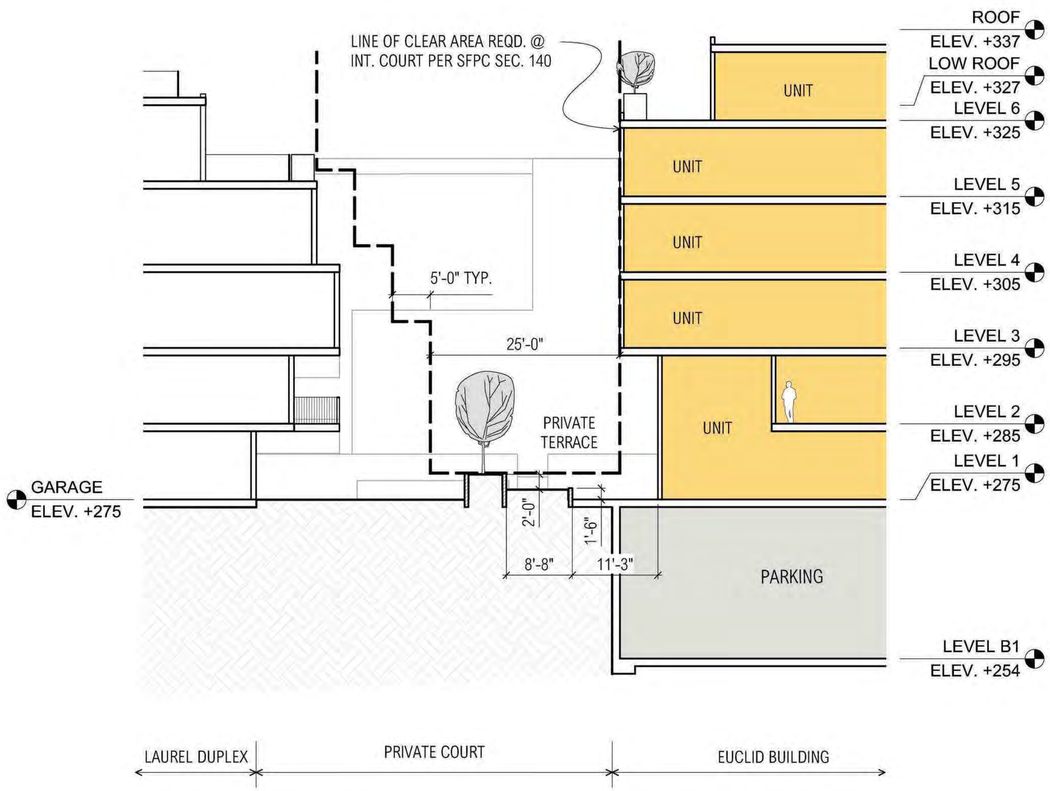
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

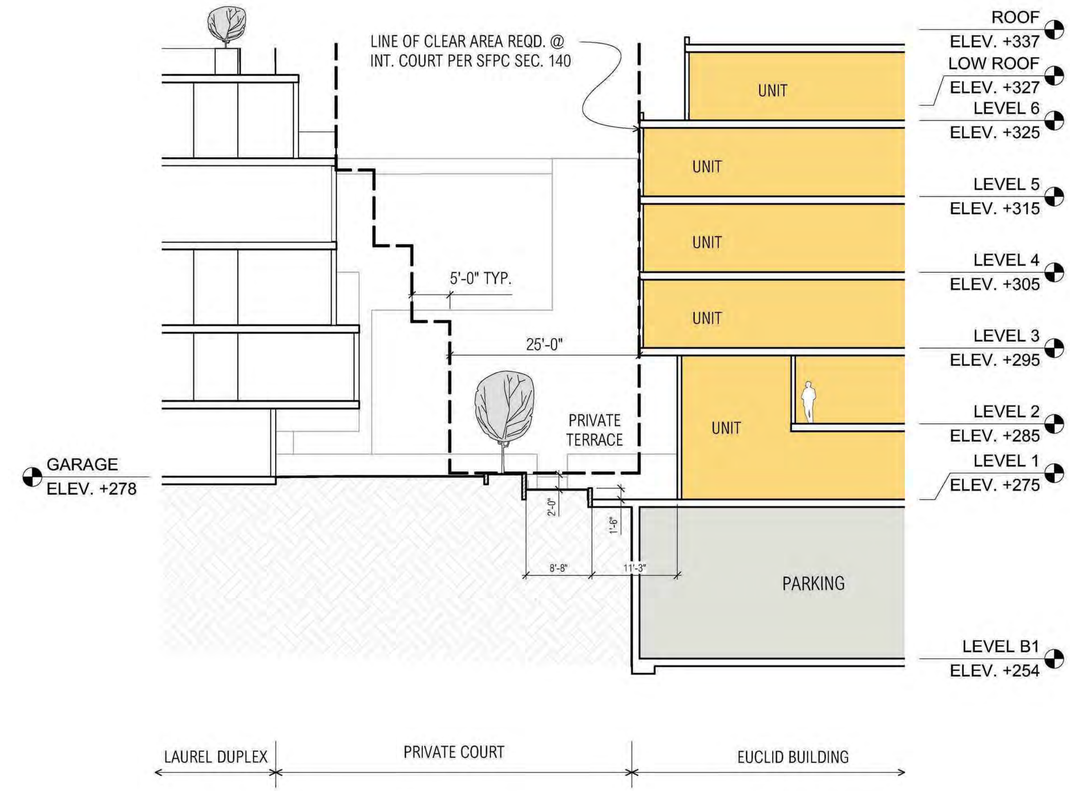
N

A8.26



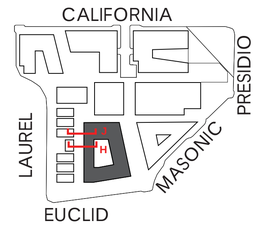

## 2 SECTION J-J

1" = 10 ft




## 1 SECTION H-H

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING SECTIONS

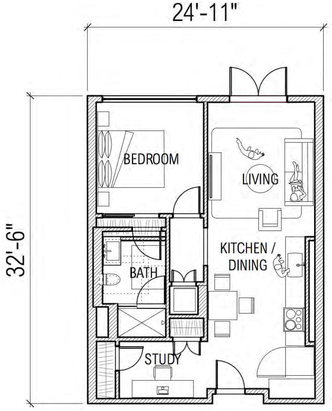
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

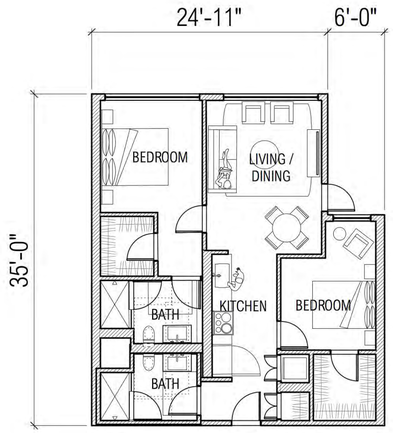
0 5' 10' 20' 30'

N

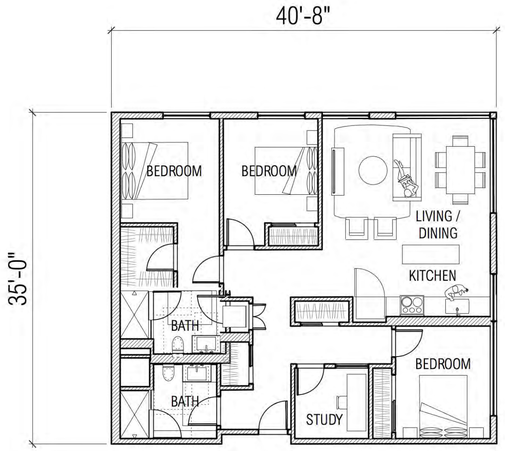
A8.27



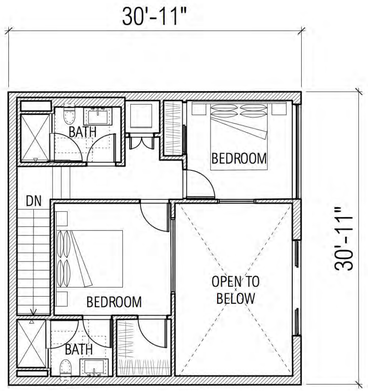

1-BEDROOM



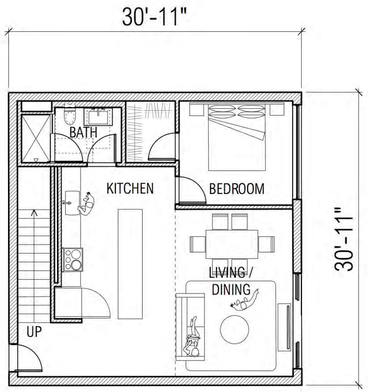

2-BEDROOM




3-BEDROOM

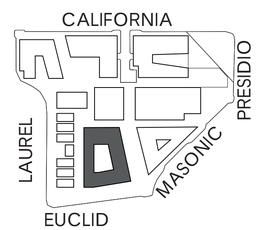



TOWNHOUSE LEVEL 2




TOWNHOUSE LEVEL 1

NOTE: UNITS ARE SHOWN FOR SCALE & REFERENCE ONLY. ADDITIONAL UNIT TYPES NOT SHOWN.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EUCLID TYPICAL UNIT PLANS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 4' 8' 16' 24'

N

**A8.30**



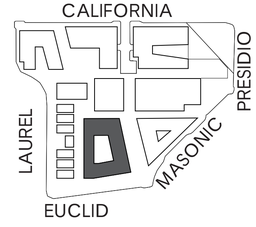

1 **EUCLID BUILDING OPEN SPACE - LEVEL 1 (EL. +275)**
1" = 20 ft

* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**LEVEL 1 SUMMARY**
COMMON: 4000 SF
PRIVATE: 2000 SF

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING OPEN SPACE - LEVEL 1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.41**



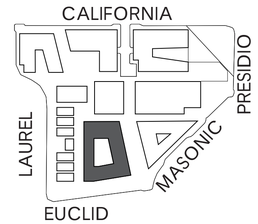

1 **EUCLID BUILDING OPEN SPACE - LEVEL 2 (EL. +285)**
1" = 20 ft

* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**LEVEL 2 SUMMARY**
COMMON: 2780 SF
PRIVATE: 0 SF

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING OPEN SPACE - LEVEL 2

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.42**




1 **EUCLID BUILDING OPEN SPACE - LEVEL 3 (EL. +295)**
1" = 20 ft

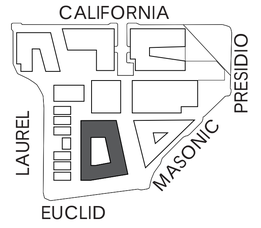
* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**LEVEL 3 SUMMARY**
COMMON: 1000 SF
PRIVATE: 0 SF

NOTE: NO OPEN SPACE PROVIDED ON LEVEL 4 & 5

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING OPEN SPACE - LEVEL 3

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.43**



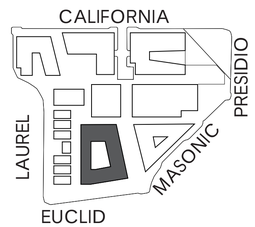

1 **EUCLID BUILDING OPEN SPACE - LEVEL 6 (EL. +325)**
1" = 20 ft

* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**LEVEL 6 SUMMARY**
COMMON: 1,880 SF
PRIVATE: 500 SF

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EUCLID BUILDING OPEN SPACE - LEVEL 6

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A8.44**



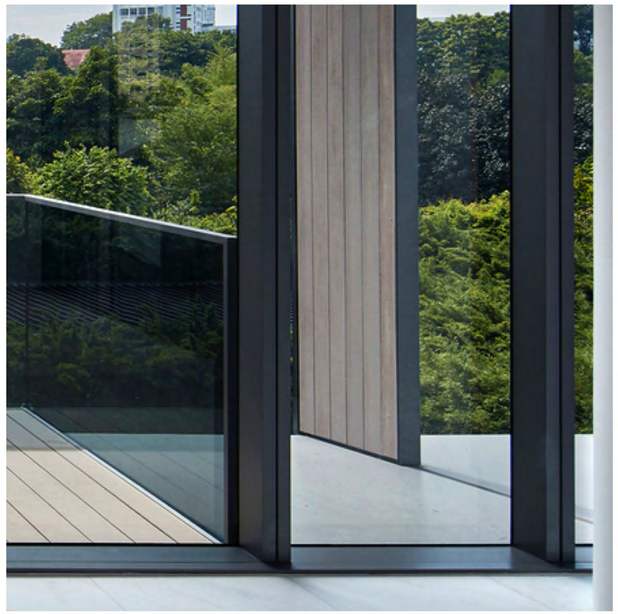
**B** CEMENT PLASTER



**H** COMPOSITE WOOD PLANK SIDING



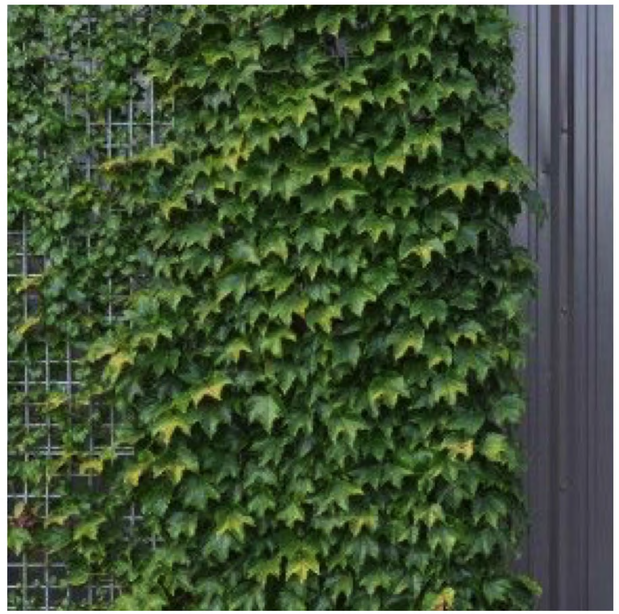
**K** ARCHITECTURAL CONCRETE



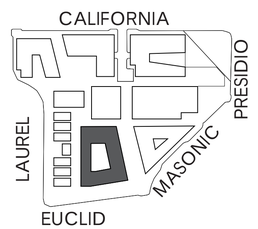
**D** **E** ALUMINUM STOREFRONT WINDOW SYSTEM



**G** STEEL GUARDRAIL



**I** GREEN WALL




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EUCLID MATERIAL PALETTE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A8.50**

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EUCLID BUILDING PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A8.60**



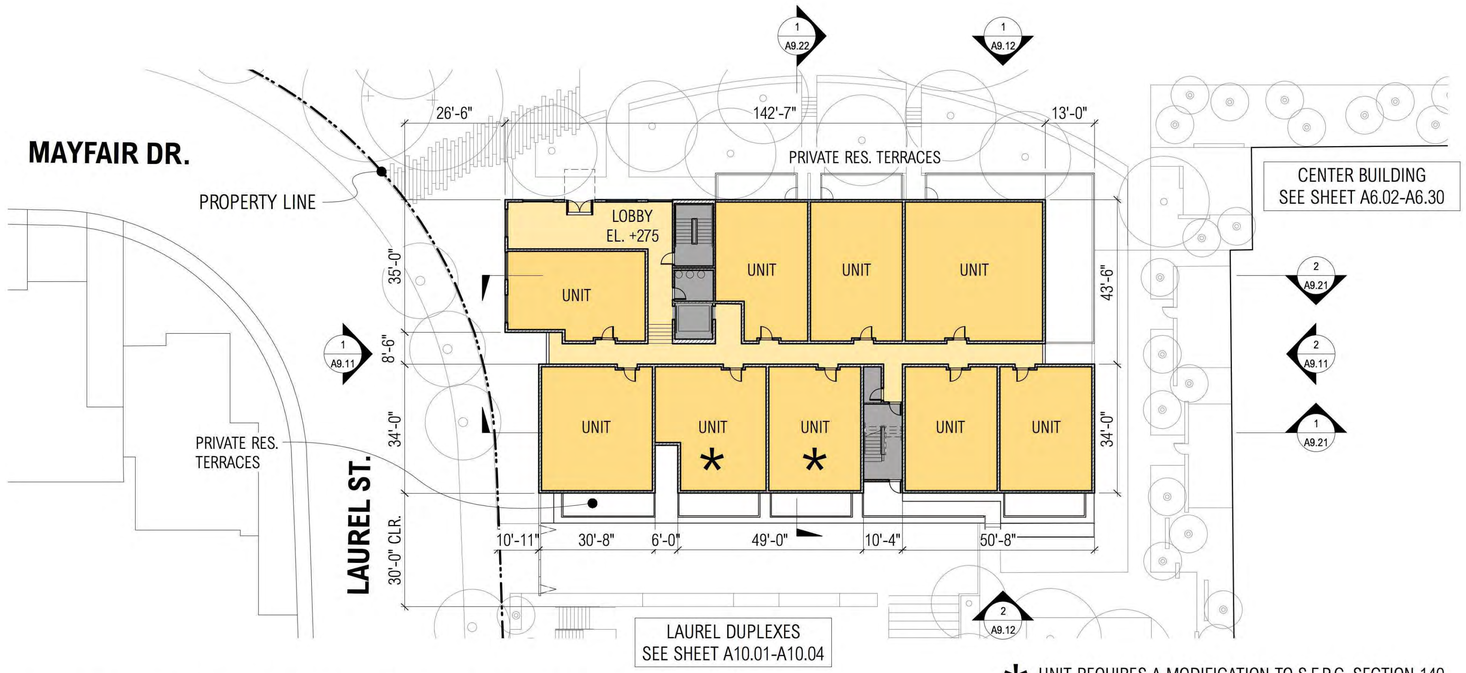
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EUCLID GREEN PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

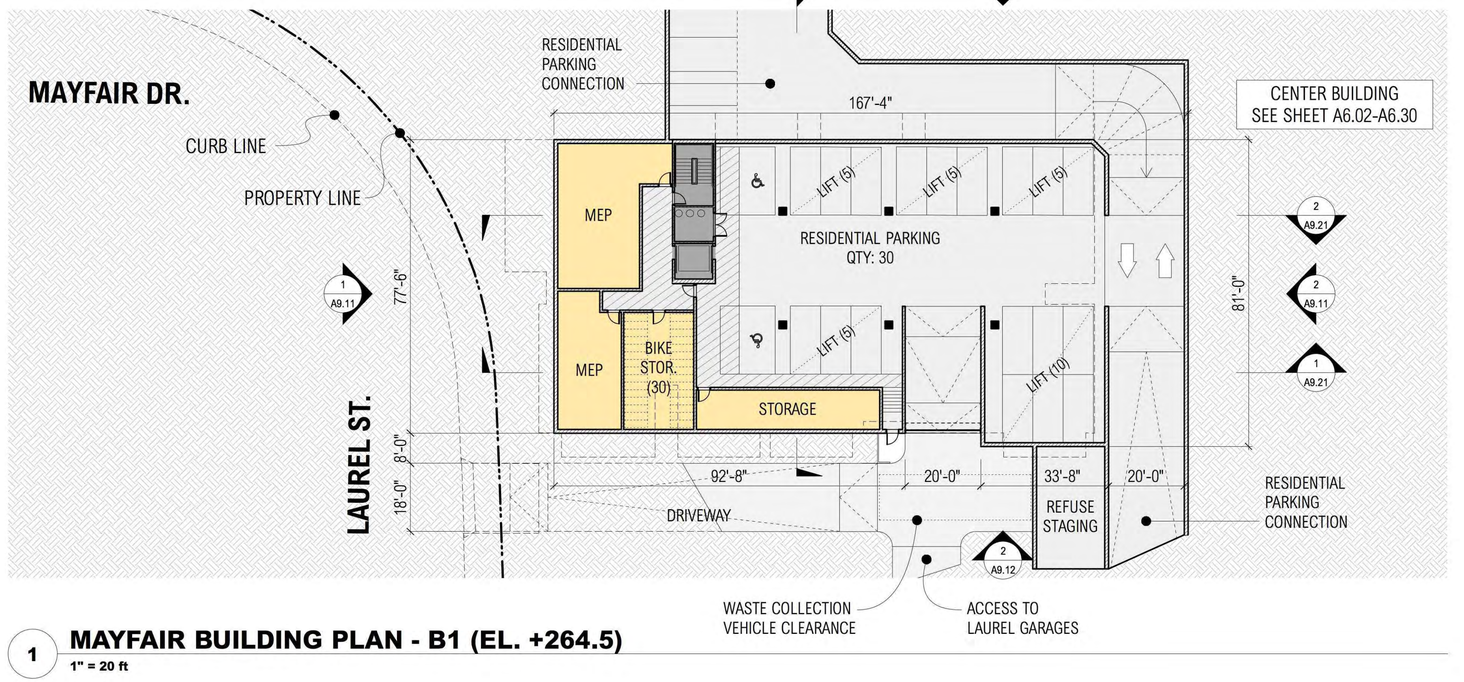
**A8.61**




## 2 MAYFAIR BUILDING PLAN - LEVEL 1 (EL. +278)

1" = 20 ft

* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A9.12 FOR MORE INFORMATION

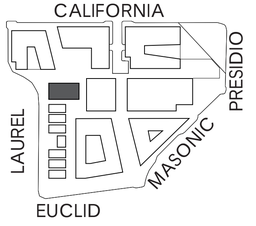



## 1 MAYFAIR BUILDING PLAN - B1 (EL. +264.5)

1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

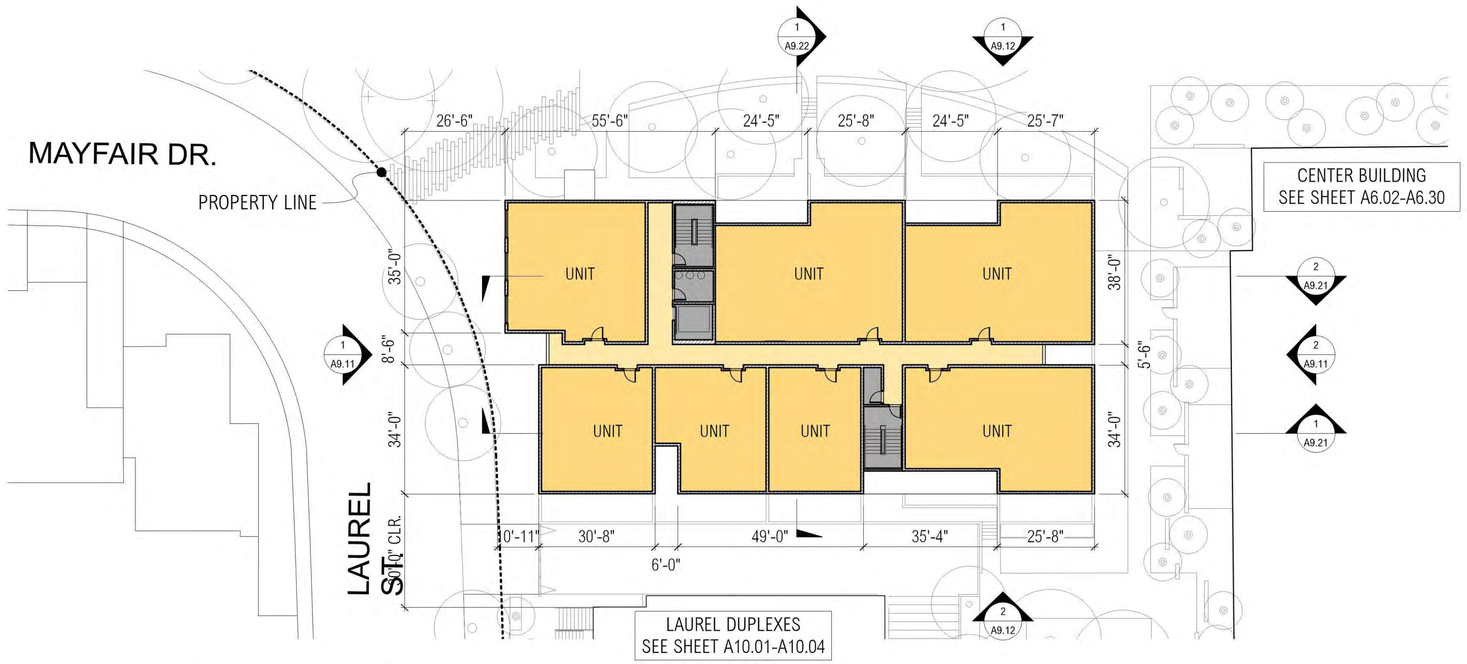
MAYFAIR BUILDING PLANS - B1 & LEVEL 1

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

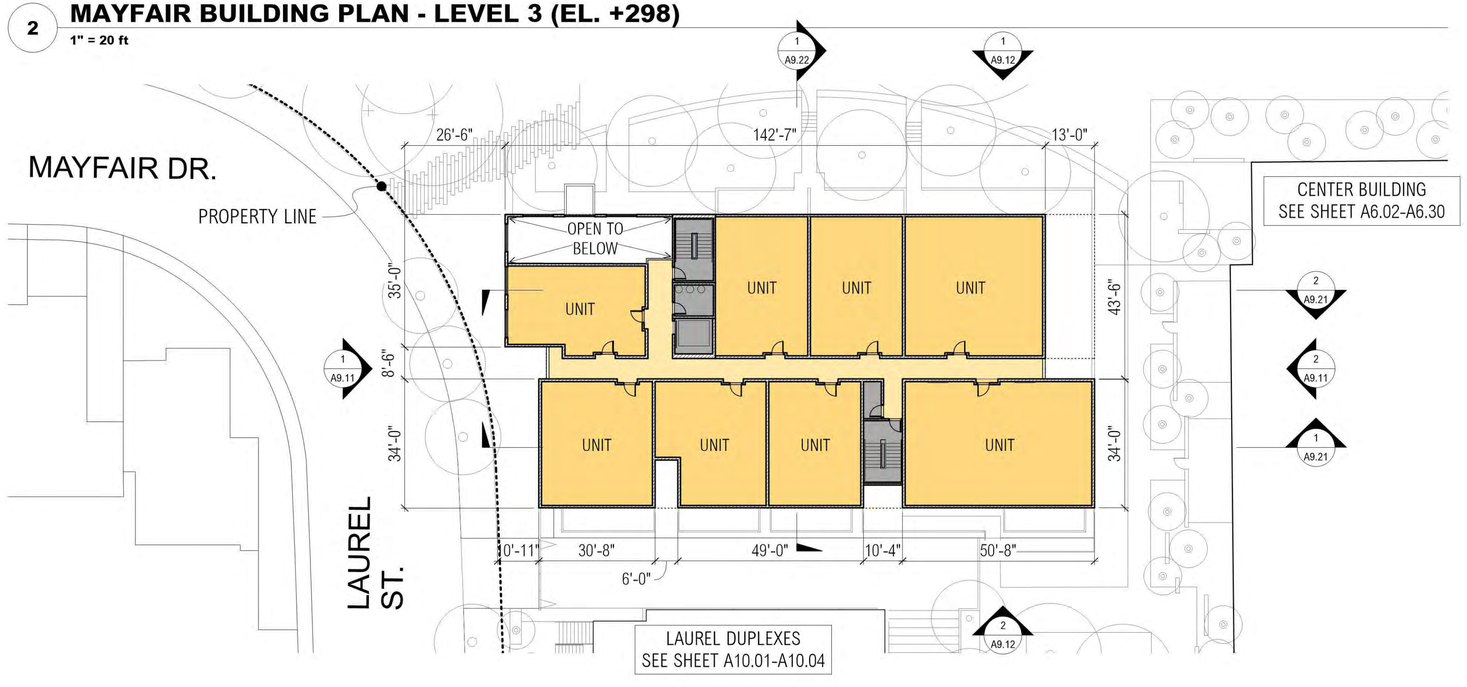
N

A9.01




## 2 MAYFAIR BUILDING PLAN - LEVEL 3 (EL. +298)

1" = 20 ft




## 1 MAYFAIR BUILDING PLAN - LEVEL 2 (EL. +288)

1" = 20 ft

PARKING

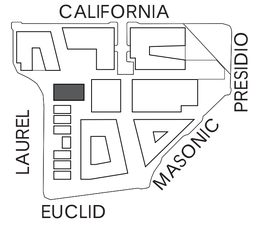
RETAIL USABLE — RETAIL B.O.H.

COMMERCIAL — COMMERCIAL, CORE

RESIDENTIAL HOMES — RESIDENTIAL CORE

LANDSCAPED ROOF — OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

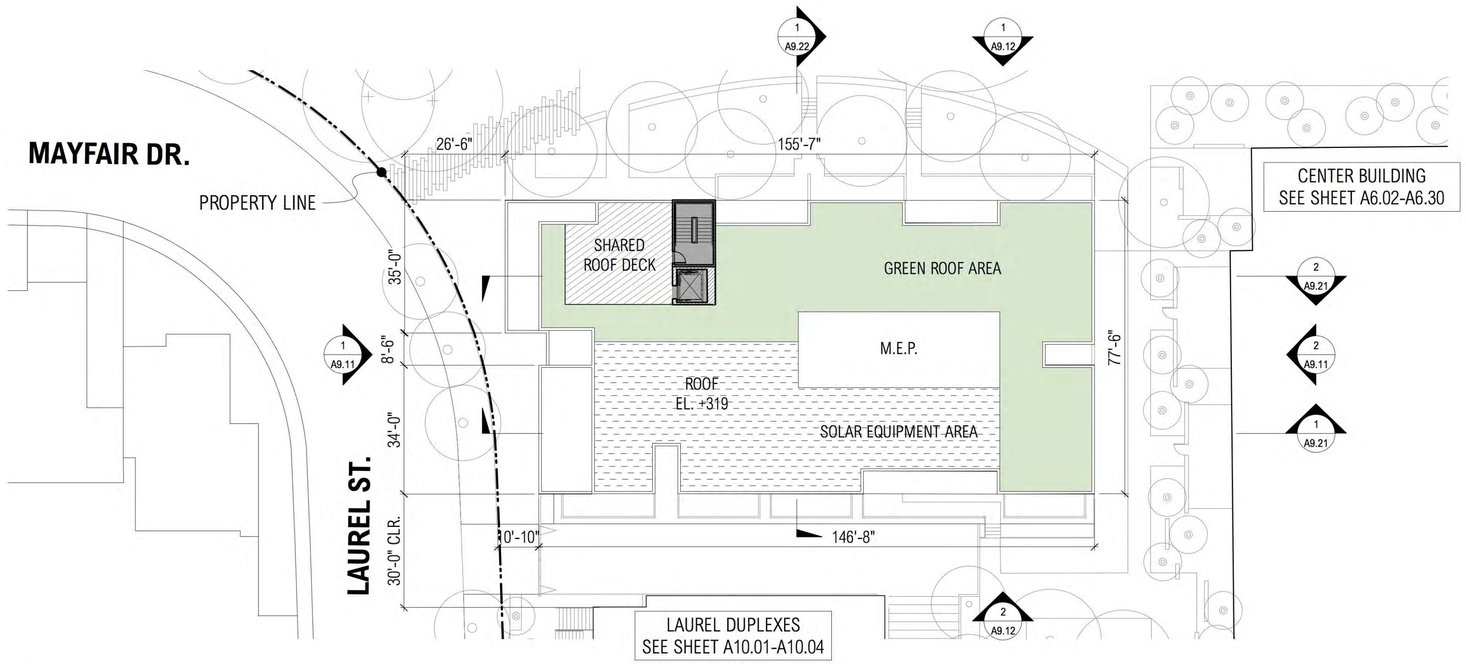
MAYFAIR BUILDING PLANS - LEVEL 2 & 3

07.03.2019
PLANNING APPLICATION SUBMITTAL

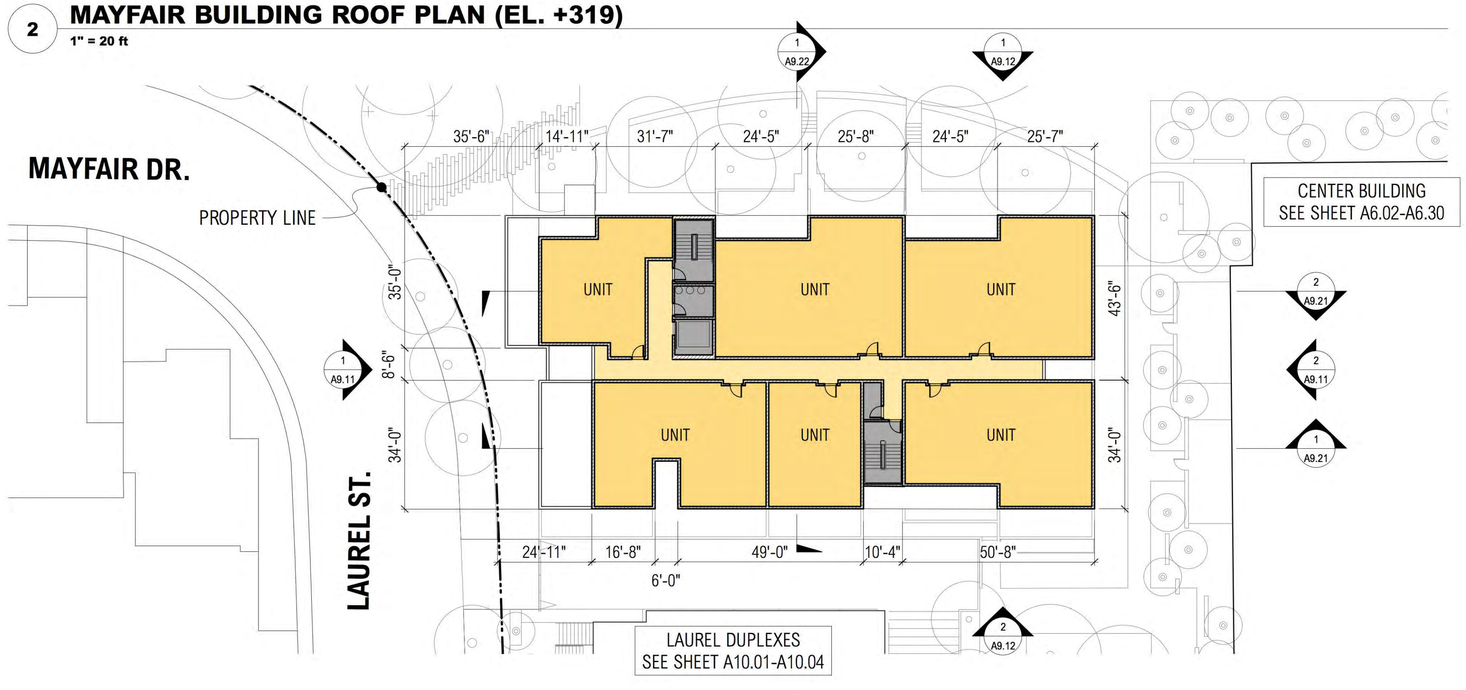
0 10' 20' 40' 60'

N

A9.02



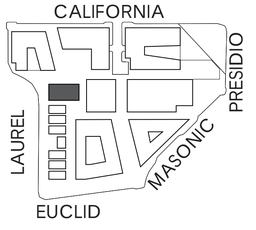

**2 MAYFAIR BUILDING ROOF PLAN (EL. +319)**
1" = 20 ft




**1 MAYFAIR BUILDING PLAN - LEVEL 4 (EL. +308)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

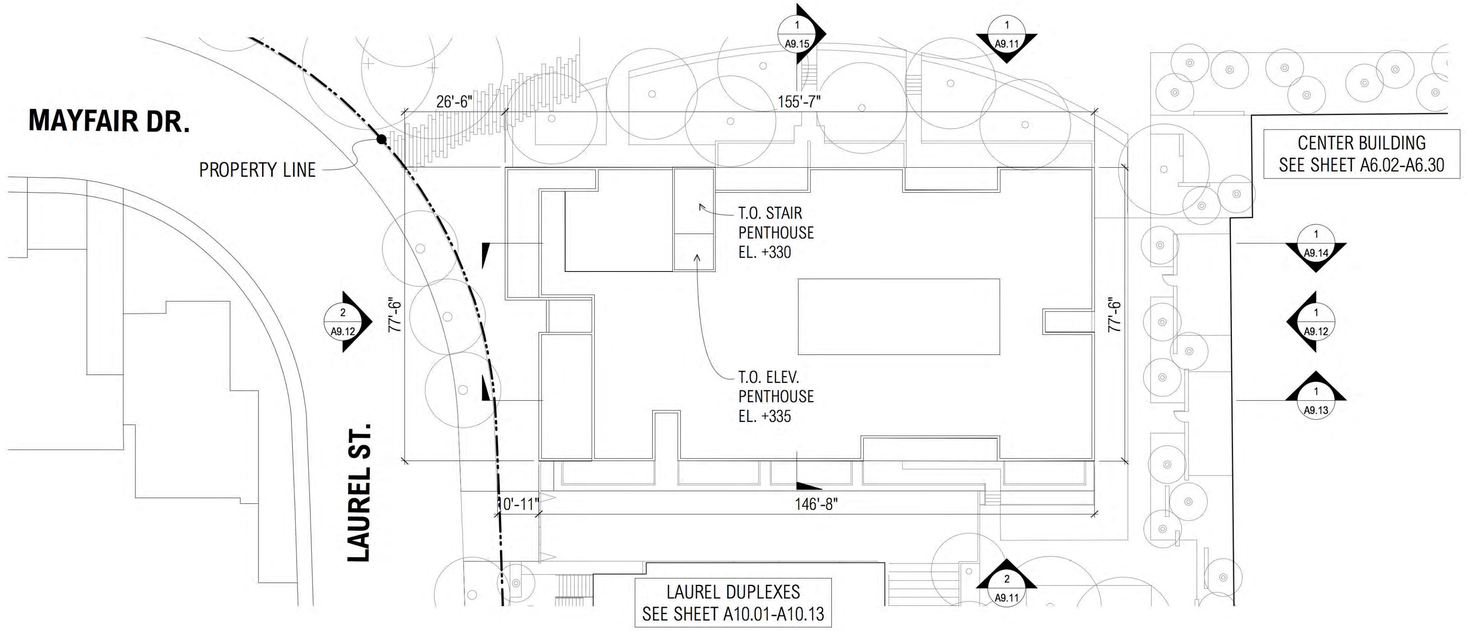
## MAYFAIR BUILDING PLANS - LEVEL 4 & ROOF

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

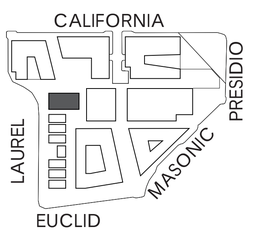
**A9.03**




1 **MAYFAIR BUILDING ROOF PLAN (EL. +330)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

## MAYFAIR BUILDING PLANS - ROOF

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

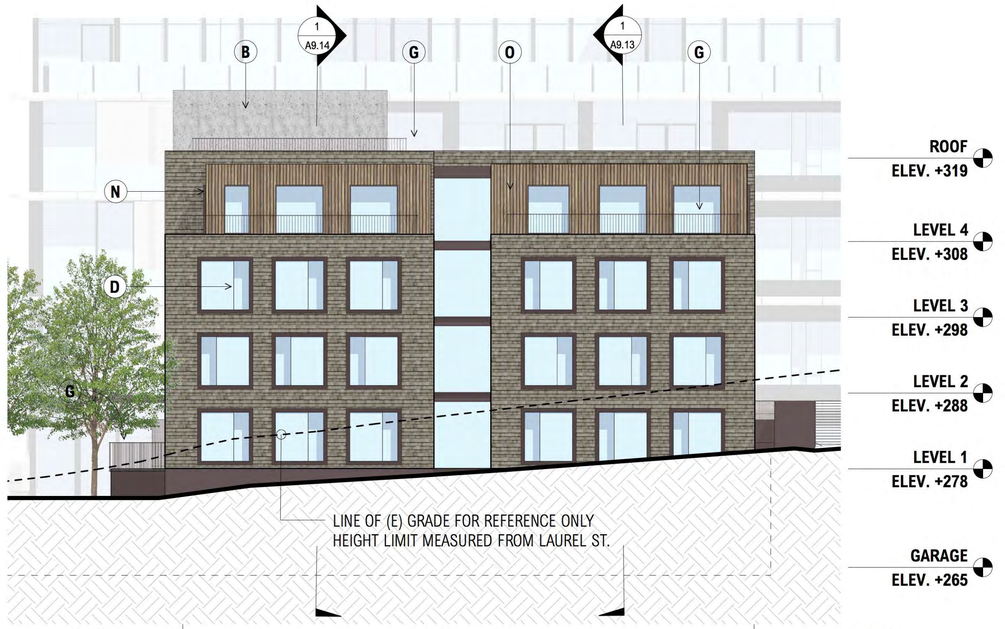
N

**A9.04**



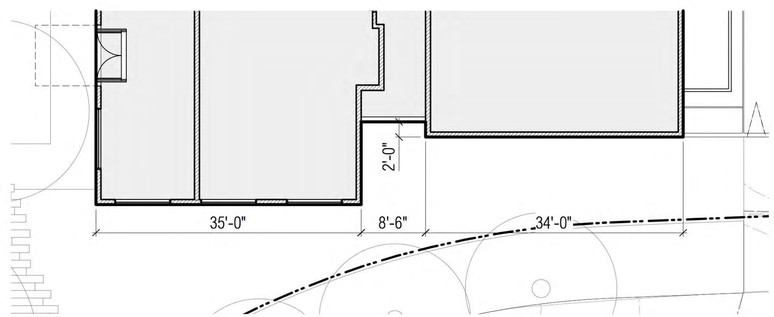

## 3 EAST ELEVATION

1" = 10 ft




## 2 WEST ELEVATION - LAUREL ST.

1" = 10 ft




## 1 ILLUSTRATIVE PLAN @ LEVEL 1 (EL. +278)

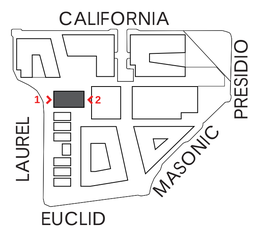
1" = 10 ft

### MATERIALS KEY

- **A.** CEMENT BOARD SIDING
- **B.** CEMENT PLASTER
- **C.** METAL PANEL
- **D.** ALUMINUM WINDOW
- **E.** ALUMINUM & GLASS STOREFRONT SYSTEM
- **F.** METAL GARAGE DOOR
- **G.** STEEL GUARDRAIL / SCREEN
- **H.** COMPOSITE WOOD PLANK SIDING
- **I.** GREEN WALL
- **J.** METAL FASCIA / SUNSHADE
- **K.** ARCHITECTURAL CONCRETE
- **L.** SLAT SCREEN / RAIL
- **M.** BOARD AND BATTEN SIDING
- **N.** WOOD SHINGLES
- **O.** WOOD SIDING
- **P.** BRICK

### SHEET NOTE

✱ BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

# MAYFAIR BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

**A9.11**




## 2 SOUTH ELEVATION

1" = 10 ft




## 1 NORTH ELEVATION

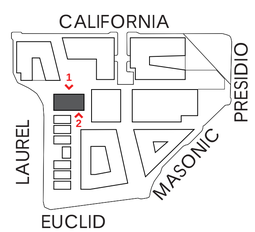
1" = 10 ft

### MATERIALS KEY

- **A.** CEMENT BOARD SIDING
- **B.** CEMENT PLASTER
- **C.** METAL PANEL
- **D.** ALUMINUM WINDOW
- **E.** ALUMINUM & GLASS STOREFRONT SYSTEM
- **F.** METAL GARAGE DOOR
- **G.** STEEL GUARDRAIL / SCREEN
- **H.** COMPOSITE WOOD PLANK SIDING
- **I.** GREEN WALL
- **J.** METAL FASCIA / SUNSHADE
- **K.** ARCHITECTURAL CONCRETE
- **L.** SLAT SCREEN / RAIL
- **M.** BOARD AND BATTEN SIDING
- **N.** WOOD SHINGLES
- **O.** WOOD SIDING
- **P.** BRICK

### SHEET NOTE

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

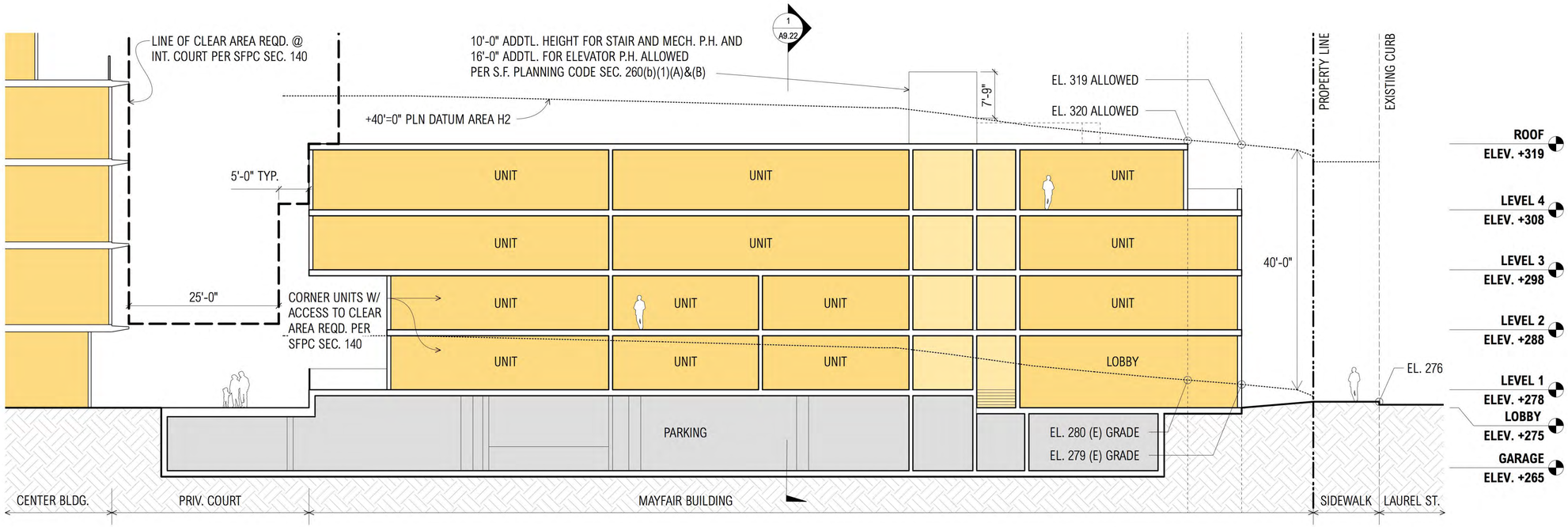
# MAYFAIR BUILDING ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

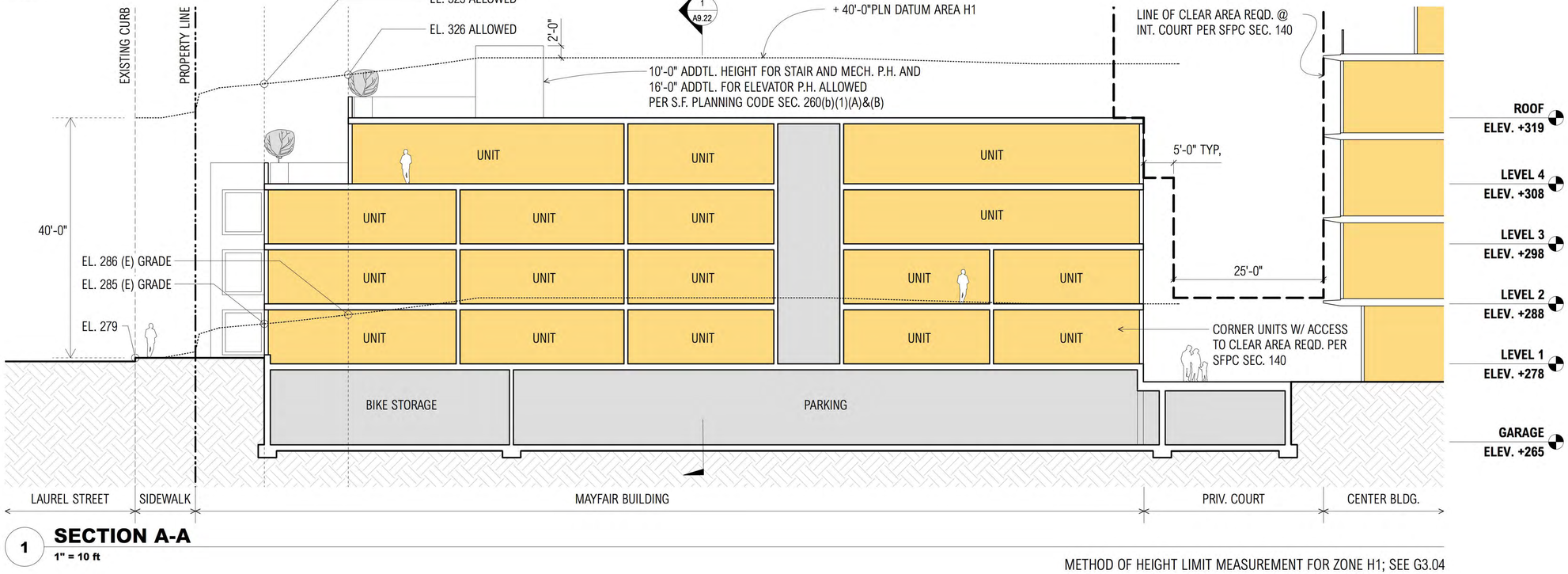
**A9.12**




## 2 SECTION B-B

1" = 10 ft

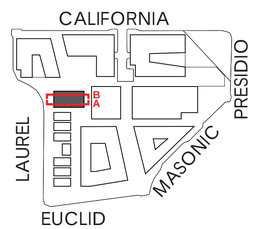
METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE H2; SEE G3.04




## 1 SECTION A-A

1" = 10 ft

METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE H1; SEE G3.04




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

MAYFAIR BUILDING SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

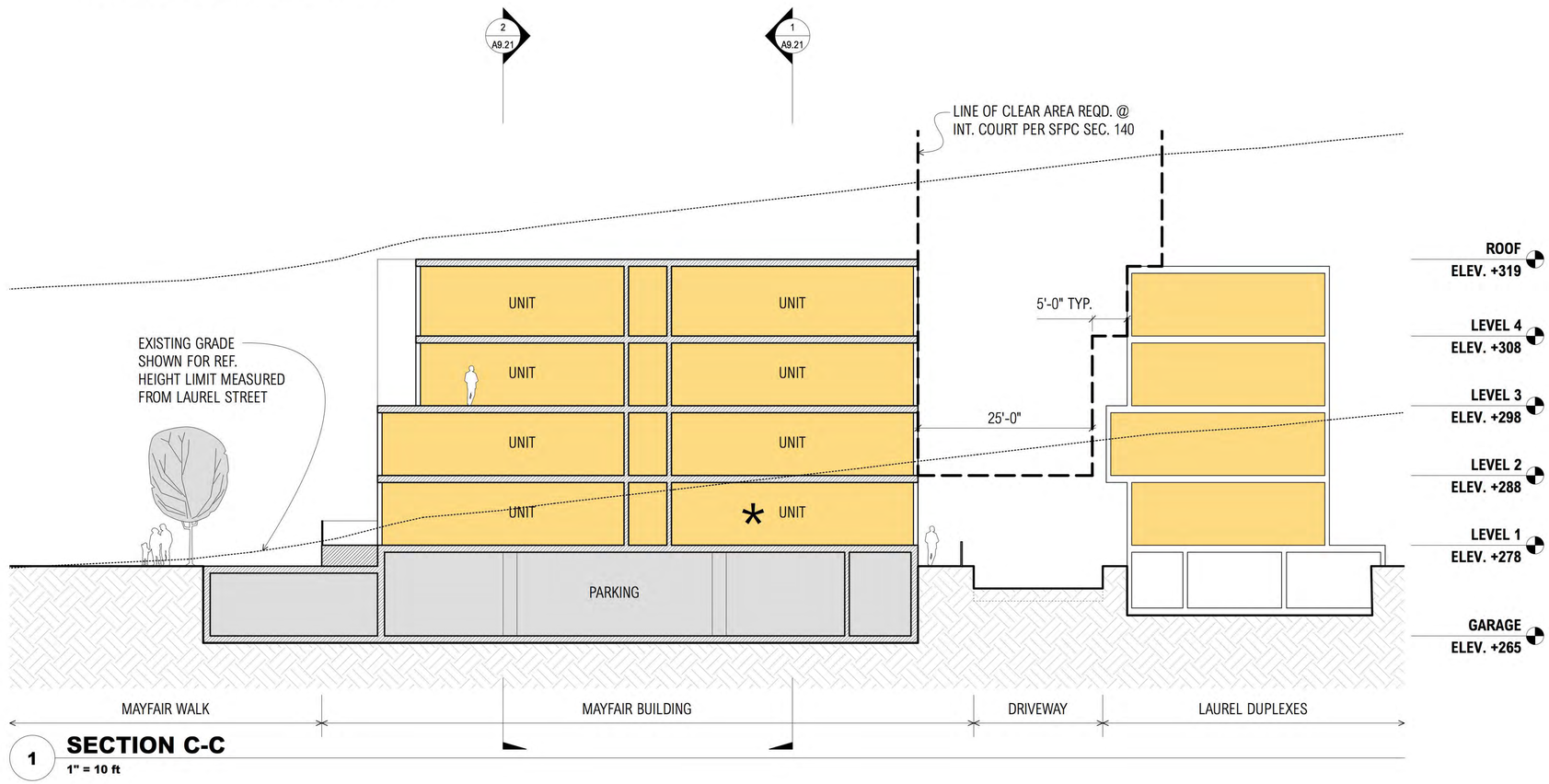
07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

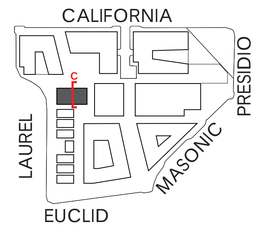
N

A9.21

* UNIT REQUIRES A MODIFICATION TO S.F.P.C. SECTION 140
SEE SECTION 2/A9.12 FOR MORE INFORMATION




1 **SECTION C-C**
1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## MAYFAIR BUILDING SECTIONS

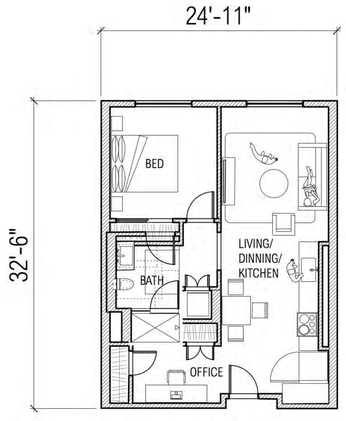
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

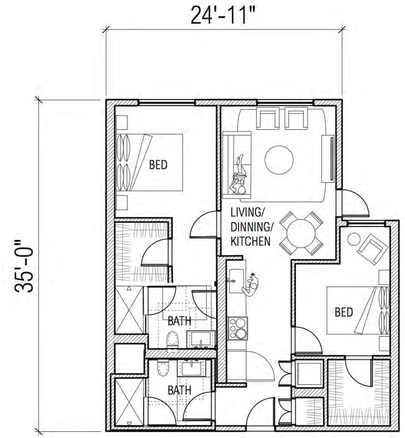
0 5' 10' 20' 30'

N

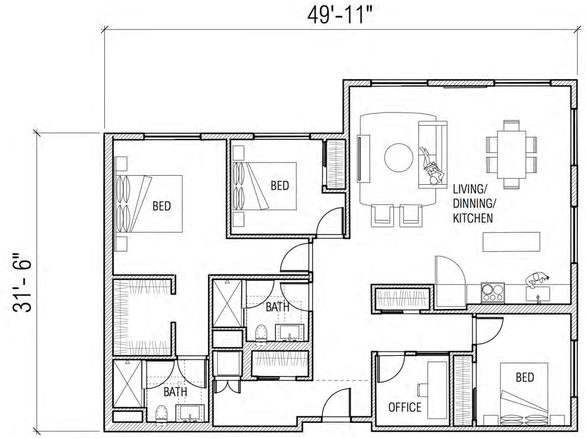
**A9.22**




1-BEDROOM

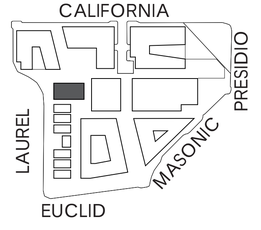



2-BEDROOM




3-BEDROOM

NOTE: UNITS ARE SHOWN FOR SCALE & REFERENCE ONLY. ADDITIONAL UNIT TYPES NOT SHOWN.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

MAYFAIR TYPICAL UNIT PLANS

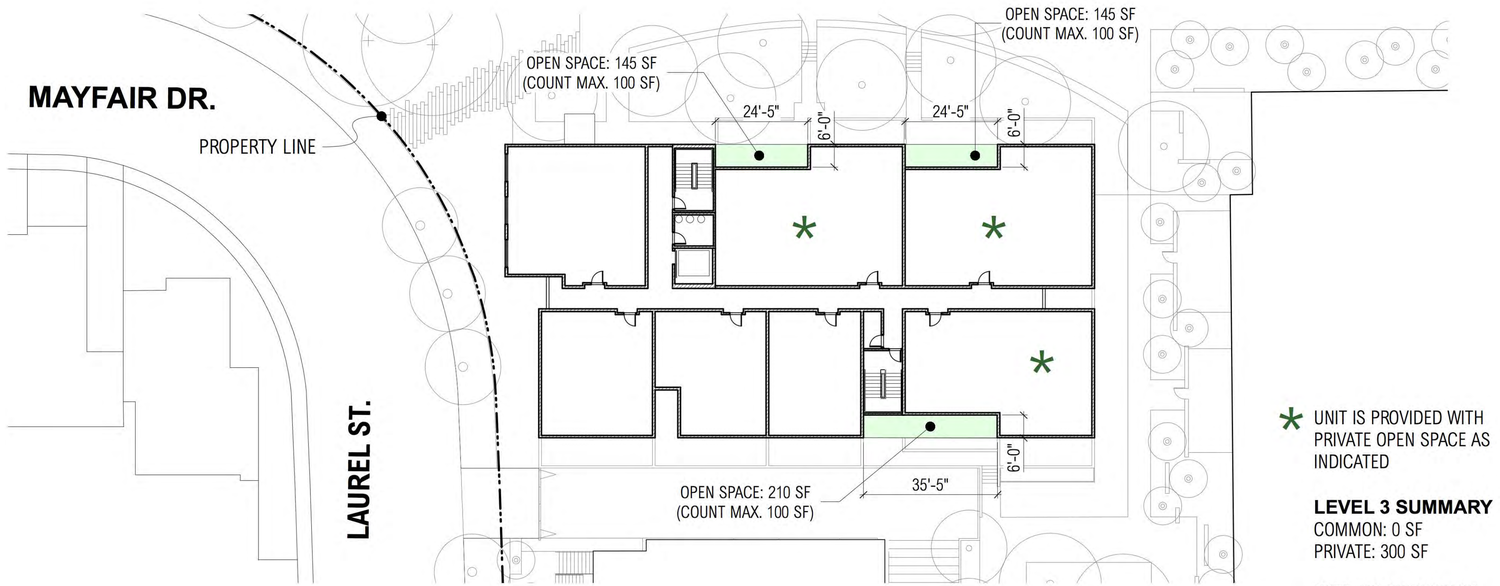
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 4' 8' 16' 24'

N

**A9.30**



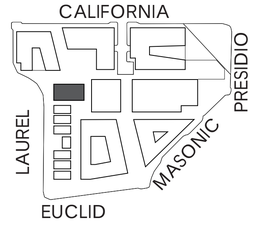

2 **MAYFAIR BUILDING OPEN SPACE - LEVEL 3 (EL. +298)**
1" = 20 ft




1 **MAYFAIR BUILDING OPEN SPACE - LEVEL 1 (EL. +278)**
1" = 20 ft

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

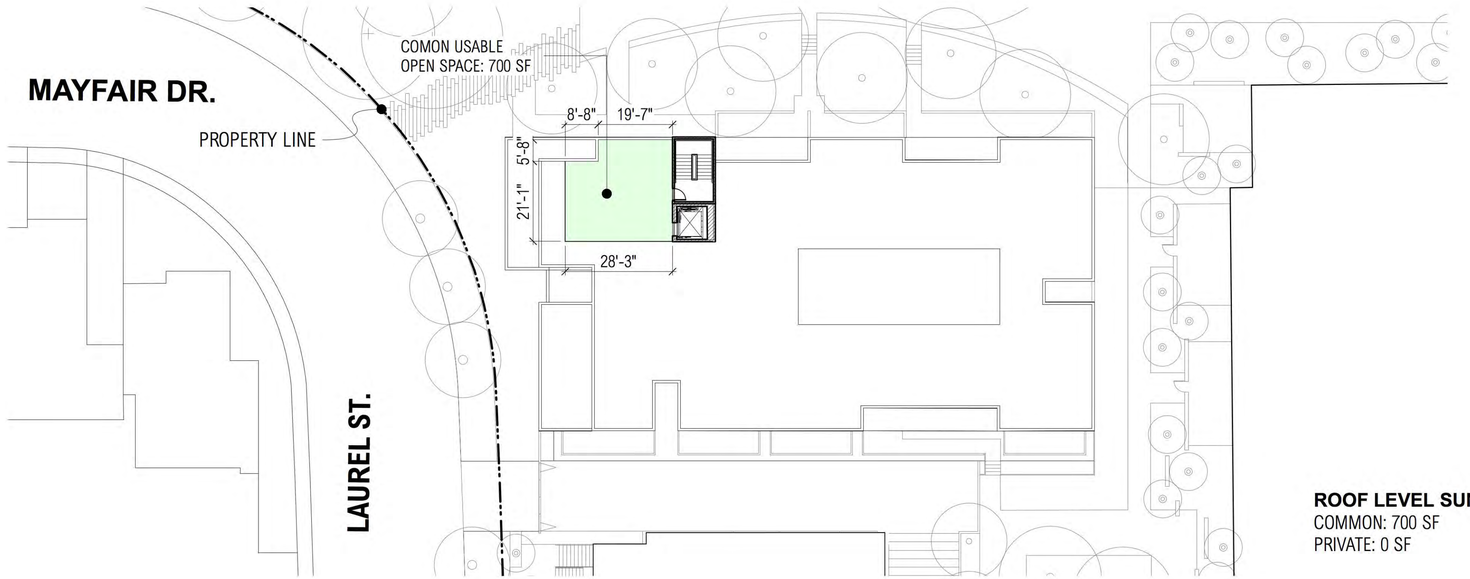
## MAYFAIR BUILDING OPEN SPACE - LEVEL 1 & 3

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

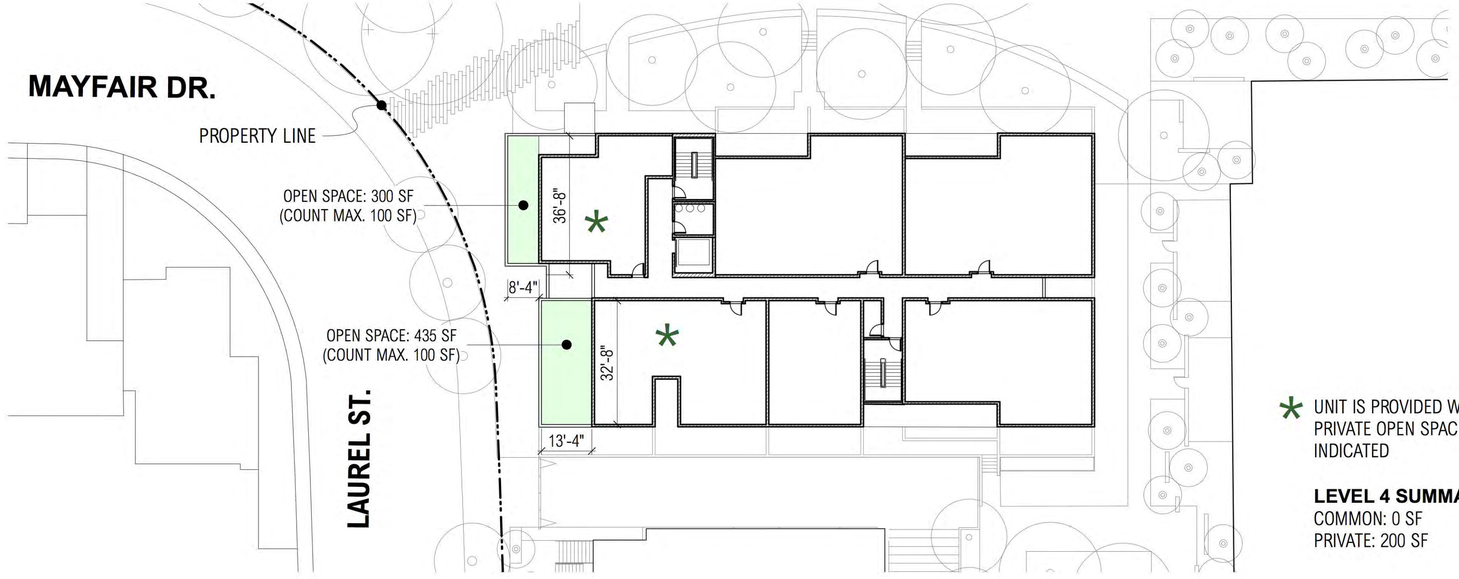
**A9.41**




**ROOF LEVEL SUMMARY**
COMMON: 700 SF
PRIVATE: 0 SF

## 2 MAYFAIR BUILDING OPEN SPACE - ROOF (EL. +319)

**1" = 20 ft**

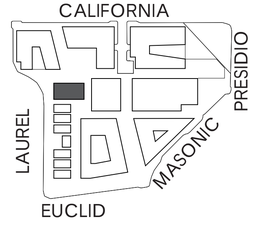



* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**LEVEL 4 SUMMARY**
COMMON: 0 SF
PRIVATE: 200 SF

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




## 1 MAYFAIR BUILDING OPEN SPACE - LEVEL 4 (EL. +308)

**1" = 20 ft**

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

## MAYFAIR BUILDING OPEN SPACE - LEVEL 4 & ROOF

07.03.2019
PLANNING APPLICATION SUBMITTAL

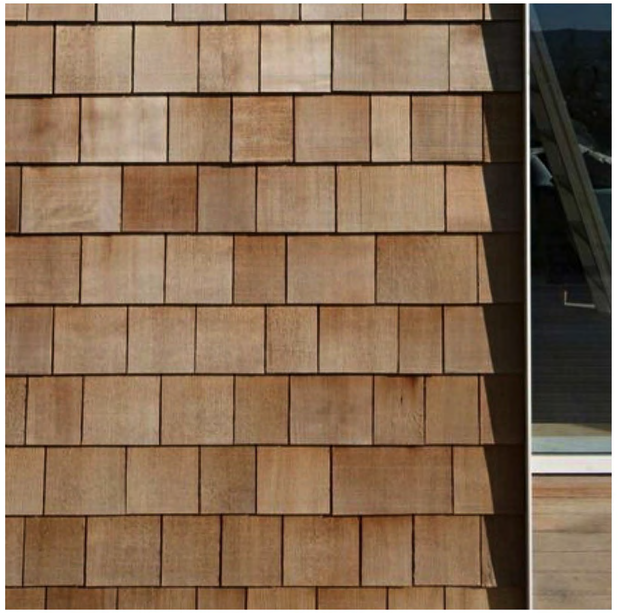
0 10' 20' 40' 60'

N

**A9.42**



**C** METAL PANEL



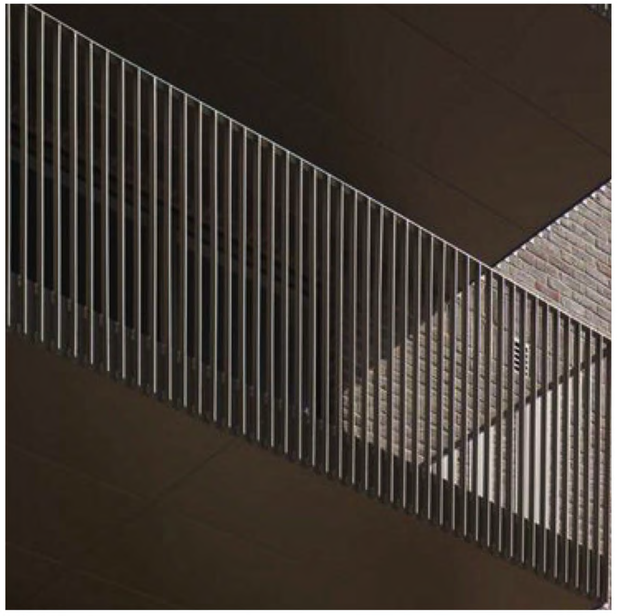
**N** WOOD SHINGLES



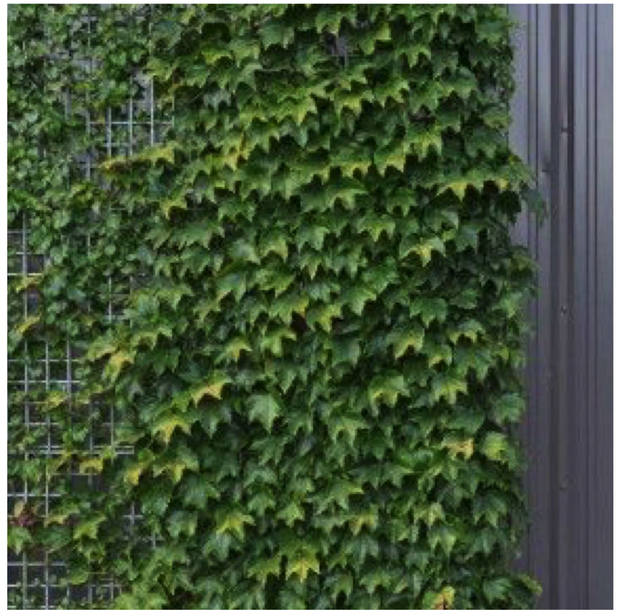
**O** WOOD SIDING



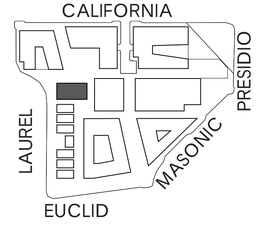
**D** ALUMINUM WINDOW SYSTEM



**G** STEEL GUARDRAIL



**I** GREEN WALL




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

MAYFAIR MATERIAL PALETTE

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A9.50**



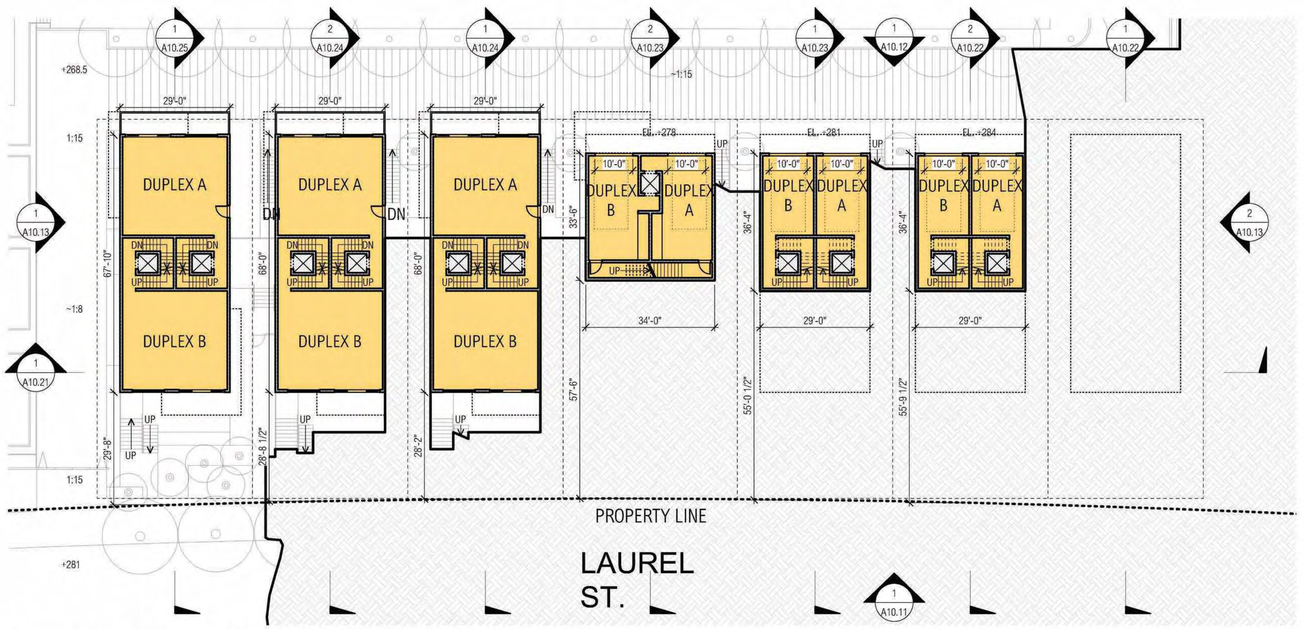
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

MAYFAIR PERSPECTIVE

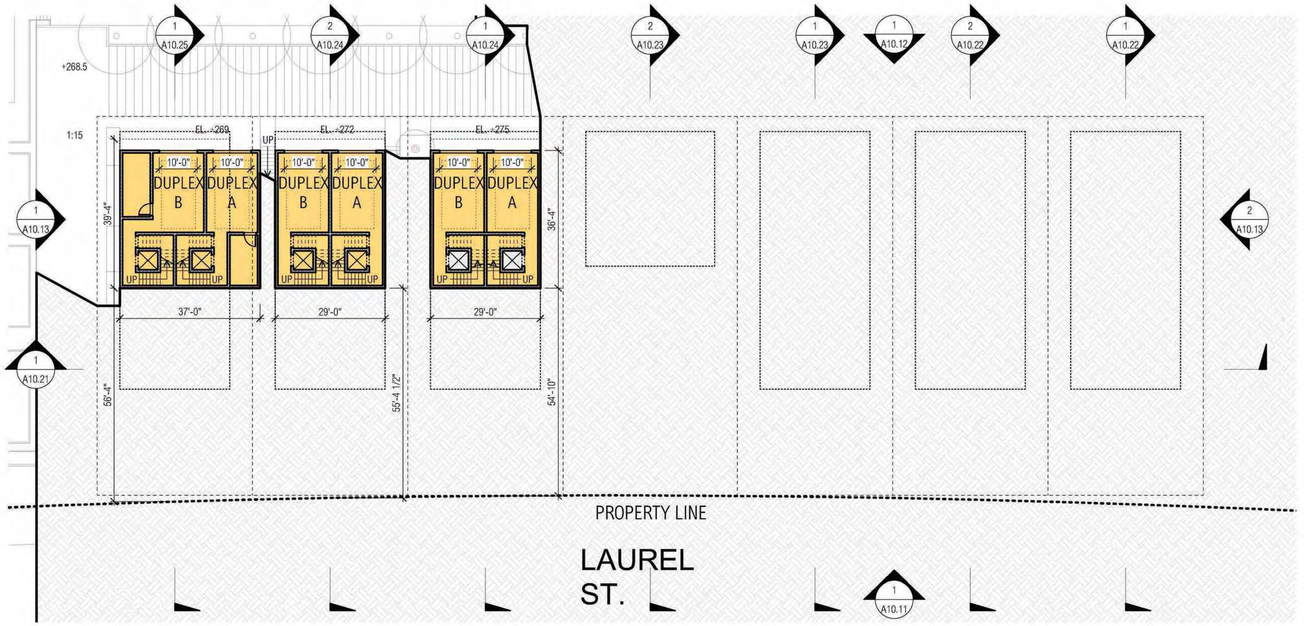
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A9.60**




**2 LAUREL DUPLEX PLAN (+285)**
1" = 20 ft



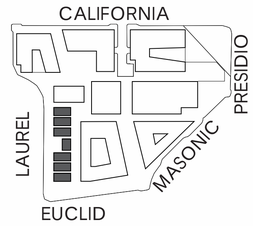

**1 LAUREL DUPLEX PLAN (+275)**
1" = 20 ft

SHEET NOTE:

1. 1 CLASS 1 BIKE PARKING SPACE PROVIDED AT EACH TOWNHOUSE GARAGE, TYP. (14 SPACES TOTAL)

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

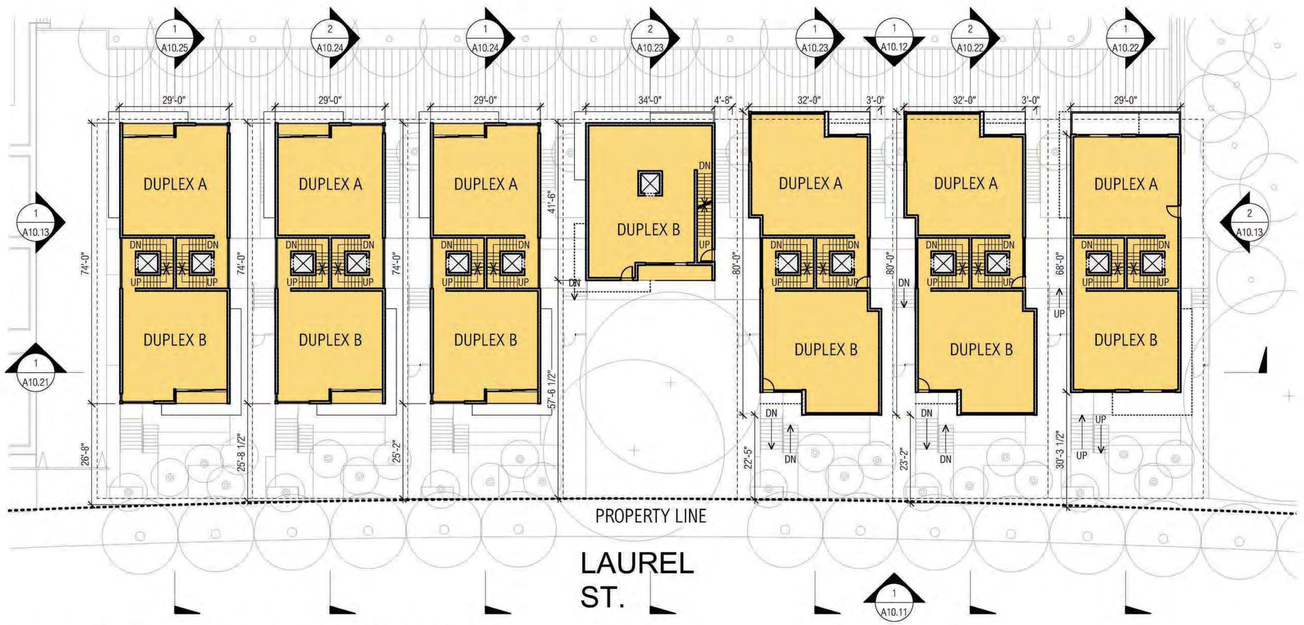
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

LAUREL DUPLEX PLANS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

**A10.01**




**2 LAUREL DUPLEX PLAN (+305)**
1" = 20 ft



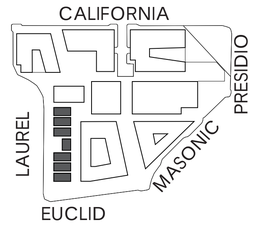

**1 LAUREL DUPLEX PLAN (+295)**
1" = 20 ft

SHEET NOTE:

1. 1 CLASS 1 BIKE PARKING SPACE PROVIDED AT EACH TOWNHOUSE GARAGE, TYP. (14 SPACES TOTAL)

PARKING
RETAIL USABLE
RETAIL B.O.H.
COMMERCIAL
COMMERCIAL, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF
OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

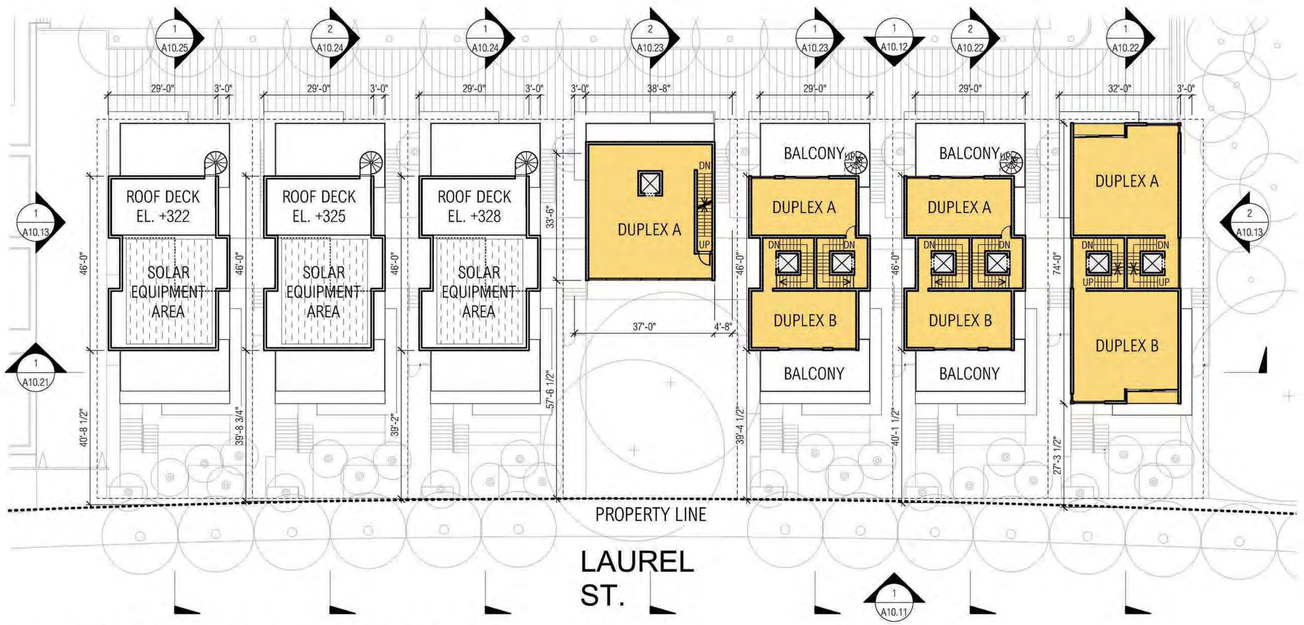
LAUREL DUPLEX PLANS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

N

**A10.02**




## 2 LAUREL DUPLEX PLAN (+325)

1" = 20 ft




## 1 LAUREL DUPLEX PLAN (+315)

1" = 20 ft

SHEET NOTE:

1. 1 CLASS 1 BIKE PARKING SPACE PROVIDED AT EACH TOWNHOUSE GARAGE, TYP. (14 SPACES TOTAL)

PARKING

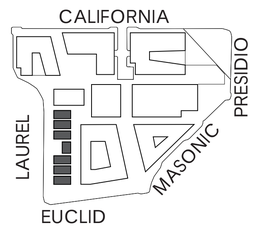
RETAIL USABLE | RETAIL B.O.H.

COMMERCIAL | COMMERCIAL, CORE

RESIDENTIAL HOMES | RESIDENTIAL CORE

LANDSCAPED ROOF | OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

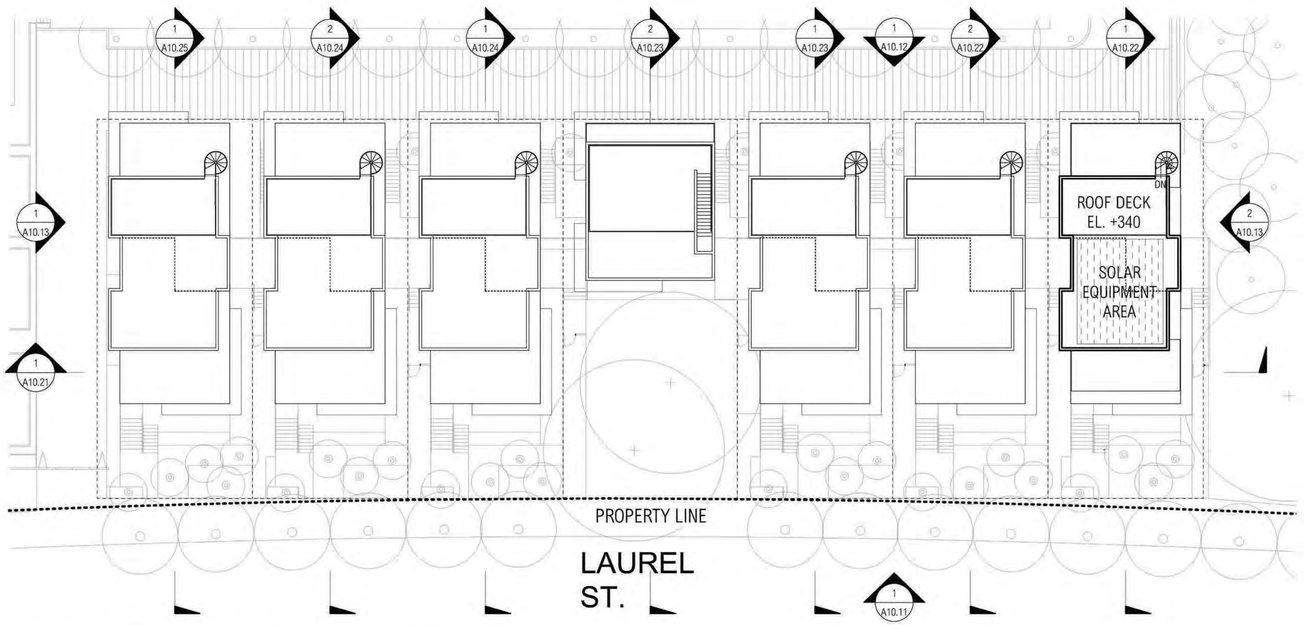
LAUREL DUPLEX PLANS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

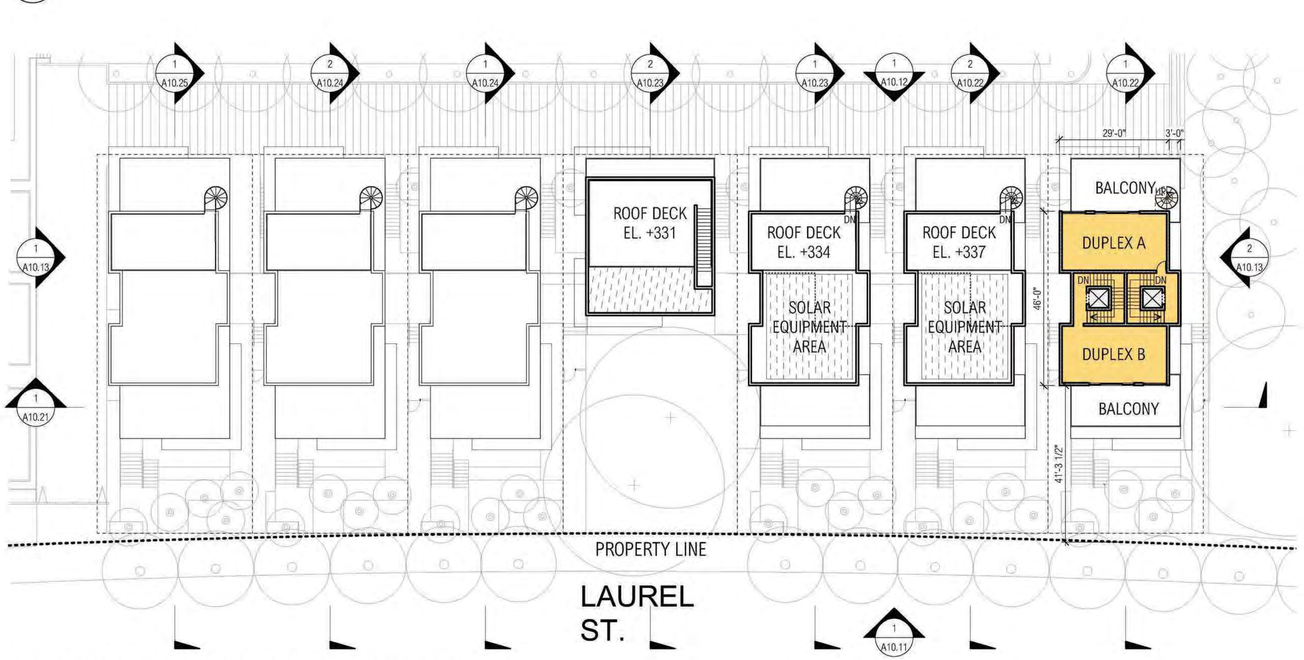
N

**A10.03**




## 2 LAUREL DUPLEX ROOF PLAN

1" = 20 ft




## 1 LAUREL DUPLEX PLAN (+335)

1" = 20 ft

SHEET NOTE:

1. 1 CLASS 1 BIKE PARKING SPACE PROVIDED AT EACH TOWNHOUSE GARAGE, TYP. (14 SPACES TOTAL)

PARKING

RETAIL USABLE

RETAIL B.O.H.

COMMERCIAL

COMMERCIAL, CORE

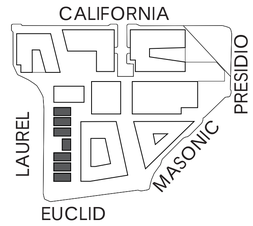
RESIDENTIAL HOMES

RESIDENTIAL CORE

LANDSCAPED ROOF

OPEN SPACE

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

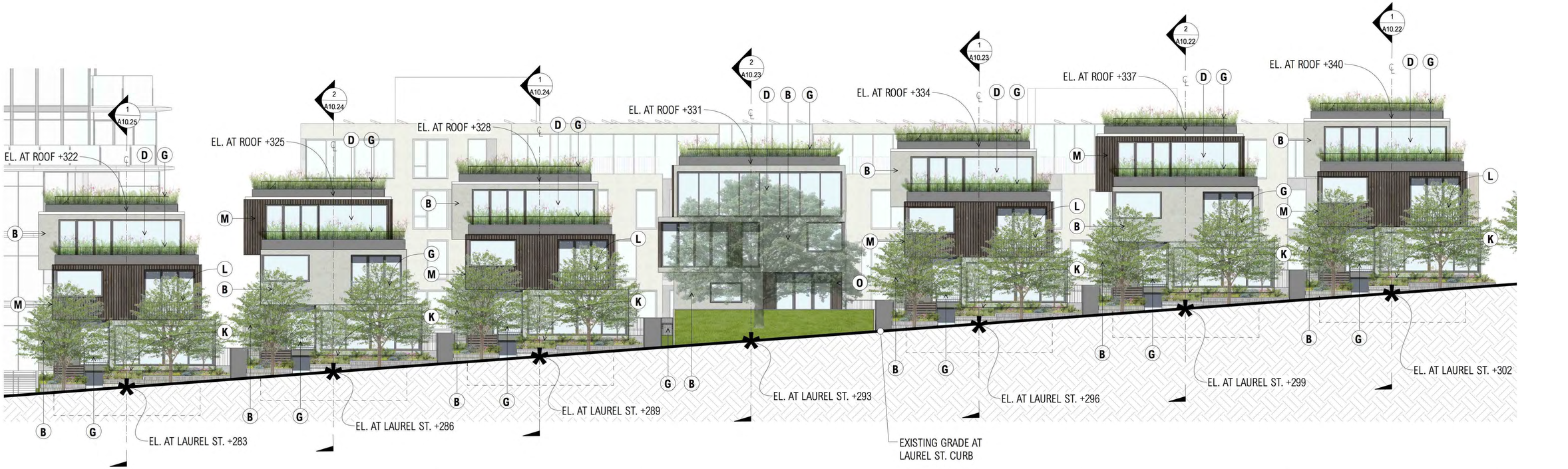
0 10' 20' 40' 60'

N

LAUREL DUPLEX PLANS

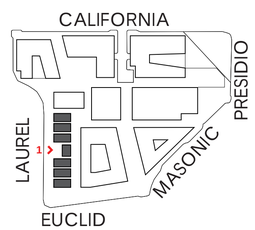
A10.04

| MATERIALS KEY | | SHEET NOTE |
|---|---|---|
| **A.** CEMENT BOARD SIDING | **H.** COMPOSITE WOOD PLANK SIDING | * BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04 |
| **B.** CEMENT PLASTER | **I.** GREEN WALL | |
| **C.** METAL PANEL | **J.** METAL FASCIA / SUNSHADE | |
| **D.** ALUMINUM WINDOW | **K.** ARCHITECTURAL CONCRETE | |
| **E.** ALUMINUM & GLASS STOREFRONT SYSTEM | **L.** SLAT SCREEN / RAIL | |
| **F.** METAL GARAGE DOOR | **M.** BOARD AND BATTEN SIDING | |
| **G.** STEEL GUARDRAIL / SCREEN | **N.** WOOD SHINGLES | |
| | **O.** WOOD SIDING | |
| | **P.** BRICK | |




## 1 WEST ELEVATION - LAUREL ST

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LAUREL DUPLEX ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

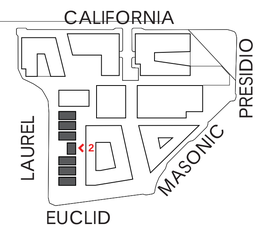
**A10.11**

| MATERIALS KEY | | SHEET NOTE |
|---|---|---|
| **A**. CEMENT BOARD SIDING | **H**. COMPOSITE WOOD PLANK SIDING | ✱ BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04 |
| **B**. CEMENT PLASTER | **I**. GREEN WALL | |
| **C**. METAL PANEL | **J**. METAL FASCIA / SUNSHADE | |
| **D**. ALUMINUM WINDOW | **K**. ARCHITECTURAL CONCRETE | |
| **E**. ALUMINUM & GLASS STOREFRONT SYSTEM | **L**. SLAT SCREEN / RAIL | |
| **F**. METAL GARAGE DOOR | **M**. BOARD AND BATTEN SIDING | |
| **G**. STEEL GUARDRAIL / SCREEN | **N**. WOOD SHINGLES | |
| | **O**. WOOD SIDING | |
| | **P**. BRICK | |




## 1 EAST ELEVATION

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

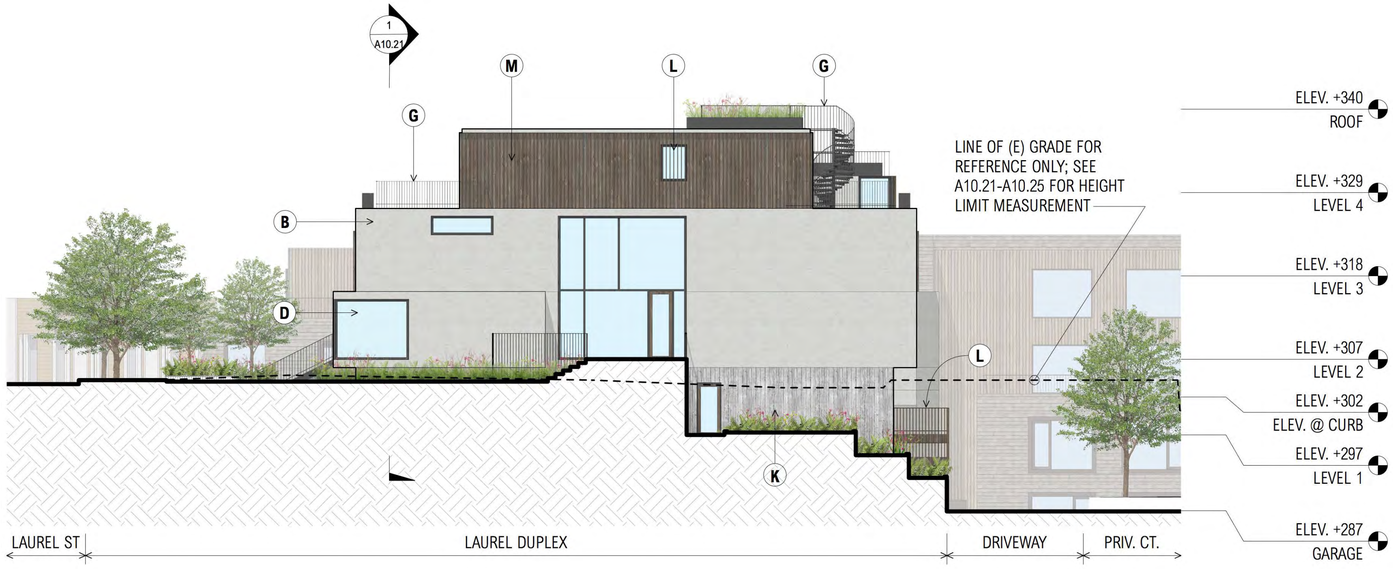
LAUREL DUPLEX ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

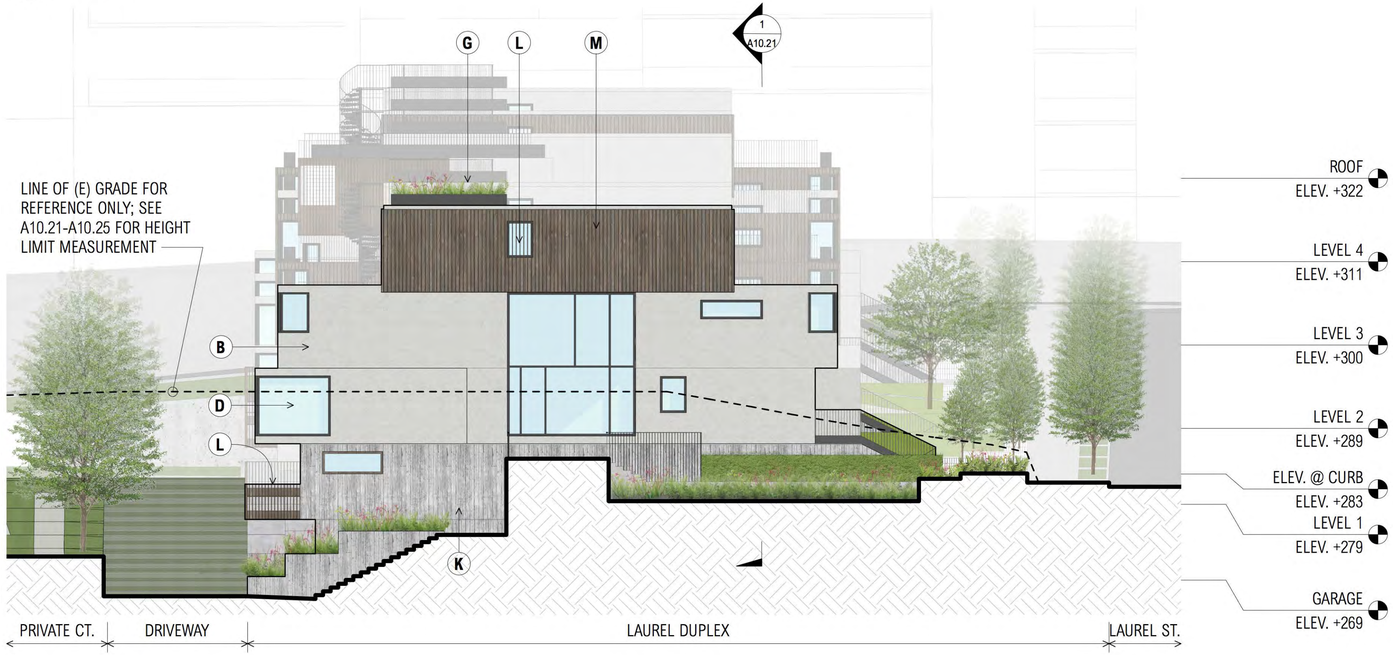
N

**A10.12**




## 2 SOUTH ELEVATION

1" = 10 ft




## 1 NORTH ELEVATION

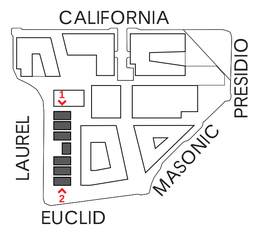
1" = 10 ft

### MATERIALS KEY

- **A.** CEMENT BOARD SIDING
- **B.** CEMENT PLASTER
- **C.** METAL PANEL
- **D.** ALUMINUM WINDOW
- **E.** ALUMINUM & GLASS STOREFRONT SYSTEM
- **F.** METAL GARAGE DOOR
- **G.** STEEL GUARDRAIL / SCREEN
- **H.** COMPOSITE WOOD PLANK SIDING
- **I.** GREEN WALL
- **J.** METAL FASCIA / SUNSHADE
- **K.** ARCHITECTURAL CONCRETE
- **L.** SLAT SCREEN / RAIL
- **M.** BOARD AND BATTEN SIDING
- **N.** WOOD SHINGLES
- **O.** WOOD SIDING
- **P.** BRICK

### SHEET NOTE

* BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT (POINTS MEASURED FROM (E) GRADE OF SITE) SEE SHEET G3.04




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

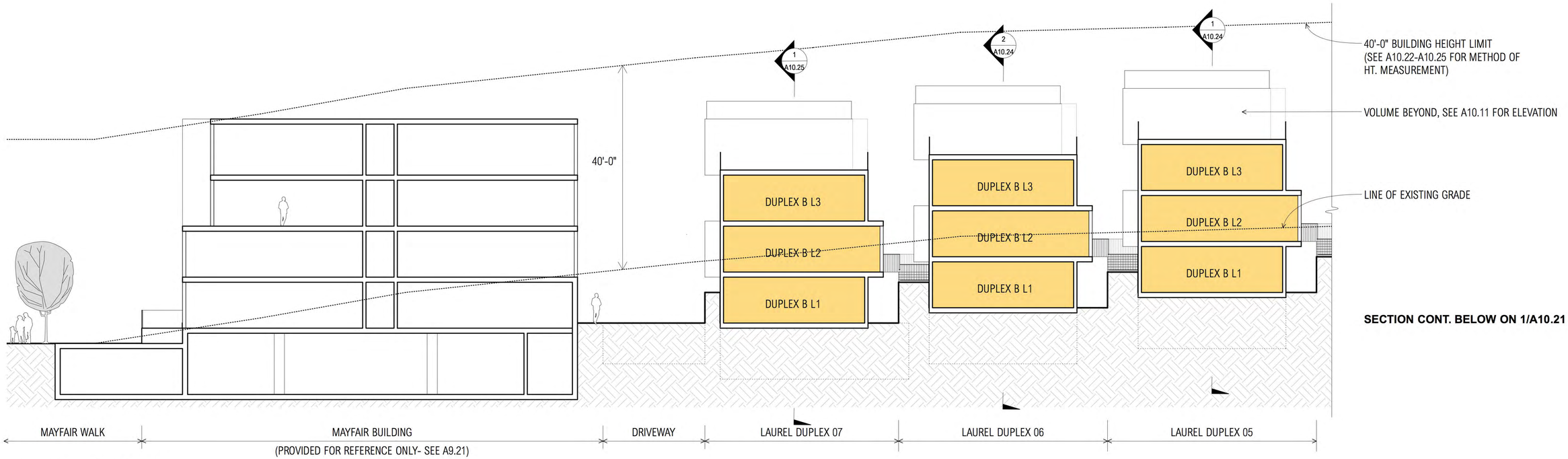
LAUREL DUPLEX ELEVATIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

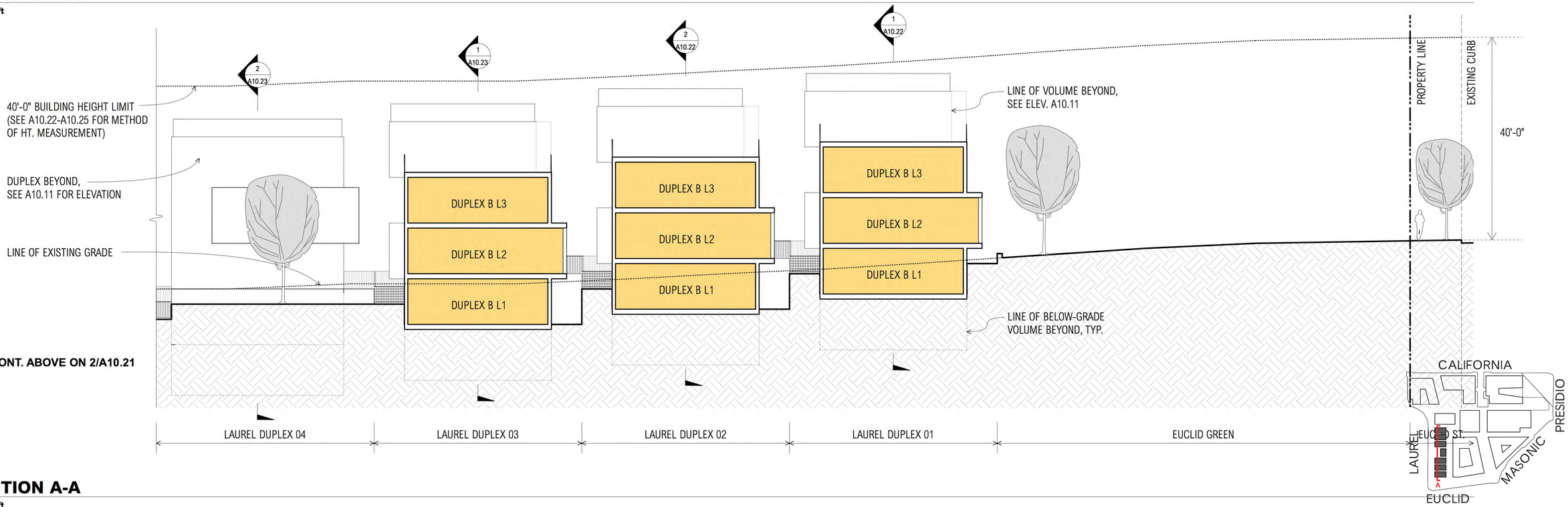
N

**A10.13**




## 2 SECTION A-A

1" = 10 ft




## 1 SECTION A-A

1" = 10 ft

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LAUREL DUPLEX SECTIONS

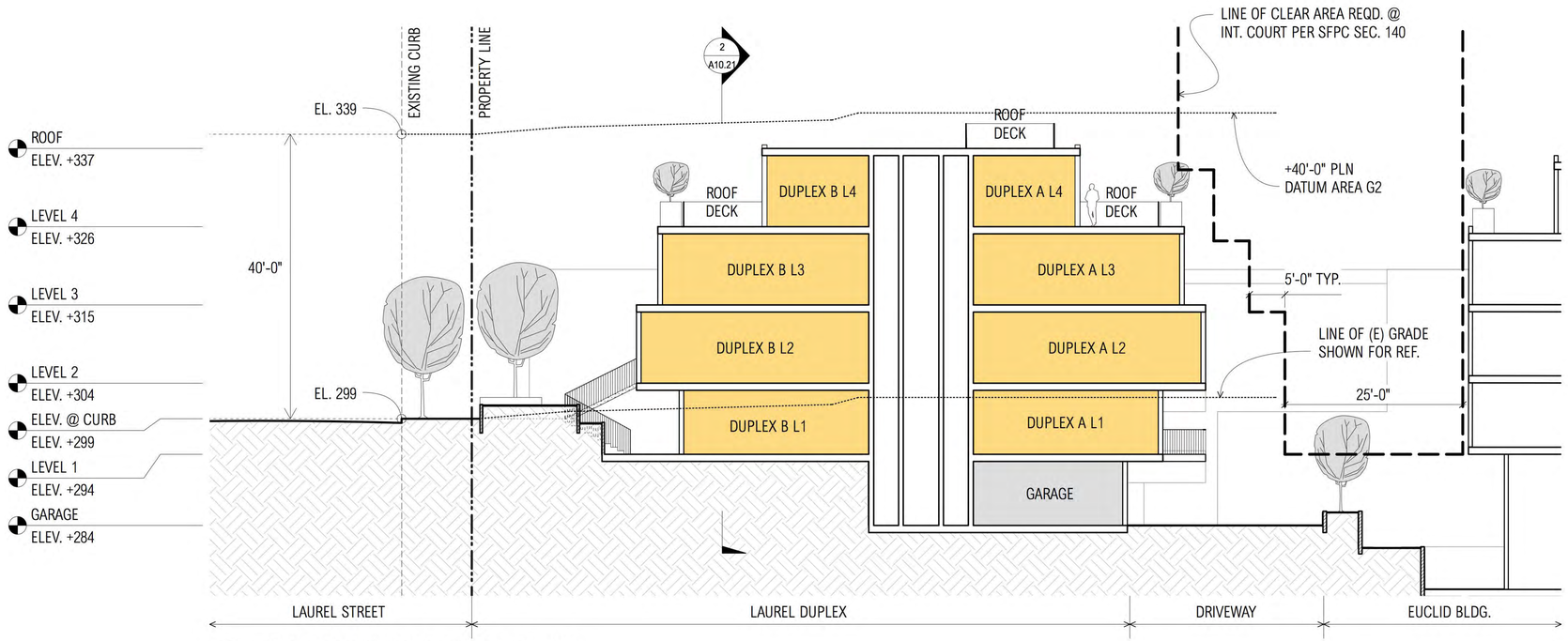
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

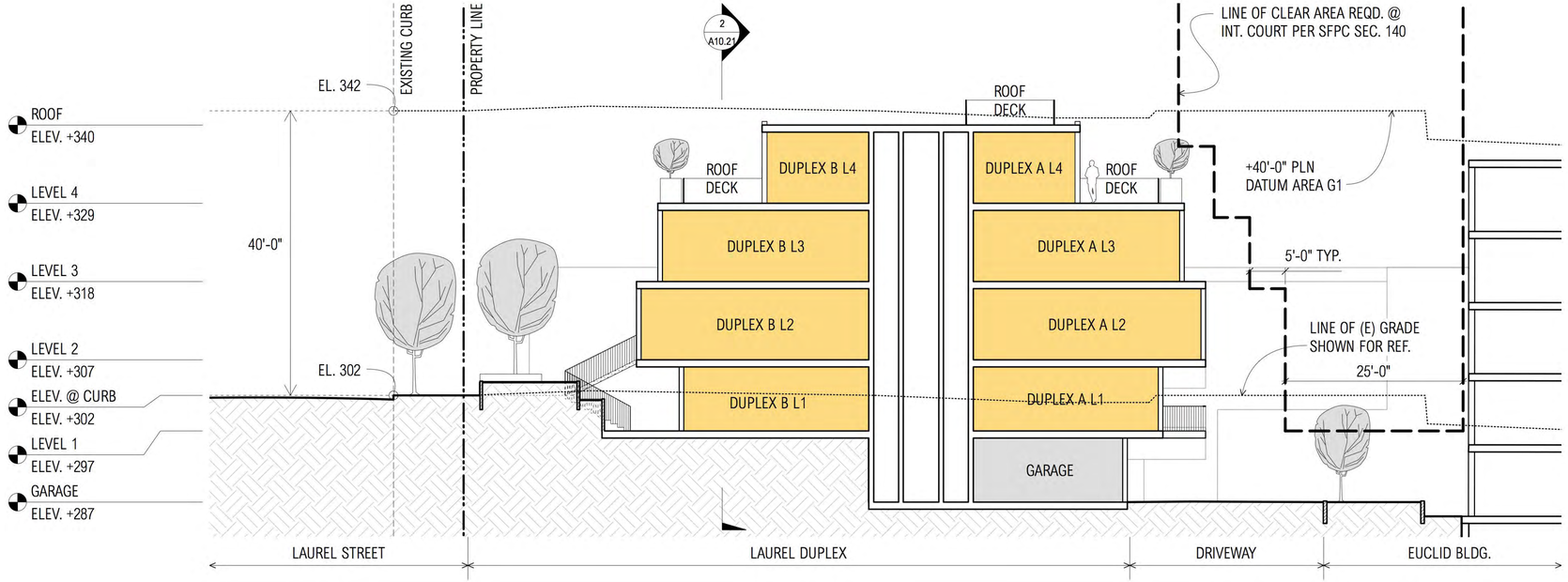
N

**A10.21**



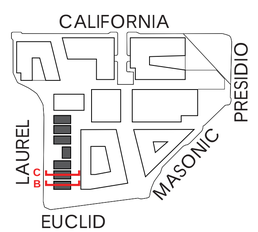

**2 SECTION C-C- DUPLEX 02**
1" = 10 ft

NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G2; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),




**1 SECTION B-B- DUPLEX 01**
1" = 10 ft

NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G1; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

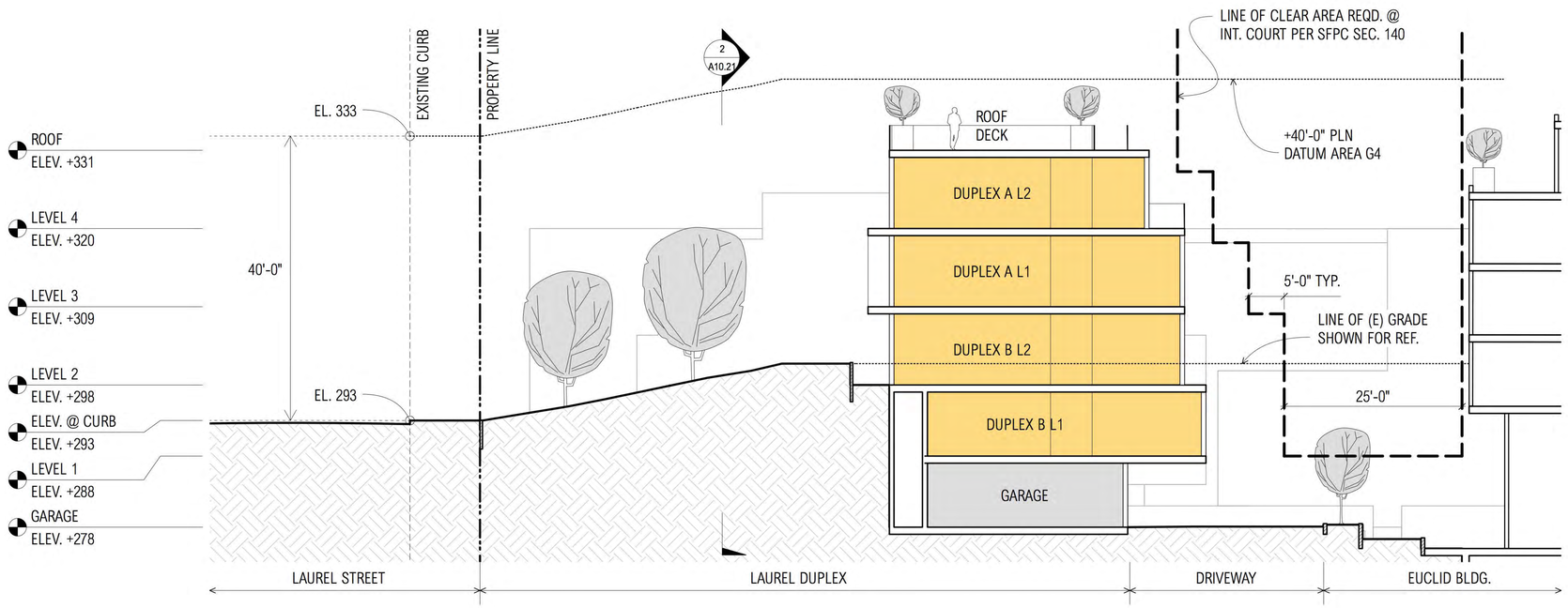
## LAUREL DUPLEX SECTIONS

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

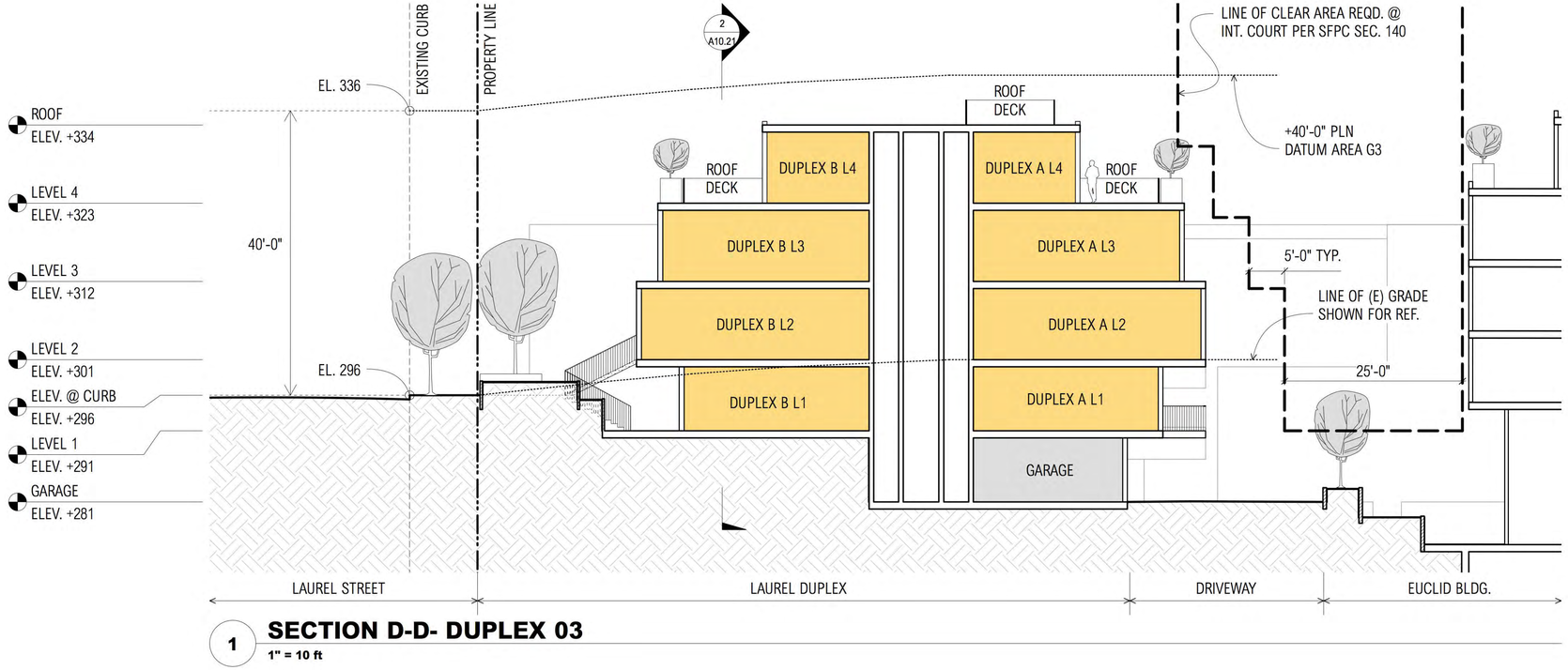
**A10.22**




NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G4; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),

## 2 SECTION E-E- DUPLEX 04

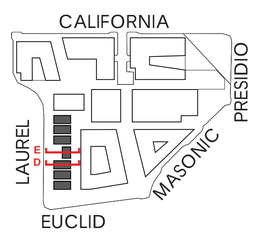
1" = 10 ft




NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G3; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),

## 1 SECTION D-D- DUPLEX 03

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LAUREL DUPLEX SECTIONS

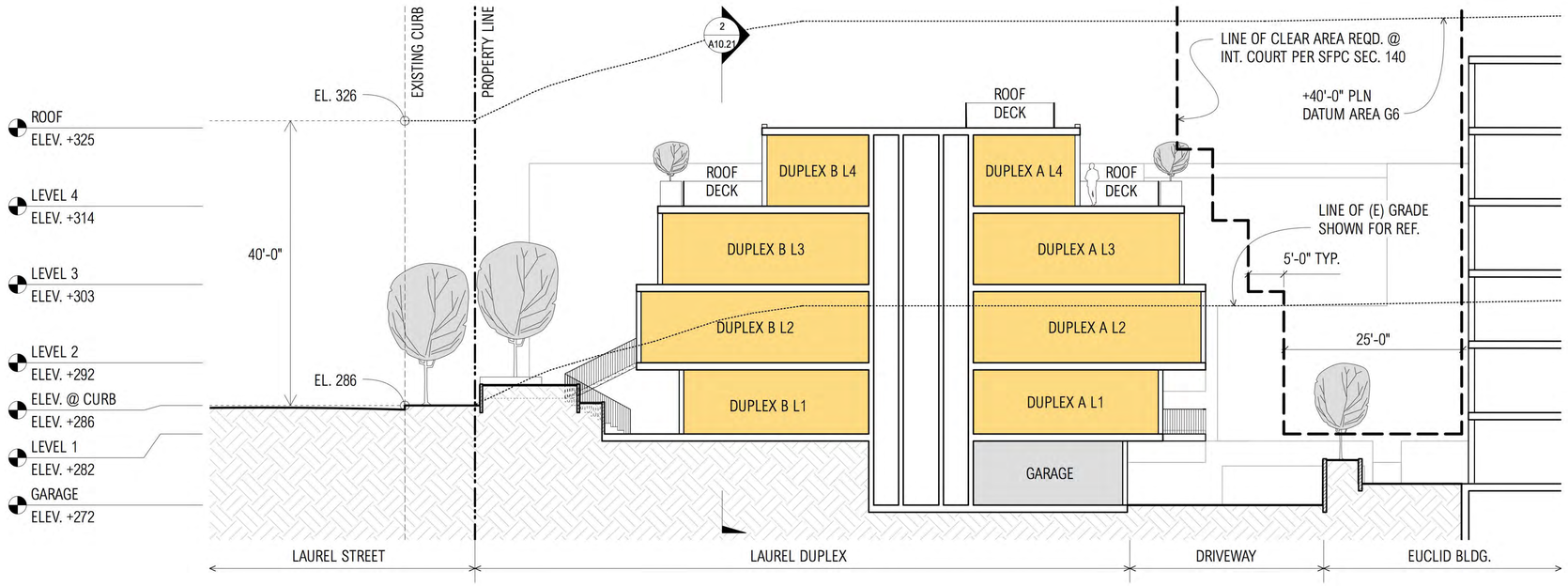
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

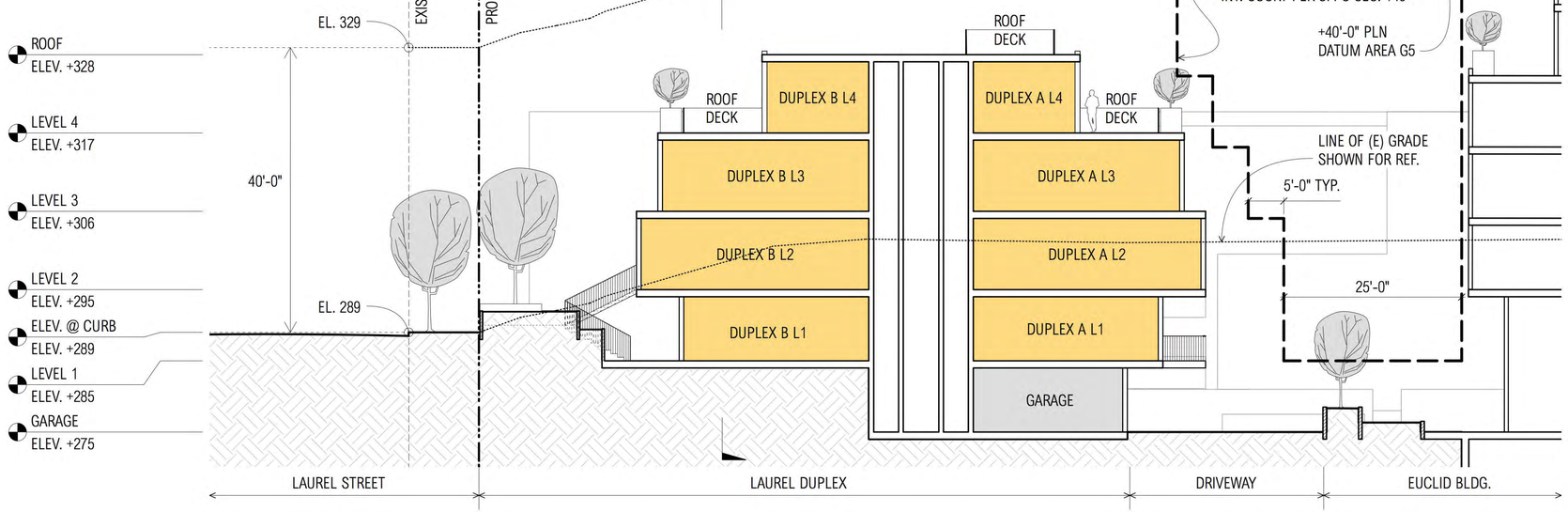
A10.23




NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G6; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),

## 2 SECTION G-G- DUPLEX 06

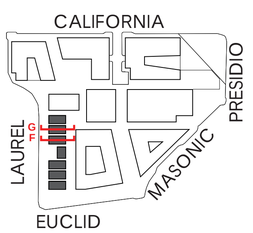
1" = 10 ft




NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G5; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),

## 1 SECTION F-F- DUPLEX 05

1" = 10 ft




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LAUREL DUPLEX SECTIONS

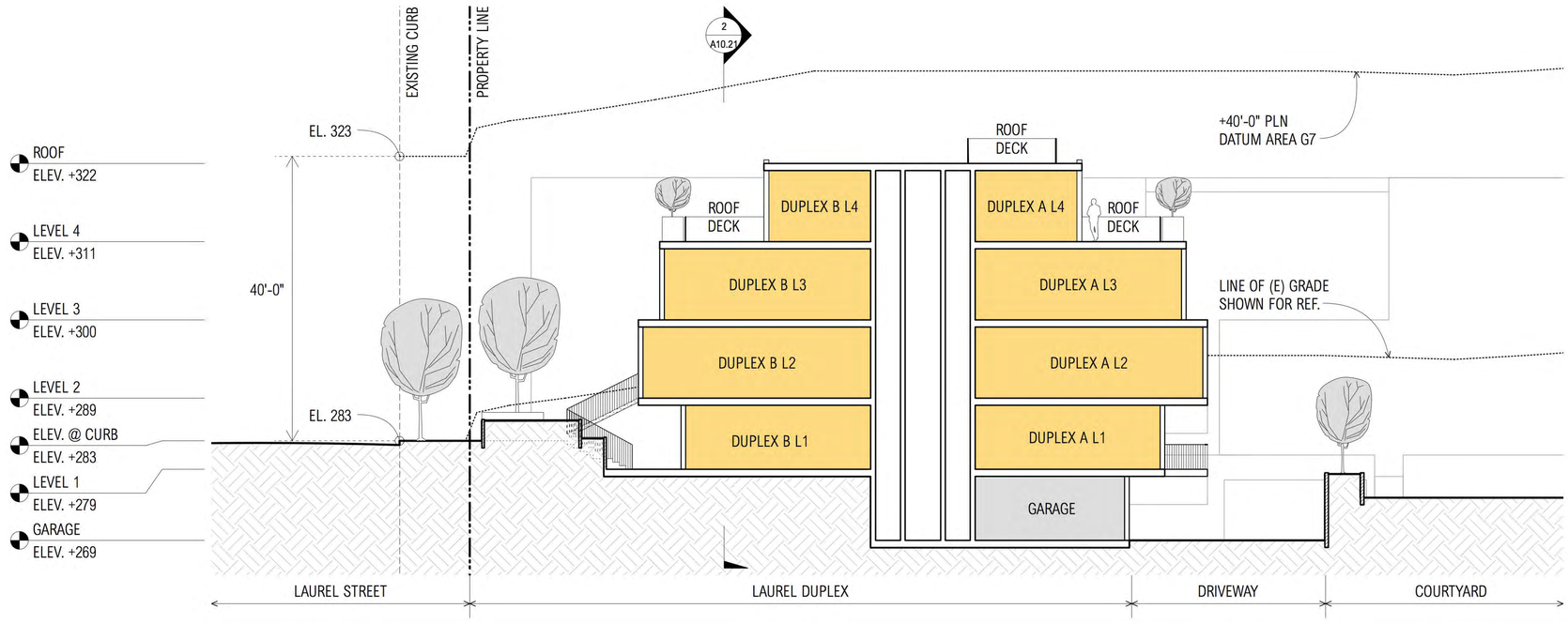
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

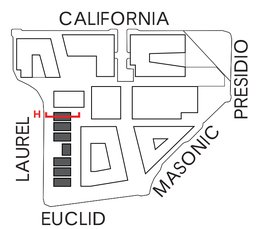
N

A10.24




1 **SECTION H-H- DUPLEX 07**
1" = 10 ft

NOTE: METHOD OF HEIGHT LIMIT MEASUREMENT FOR ZONE G7; SEE SHEET G3.04. SECTION TAKEN AT C.L. OF BUILDING PER SFPC SECTION 260(a)(1)(C),




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LAUREL DUPLEX SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

**A10.25**




2 **LAUREL DUPLEX OPEN SPACE - ROOF**
1" = 20 ft

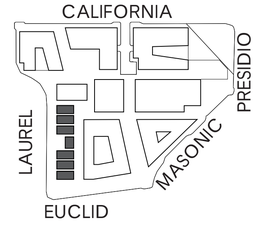
* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**ROOF LEVEL SUMMARY**
COMMON: 0 SF
PRIVATE: 1300 SF

1 **LAUREL DUPLEX OPEN SPACE - ELEV. +315**
1" = 20 ft

* UNIT IS PROVIDED WITH PRIVATE OPEN SPACE AS INDICATED

**ELEV. 315 SUMMARY**
COMMON: 0 SF
PRIVATE: 100 SF




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

LAUREL DUPLEX OPEN SPACE

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 5' 10' 20' 30'

N

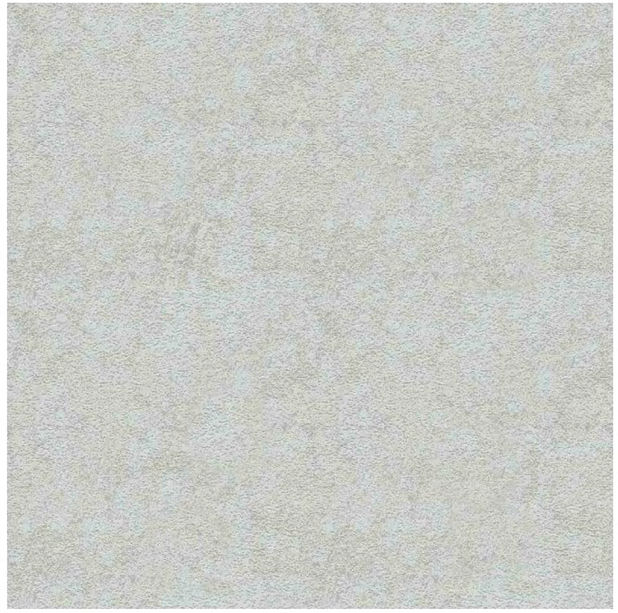
**A10.40**



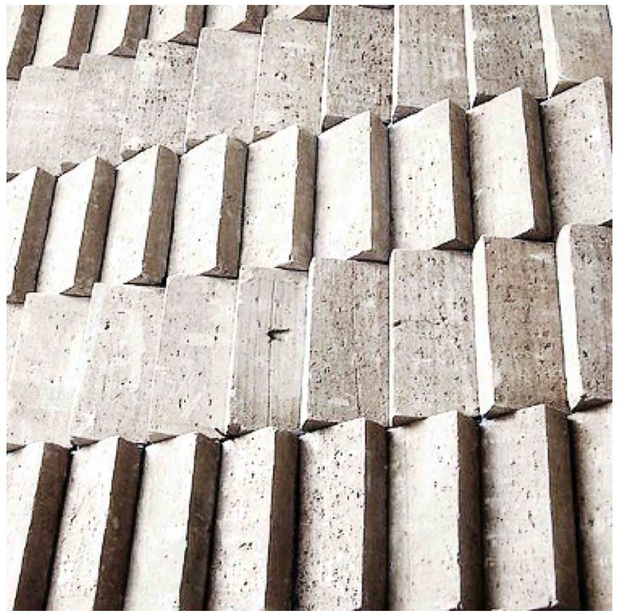
**L** SLAT SCREEN



**D** ALUMINUM WINDOW SYSTEM



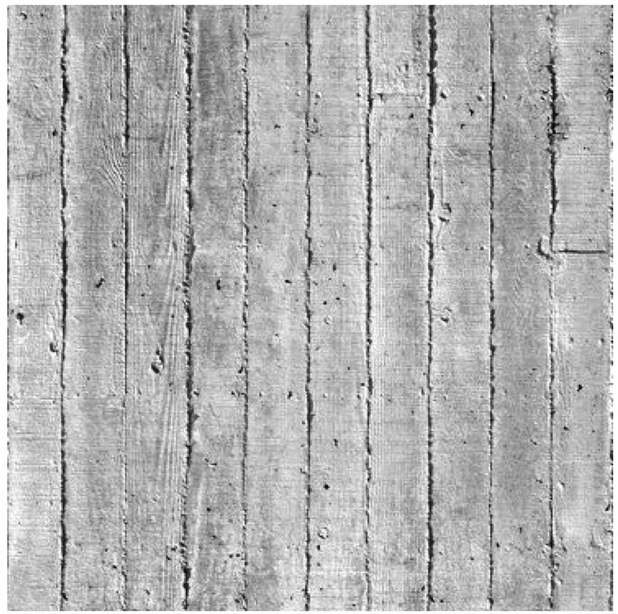
**B** CEMENT PLASTER



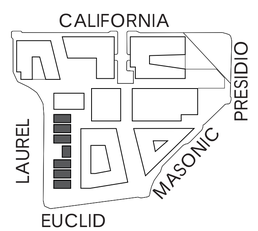
**P** BRICK



**G** STEEL GUARDRAIL



**K** ARCHITECTURAL CONCRETE




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LAUREL MATERIAL PALETTE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A10.50**



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

LAUREL TOWNHOMES PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

**A10.60**

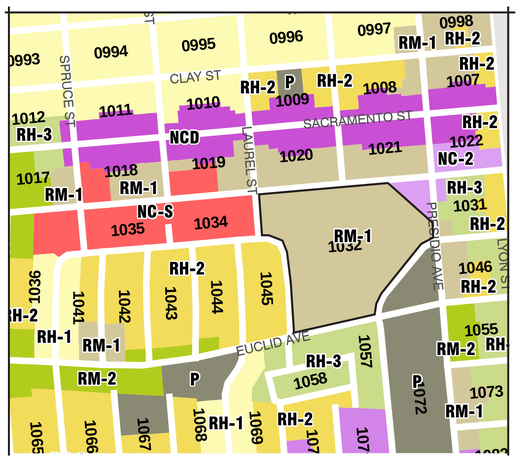
## PROJECT DESCRIPTION

THE 3333 CALIFORNIA STREET MIXED-USE PROJECT (PROPOSED PROJECT) SITE IS A 446,468-SQUARE-FOOT, OR AN APPROXIMATELY 10.25-ACRE PARCEL BOUNDED BY CALIFORNIA STREET TO THE NORTH, PRESIDIO AVENUE TO THE EAST, MASONIC AVENUE TO SOUTHEAST, EUCLID AVENUE TO THE SOUTH, AND LAUREL STREET/MAYFAIR DRIVE TO THE WEST, IN SAN FRANCISCO'S PRESIDIO HEIGHTS NEIGHBORHOOD, IN THE NORTHWEST PORTION OF SAN FRANCISCO. THE PROJECT SPONSOR, LAUREL HEIGHTS PARTNERS LLC, OWNS THE SITE AND LEASES IT TO THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, WHICH USES THE PROJECT SITE FOR ITS UNIVERSITY OF CALIFORNIA SAN FRANCISCO (UCSF) LAUREL HEIGHTS CAMPUS. PRIOR TO THE PROJECT SPONSOR'S ACQUISITION OF FEE TITLE TO THE SITE, THE PROJECT SPONSOR HAD ENTERED INTO A 99-YEAR PRE-PAID GROUND LEASE WITH THE REGENTS, THE FORMER OWNER OF THE SITE, IN 2014. THE PROJECT SITE DOES NOT INCLUDE THE SAN FRANCISCO FIREMAN'S CREDIT UNION (NOW CALLED SF FIRE CREDIT UNION) AT THE SOUTHWEST CORNER OF CALIFORNIA STREET AND PRESIDIO AVENUE, WHICH IS ON A SEPARATE PARCEL.

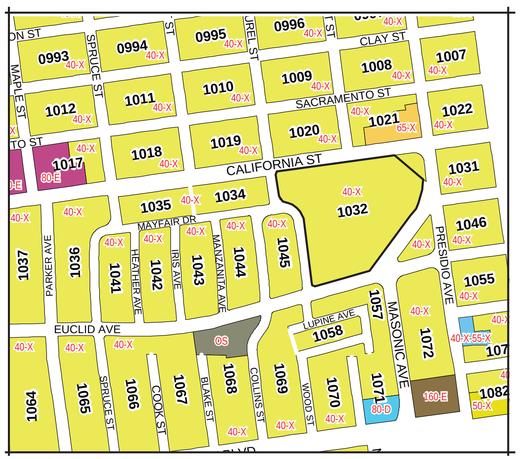
THE PROJECT SITE IS DEVELOPED WITH A FOUR-STORY, 455,000-GROSS-SQUARE-FOOT (GSF) OFFICE BUILDING WITH A THREE-LEVEL, 212-SPACE, PARTIALLY BELOW-GRADE PARKING GARAGE AT THE CENTER OF THE SITE; A ONE-STORY, 14,000-GSF ANNEX BUILDING AT THE CORNER OF CALIFORNIA AND LAUREL STREETS; THREE SURFACE PARKING LOTS WITH A TOTAL OF 331 SPACES CONNECTED BY INTERNAL ROADWAYS; TWO CIRCULAR GARAGE RAMP STRUCTURES LEADING TO BELOW-GRADE PARKING LEVELS; AND LANDSCAPING OR LANDSCAPED OPEN SPACE. THE CAMPUS SERVES AS THE PRIMARY LOCATION FOR UCSF'S OFFICES FOR ITS SOCIAL, BEHAVIORAL, AND POLICY SCIENCE RESEARCH DEPARTMENTS.

THE PROPOSED PROJECT CONSISTS OF REDEVELOPMENT OF THE SITE FROM OFFICE, RESEARCH, CHILD CARE, AND PARKING USES TO A MIX OF RESIDENTIAL, RETAIL, CHILD CARE, AND ASSOCIATED PARKING USES. THESE PROPOSED USES WOULD BE LOCATED IN 13 NEW BUILDINGS AND IN THE ADAPTIVELY REUSED OFFICE BUILDING, WHICH WOULD BE DIVIDED INTO TWO SEPARATE RESIDENTIAL BUILDINGS. PROPOSED PARKING WOULD BE PROVIDED IN FOUR BELOW-GRADE PARKING GARAGES AND SEVEN INDIVIDUAL, TWO-CAR PARKING GARAGES. THE PROPOSED PROJECT WOULD REQUIRE DEMOLITION, SOILS DISTURBANCE, AND EXCAVATION TO DEPTHS RANGING FROM 7 TO 40 FEET BELOW THE EXISTING GRADE FOR CONSTRUCTION OF THE BELOW-GRADE PARKING GARAGES, BUILDING FOUNDATIONS, AND SITE TERRACING.

## ZONING MAP*




## HEIGHT / BULK MAP*




* MAPS FROM WWW.SF-PLANNING.ORG

## PROJECT TOTALS SUMMARY

PROJECT TOTALS SR HOUSING

| | | EXISTING (area or count) | PROPOSED (area or count) | DELTA |
|---|---|---|---|---|
| **AREA SUMMARY** | | | | |
| | **RESIDENTIAL** | 0 | 977,437 | 977,437 |
| | **RETAIL** | 0 | 21,498 | 21,498 |
| | **RETAIL F&B** | 0 | 12,998 | 12,998 |
| | **OFFICE** | 364,500 | 0 | -364,500 |
| | **CHILDCARE** | 11,500 | 14,665 | 3,165 |
| | **GARAGE** | 93,000 | 401,234 | 308,234 |
| | **Total** | 469,000 | 1,427,832 | 958,832 |
| **TOTAL UNIT COUNT SUMMARY** | | | | |
| | **JR** | 0 | 27 | 27 |
| | **1-BED** | 0 | 392 | 392 |
| | **2-BED** | 0 | 195 | 195 |
| | **3-BED** | 0 | 103 | 103 |
| | **4-BED** | 0 | 27 | 27 |
| | **Total** | 0 | 744 | 744 |
| **PARKING SUMMARY** | | | | |
| | **RESIDENTIAL** | 0 | 744 | 744 |
| | **RETAIL** | 0 | 46 | 46 |
| | **RETAIL F&B** | 0 | 28 | 28 |
| | **OFFICE** | 483 | 0 | -483 |
| | **CHILDCARE** | 0 | 29 | 29 |
| | **COMMERCIAL** | 60 | 0 | -60 |
| | **Total** | 543 | 847 | 304 |
| | **CAR SHARE** | 0 | 10 | 10 |
| **SECTION 135 OPEN SPACE SUMMARY** | | | | |
| | **RESIDENTIAL PRIVATE** | 0 | 11,700 | 11,700 |
| | **TENANT COMMON** | 160,700 | 28,170 | -132,530 |
| | **PUBLIC** | 0 | 53,821 | 53,821 |
| | **COMMON NON-SEC.135** | 4,500 | 45,300 | 40,800 |
| | **PUBLIC NON-SEC.135** | | 71,405 | 71,405 |
| | **Total** | 165,200 | 210,396 | 45,196 |

**BELOW MARKET RATE UNITS NOTE:**
*THE PROPOSED PROJECT INCLUDES AFFORDABLE HOUSING UNITS AS REQUIRED UNDER PLANNING CODE SECTION 415 AND/OR AS SET FORTH IN A DEVELOPMENT AGREEMENT (DA) FOR THE PROJECT BETWEEN THE PROJECT SPONSOR AND THE CITY.*

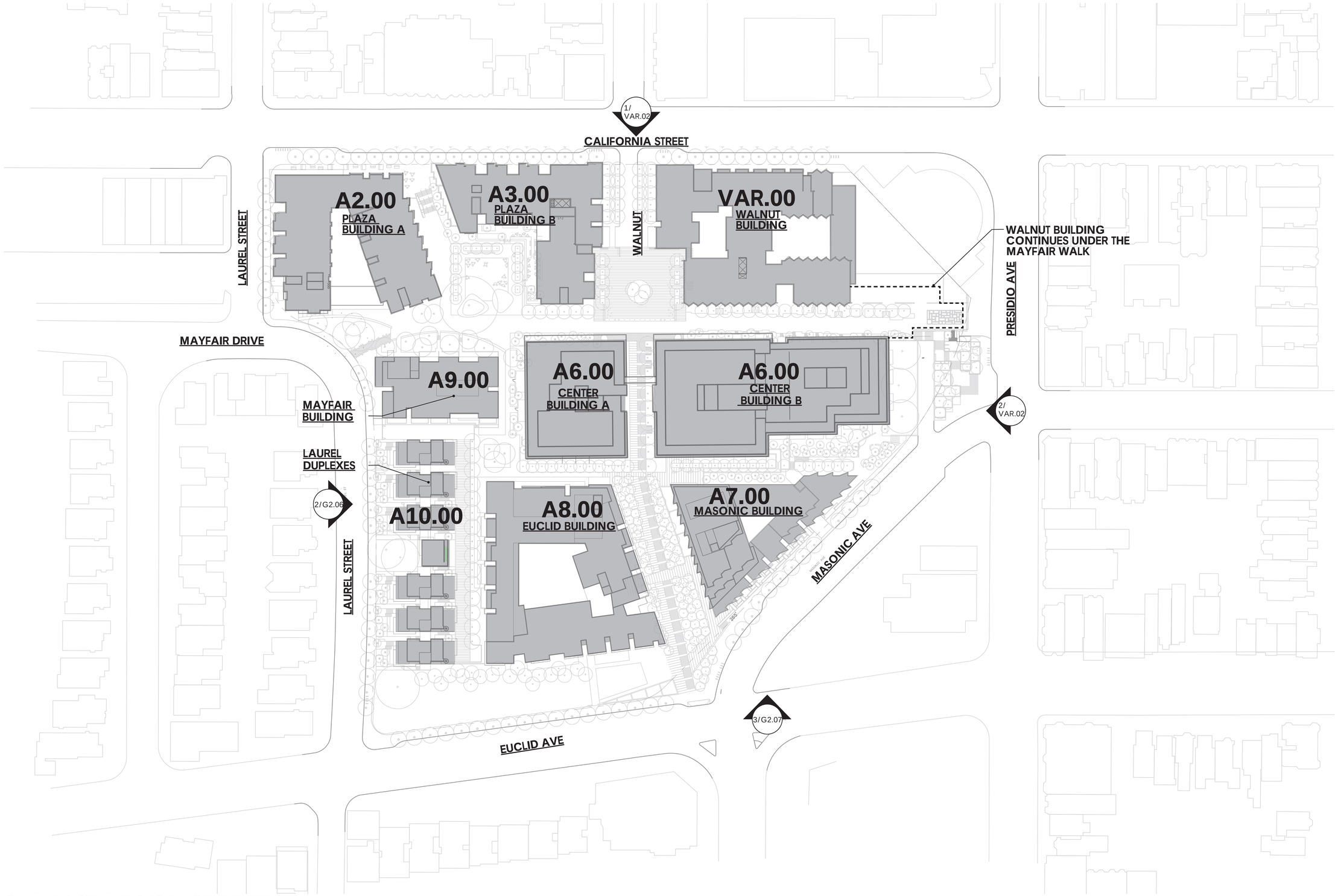
## PROPERTY SUMMARY:

| | |
|---|---|
| ADDRESS: | 3333 CALIFORNIA STREET |
| SUPERVISOR: | DISTRICT 2 / CATHERINE STEFANI |
| BLOCK/LOT: | 1032/003 |
| LOT AREA: | 446,468 SF |
| ZONING: | RM-1 |
| HEIGHT/BULK: | 40-X |

## ZONING SUMMARY:

| | REQUIRED / PERMITTED | PROVIDED |
|---|---|---|
| USES PERMITTED: (TABLE 209.2) | DWELLING UNITS (P)<br>RETAIL SALES (NP)[1]<br>COMMERCIAL USE (NP)[1]<br>CHILDCARE (P) | 744 RESIDENTIAL DWELLING UNITS<br>34,496 SF RETAIL<br>0 SF OFFICE<br>14,665 SF |
| DWELLING UNIT DENSITY : (TABLE 209.2) | 1:600 SF LOT AREA WITH C.U.A./P.U.D. | 744 DU - COMPLIES |
| HEIGHT (SEC. 260): | 40-FT[2]<br><br><br><br><br>(E) BLDG A - 68'-6"(NON-CONFORMING)<br>(E) BLDG B - 67'-0"(NON-CONFORMING) | CALIFORNIA ST - 45-FT<br>WALNUT - 68-FT<br>MASONIC AVE - 40-FT<br>EUCLID AVE - 40-FT<br>LAUREL - 30 TO 40FT<br>MAYFAIR - 40-FT<br>(E) BLDG A - 11'-6" ABOVE (E) BLDG<br>(E) BLDG B - 25 FT ABOVE (E) BLDG |
| BULK (SEC. 270): | "X" - HEIGHT STEPPING REQ'D IF GRADE EXCEEDS 5% SLOPE. | COMPLIES, SEE SHEET G3.04 + VAR.44 |
| FAR (SEC. 124(b)) | 1.8:1-ONLY APPLIES TO NON-RESI USES<br>803,642.4 GSF NON-RESI PERMITTED | NON-RESI AREA LESS THAN 803,642 SF |
| UNIT MIX | MIN. 25% 2-BED; 10% 3 BED<br>PER SFP SEC. 207.7 | COMPLIES -44% 2BD OR LARGER |
| REAR YARD (SEC. 209.2): | 45% LOT DEPTH | 52 % OF SITE IS OPEN AREA[3] |
| OPEN SPACE (SEC. 135): | 100 SF/UNIT PRIVATE,<br>133 SF/UNIT COMMON | COMPLIES, SEE SHEET VAR.43 |
| PARKING (SEC. 150): | RES: REQ'D 1.0/1.0 DU<br>RETAIL GEN: REQ'D 2/1000 UP TO 20K GSF<br>RETAIL F+B: 4/1000 OSF<br>CHILDCARE 1/25 CHILDREN = 7<br>PARKING TOTAL: | 744 SPACES, OR 1.0/1.0<br>46 (PER MITIGATION MEASURE 2.14/1000 OSF)<br>28 (PER MITIGATION MEASURE 2.14/1000 OSF)<br>29 SPACES (PER S.U.D.)<br>847 |
| CAR SHARE (SEC. 166): | 201+ DU: 2, + 1/200 = 5 REQ'D<br>50+ STALLS: 1+ 1/50 OVER 50 = 3 REQ'D<br>CAR SHARE TOTAL: | 5 - COMPLIES<br>5 - COMPLIES[4]<br>10 |
| OFF-STREET LOADING: (SEC. 152) | 1 FOR 10,000-60,000 SF RETAIL<br>3 FOR 500,000-900,000 SF RES+OFFICE | TOTAL OF 6 PROVIDED - COMPLIES<br>(3 IN WALNUT BLDG, 3 IN MASONIC BLDG) |
| BIKE PARKING (SEC. 155): | CLASS ONE:<br>RES: 100 + 1/4 DU OVER 100 = 653<br>RETAIL: 1/7,500 OSF = 34,496/7,500 = 5<br>CHILDCARE: 1/20 CHILDREN = 172/20=9<br>TOTAL CLASS 1 BIKE STALLS:<br><br>CLASS TWO:<br>RES: 1 / 20 DU = 744/20 = 38<br>RETAIL: 1/2,500 NSF IF <50K GSF = 8<br>FOOD/BEV: 1/750 NSF = 10,398/750<br>CHILDCARE: 1/20 CHILDREN = 8<br>TOTAL CLASS 2 BIKE STALLS: | <br>744 - COMPLIES[4]<br>8 - COMPLIES<br>10 - COMPLIES<br>762<br><br><br>45 - COMPLIES[4]<br>8 - COMPLIES<br>14 - COMPLIES<br>10 - COMPLIES<br>77 |

1. *SPONSOR WILL BE REQUESTING A S.U.D. TO INCLUDE THESE USES.*
2. *SPONSOR WILL BE REQUESTING A HEIGHT MAP CHANGE TO ALLOW FOR HEIGHTS PROVIDED.*
3. *SPONSOR WILL BE REQUESTING TO SATISFY THE REAR YARD REQUIREMENT THROUGH AN S.U.D. OPEN SPACE EQUIVALENCY.*
4. *ADDITIONAL SPACES PROVIDED, BEYOND CODE REQUIRED.*
5. *PC RESOLUTION 4109 WILL BE EXTINGUISHED THROUGH ORDINANCE APPROVED BY THE BOARD OF SUPERVISORS.*




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

KEYING SITE PLAN - EIR VARIANT 1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019

0 30' 60' 120' 180'

N

**VAR.00**

## WALNUT VARIANT AREAS

| Level | Residential Gross SF | Retail SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| 5 | 26,910 | 0 | 0 | 0 | 0 | 0 | 26,910 |
| 4 | 29,445 | 0 | 0 | 0 | 0 | 0 | 29,445 |
| 3 | 29,445 | 0 | 0 | 0 | 0 | 0 | 29,445 |
| 2 | 29,445 | 0 | 0 | 0 | 0 | 0 | 29,445 |
| 1 | 31,180 | 0 | 0 | 0 | 0 | 0 | 31,180 |
| B1 | 1,165 | 8,500 | 0 | 0 | 13,465 | 39,635 | 62,765 |
| B2 | 0 | 0 | 0 | 0 | 1,200 | 47,865 | 49,065 |
| B3 | 0 | 0 | 0 | 0 | 0 | 78,445 | 78,445 |
| | | | | | | | |
| **Total** | 147,590 | 8,500 | 0 | 0 | 14,665 | 165,945 | **336,700** |

## WALNUT VARIANT UNIT MIX

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
|---|---|---|---|---|---|---|
| 5 | 0 | 36 | 0 | 0 | 0 | 36 |
| 4 | 0 | 39 | 0 | 0 | 0 | 39 |
| 3 | 0 | 39 | 0 | 0 | 0 | 39 |
| 2 | 0 | 37 | 0 | 0 | 0 | 37 |
| 1 | 0 | 34 | 1 | 0 | 0 | 35 |
| B1 | 0 | 0 | 0 | 0 | 0 | 0 |
| B2 | 0 | 0 | 0 | 0 | 0 | 0 |
| B3 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | | | |
| **Total** | 0 | 185 | 1 | 0 | 0 | **186** |
| *Percentage* | *0%* | *99%* | *1%* | *0%* | *0%* | *100%* |

## VARIANT TOTALS AREAS

| Bldg | Residential Gross SF | Retail Gross SF | Retail Food and Bev. SF | Office Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 66,755 | 7,408 | 7,408 | 0 | 0 | 69,329 | 150,900 |
| **Plaza Bldg B** | 72,035 | 5,590 | 5,590 | 0 | 0 | 69,329 | 152,544 |
| **Walnut Variant** | 147,590 | 8,500 | 0 | 0 | 14,665 | 165,945 | 336,700 |
| **Center Bldg A** | 89,735 | 0 | 0 | 0 | 0 | 0 | 89,735 |
| **Center Bldg B** | 231,667 | 0 | 0 | 0 | 0 | 22,731 | 254,398 |
| **Masonic** | 83,505 | 0 | 0 | 0 | 0 | 14,220 | 97,725 |
| **Euclid** | 184,170 | 0 | 0 | 0 | 0 | 42,360 | 226,530 |
| **Laurel Duplexes** | 55,300 | 0 | 0 | 0 | 0 | 4,960 | 60,260 |
| **Mayfair** | 46,680 | 0 | 0 | 0 | 0 | 12,360 | 59,040 |
| | | | | | | | |
| **Total** | **977,437** | **21,498** | **12,998** | **0** | **14,665** | **401,234** | **1,427,832** |

## VARIANT UNIT MIX TOTALS

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED or PH | TOTAL |
|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 18 | 22 | 23 | 4 | 0 | 67 |
| **Plaza Bldg B** | 9 | 21 | 25 | 6 | 0 | 61 |
| **Walnut Variant** | 0 | 185 | 1 | 0 | 0 | 186 |
| **Center Bldg A** | 0 | 24 | 11 | 10 | 6 | 51 |
| **Center Bldg B** | 0 | 51 | 49 | 30 | 9 | 139 |
| **Masonic** | 0 | 22 | 25 | 10 | 0 | 57 |
| **Euclid** | 0 | 55 | 54 | 30 | 0 | 139 |
| **Laurel Duplexes** | 0 | 0 | 0 | 2 | 12 | 14 |
| **Mayfair** | 0 | 12 | 7 | 11 | 0 | 30 |
| | | | | | | |
| **Total** | **27** | **392** | **195** | **103** | **27** | **744** |
| | *4%* | *53%* | *26%* | *14%* | *4%* | *100%* |

# PARKING PROVIDED

## VARIANT PARKING

| Bldg | Dwelling Units | Res *0 to 1.5 / DU* | Res Total TDM Provided | Childcare | Childcare Req'd *1.5/25 children* | Total TDM Provided | Retail (general) x 0.8 * | Retail (general) *Code 1.5/500 osf* | Total Retail TDM Provided | Retail (F&B) x 0.8* | Retail (F&B) *Code 1.5/200 osf* | Total Retail TDM Provided | Office x 0.8* | Office Req'd 1.5/*500 osf* | Total Office TDM Provided | Commercial | Commercial Req'd | Total Com. Provided |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 101 | **67** | 0 | 0 | **0** | 5,926 | 18 | **16** | 5,926 | 44 | **14** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Plaza Bldg B** | 61 | 92 | **61** | 0 | 0 | **0** | 4,472 | 14 | **12** | 4,472 | 34 | **14** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Walnut** | 186 | 279 | **186** | 179 children | 11 | **29** | 6,800 | 21 | **18** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg A** | 51 | 77 | **51** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg B** | 139 | 209 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Masonic** | 57 | 86 | **57** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Euclid** | 139 | 209 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Laurel Duplexes** | 14 | 21 | **14** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Mayfair** | 30 | 45 | **30** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Total** | | 1,116 | **744** | | 11 | **29** | | 53 | **46** | | 78 | **28** | | 0 | **0** | | 0 | **0** |

Car Share: 5 | Required Residential | 3 | Required Non-Residential | 8 | Total Required | 10 | Total Car Share Provided | Total Parking on Site: 857

* Occupied Floor Area (OFA) is assumed to be 80% of tenant floor area per NOPDR1

## CLASS ONE BIKE

| Bldg | Dwelling Units | Stalls Req'd *1/du to 100 then 1/4du* | Total Res. Provided | Childcare | Stalls Req'd *1/20 children* | Total Provided | Retail (general) x 0.8 | Retail (general) Req'd *1/7,500sf* | Total Retail Provided | Retail (F&B) x 0.8 | Retail (F&B) *Req'd 1/7,500sf* | Total Retail Provided | Office x 0.8 | Office Req'd *1/5000sf* | Total Office Provided |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 67 | **67** | 0 | 0 | **0** | 5,926 | 1 | **0*** | 5,926 | 1 | **0*** | 0 | 0 | **0** |
| **Plaza Bldg B** | 61 | 61 | **61** | 0 | 0 | **0** | 4,472 | 1 | **2** | 4,472 | 1 | **2** | 0 | 0 | **0** |
| **Walnut** | 186 | 122 | **186** | 179 children | 9 | **10** | 6,800 | 1 | **4** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg A** | 51 | 51 | **51** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg B** | 139 | 110 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Masonic** | 57 | 89 | **57** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Euclid** | 139 | 110 | **139** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Laurel Duplexes** | 14 | 14 | **14** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Mayfair** | 30 | 30 | **30** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Total** | | 653 | **744** | | 9 | **10** | | 2 | **6** | | 2 | **2** | | 0 | **0** |

* Class 1 bike parking for retail in the Plaza buildings is centralized at the B1 level in Plaza B and adjacent to a locker and shower room — **Total on Site: 762**

## CLASS TWO BIKE

| Bldg | Dwelling Units | Stalls Req'd *1/20 du* | Total Res. Provided | Childcare | Stalls Req'd *1/20 children* | Total Provided | Retail (general) x 0.8 | Retail (general) Req'd *1/2,500sf* | Total Retail Provided | Retail (F&B) x 0.8 | Retail (F&B) *Req'd 1/750sf* | Total Retail Provided | Office x 0.8 | Office *min 2, plus 1/50,000 sf* | Total Office Provided |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 3 | **4** | 0 | 0 | **0** | 5,926 | 2 | **2** | 5,926 | 8 | **8** | 0 | 0 | **0** |
| **Plaza Bldg B** | 61 | 3 | **4** | 0 | 0 | **0** | 4,472 | 2 | **2** | 4,472 | 6 | **6** | 0 | 0 | **0** |
| **Walnut** | 186 | 9 | **9** | 179 children | 9 | **10** | 6,800 | 3 | **4** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg A** | 51 | 3 | **4** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Center Bldg B** | 139 | 7 | **8** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Masonic** | 61 | 3 | **4** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Euclid** | 139 | 7 | **8** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Laurel Duplexes** | 14 | 1 | **2** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Mayfair** | 30 | 2 | **2** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** | 0 | 0 | **0** |
| **Total** | | 38 | **45** | | 9 | **10** | | 8 | **8** | | 14 | **14** | | 0 | **0** |

**Total on Site: 77**




(E) CREDIT UNION -
NOT PART OF SITE

1. CALIFORNIA STREET ELEVATION - OVERALL



4. PRESIDIO / MASONIC ELEVATION - OVERALL




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

LANDSCAPE SITE PLAN

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION SUBMITTAL

0 25' 50' 100' 150'

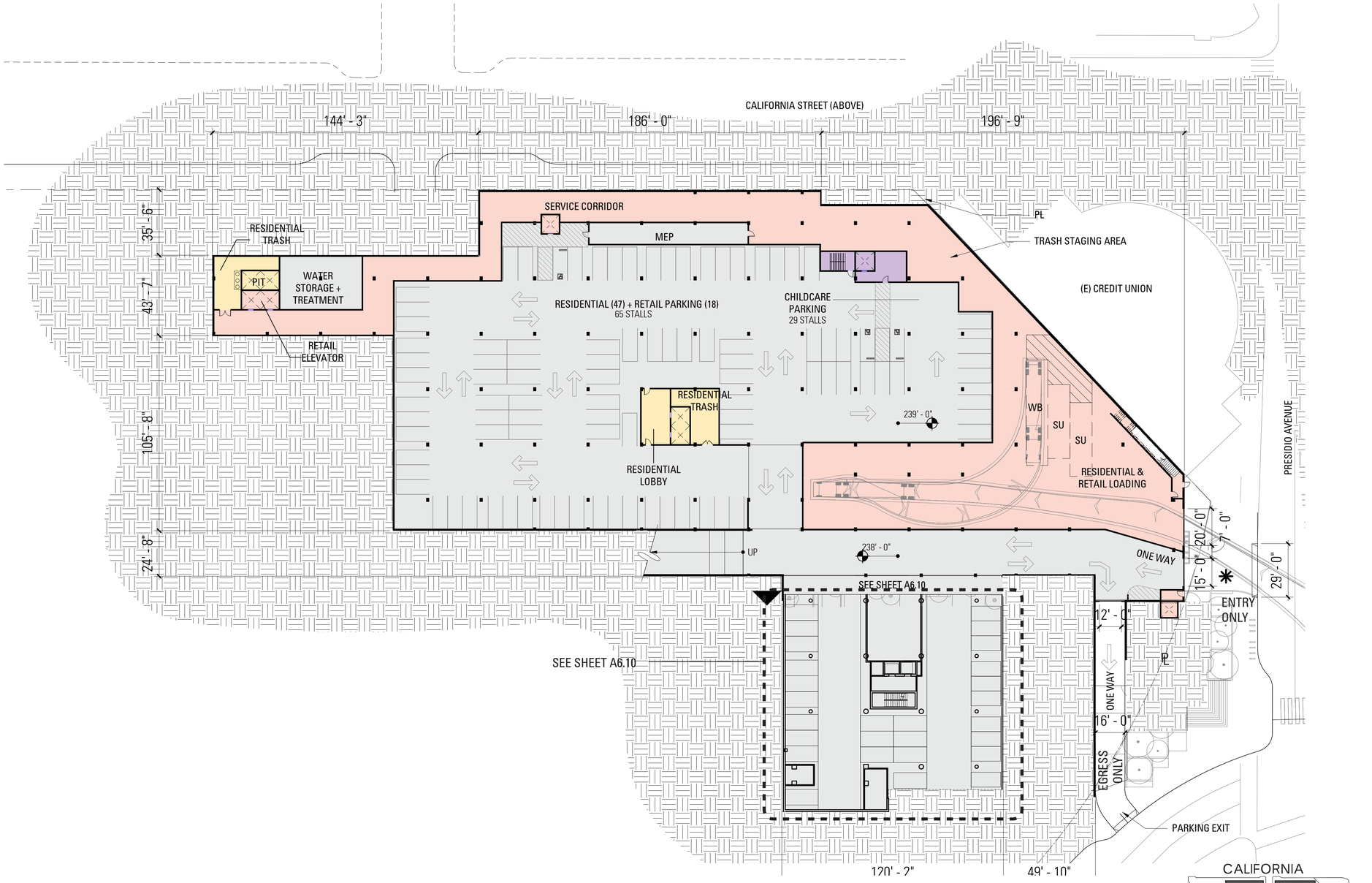
**VAR.04**




| | |
|---|---|
| **LAUREL STREET ENTRY** | **128 STALLS** |
| PLAZA A BLDG. RESIDENTIAL PARKING | 67 STALLS |
| PLAZA B BLDG. RESIDENTIAL PARKING | 61 STALLS |
| **WALNUT STREET ENTRY** | **168 STALLS** |
| CENTER BLDG. RESIDENTIAL PARKING | 102 STALLS |
| PLAZA A&B BLDG. RETAIL | 56 STALLS |
| CAR SHARE | 10 STALLS |
| **PRESIDIO AVENUE ENTRY** | **259 STALLS** |
| WALNUT BLDG. CHILDCARE | 29 STALLS |
| WALNUT BLDG. RETAIL | 18 STALLS |
| WALNUT SR. RESIDENTIAL | 186 STALLS |
| CENTER BLDG. RESIDENTIAL PARKING | 26 STALLS |
| **MASONIC AVENUE ENTRY** | **258 STALLS** |
| MASONIC RESIDENTIAL PARKING | 57 STALLS |
| EUCLID RESIDENTIAL PARKING | 139 STALLS |
| CENTER BLDG. RESIDENTIAL PARKING | 62 STALLS |
| **LAUREL STREET ENTRY** | **44 STALLS** |
| MAYFAIR BLDG. RESIDENTIAL PARKING | 30 STALLS |
| LAUREL RESIDENTIAL PARKING | 14 STALLS |
| **TOTAL ON-SITE PARKING** | **857 STALLS** |

**SITE PLAN LEGEND**

X PRIMARY VEHICLE ACCESS




CHILDCARE USABLE — CHILDCARE B.O.H.

PARKING

RETAIL USABLE — RETAIL B.O.H.

OFFICE — OFFICE, CORE

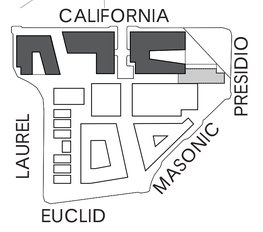
RESIDENTIAL HOMES — RESIDENTIAL CORE

LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.

* ENTRY FOR: RETAIL, SR. HOUSING, CHILDCARE, OFFICE, & CENTER BUILDING B (SELECT STALLS)

** LOADING AREA USED FOR RETAIL, OFFICE, AND RESIDENTIAL TRASH COLLECTION AS WELL AS RESIDENTIAL AND RETAIL LOADING.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: CALIFORNIA STREET PARKING GARAGE - LEVEL B3

PRADO GROUP · SKS · JAMES CORNER FIELD OPERATIONS · MSLA · ARUP · BAR architects · JENSEN · SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15' 30' 60' 90'

N

**VAR.11**

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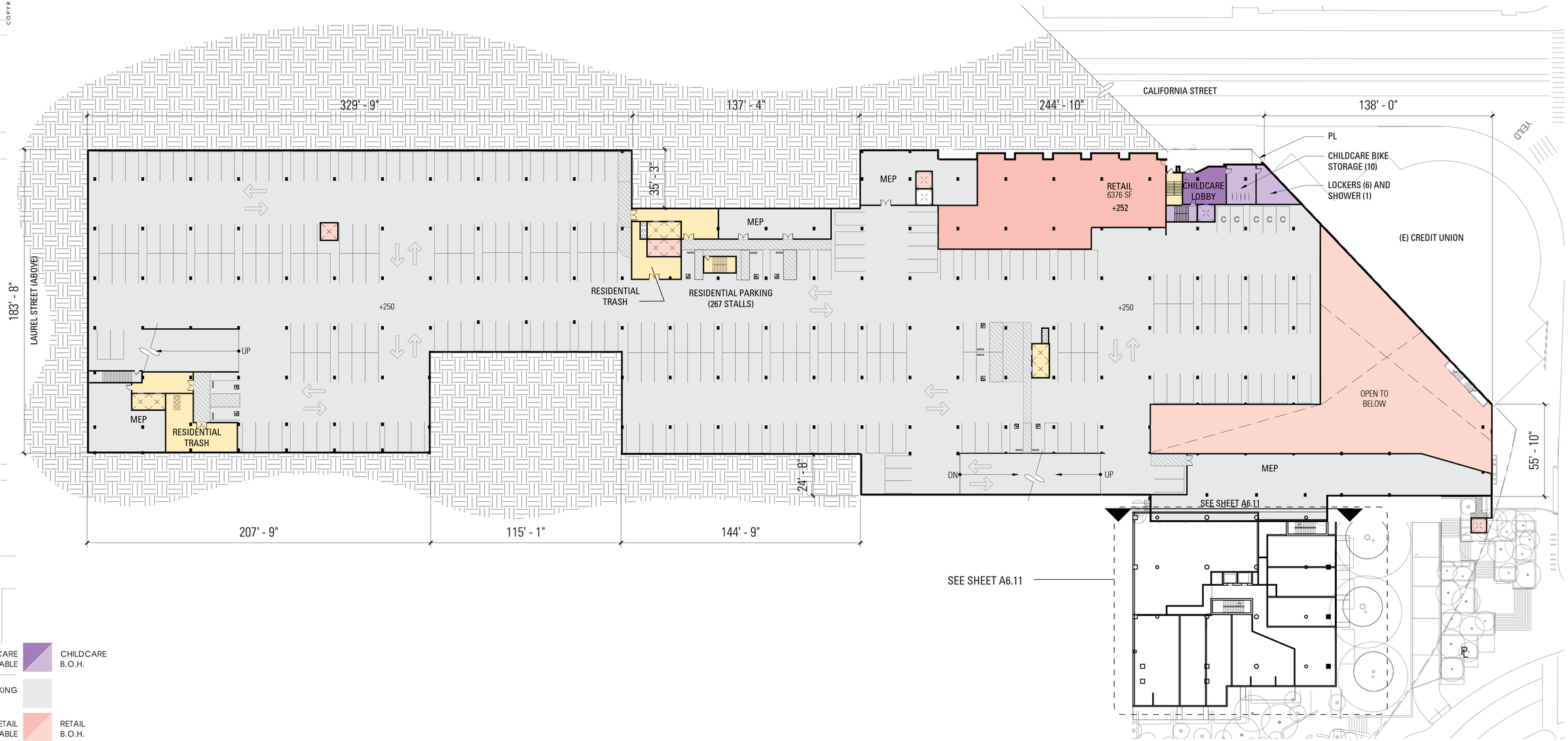
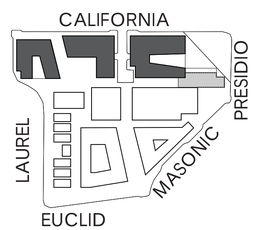



CHILDCARE USABLE — CHILDCARE B.O.H.
PARKING
RETAIL USABLE — RETAIL B.O.H.
OFFICE — OFFICE, CORE
RESIDENTIAL HOMES — RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: CALIFORNIA STREET PARKING GARAGE - LEVEL B2

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15' 30' 60' 90'

N

**VAR.12**

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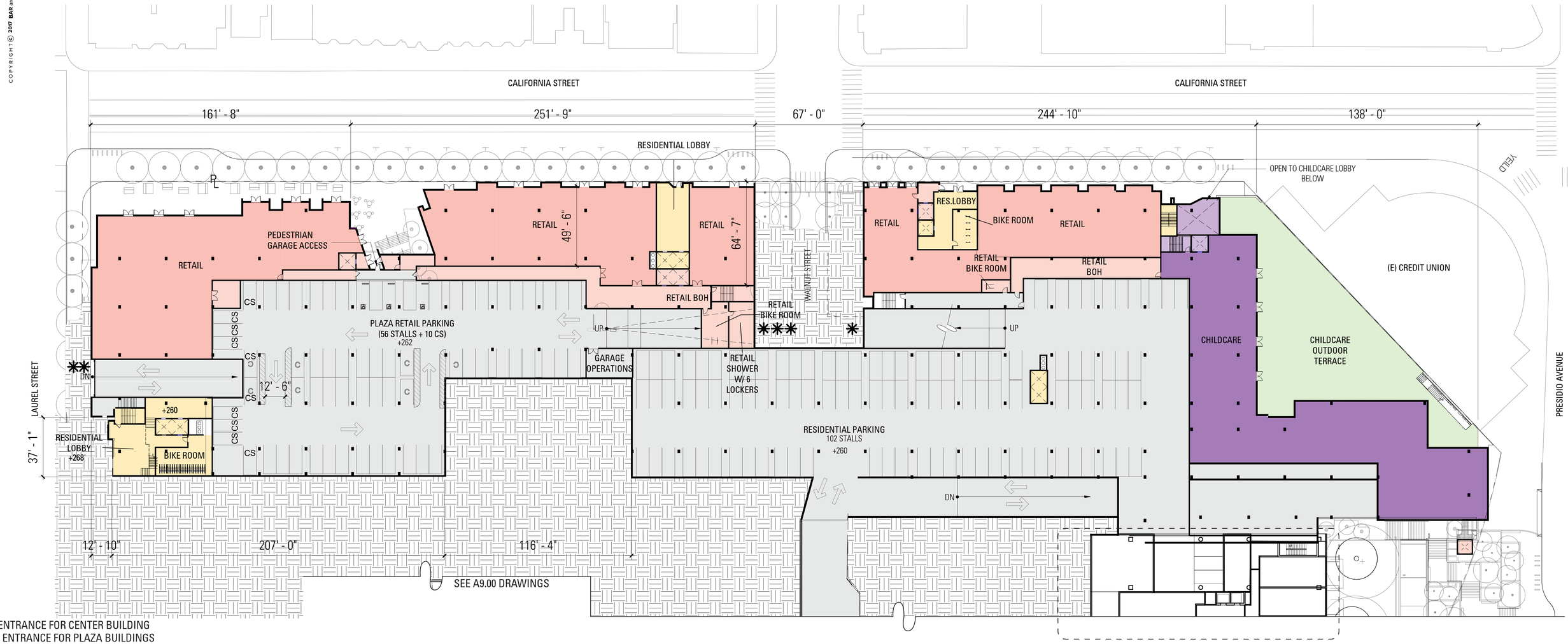
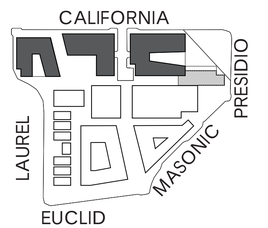



* ENTRANCE FOR CENTER BUILDING
** ENTRANCE FOR PLAZA BUILDINGS
*** ENTRANCE FOR RETAIL AND CAR SHARE

| | |
|---|---|
| CHILDCARE USABLE | CHILDCARE B.O.H. |
| PARKING | |
| RETAIL USABLE | RETAIL B.O.H. |
| OFFICE | OFFICE, CORE |
| RESIDENTIAL HOMES | RESIDENTIAL CORE |
| LANDSCAPED ROOF | |

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: CALIFORNIA STREET PARKING GARAGE - LEVEL B1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 15' 30' 60' 90'

N

**VAR.13**

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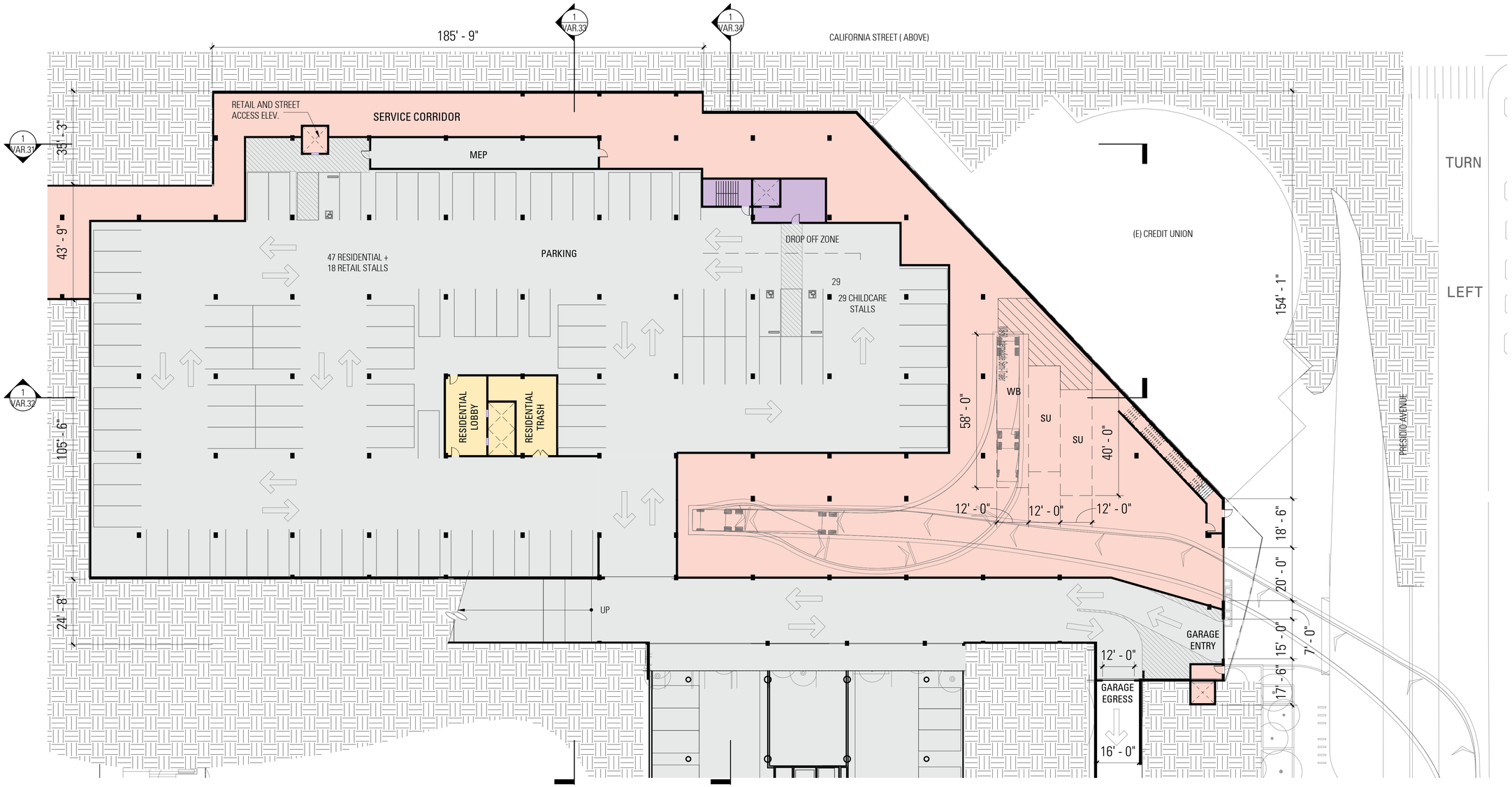
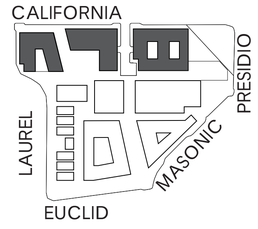



60 stalls reduced area_zprowda.rvt

* ENTRY FOR: RETAIL, CHILDCARE, SENIOR HOUSING, CENTER BUILDING B (SELECT STALLS)




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

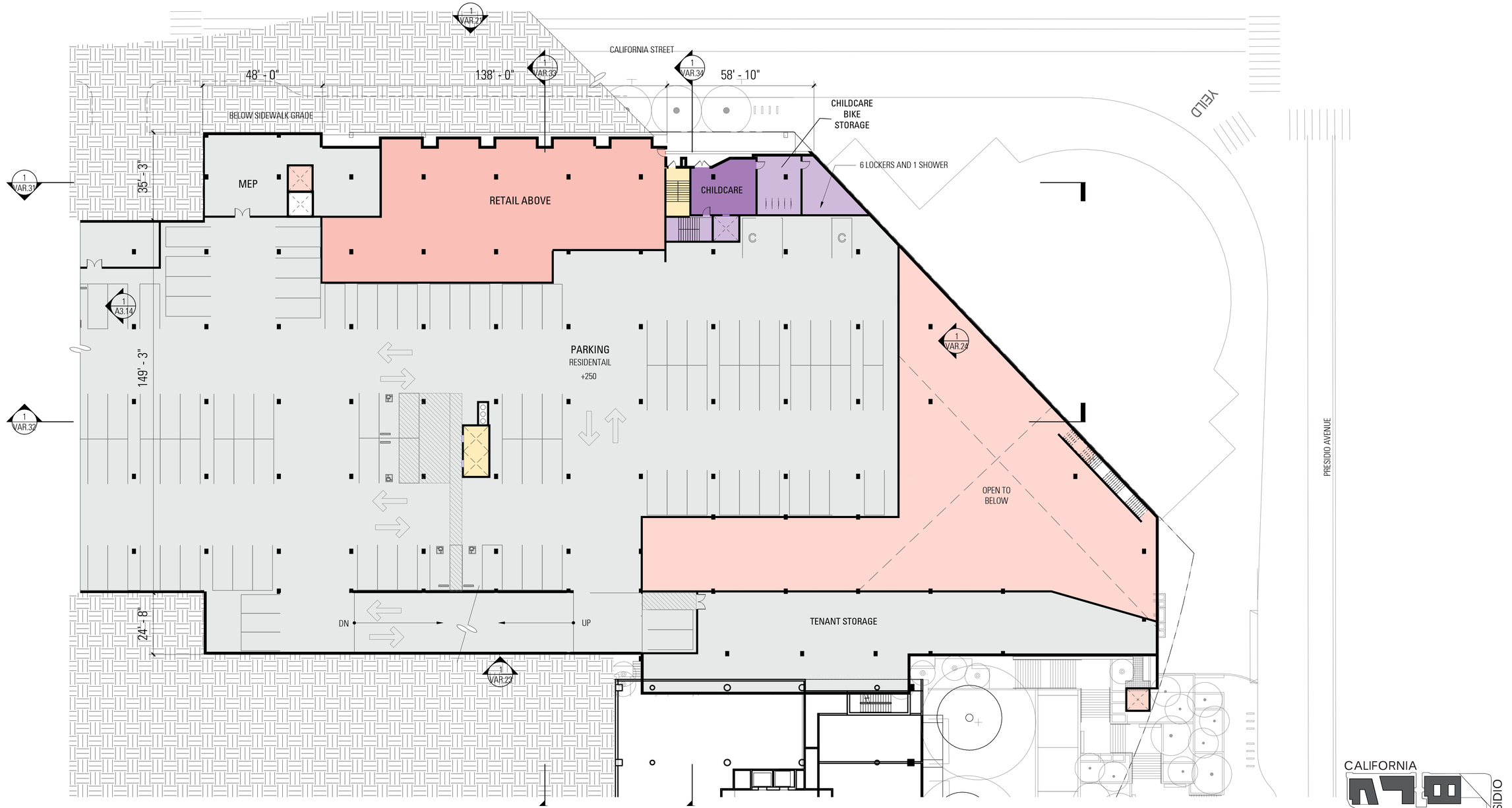
## EIR VARIANT 1: "WALNUT" BUILDING PLANS - B3

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

VAR.14




s reduced area_zprovela.rvt

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

## EIR VARIANT 1: "WALNUT" BUILDING PLANS - B2

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

**VAR.15**

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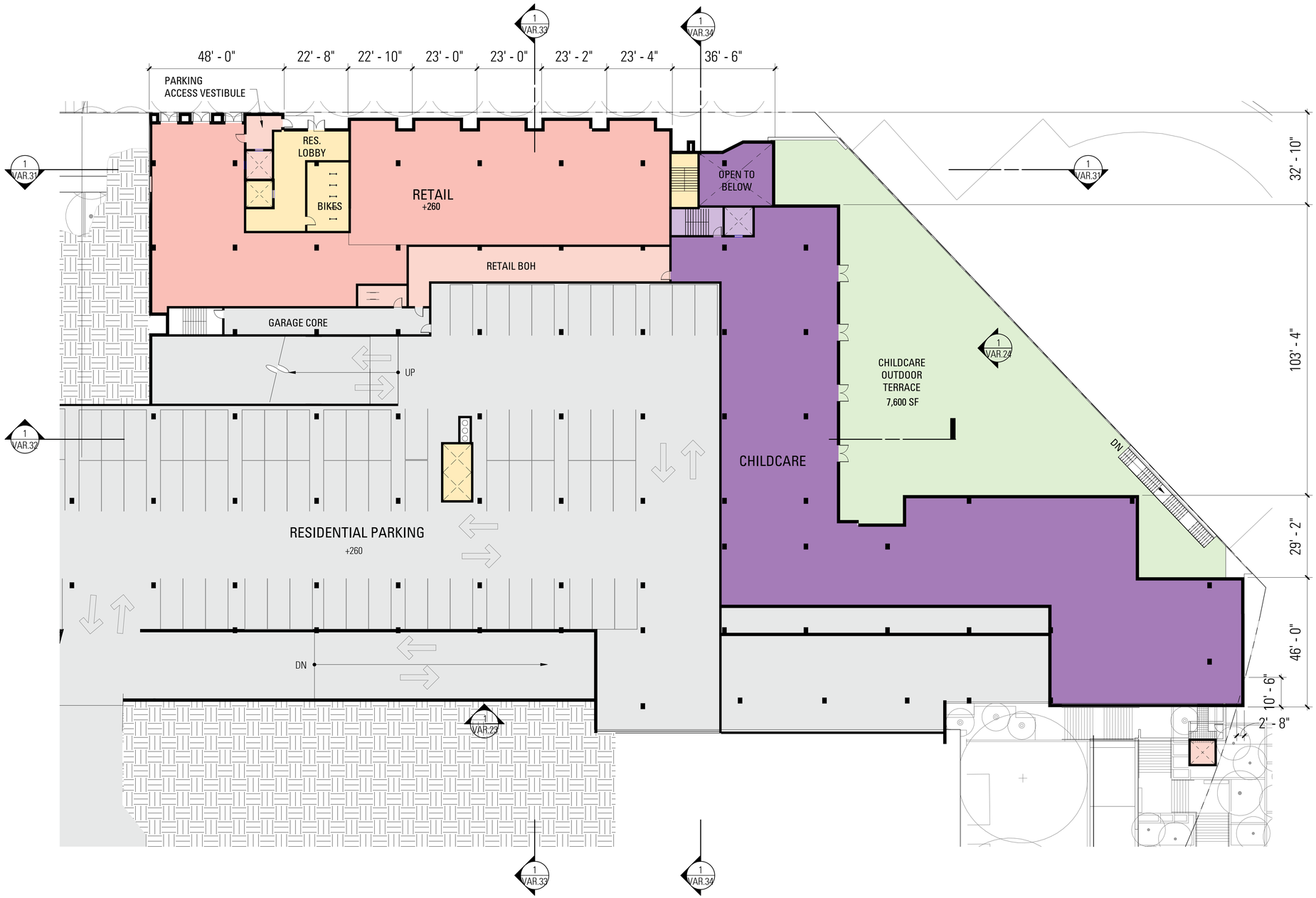
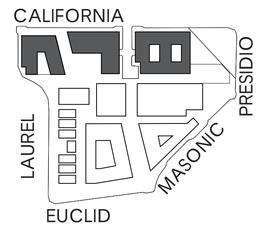



hsing R0 stalls reduced area_zgrowvda.rvt




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: "WALNUT" BUILDING PLANS - B1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

**VAR.16**

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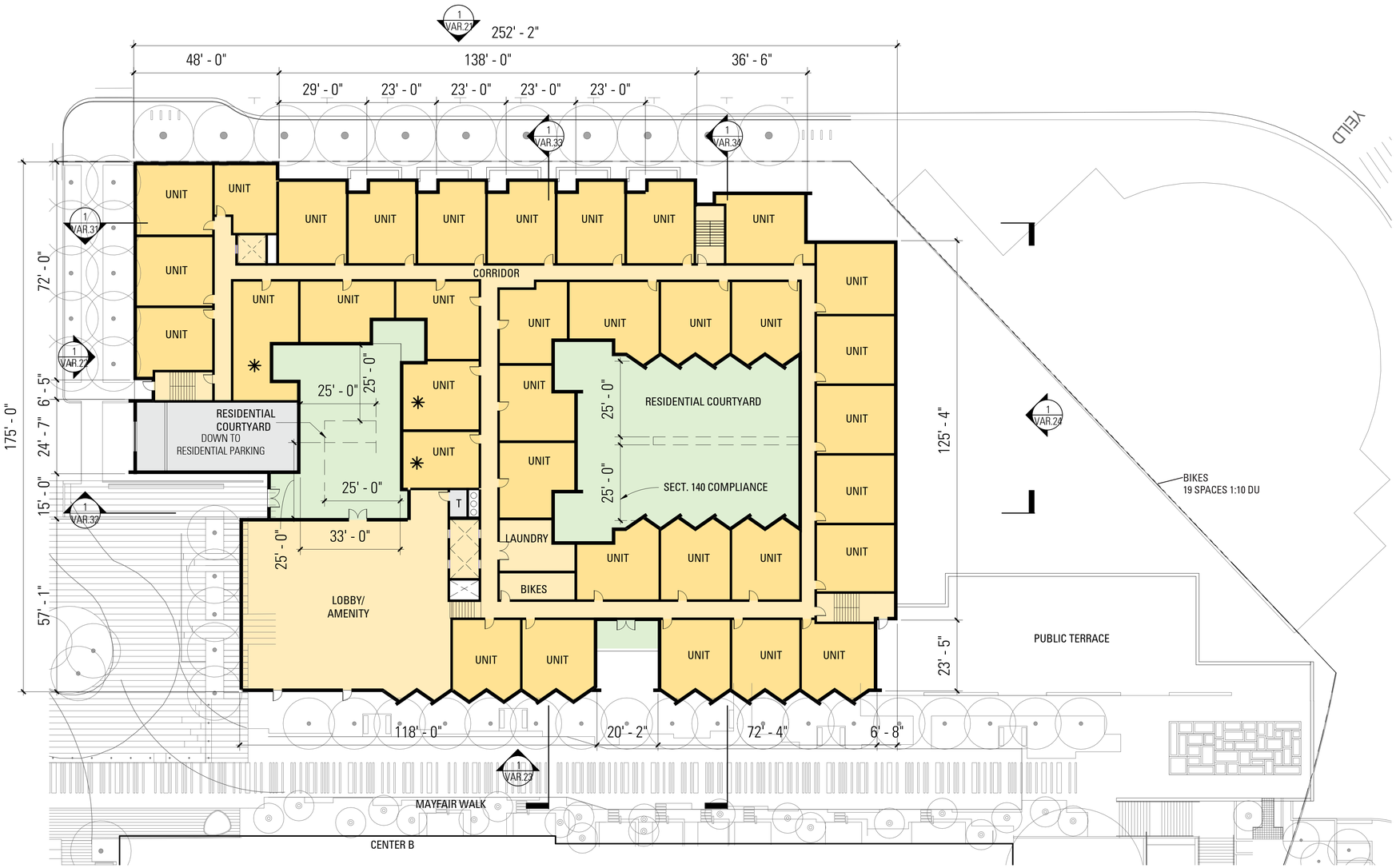
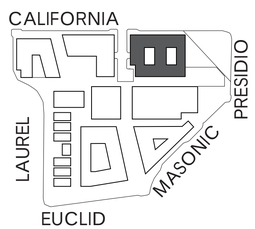



UNIT REQUIRES MODIFICATION TO SECTION 140. 40' - 0" DEPTH REQUIRED, 33'-0" PROVIDED




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 1

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

**VAR.17**

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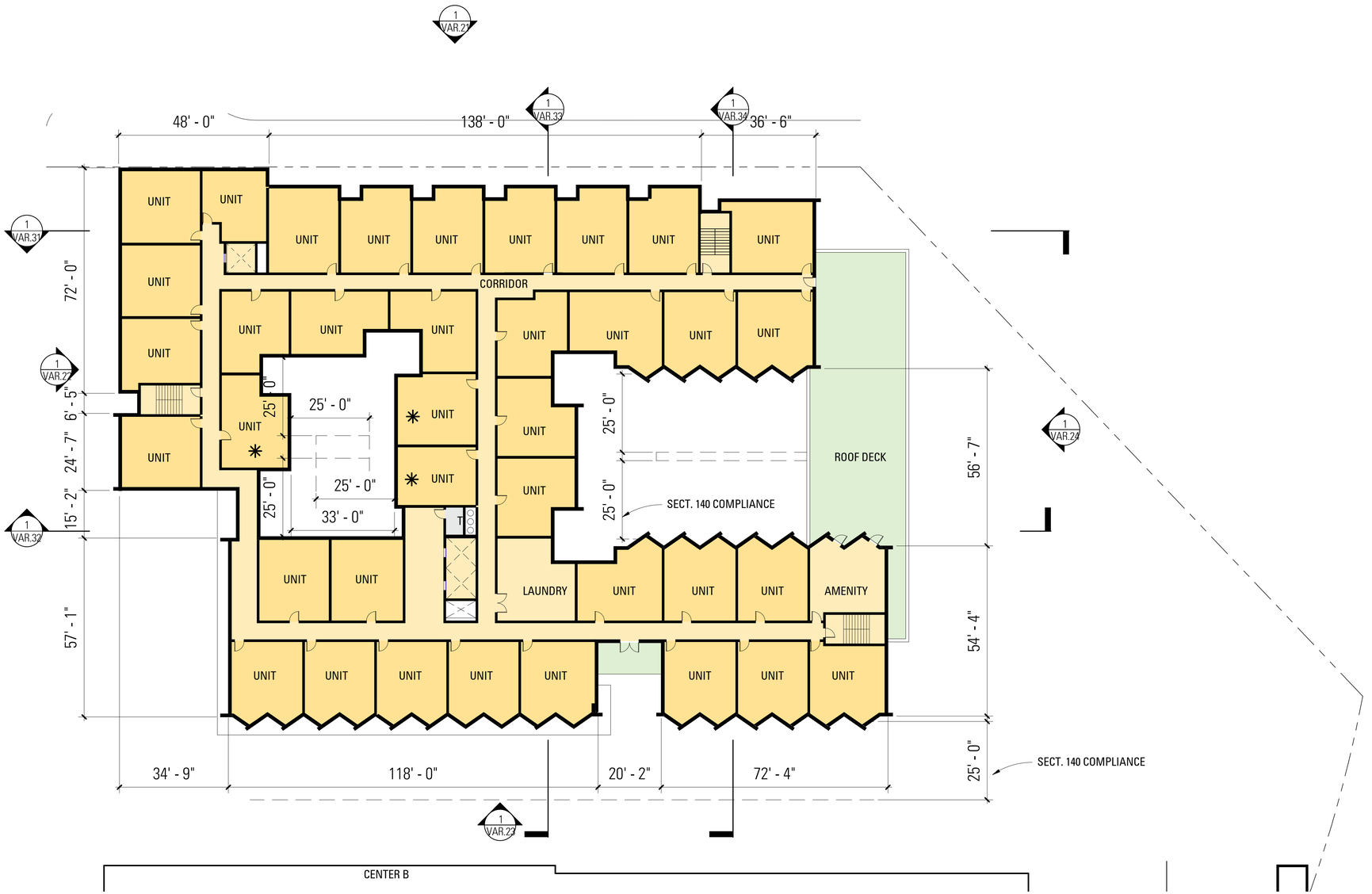
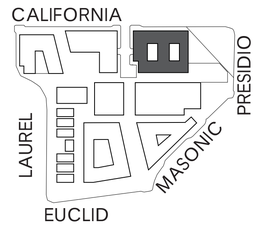



✱ UNIT REQUIRES MODIFICATION TO SECTION 140. 35' - 0" DEPTH REQUIRED, 33'-0" PROVIDED




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 2

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

**VAR.18**

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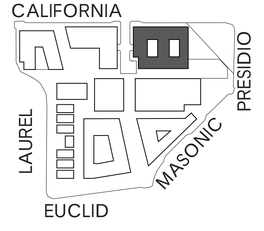


# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 3-4

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

**VAR.19**

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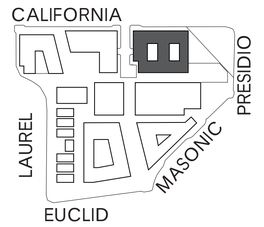


# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

## EIR VARIANT 1: "WALNUT" BUILDING PLANS - LEVEL 5

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 30' 60' 90'

**VAR.20**

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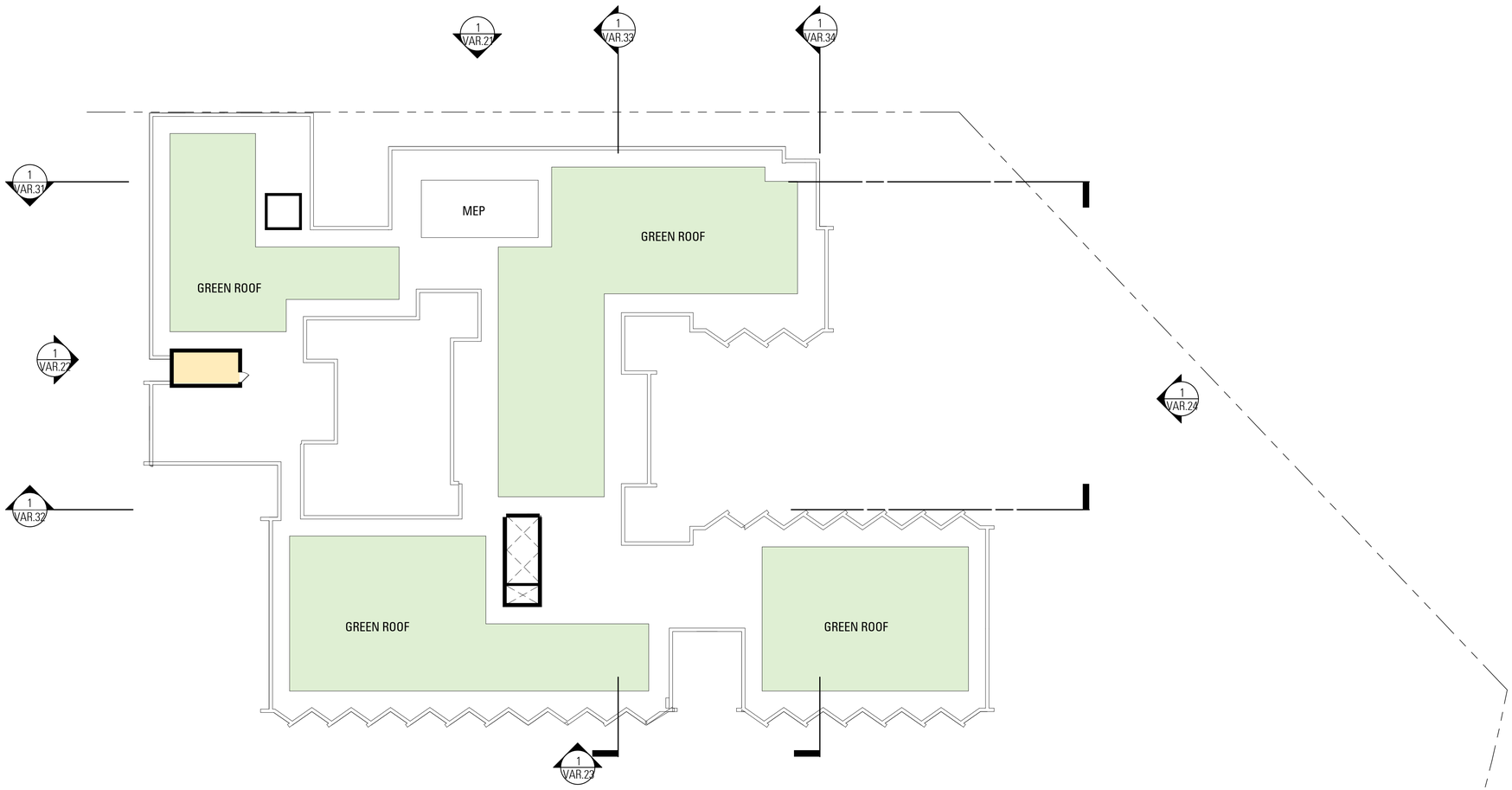



**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EIR VARIANT 1: "WALNUT" BUILDING PLANS - ROOF

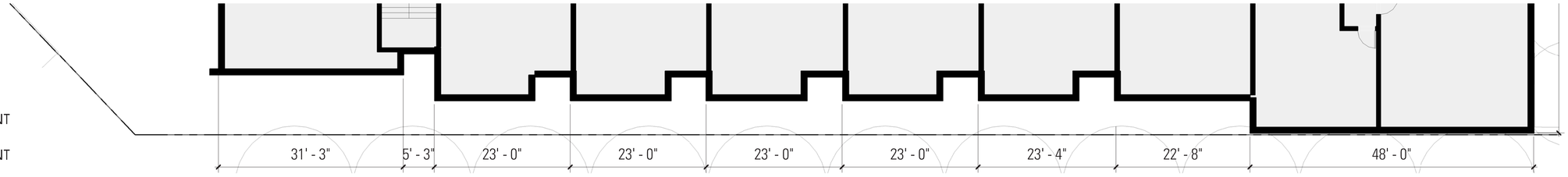
PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**VAR.21**



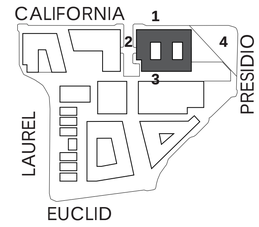

(E) CREDIT UNION




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 1. CALIFORNIA STREET ELEVATION (NORTH) WITH ILLUSTRATIVE SITE PLAN @ LEVEL 1




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**VAR.22**

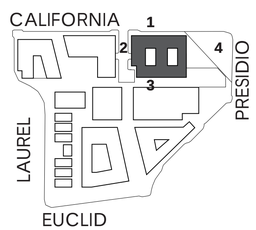



## 2. WALNUT STREET ELEV WITH ILLUSTRATIVE SITE PLAN @ LEVEL 2

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04

**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE



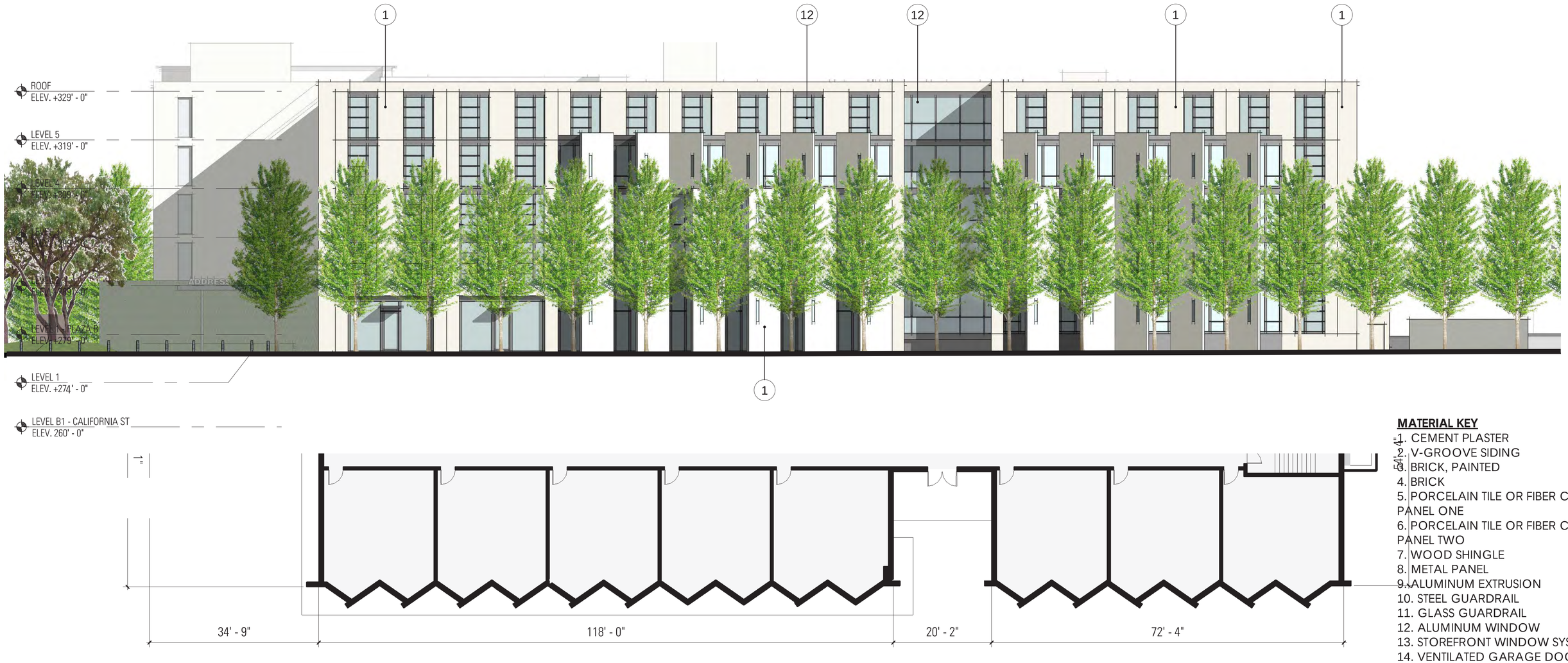

# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

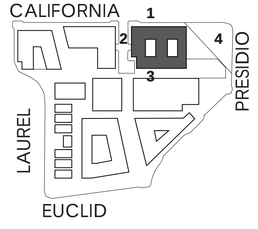
**VAR.23**




**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 3. MAYFAIR WALK ELEVATION (SOUTH) WITH ILLUSTRATIVE SITE PLAN @ LEVEL 2




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EIR VARIANT 1: "WALNUT" BUILDING ELEVATIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

0 5' 10' 20' 30'

**VAR.24**

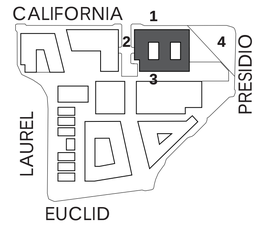


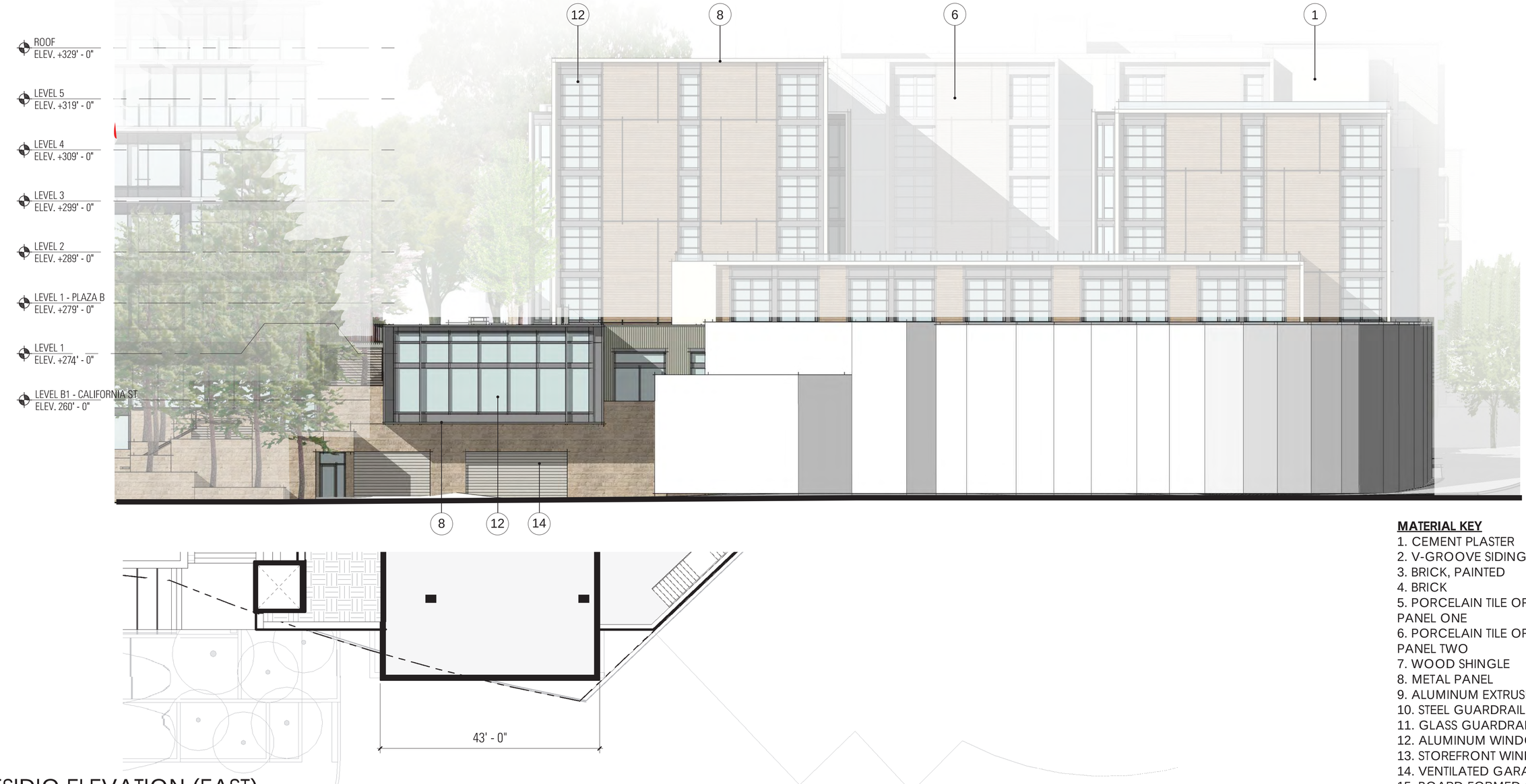

**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE

## 4. PRESIDIO ELEVATION (EAST) WITH ILLUSTRATIVE SITE PLAN @ LEVEL 2

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04



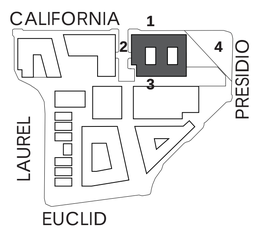



## 4. PRESIDIO ELEVATION (EAST) WITH ILLUSTRATIVE SITE PLAN @ LEVEL B1

*BASEPOINT FOR PLANNING CODE HEIGHT MEASUREMENT, SEE SHEET G3.04

**MATERIAL KEY**

1. CEMENT PLASTER
2. V-GROOVE SIDING
3. BRICK, PAINTED
4. BRICK
5. PORCELAIN TILE OR FIBER CEMENT PANEL ONE
6. PORCELAIN TILE OR FIBER CEMENT PANEL TWO
7. WOOD SHINGLE
8. METAL PANEL
9. ALUMINUM EXTRUSION
10. STEEL GUARDRAIL
11. GLASS GUARDRAIL
12. ALUMINUM WINDOW
13. STOREFRONT WINDOW SYSTEM
14. VENTILATED GARAGE DOOR
15. BOARD-FORMED CONCRETE



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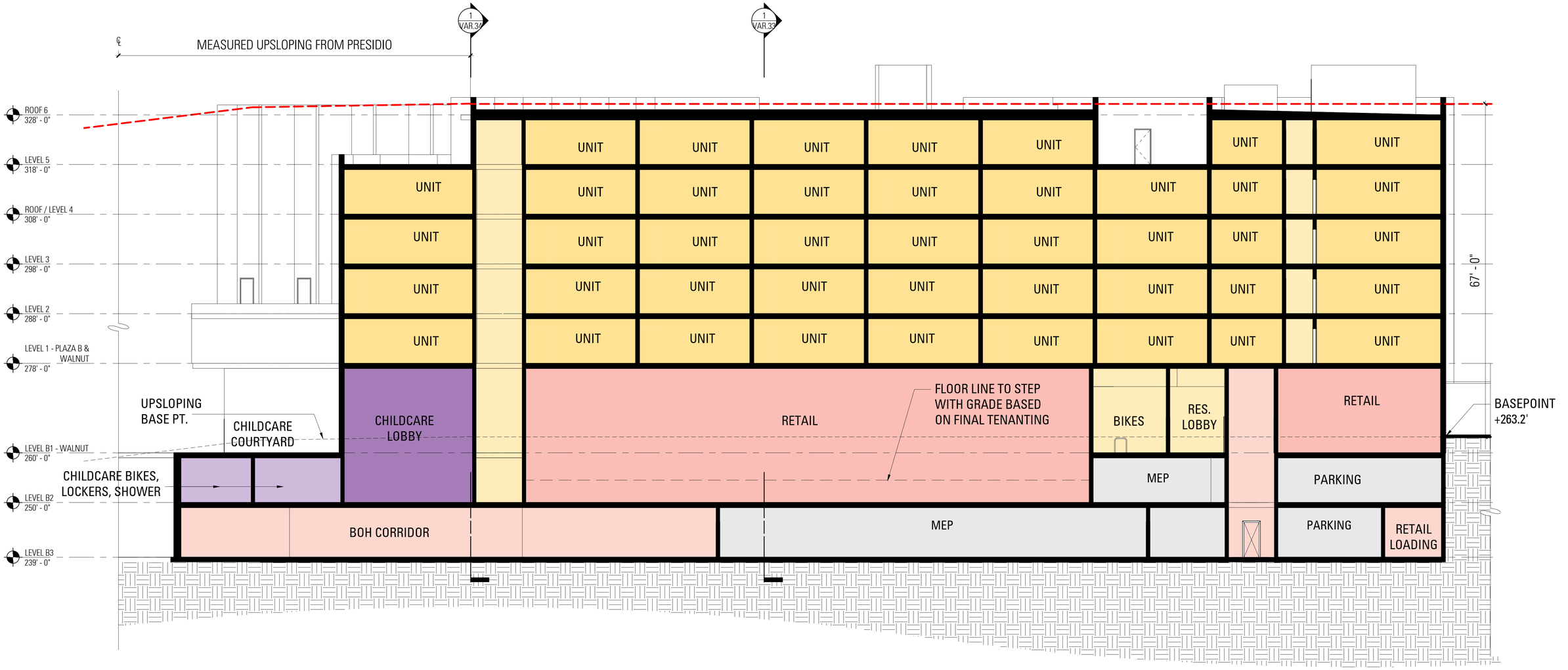


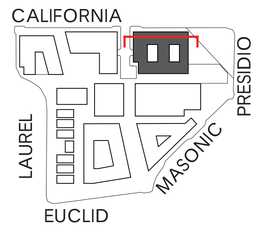


## 1. WALNUT BUILDING EAST/WEST SECTION

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EIR VARIANT 1: WALNUT SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**VAR.31**

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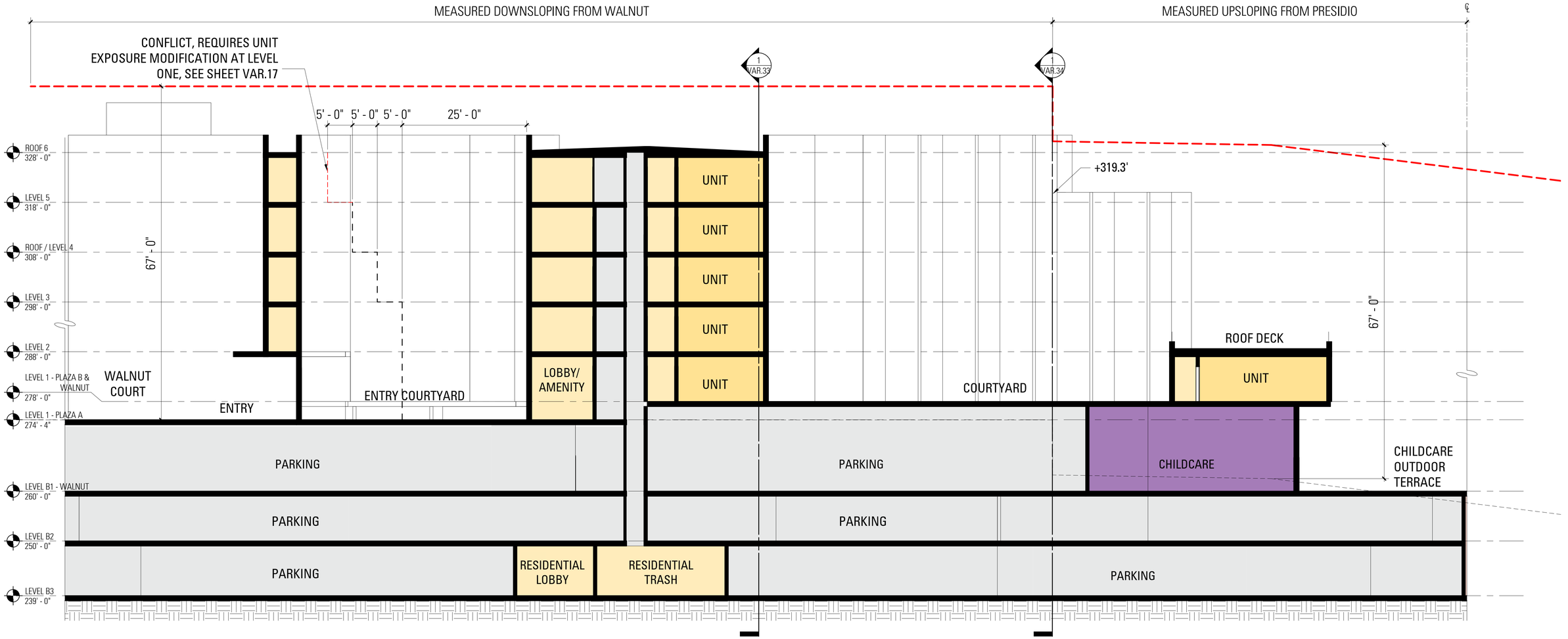
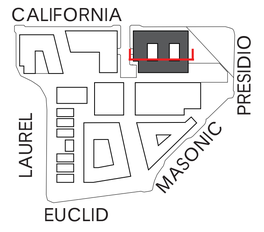



1. WALNUT BUILDING EAST/WEST SECTION




# 3333 CALIFORNIA STREET SAN FRANCISCO, CA

EIR VARIANT 1: WALNUT SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MSLA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**VAR.32**

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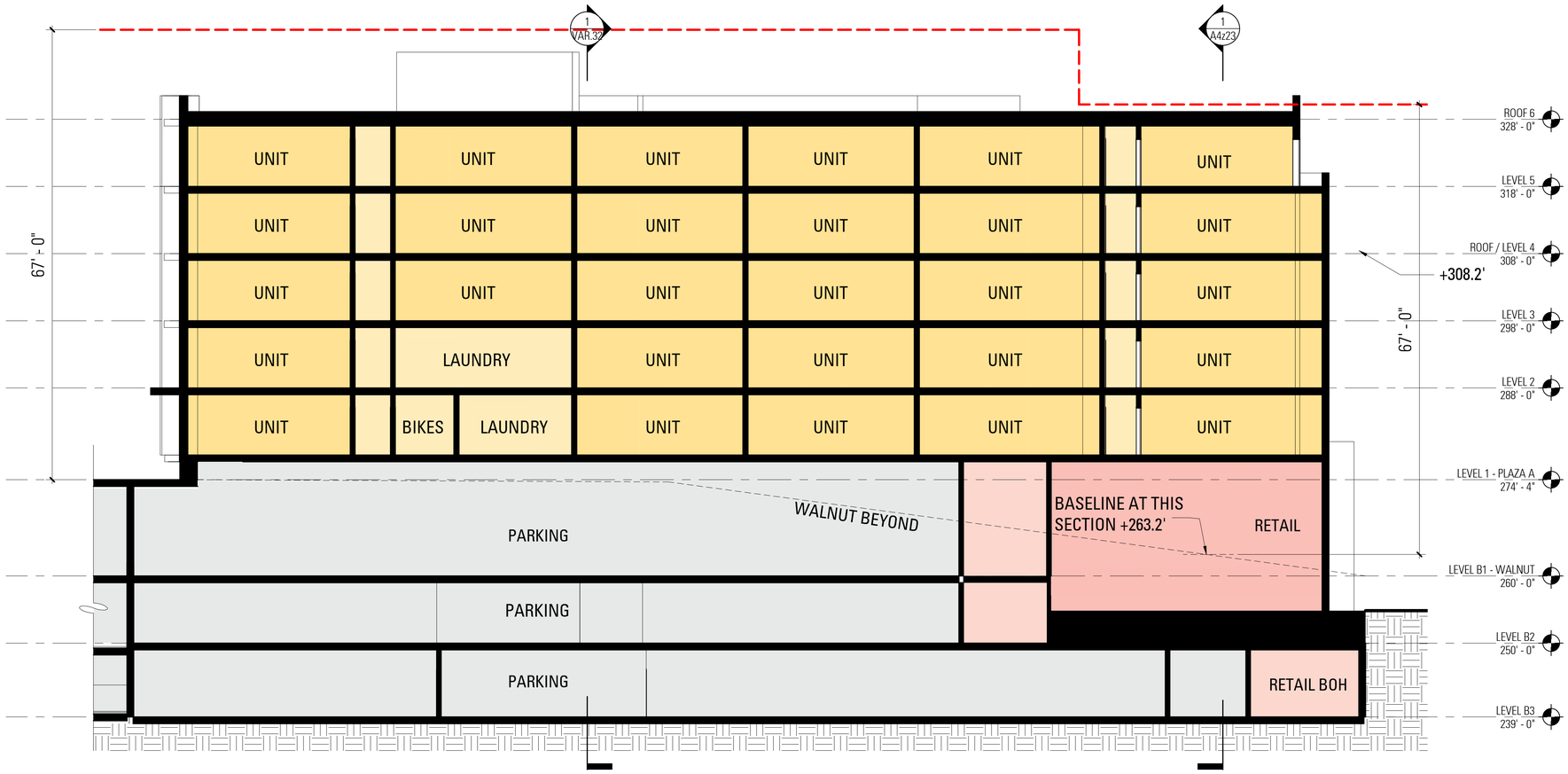
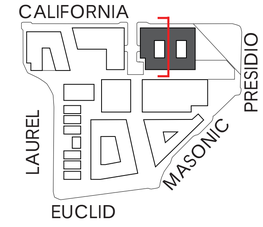



## 1. WALNUT BUILDING NORTH/SOUTH SECTION



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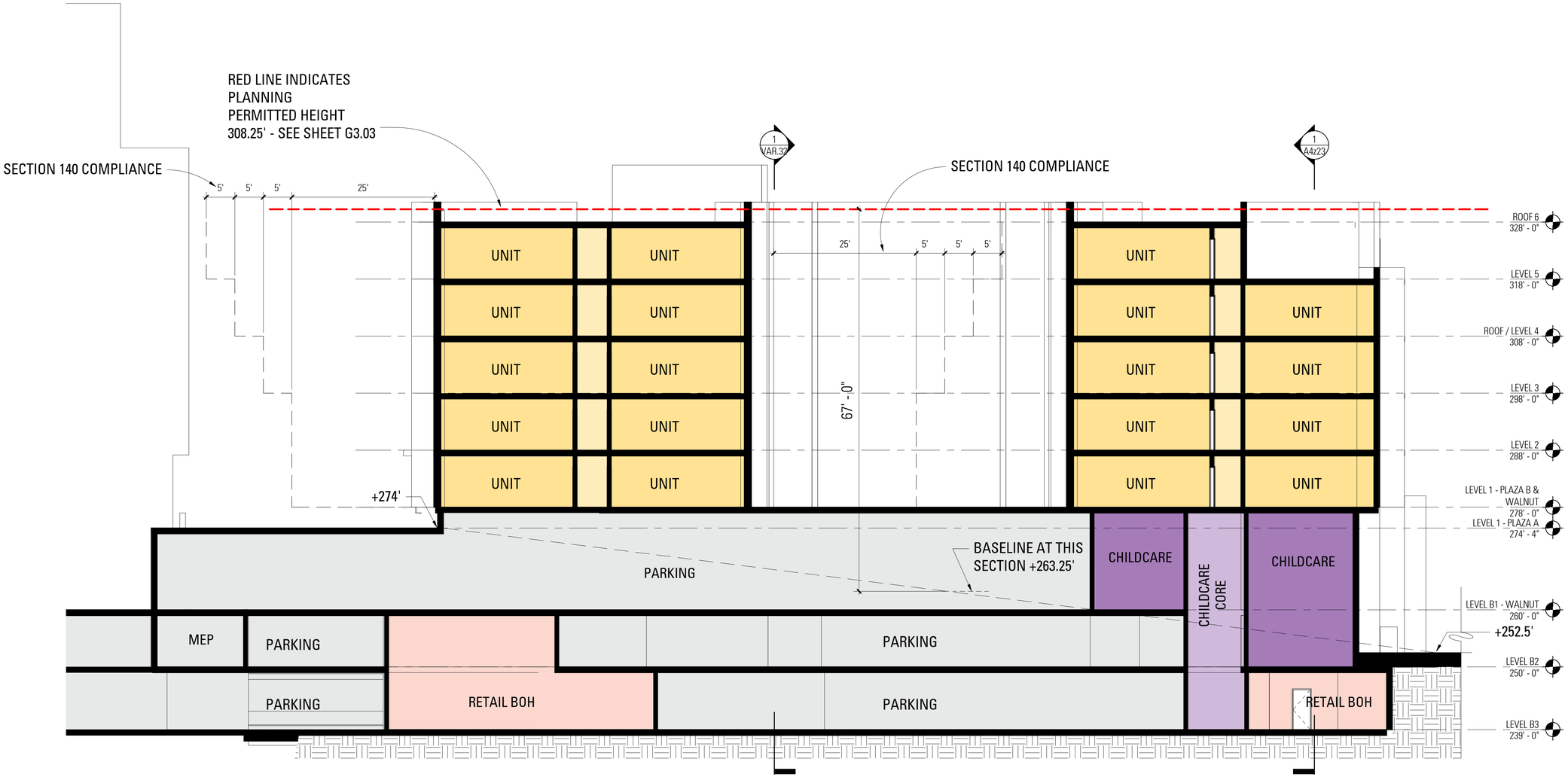
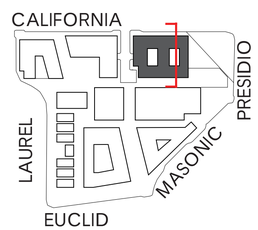



## 1. WALNUT BUILDING NORTH/SOUTH SECTION

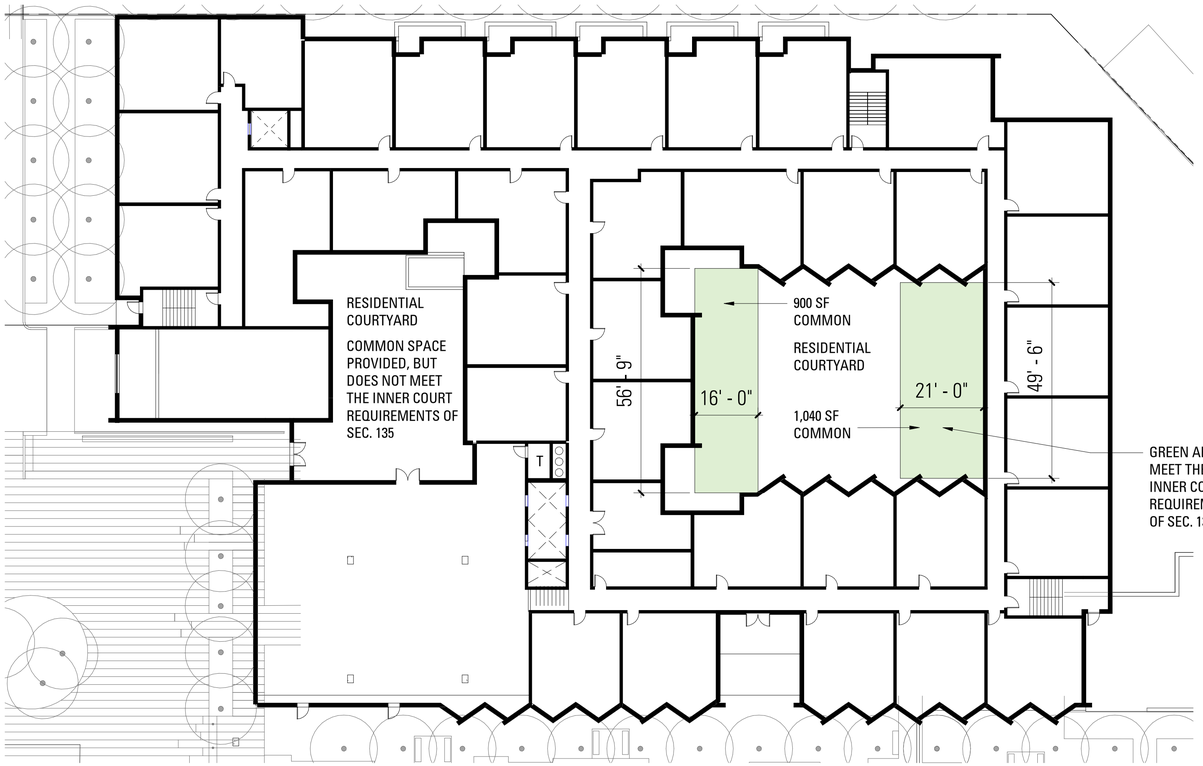
**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EIR VARIANT 1: WALNUT SECTIONS

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

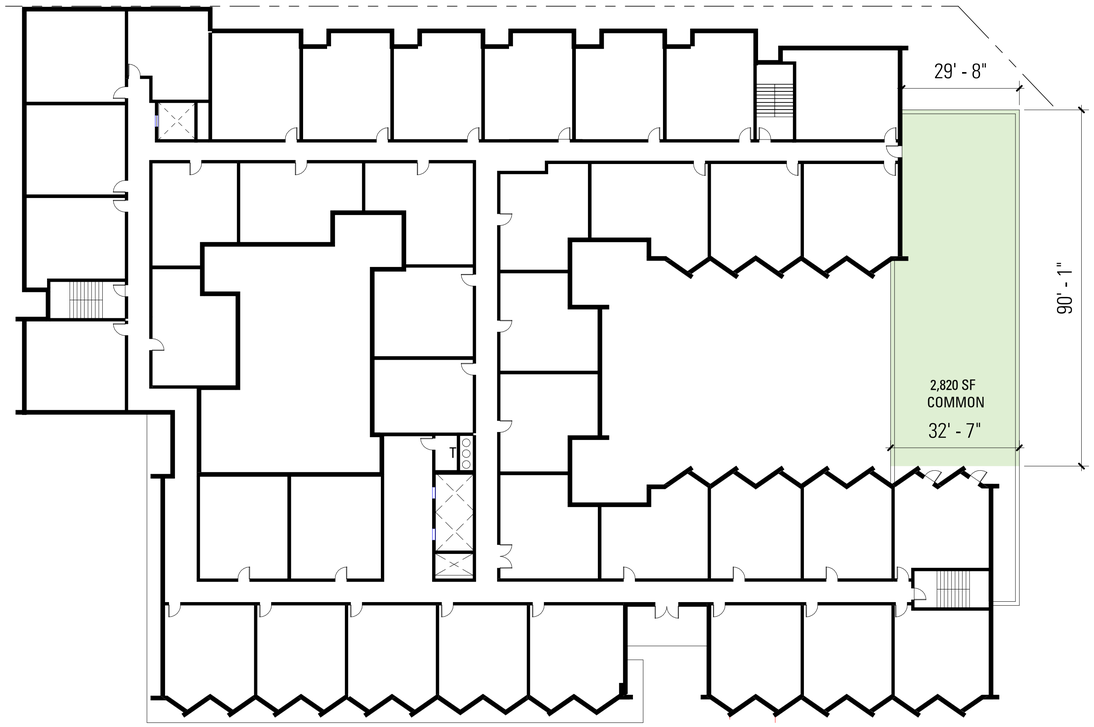
07.03.2019
PLANNING APPLICATION RESUBMITTAL

**VAR.34**




## LEVEL 1 - WALNUT OPEN SPACE

1" = 20'-0"



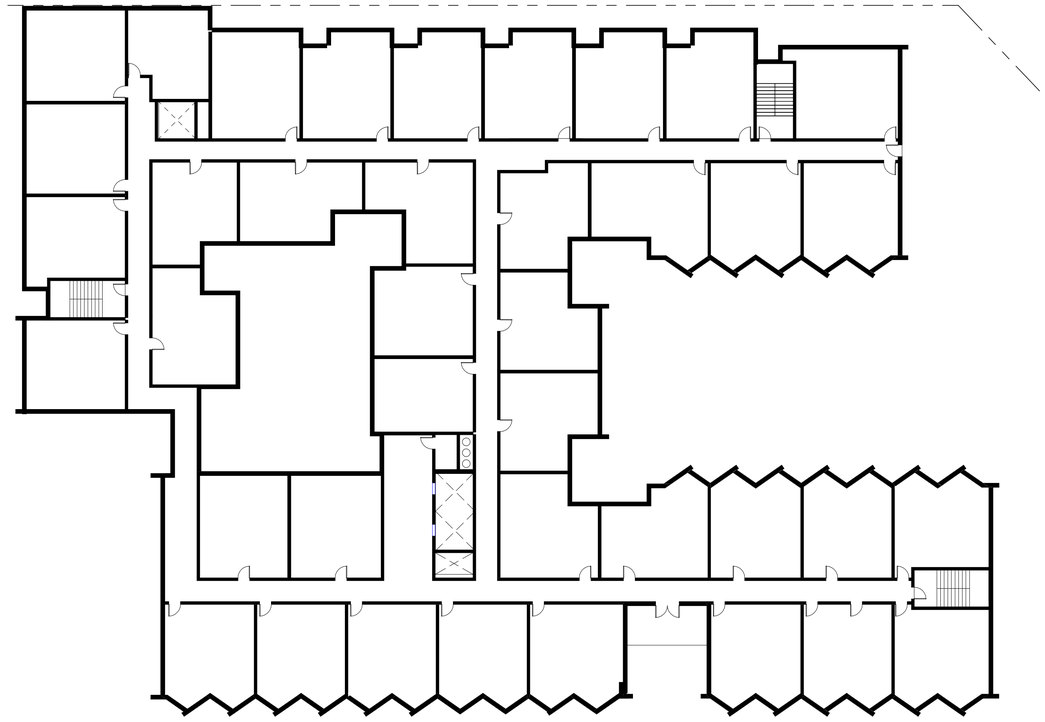

## LEVEL 2 - WALNUT OPEN SPACE

1" = 20'-0"

**LEVEL 1 SUMMARY:**
COMMON: 1,940 SF
PRIVATE: 0 SF

**LEVEL 2 SUMMARY:**
COMMON: 2,820 SF
PRIVATE: 0 SF

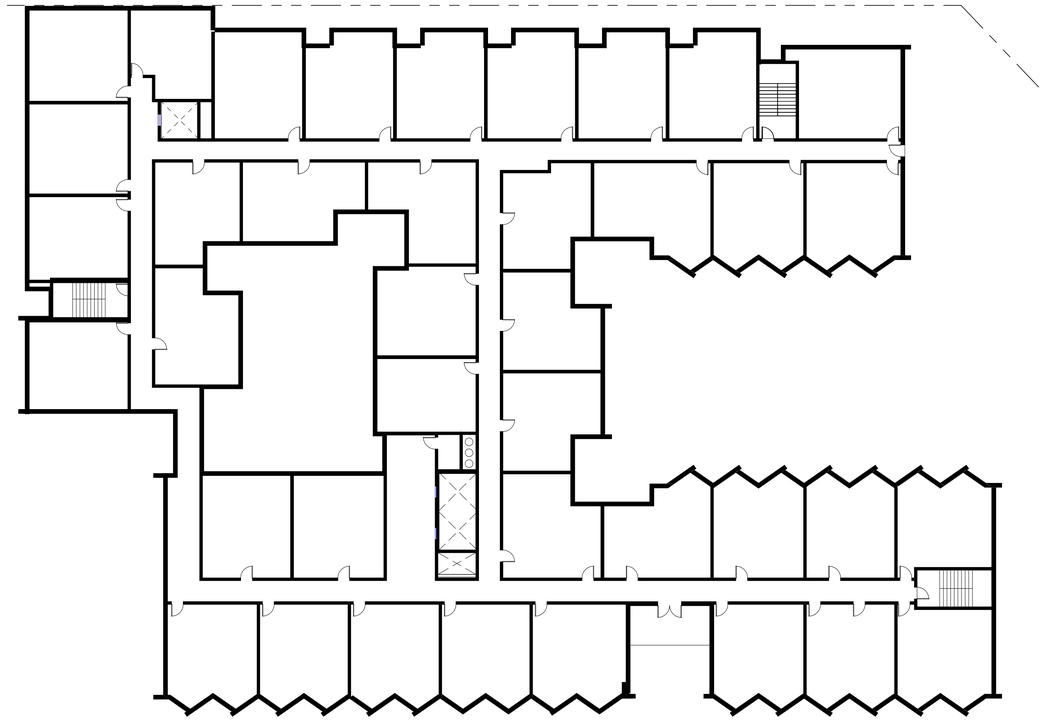
✱ UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)



## LEVEL 3 - WALNUT OPEN SPACE

1" = 20'-0"

**LEVEL 3 SUMMARY:**
COMMON: 0 SF
PRIVATE: 0 SF



## LEVEL 4 - WALNUT OPEN SPACE

1" = 20'-0"

**LEVEL 4 SUMMARY:**
COMMON: 0 SF
PRIVATE: 0 SF

✱ UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)

| Building | Total Units | Base O.S. Req'd (100/du) | Units with Private O.S. | Provided Private O.S. | Remaining Area | Area Req'd as Common (x1.33) | Provided Common O.S. | Remaing Area Req'd on Project Site |
|---|---|---|---|---|---|---|---|---|
| **Plaza Bldg A** | 67 | 6,700 | 1 | 100 | 6,600 | 8,778 | 5,550 | 3,228 |
| **Plaza Bldg B** | 61 | 6,100 | 4 | 400 | 5,700 | 7,581 | 5,180 | 2,401 |
| **Walnut Variant** | 186 | 18,600 | 0 | 0 | 18,600 | 24,738 | 5,370 | 19,368 |
| **Center Bldg A** | 51 | 5,100 | 12 | 1,200 | 3,900 | 5,187 | 435 | 4,752 |
| **Center Bldg B** | 139 | 13,900 | 39 | 3,900 | 10,000 | 13,300 | 1,275 | 12,025 |
| **Masonic** | 57 | 5,700 | 11 | 1,100 | 4,600 | 6,118 | 1,400 | 4,718 |
| **Euclid** | 139 | 13,900 | 24 | 2,400 | 11,500 | 15,295 | 9,660 | 5,635 |
| **Laurel Duplexes** | 14 | 1,400 | 14 | 1,400 | 0 | 0 | 0 | 0 |
| **Mayfair** | 30 | 3,000 | 12 | 1,200 | 1,800 | 2,394 | 700 | 1,694 |
| | | | | | | | | |
| **Total** | **744** | **74,400** | **117** | **11,700** | **62,700** | **83,391** | **29,570** | **53,821** |

COMMON SITE PLAN OPEN SPACE CONTRIBUTING TO SECTION 135 REQUIREMENT:

| | |
|---|---|
| CYPRESS SQUARE + WESTERN MAYFAIR WALK: | 24,780 SF |
| LOWER WALNUT WALK: | 16,850 SF |
| CALIFORNIA PLAZA: | 4,290 SF |
| OVERLOOK: | 10,450 SF |
| **TOTAL COMMON OPEN SPACE*:** | **56,370 SF, EXCEEDS REQUIRED -- COMPLIES** |

LOCATIONS FOR REQUIRED OPEN SPACE ON SITE:

PLAZA BLDG A: 3,228 SF REQUIRED ON PROJECT SITE
3,228 (OF 4,290) SF PROVIDED AT CALIFORNIA PLAZA

PLAZA BLDG B: 2,401 SF REQUIRED ON PROJECT SITE
2,401 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

WALNUT: 19,368 SF REQUIRED ON PROJECT SITE
10,450 (OF 10,450) SF PROVIDED AT OVERLOOK
8,918 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

CENTER BLDG. A: 4,752 SF REQUIRED ON PROJECT SITE
4,752 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

CENTER BLDG. B: 12,025 SF REQUIRED ON PROJECT SITE
6,400 (OF 16,850) SF PROVIDED AT LOWER WALNUT WALK
5,625 (OF 24,780) SF PROVIDED AT CYPRESS SQUARE

MASONIC: 4,718 SF REQUIRED ON PROJECT SITE
4,718 (OF 16,850) SF PROVIDED AT LOWER WALNUT WALK

EUCLID: 5,635 SF REQUIRED ON PROJECT SITE
5,635 (OF 16,850) SF PROVIDED AT LOWER WALNUT WALK

LAUREL DUPLEXES: 0 SF REQUIRED ON PROJECT SITE

MAYFAIR: 1,694 SF REQUIRED ON SITE
1,694 (OF 24,780) PROVIDED AT CYPRESS SQUARE

OPEN SPACE USE

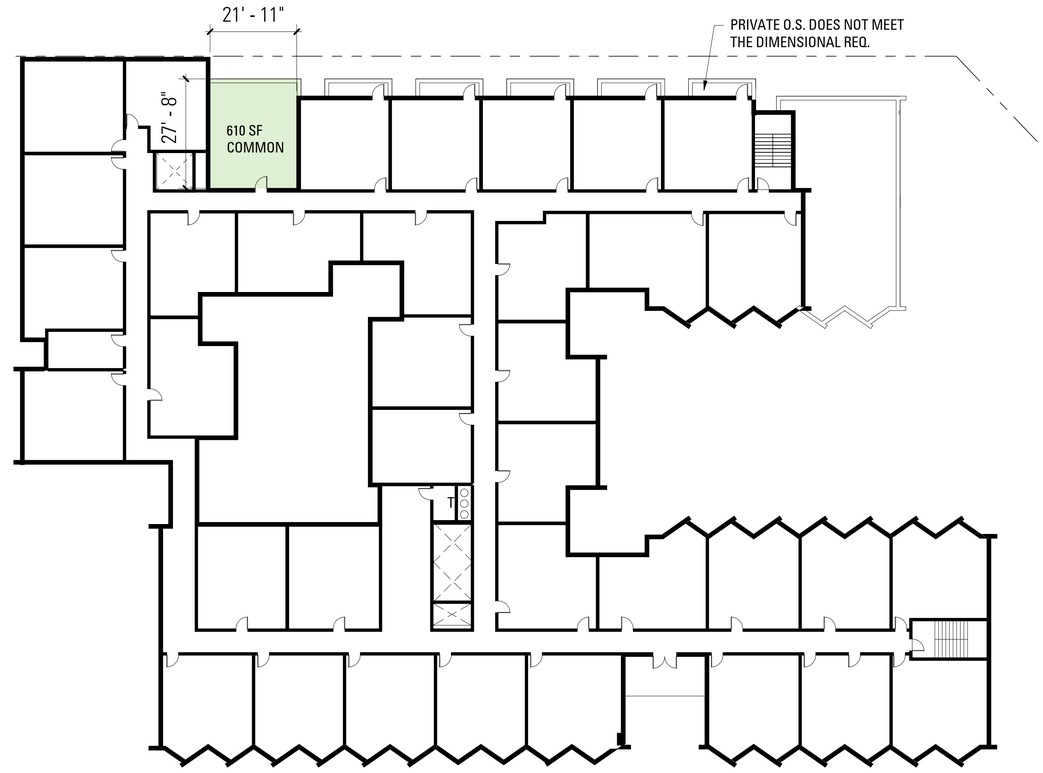
CALIFORNIA PLAZA: 3,228 SF FOR PLAZA A BLDG
T: 3,228 SF OF 4,290

CYPRESS SQUARE: 2,401 SF FOR PLAZA B BLDG
8,918 SF FOR WALNUT BLDG
4,752 SF FOR CENTER BLDG A
5,625 SF FOR CENTER BLDG B
1,694 SF FOR MAYFAIR BLDG
T: 23,390 SF OF 24,780

OVERLOOK: 10,450 SF FOR WALNUT
T: 10,450 SF OF 10,450

LOWER WALNUT WALK: 6,400 SF FOR CENTER BLDG B
4,718 SF FOR MASONIC BLDG
5,635 SF FOR EUCLID BLDG
T: 16,753 SF OF 16,850

* UNIT WITH CODE COMPLYING OPEN SPACE
(MAX 100 SF/UNITS COUNTED TOWARD REQUIREMENT)

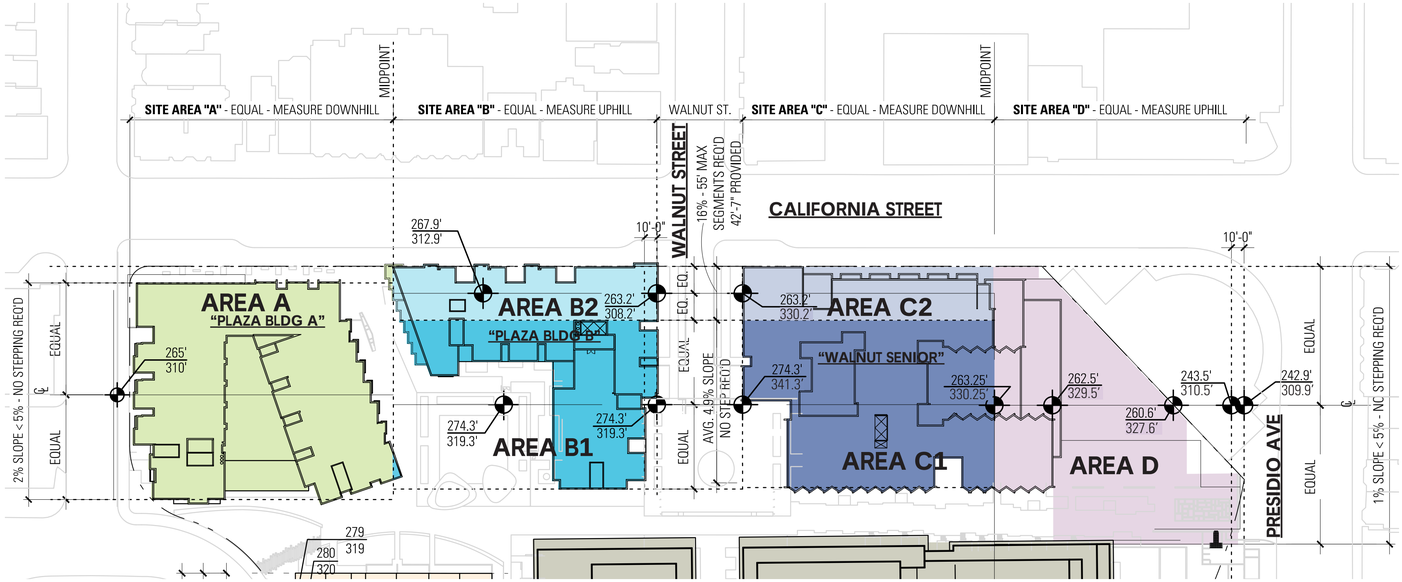


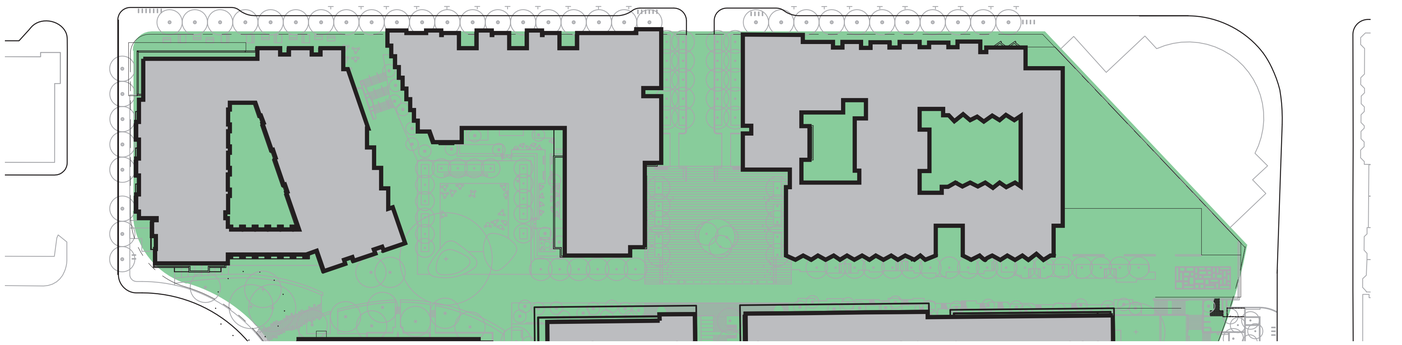

## LEVEL 5 - WALNUT OPEN SPACE

1" = 20'-0"

**LEVEL 5 SUMMARY:**
COMMON: 610 SF
PRIVATE: 0 SF

**WALNUT TOTALS:**
COMMON: 5,370 SF
PRIVATE: 0 SF COMPLIANT AND COUNTED



## BUILDING HEIGHTS SUMMARY (SECTION 260):

The project is composed of a site plan with several different buildings. Each building's height is measured independantly and in compliance with the provisions of Section 260.

Section 260(a)(1)(D): Where a building has frontages on two or more streets the owner may elect the street frontage from which the measurement is taken.

Section 260(a)(1)(B): Where the lot slopes downward from the street the point of measurement shall be taken from curb. This point may be used to measure all portions of the building within100-ft of the street or to a point equidistant between such street and the street on the opposite side of the block - whichever is greater.

Section 260(a)(1)(C) Where the lot slopes upward from the street, the point of measurement shall be taken from the curb at the centerline of the frontage or building step for the first 10-ft of the building. At all other sections the height shall be taken at the average of the grades on either side of the building or building step.

Table 260

| Avg. Slope of Curb | Maximum width for portions of the building that may be measured from a single point |
|---|---|
| 0% - 5% Slope: | No Requirement |
| 6%-15% Slope: | 65-ft |
| 15% - 20% Slope: | 55-ft |

| BUILDING | MEASUREMENT NARRATIVE |
|---|---|
| **WALNUT SENIOR** | The Walnut Building is within height measurement "Area C" and "Area D." and fronts California Street, Walnut Street Extension and Presidio Streets. For the western portions of the building the project elects to measure downsloping from the Walnut Street Extension per Section 260(a)(1)(D). The slope of the Walnut Street Extension varies, with the Southern portion under 5% and the portion closer to California requiring stepping. Per Table 260 the portion closer to California Street is measured in 55-ft segments. The measurement from the Walnut Street Extension is downloping and is carried to the line equidistant between Walnut Street and Presidio Avenue. The Eastern portions of the Walnut building building fall within "Area D" and is measured upsloping from Presidio per Section 260(a)(1)(B). The slope of Presidio is less than 5% and is therefore measured at the midpoint of the frontage. Measuring from Presidio Avenue is upsloping and complies with Section 260(a)(1)(C), with the first 10-ft measured from the centerline of frontage at existing curb, thereafter measured from the average of new grades on either side of the building. The measurement is taken to 45-ft, to allow an additional 5-ft for adequate retail and commercial floor-to-floor heights. See sheet A4.21 A and B for building section showing height compliance.<br><br>**EIR Variant 1:** The Walnut Senior Building is requesting a height increease to 67-ft as part of the PUD. |

## LOT COVERAGE / YARD COMPLIANCE SUMMARY:

| | |
|---|---|
| LOT AREA: | 446,468 SF |
| 45% OF LOT AREA: | 200,911 SF REQUIRED REAR YARD EQUIVALENT * |
| OPEN AREA PROVIDED: | 232,846 SF OR 52% OF SITE AREA |

DENOTES OPEN AREA




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

EIR VARIANT 1: “WALNUT” RESIDENTIAL PERSPECTIVE

PRADO GROUP | SKS | JAMES CORNER FIELD OPERATIONS | MS LA | ARUP | BAR architects | JENSEN | SCB

07.03.2019
PLANNING APPLICATION RESUBMITTAL

**VAR.60**

SAN FRANCISCO
PLANNING DEPARTMENT

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

# DRAFT Planning Commission Motion
## NO. M-XXXXX
### HEARING DATE: September 5, 2019

| | |
|---|---|
| *Hearing Date:* | September 5, 2019 |
| *Case No.:* | **2015-014028ENV** |
| *Project Title:* | **3333 California Street Mixed-Use Project** |
| *Zoning:* | RM-1 (Residential, Mixed, Low Density District)<br>40-X Height and Bulk District |
| *Block/Lot:* | Assessor's Block 1032/Lot 003 |
| *Lot Size:* | 446,490 square feet (10.25 acres) |
| *Project Sponsor:* | Laurel Heights Partners<br>Don Bragg - (415) 857-9324<br>dbragg@pradogroup.com |
| *Staff Contact:* | Kei Zushi - (415) 575-9038<br>CPC.3333CaliforniaEIR@sfgov.org |

**ADOPTING FINDINGS RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR A PROPOSED MIXED-USE PROJECT AND PROJECT VARIANT AT 3333 CALIFORNIA STREET. BOTH THE PROJECT AND PROJECT VARIANT WOULD DEMOLISH THE EXISTING ANNEX BUILDING, SURFACE PARKING LOTS, AND CIRCULAR GARAGE RAMPS; PARTIALLY DEMOLISH THE EXISTING FOUR-STORY OFFICE BUILDING AND DIVIDE IT INTO TWO SEPARATE BUILDINGS, VERTICALLY EXPAND THE EXISTING BUILDING TO ADD TWO TO THREE LEVELS; AND CONSTRUCT THIRTEEN NEW BUILDINGS. IN TOTAL, THE PROJECT WOULD INCLUDE 829,847 SQUARE FEET OF RESIDENTIAL USES (CONTAINING A TOTAL OF 558 UNITS), 40,261 SQUARE FEET OF RETAIL USE, 49,999 SQUARE FEET OF OFFICE USE, AND 13,630 SQUARE FEET OF CHILD CARE USE. THE PROJECT VARIANT WOULD INCLUDE 977,437 SQUARE FEET OF RESIDENTIAL USES (CONTAINING A TOTAL OF 744 UNITS), 34,496 SQUARE FEET OF RETAIL USE, AND 14,665 SQUARE FEET OF CHILD CARE USE. BOTH THE PROJECT AND PROJECT VARIANT WOULD ALSO INCLUDE VEHICULAR PARKING, BICYCLE PARKING, LOADING FACILITIES, AND STREETSCAPE IMPROVEMENTS.**

MOVED, that the San Francisco Planning Commission (hereinafter "commission") hereby CERTIFIES the final environmental impact report identified as case no. 2015-014028ENV, the "3333 California Street Mixed-Use Project" (hereinafter "project and variant"), based upon the following findings:

1. The City and County of San Francisco, acting through the planning department (hereinafter "department") fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code section 21000 *et seq.*, hereinafter "CEQA"), the State CEQA Guidelines (Cal. Code. Regs. Title 14, section 15000 *et seq.*, (hereinafter "CEQA Guidelines"), and Chapter 31 of the San Francisco Administrative Code (hereinafter "Chapter 31").

A. The department determined that an environmental impact report (hereinafter "EIR") was required and provided public notice of that determination by publication in a newspaper of general circulation on September 20, 2017.

B. The department held a public scoping meeting on October 16, 2017 in order to solicit public comment on the scope of the project's environmental review.

C. On April 25, 2018, the department published an initial study and provided public notice in a newspaper of general circulation of the availability of the initial study for public review and comment; this notice was mailed to the department's list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on April 25, 2018.

D. On November 7, 2018, the department published the draft EIR (hereinafter "DEIR") and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment, and of the date and time of the commission public hearing on the DEIR; this notice was mailed to the department's list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on November 7, 2018.

E. Notices of availability of the DEIR and of the date and time of the public hearing were posted near the project site on November 7, 2018.

F. On November 7, 2018, copies of the DEIR were mailed or otherwise delivered to a list of persons requesting it, to those noted on the distribution list in the DEIR, and to government agencies, the latter both directly and through the State Clearinghouse.

G. A notice of completion was filed with the State Secretary of Resources via the State Clearinghouse on November 7, 2018.

2. The historic preservation commission held a duly advertised hearing on said DEIR on December 5, 2018 at which historic preservation commission formulated its comments on the DEIR.

3. The planning commission held a duly advertised public hearing on said DEIR on December 13, 2018 at which opportunity for public comment was given, and public comment was received on the DEIR. The period for acceptance of written comments ended on January 8, 2019.

4. The department prepared responses to comments on environmental issues received at the public hearing and in writing during the 62-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a responses to comments document, published on August 22, 2019, distributed to the commission and all parties who commented on the DEIR, and made available to others upon request at the department.

5. A final EIR (hereinafter "FEIR") has been prepared by the department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the responses to comments document, all as required by law.

6. Project EIR files have been made available for review by the commission and the public. These files are available for public review at the department at 1650 Mission Street, Suite 400, and are part of the record before the commission. The project files are also available on the internet at the following address: https://www.ab900record.com/3333cal.

7. On September 5, 2019, the commission reviewed and considered the information contained in the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

8. The commission hereby does find that the FEIR concerning file no. 2015-014028ENV reflects the independent judgement and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the responses to comments document contains no significant revisions to the DEIR that would require recirculation of the document pursuant to CEQA Guideline section 15088.5, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.

9. The commission, in certifying the completion of said FEIR, hereby does find that the project or project variant described in the EIR would have the following significant unavoidable environmental impacts, which cannot be mitigated to a level of insignificance:

   A. The proposed project or project variant would have a significant, project-specific impact on historic architectural resources;

   B. The proposed project or project variant would have a significant, project-specific transit capacity utilization impact related to transportation and circulation; and

   C. The proposed project or project variant would have a significant, project-specific construction noise impact.

10. The commission reviewed and considered the information contained in the FEIR prior to approving the project or project variant.

I hereby certify that the foregoing motion was ADOPTED by the planning commission at its regular meeting of September 5, 2019.

Jonas P. Ionin
Commission Secretary

AYES:

NOES:

ABSENT:

ADOPTED:

# 3333 CALIFORNIA STREET MIXED-USE PROJECT



# RESPONSES TO COMMENTS ON DRAFT EIR
# VOLUME 1

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - JANUARY 8, 2019
FINAL EIR CERTIFICATION HEARING: SEPTEMBER 5, 2019

SAN FRANCISCO
PLANNING
DEPARTMENT

SAN FRANCISCO
**PLANNING DEPARTMENT**

**MEMO**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

DATE: August 22, 2019

TO: Members of the Planning Commission and Interested Parties

FROM: Lisa Gibson, Environmental Review Officer

**Re: Attached Responses to Comments on Draft Environmental Impact Report Case No. 2015-014028ENV [3333 California Street Mixed-Use Project]**

Attached for your review please find a copy of the Responses to Comments document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on September 5, 2019.** The Planning Commission will receive public testimony on the Final EIR certification at the September 5, 2019 hearing. Please note that the public review period for the Draft EIR ended on January 8, 2019; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

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

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Kei Zushi at 415-575-9038.

As noted on EIR pp. I.19-I.21, the project sponsor applied for certification as an Environmental Leadership Development Project (ELDP) under CEQA Chapter 6.5, sections 21178-21189.3, commonly known as AB900 on August 23, 2018. In compliance with this CEQA section, the record of proceedings for this project was made available online at the time of Draft EIR publication. During preparation of the Responses to Comments document the ELDP application was certified. On January 30, 2019, the California Air Resources Board (CARB) issued Executive Order G-18-101 determining that the proposed project or project variant would not result in any net additional greenhouse gas emissions with the payment of offsets for purposes of certification under AB 900. On June 7, 2019, Governor Gavin Newsom, with assistance from the Governor's Office of Planning and Research, certified the proposed project or project variant as an eligible project under AB 900, and the Governor's Office of Planning and Research forwarded the Governor's determination to the Joint Legislative Budget Committee. The State Legislative Analyst's Office indicated that the project aligns with the intent of AB 900, and recommended to the Joint Legislative Budget Committee that they concur with the Governor's determination. On July 8, 2019, the Joint Legislative Budget Committee concurred with the Governor's determination that the project is an eligible project under AB 900.

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

# 3333 CALIFORNIA STREET MIXED-USE PROJECT

# RESPONSES TO COMMENTS ON DRAFT EIR
## VOLUME 1

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - JANUARY 8, 2019
FINAL EIR CERTIFICATION HEARING: SEPTEMBER 5, 2019

SAN FRANCISCO
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DEPARTMENT

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Attachment B: Draft EIR Comment Letters and E-mails
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Attachment D: San Francisco Public Works, Independent Peer Review of 3333 California – Proposed Alternative, August 15, 2019
Attachment E: SFPUC Revised Water Supply Assessment, June 11, 2019

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# 1. INTRODUCTION TO RESPONSES TO COMMENTS

## A. PURPOSE OF THIS RESPONSES TO COMMENTS DOCUMENT

The purpose of this Responses to Comments (RTC) document is to present comments submitted on the draft Environmental Impact Report (draft EIR) for the proposed 3333 California Street Mixed-Use Project, to respond in writing to comments on environmental issues, and to revise the draft EIR as necessary to provide additional clarity. Comments were made in written form during the public comment period from November 8, 2018 to January 8, 2019, and as oral testimony received before the San Francisco Planning Commission at the public hearing on the draft EIR held on December 13, 2018. A complete transcript of proceedings from the public hearing on the draft EIR and all written comments are included herein in their entirety. A complete list of commenters is provided in Section 3, Public Agencies and Commissions, Non-Governmental Organizations, and Individuals Commenting on the Draft EIR. Note that some commenters re-submitted their comments on the initial study; these comments are included in RTC Attachment B, Draft EIR Comment Letters and E-mails. In addition, some comments were received after the close of the comment period on January 8, 2019; these comment letters are included in RTC Attachment C: Comment Letters and E-mails Received After Close of Public Comment Period. Most of these comments relate to the merits of the project and do not raise issues concerning the adequacy and accuracy of the EIR. The few that relate to environmental topics raise issues that are already addressed in this RTC document.

Pursuant to the California Environmental Quality Act (CEQA)[1] section 21091(d)(2)(A) and (B) and the CEQA Guidelines,[2] the San Francisco Planning Department (planning department) has considered the comments received on the draft EIR, evaluated the issues raised, and provides written responses that fully address each substantive physical environmental issue that has been raised. CEQA Guidelines section 15088 requires the evaluation of all public comments received on the draft EIR and the identification of comments that raise significant environmental issues requiring a good faith, reasoned analysis in the written response. As further stated in CEQA Guidelines section 15088(c), the level of detail in response may correspond to the level of detail provided in the comment. Where appropriate, this RTC document also includes EIR text changes made in response to comments.

[1] Public Resources Code section 21000-21189 (the California Environmental Quality Act or CEQA).
[2] California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387, Guidelines for Implementation of the California Environmental Quality Act (the CEQA Guidelines).

In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing significant environmental effects associated with the proposed project. "Significant effects on the environment" means substantial, or potentially substantial, adverse changes in any of the physical conditions within the area affected by the project. Economic or social changes alone are not considered a significant effect on the environment.[3] Therefore, this document focuses on responding to comments that relate to physical environmental issues in compliance with CEQA.[4] However, for informational purposes, this RTC document also provides limited responses to general comments on the draft EIR received during the public review period that were not related to physical environmental issues.

The comments do not identify any new significant environmental impacts, or substantial increases in the severity of previously identified environmental impacts, from those analyzed in the EIR. Nor do the comments identify feasible project alternatives or mitigation measures that are considerably different from those analyzed in the EIR that would reduce the significant environmental impacts of the proposed project or project variant, but which the project sponsor has not agreed to study or implement.

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

[3] CEQA Guidelines section 15064 (e).
[4] CEQA Guidelines sections 15382, 15064(c) and 15064 (d).

## B. ENVIRONMENTAL REVIEW PROCESS

### Notice of Preparation of an EIR and Public Scoping

On September 20, 2017, the planning department published a Notice of Preparation (NOP) of an Environmental Impact Report and Notice of Public Scoping Meeting (EIR Appendix A), announcing its intent to solicit public comments on the scope of the environmental analysis and to prepare and distribute an EIR on the 3333 California Street Mixed-Use Project. The planning department mailed the Notice of Availability of an NOP and Notice of Public Scoping Meeting to the State Clearinghouse and relevant state and regional agencies; occupants of the site and adjacent properties; property owners within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations that have requested such notice. A legal notice in the newspaper was also published on Wednesday, September 20, 2017.

Publication of the NOP initiated a 30-day public review and comment period that ended on October 20, 2017. Pursuant to CEQA section 21083.9 and CEQA Guidelines section 15206, the planning department held a public scoping meeting on October 16, 2017 to receive input on the scope of the environmental review for this project.[5] During the NOP review and comment period, a total of 54 comment letters, comment cards, and emails were submitted to the planning department and 28 speakers provided oral comments at the public scoping meeting. The comment letters received in response to the NOP and a copy of the transcript from the public scoping meeting are available for review at the planning department offices as part of Case File No. 2015-014028ENV.[6] The planning department considered the comments made by the public in preparation of the draft EIR for the proposed project and project variant.

### Initial Study

On April 25, 2018, the planning department published an initial study (EIR Appendix B) and a Notice of Availability of an Initial Study. The planning department mailed the Notice of Availability of an Initial Study to the State Clearinghouse and relevant state and regional agencies; occupants and owners of the site and properties within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations that have requested such notice. The initial study addresses physical environmental impacts related to land use and planning; population and housing; cultural resources (subsurface archaeological resources including human remains and tribal cultural resources); greenhouse gas emissions; wind and shadow; recreation; utilities and service systems; public services; biological resources; geology and soils; hydrology

[5] The public scoping meeting was held at the Jewish Community Center of San Francisco at 3200 California Street, San Francisco 94118 on Monday, October 16, 2017, between 6 p.m. and 8 p.m. A transcript of the proceedings is available as part of Case No. 2015-014028ENV.

[6] The administrative record is also online at https://www.ab900record.com/3333cal.

and water quality; hazards and hazardous materials; mineral and energy resources; and agricultural and forest resources.

Significant impacts identified in the initial study include impacts on cultural resources (subsurface archaeological resources including human remains and tribal cultural resources), biological resources, and paleontological resources. Mitigation measures identified in the initial study would reduce these impacts to less-than-significant levels. (See pp. 249-255 in Section F, Mitigation Measures and Improvements Measures, of the initial study [EIR Appendix B].) The project sponsor agreed to implement the identified mitigation measures and signed an Agreement to Implement Mitigation Measures on November 7, 2018. As part of the environmental review process, significant impacts that cannot be mitigated to a less-than-significant level were identified for the following environmental topics, which are addressed in this EIR: cultural resources (historic architectural resources), transportation and circulation, noise and vibration, and air quality.

Following publication of the initial study, a total of 15 comment letters and emails were submitted to the planning department. These comment letters are available for review at the planning department offices as part of Case File No. 2015-014028ENV.[7] The planning department considered the comments made by the public in preparation of the draft EIR for the proposed project and project variant.

**Draft EIR**

The planning department prepared the 3333 California Street Mixed-Use Project Draft EIR in accordance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The Draft EIR was published on November 7, 2018. The draft EIR identified a 47-day public comment period from Thursday, November 8, 2018 through Monday, December 24, 2018 to solicit public comment on the adequacy and accuracy of information presented in the draft EIR. The public comment period was extended to January 8, 2019 (to 62 days) at the direction of the San Francisco Planning Commission at the public hearing held on December 13, 2018. Paper copies of the draft EIR were made available for public review at the following locations: (1) the San Francisco Planning Department, 1650 Mission Street, and the Planning Information Center, 1660 Mission Street, (2) the San Francisco Main Library, 100 Larkin Street, and (3) the Presidio Branch Library, 3150 Sacramento Street. Paper copies of the appendices to the draft EIR were made available for public review at the San Francisco Planning Department, 1650 Mission Street, and the Presidio Branch Library, 3150 Sacramento Street. The planning department also distributed paper copies of the Notice of Public Hearing and Availability of the draft EIR via the Unites States Postal Service to relevant state and regional agencies; occupants and owners of the site and properties within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations that have requested such notice. The planning department also distributed the notice

[7] The administrative record is also online at https://www.ab900record.com/3333cal.

electronically via e-mails to recipients whose e-mail addresses were provided; published notification of its availability in a newspaper of general circulation in San Francisco; and posted the Notice of Public Hearing and Availability of the EIR at multiple locations on the project site.

Comments on the draft EIR were made in written form during the public comment period and as oral testimony received at the public hearing on the draft EIR before the San Francisco Planning Commission on December 13, 2018. A court reporter was present at the public hearing to transcribe the oral comments verbatim and provide a written transcript. As noted on p. 1.1, some commenters re-submitted their comments on the initial study; these comments are included in RTC Attachment B, Draft EIR Comment Letters and E-mails. Other comments were received after the close of the comment period; these comment letters are included in RTC Attachment C: Comment Letters and E-mails Received After Close of Public Comment Period.

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the draft EIR. Under CEQA Guidelines section 15201,[8] members of the public may comment on any aspect of the project. Further, CEQA Guidelines section 15204(a) states that the focus of public review should be "on the sufficiency of the [Draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." As noted above, CEQA Guidelines section 15088 specifies that the lead agency is required to respond to the comments raising significant environmental issues received during the public review period. Therefore, this RTC document is focused on the sufficiency and adequacy of the draft EIR in disclosing the significance of the environmental impacts of the proposed project or project variant that were evaluated in the draft EIR.

The planning department distributed this RTC document for review to the San Francisco Planning Commission as well as to the other public agencies and commissions, non-governmental organizations including neighborhood associations, and individuals who commented on the draft EIR. The San Francisco Planning Commission will consider the adequacy of the Final EIR – consisting of the draft EIR and the RTC document – in complying with the requirements of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. If the San Francisco Planning Commission finds that the Final EIR is adequate, accurate, and complete and complies with CEQA requirements, it will certify the Final EIR and will then consider the associated MMRP, and the requested approvals for the proposed project or project variant.

[8] CEQA section 21082.1(b).

Consistent with CEQA Guidelines section 15097[9], the MMRP is designed to ensure implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the proposed project's or project variant's significant environmental effects. CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA sections 21002, 21002.1, and 21081 and CEQA Guidelines sections 15091 and 15092). The EIR identifies four significant impacts related to historic architectural resources, transportation and circulation (vehicle miles traveled and transit), and noise and vibration (construction noise and construction vibration) and mitigation measures. Because this EIR identifies three significant impacts (historic architectural resources, transit, and construction noise) that cannot be mitigated to less-than-significant levels even with mitigation measures, the San Francisco Planning Commission must adopt findings that include a Statement of Overriding Considerations for these significant unavoidable impacts (CEQA sections 21081(a)(3) and (b) and CEQA Guidelines section 15093(b)) if the revised project or revised variant would be approved. The project sponsor would be required to implement the MMRP as a condition of project approval.

The project sponsor, Laurel Heights Partners, LLC, applied to the Governor of California for certification of the 3333 California Street Mixed-Use Project as an Environmental Leadership Development Project (ELDP), pursuant to Assembly Bill 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code section 21178 et. seq., on August 23, 2018, with public review commencing on August 24, 2018. The AB900 process included a public comment period from August 24, 2018, to September 24, 2018. The ELDP application is available at http://opr.ca.gov/ceqa/california-jobs.html (see "2017092053 – 3333 California Street Project"). The AB 900 Record of Proceedings is available at https://www.ab900record.com/3333cal.

The ELDP application was certified. On January 30, 2019, the California Air Resources Board (CARB) issued Executive Order G-18-101 determining that the proposed project or project variant would not result in any net additional GHGs with payment of offsets for purposes of certification under AB 900. On June 7, 2019, Governor Gavin Newsom, with assistance from the Governor's Office of Planning and Research, certified the proposed project or project variant as an eligible project under AB 900, and the Governor's Office of Planning and Research (OPR) forwarded the Governor's determination to the Joint Legislative Budget Committee. The State Legislative Analyst's Office indicated that the project aligns with the intent of AB 900, and recommended to the Joint Legislative Budget Committee that they concur with the Governor's determination. On July 8, 2019, the Joint Legislative Budget Committee concurred with the Governor's determination that the project is an eligible project under AB 900.

[9] CEQA Guidelines section 15097 cites CEQA section 21081.6 as the authority for the CEQA Guidelines section.

The documents above and any cited documents in the subsequent sections of this RTC document are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## C. DOCUMENT ORGANIZATION

This RTC document consists of the following sections:

**Section 1, Introduction to Responses to Comments**, discusses the purpose of the RTC document, the environmental review process for the EIR, and the organization of the RTC document.

**Section 2, Revisions and Clarifications to the Project Description**, summarizes changes to the description of the proposed project or project variant, as described in draft EIR Chapter 2, that the project sponsor has initiated since publication of the draft EIR. The revisions and clarifications consist of new information that updates, supplements, or replaces certain project description information and the associated environmental analysis previously presented in the draft EIR. RTC Section 2 analyzes whether these revisions and clarifications to the proposed project or project variant would result in any new environmental impacts not already discussed in the draft EIR and initial study or a substantial increase in the severity of previously identified significant environmental impacts.

**Section 3, Public Agencies and Commissions, Non-governmental Organizations, and Individuals Commenting on the Draft EIR**, presents the names of persons who provided comments on the draft EIR during the public comment period. This section includes three tables: Public Agencies and Commissions Commenting on the Draft EIR, Non-Governmental Organizations Commenting on the Draft EIR, and Individuals Commenting on the Draft EIR. Commenters within each category are listed in alphabetical order. These lists also show the comment code (described below) and the format (i.e., public hearing transcript, letter, or email) and date of each set of comments.

**Section 4, Master Response – Transportation and Circulation**, presents a list of the agencies and commissions, non-governmental organizations, and/or individuals who submitted public comments related to the transportation analysis methodologies. These comments are responded to in a single, comprehensive response. The master response includes revisions or additions to the draft EIR. Text changes are shown as indented text, with new text double underlined and deleted material shown as ~~strikethrough~~ text.

**Section 5, Comments and Responses**, presents the substantive comments excerpted verbatim from the public hearing transcript and written correspondence. The complete transcript, letters, and emails containing the comments are provided in Attachments A and B of this RTC document. The

comments and responses in this section are organized by topic and, where appropriate, by subtopic, including all of the same environmental topics addressed in Chapter 4 of the draft EIR and Section E of the initial study (EIR Appendix B). The comments appear as single-spaced text and are coded in the following way:

- Comments from public agencies and commissions are designated by "A-" and an acronym of the agency's or commission's name
- Comments from non-governmental organizations including neighborhood associations are designated by "O-" and an acronym of the organization's or association's name
- Comments from individuals are designated by "I-" and the individual's last name

In cases where a commenter spoke at the public hearing and also submitted written comments, or submitted more than one letter or email, the individual's last name or the acronym of the organization's name is followed by a sequential number by date of submission. A final number at the end of the code keys each comment to the order of the bracketed comments within each written communication or set of transcript comments. Thus, each discrete comment has a unique comment code. The coded comment excerpts in Section 5 tie in with the bracketed comments presented in Attachments A and B of this RTC document.

Preceding each group of comments is a summary introduction of issues raised about the specific topic. Following each comment or group of comments on a topic are the planning department's responses. The responses generally provide clarification of the draft EIR text. In some instances, the responses may result in revisions or additions to the draft EIR. Text changes are shown as indented text, with new text double underlined and deleted material shown as ~~strikethrough~~ text.

**Section 6, Draft EIR Revisions**, presents the text changes to the draft EIR made as a result of a response to comments, and/or staff-initiated text changes identified by planning department staff to update, correct, or clarify the draft EIR text. In addition, as described in RTC Section 2, the proposed project and its variant have been revised, and text and graphic changes are limited to the minor modifications introduced as part of the update to the project sponsor's Planning Application. Staff-initiated text changes are identified by an asterisk (*) in the margin. These changes and minor errata do not result in significant new information with respect to the proposed project or project variant, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft EIR pursuant to CEQA Guidelines section 15088.5 is not required.

**Attachments A** and **B** present, respectively, a complete transcript of the San Francisco Planning Commission hearing and a copy of the written correspondence received by the planning department in their entirety, with individual comments bracketed and coded as described above. An additional code points the reader to the topic and subtopic in Section 5 in which the bracketed comment appears and the response that addresses it.

**Attachment C** presents comment letters and emails received after the close of public comment period on the draft EIR through August 16, 2019.

**Attachment D** presents the San Francisco Public Works Independent Peer Review of 3333 California – Proposed Alternative, August 15, 2019 [regarding the Laurel Heights Improvement Association Alternative].

**Attachment E** presents SFPUC Revised Water Supply Assessment, June 11, 2019.

This RTC document will be consolidated with the draft EIR as its own chapter, and upon certification of the EIR the two documents will together comprise the project's Final EIR. The revisions to the EIR's text called out in Section 6, Draft EIR Revisions, of the RTC document will be incorporated into the draft EIR text as part of publishing the consolidated Final EIR.

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# 2. REVISIONS AND CLARIFICATIONS TO THE PROJECT DESCRIPTION

## A. INTRODUCTION

Since the November 7, 2018 publication of the 3333 California Street Mixed-Use Project Draft EIR, the project sponsor has initiated revisions and clarifications to the proposed project and project variant as described in draft EIR Chapter 2, Project Description. This RTC section describes these revisions and analyzes whether such revisions would result in any new significant environmental impacts not already discussed in the draft EIR or initial study or in a substantial increase in the severity of any identified significant impacts.

CEQA Guidelines section 15088.5, Recirculation of an EIR Prior to Certification, requires recirculation of an EIR when "significant new information" is added to the EIR after publication of the draft EIR but before certification. The CEQA Guidelines section 15088.5(a) states that new information added to an EIR is not "significant" unless "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement." CEQA Guidelines section 15088.5(a) further defines "significant new information," in part, as a disclosure that "a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented" or a disclosure that "a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance." CEQA Guidelines section 15088.5(b) states that recirculation is not required if "new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

As described below, the revisions and clarifications to the proposed project and project variant would not introduce new characteristics or substantially modify previously proposed characteristics that would result in any new significant impacts not already identified for the proposed project and project variant studied in the draft EIR or initial study, nor would these changes increase the severity of any of the identified significant impacts. Although the revisions to the proposed project and project variant do not present significant new information and do not give rise to any new significant environmental impact, or a substantial increase in the severity of any identified significant impact, the mitigation measures identified in the draft EIR and the initial study for the proposed project or project variant would continue to be required in order to reduce or avoid significant environmental impacts of the revised project or revised variant. No new measures would be required to mitigate the significant impacts identified in the draft EIR or initial study for the proposed project and project variant. Mitigation Measure M-TR-2: Reduce Retail Parking Supply, on EIR p. 4.C.80, would continue to be applicable to the revised project or revised variant and would be satisfied by the reduced retail parking program and elimination of the 60 commercial parking spaces in both the revised project and revised

variant. Compliance would be verified through the building permit process. Therefore, recirculation of the EIR pursuant to CEQA Guidelines section 15088.5 is not required.

## B. SUMMARY OF REVISIONS AND CLARIFICATIONS

The project sponsor has introduced the following changes to the proposed retail and parking components of the proposed project's and project variant's development program and the site circulation program: (1) retail uses in the Euclid Building have been eliminated, and the amount of gross square footage to be devoted to ground-floor retail uses in the California Street buildings has been reduced; (2) the number of vehicle parking spaces for commercial uses has been reduced; and (3) the curb cuts in front of the Laurel Duplexes have been eliminated, and the parking garage access for the seven Laurel Duplexes has been consolidated into a single curb cut on Laurel Street with shared access to the Mayfair Building's garage. The project sponsor has also proposed minor changes regarding the size of the publicly accessible open space, the overall amount of excavation and soils to be exported from the project site, the residential dwelling unit mix, the total number of dwelling units in some of the proposed buildings, the number of bicycle parking spaces, and design refinements to address planning department requests for updates to Planning Application Submittal 1, dated June 28, 2017, to address various provisions of the planning code such as dwelling unit exposure.

Programmatic changes related to gross square footage by use and building, project characteristics such as the number and mix of residential units and the number of class 1 and class 2 bicycle parking spaces, and the overall square footage, among other project data, are shown in RTC Table 2.2: Comparison of Characteristics of Buildings in Proposed Project and Revised Project, and RTC Table 2.6: Comparison of Characteristics of Buildings in Project Variant and Revised Variant, starting on RTC pp. 2.3 and 2.5, respectively (RTC table numbers parallel those in draft EIR Chapter 2, Project Description, for ease of comparison). Note that throughout this RTC section, RTC tables are shown with deletions in ~~strikethrough~~ and new text in <u>double-underline</u> to illustrate the differences between the proposed project and revised project and between the project variant and the revised variant.

Although the building footprints, sizes, height, and massing would remain largely the same, modifications have been introduced to the site plan along Laurel Street between Mayfair Drive and Euclid Avenue; to the parking plan under the Masonic, Euclid, and Mayfair buildings; and to the preliminary excavation plan. Modified graphics are presented in this RTC section to illustrate the main changes to the site plan and to select elevations and garage levels. (RTC figure numbers parallel those in draft EIR Chapter 2, Project Description, for ease of comparison.)

**RTC Table 2.2: Comparison of Characteristics of Buildings in Proposed Project and Revised Project**

| Building Characteristics | Center Bldg. A | Center Bldg. B | Plaza A Building | Plaza B Building | Walnut Building | Masonic Building | Euclid Building | Laurel Duplex (7) | Mayfair Building | Totals |
|---|---|---|---|---|---|---|---|---|---|---|
| Location | Center of Site (Office Bldg. Renovation) | | California Street (New Construction) | | | Presidio/Masonic/Euclid (New Construction) | | Laurel Street (New Construction) | | |
| **Building Height** | 80 ft. | 80 – 92 ft. | 45 ft. | 45 ft. | 45 ft. | 40 ft. | 40 ft. | 37 - 40 ft. | 40 ft. | -- |
| **Number of Stories** | 6 | 6 - 7 | 4 | 4 | 3 | 4 - 6 | 4 - 6 | 4 | 4 | -- |
| **Use (gsf)** | ~~**89,465**~~ **89,735** | ~~**252,681**~~ **254,398** | ~~**144,878**~~ **143,761** | ~~**145,618**~~ **133,757** | ~~**263,453**~~ **230,319** | ~~**124,892**~~ **97,725** | ~~**233,623**~~ **226,530** | ~~**58,839**~~ **60,260** | ~~**58,821**~~ **59,040** | ~~**1,372,270**~~ **1,295,525** |
| Residential | ~~89,465~~ 89,735 | ~~233,423~~ 231,667 | ~~66,150~~ 66,755 | ~~72,220~~ 72,035 | 0 | ~~88,906~~ 83,505 | ~~177,345~~ 184,170 | ~~54,111~~ 55,300 | ~~43,071~~ 46,680 | ~~824,691~~ 829,847 |
| Office | 0 | 0 | 0 | 0 | 49,999 | 0 | 0 | 0 | 0 | 49,999 |
| Retail | 0 | 0 | ~~14,178~~ 14,816 | ~~11,328~~ 11,180 | ~~24,324~~ 14,265 | 0 | ~~4,287~~ 0 | 0 | 0 | ~~54,117~~ 40,261 |
| Child Care | 0 | 0 | 0 | 0 | ~~14,690~~ 13,630 | 0 | 0 | 0 | 0 | ~~14,690~~ 13,630 |
| Parking | 0 | ~~19,258~~ 22,731 | ~~64,550~~ 62,190 | ~~62,070~~ 50,542 | ~~174,440~~ 152,425 | ~~35,986~~ 14,220 | ~~51,991~~ 2,360 | ~~4,728~~ 4,960 | ~~15,750~~ 12,360 | ~~428,773~~ 361,788 |
| **Dwelling Units** | **51** | **139** | **67** | **61** | **0** | ~~**61**~~ **57** | ~~**135**~~ **139** | **14** | **30** | **558** |
| Studio+1 bedroom | 24 | ~~50~~ 51 | 40 | 30 | 0 | ~~27~~ 22 | ~~50~~ 55 | 0 | ~~14~~ 12 | ~~235~~ 234 |
| 2 bedroom | 11 | ~~51~~ 49 | 23 | 25 | 0 | ~~24~~ 25 | 54 | ~~1~~ 0 | ~~67~~ | ~~195~~ 194 |
| 3 bedroom | 10 | ~~29~~ 30 | 4 | 6 | 0 | 10 | ~~31~~ 30 | ~~1~~ 2 | ~~10~~ 11 | ~~101~~ 103 |
| 4 bedroom | 6 | 9 | 0 | 0 | 0 | 0 | 0 | 12 | 0 | 27 |
| **Vehicle Parking Spaces** | **51** [Note A] | **139** [Note A] | ~~**170**~~ **99** | ~~**95**~~ **85** | ~~**177**~~ **139** | ~~**61**~~ **57** | ~~**148**~~ **139** | **14** [~~Note B~~] | **30** | ~~**896**~~ **763** [Note ~~C~~ B] |
| Residential | 51 | 139 | 67 | 61 | 0 | ~~61~~ 57 | ~~135~~ 139 | ~~12~~ 14 | 30 | 558 |
| Retail | 0 | 0 | ~~43~~ 32 | ~~34~~ 24 | ~~48~~ 30 | 0 | ~~13~~ 0 | 0 | 0 | ~~138~~ 86 |
| Commercial | 0 | 0 | ~~60~~ 0 | 0 | 0 | 0 | 0 | 0 | 0 | ~~60~~ 0 |
| Office | 0 | 0 | 0 | 0 | ~~100~~ 80 | 0 | 0 | 0 | 0 | ~~100~~ 80 |
| Child Care | 0 | 0 | 0 | 0 | 29 | 0 | 0 | 0 | 0 | 29 |

***(continued)***

| Building Characteristics | Center Bldg. A | Center Bldg. B | Plaza A Building | Plaza B Building | Walnut Building | Masonic Building | Euclid Building | Laurel Duplex (7) | Mayfair Building | Totals |
|---|---|---|---|---|---|---|---|---|---|---|
| **Bicycle Parking Spaces** Note C D | ~~56~~ 55 | ~~153~~ 147 | ~~96~~ 81 | 77 | 40 | ~~67~~ 61 | ~~156~~ 147 | ~~15~~ 16 | ~~33~~ 32 | ~~693~~ 656 |
| Residential Class 1/ Class 2 | 51 / ~~5~~ 4 | 139 / ~~14~~ 8 | 67 / ~~7~~ 4 | 61 / ~~6~~ 4 | 0 | ~~61~~ 57 / ~~6~~ 4 | ~~135~~ 139 / ~~14~~ 8 | 14 / ~~1~~ 2 | 30 / ~~3~~ 2 | 558 / ~~56~~ 36 |
| Retail Class 1 Note D E/Class 2 | 0 | 0 | ~~10~~ 0 / ~~12~~ 10 | ~~0~~ 4 / ~~10~~ 8 | 4 / 4 | 0 | 0 / ~~7~~ 0 | 0 | 0 | ~~14~~ 8 / ~~33~~ 22 |
| Child Care Class 1/Class 2 | 0 | 0 | 0 | 0 | 10 / 10 | 0 | 0 | 0 | 0 | 10 / 10 |
| Office Class 1/Class 2 | 0 | 0 | 0 | 0 | ~~10~~ 8 / ~~2~~ 4 | 0 | 0 | 0 | 0 | ~~10~~ 8 / ~~2~~ 4 |

*Notes:*

**A** Parking for Center Buildings A and B would be provided in the renovated parking level (Basement Level~~s B1 and~~ B3) under Center Buildings A and B (~~32~~ 26 spaces) that would be part of the proposed California Street Garage, in Basement Level B1 of the proposed California Street Garage including the renovated parking level (Basement Level B1) under Center Buildings A and B (~~106~~ 102 spaces), and in Basement Level B1 of the proposed Masonic Garage (~~52~~ 62 spaces).

~~**B** The two parking spaces for the Laurel Duplex without a private parking garage would be located within the proposed Masonic Garage.~~

~~**C**~~ **B** Includes the ~~11~~ 10 car-share spaces and ~~26~~ 27 Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.

~~**D**~~ **C** Residential class 1 spaces would be located within storage rooms in the proposed buildings. Class 2 spaces would be located along adjacent sidewalks near proposed retail and residential entrances.

~~**E**~~ **D** Retail class 1 spaces would be located in two separate bicycle storage rooms in Basement Level B1 – one under the Plaza B Building and one under the Walnut Building.

*Source:* Laurel Heights Partners, LLC; Meyer Studio Land Architects; James Corner Field Operations; BAR Architects; Jensen Architects; Solomon Cordwell Buenz; ; BKF Engineers; and ARUP ~~and Jensen Architects~~ (February 2019) ~~(August 2017)~~

**RTC Table 2.6: Comparison of Characteristics of Buildings in Project Variant and Revised Variant**

| **Building Characteristics (same as or *different* than proposed project)** | **Center Bldg. A (same)** | **Center Bldg. B (same)** | **Plaza A Building *(~~same~~ different)*** | **Plaza B Building *(~~same~~ different)*** | ***Walnut Building (different)*** | **Masonic Building (same)** | **Euclid Building (same)** | **Laurel Duplexes (same)** | **Mayfair Building (same)** | ***Total (different)*** |
|---|---|---|---|---|---|---|---|---|---|---|
| Location | Center of Site (Office Bldg. Renovation) | | *California Street (New Construction)* | | | Presidio/Masonic/Euclid (New Construction) | | Laurel Street (New Construction) | | |
| **Building Height** | 80 ft. | 80 – 92 ft. | 45 ft. | 45 ft. | *67 ft.* | 40 ft. | 40 ft. | 37 - 40 ft. | 40 ft. | -- |
| **Number of Stories** | 6 | 6 - 7 | 4 | 4 | *6* | 4 - 6 | 4 - 6 | 4 | 4 | -- |
| **Use (gsf)** | **~~89,465~~** 89,735 | **~~252,681~~ 254,398** | **~~144,878~~ 150,900** | **~~145,618~~ 152,544** | ***~~368,170~~ 336,700*** | **~~124,892~~ 97,725** | **~~233,623~~ 226,530** | **~~58,839~~ 60,260** | **~~58,821~~ 59,040** | ***~~1,476,987~~ 1,427,832*** |
| Residential | ~~89,465~~ 89,735 | ~~233,423~~ 231,667 | ~~66,150~~ 66,755 | ~~72,220~~ 72,035 | *~~153,920~~ 147,590* | ~~88,906~~ 83,505 | ~~177,345~~ 184,170 | ~~54,111~~ 55,300 | ~~43,071~~ 46,680 | *~~978,611~~ 977,437* |
| Retail | 0 | 0 | ~~14,178~~ 14,816 | ~~11,328~~ 11,180 | *~~18,800~~ 8,500* | 0 | ~~4,287~~ 0 | 0 | 0 | *~~48,593~~ 34,496* |
| Child Care | 0 | 0 | 0 | 0 | *~~14,650~~ 14,665* | 0 | 0 | 0 | 0 | *~~14,650~~ 14,665* |
| Parking | 0 | ~~19,258~~ 22,731 | ~~64,550~~ 69,329 | ~~62,070~~ 69,329 | *~~180,800~~ 165,945* | ~~35,986~~ 14,220 | ~~51,991~~ 42,360 | ~~4,728~~ 4,960 | ~~15,750~~ 12,360 | *~~435,133~~ 401,234* |
| **Dwelling Units** | **51** | **139** | **67** | **61** | ***186*** | **~~61~~ 57** | **~~135~~ 139** | **14** | **30** | ***744*** |
| Studio+1 bedroom | 24 | ~~50~~ 51 | 40 | 30 | *185* | ~~27~~ 22 | ~~50~~ 55 | 0 | ~~14~~ 12 | *~~420~~ 419* |
| 2 bedroom | 11 | ~~51~~ 49 | 23 | 25 | *1* | ~~24~~ 25 | 54 | ~~1~~ 0 | ~~6~~ 7 | *~~196~~ 195* |
| 3 bedroom | 10 | ~~29~~ 30 | 4 | 6 | *0* | 10 | ~~31~~ 30 | ~~1~~ 2 | ~~10~~ 11 | *101 103* |
| 4 bedroom | 6 | 9 | 0 | 0 | *0* | 0 | 0 | 12 | 0 | *27* |
| **Vehicle Parking Spaces** | **51** [Note A] | **139** [Note A] | **~~170~~ 99** | **~~95~~ 85** | ***~~253~~ 233*** | **~~61~~ 57** | **~~148~~ 139** | **14** [~~Note B~~] | **30** | ***~~970~~ 857*** [~~Note D~~ *B*] |
| Residential | 51 | 139 | 67 | 61 | *186* | ~~61~~ 57 | ~~135~~ 139 | 14 | 30 | *744* |
| Retail | 0 | 0 | ~~43~~ 32 | ~~34~~ 24 | *~~38~~ 18* | 0 | ~~13~~ 0 | 0 | 0 | *~~128~~ 74* |
| Commercial | 0 | 0 | ~~60~~ 0 | 0 | *0* | 0 | 0 | 0 | 0 | *~~60~~ 0* |
| Child Care | 0 | 0 | 0 | 0 | *29* | 0 | 0 | 0 | 0 | *29* |

***(continued)***

| **Building Characteristics (same as or *different* than proposed project)** | **Center Bldg. A (same)** | **Center Bldg. B (same)** | **Plaza A Building *(~~same~~ different)*** | **Plaza B Building *(~~same~~ different)*** | ***Walnut Building (different)*** | **Masonic Building (same)** | **Euclid Building (same)** | **Laurel Duplexes (same)** | **Mayfair Building (same)** | ***Total (different)*** |
|---|---|---|---|---|---|---|---|---|---|---|
| **Bicycle Parking Spaces** Note ~~E~~ C | **~~56~~ 55** | **~~153~~ 147** | **~~96~~ 83** | **~~77~~ 75** | ***~~237~~ 223*** | **~~67~~ 61** | **~~156~~ 147** | **~~15~~ 16** | **~~33~~ 32** | ***~~890~~ 839*** |
| Residential Class 1 / Class 2 | 51 / ~~5~~ 4 | 139 / ~~14~~ 8 | 67 / ~~7~~ 4 | 61 / ~~6~~ 4 | *186 / ~~19~~ 9* | ~~61~~ 57 / ~~6~~ 4 | ~~135~~ 139 / ~~14~~ 8 | 14 / ~~1~~ 2 | 30 / ~~3~~ 2 | *744 / ~~75~~ 45* |
| Retail Class 1 Note ~~D~~ F / Class 2 | 0 | 0 | ~~10~~ 0 / ~~12~~ 10 | ~~0~~ 4/ ~~10~~ 8 | *4 / ~~8~~4* | 0 | 0 / ~~7~~ 0 | 0 | 0 | *~~14~~ 8 / ~~37~~ 22* |
| Child Care Class 1 / Class 2 | 0 | 0 | 0 | 0 | *10 / 10* | 0 | 0 | 0 | 0 | *10 / 10* |

*Notes:*

**A** Parking for Center Buildings A and B would be provided in the renovated parking level (Basement Level~~s B1 and~~ B3) under Center Buildings A and B (~~32~~ 26 spaces) that would be part of the proposed California Street Garage, in Basement Level B1 of the proposed California Street Garage including the renovated parking level (Basement Level B1) under Center Buildings A and B (~~106~~ 102 spaces), and in Basement Level B1 of the proposed Masonic Garage (~~52~~ 62 spaces).

~~**B** The two parking spaces for the Laurel Duplex without a private parking garage would be located within the proposed Masonic Garage.~~

~~**C**~~ **B** Includes the ~~9~~ 10 car-share spaces and ~~26~~ 27 Americans with Disabilities Act accessible spaces. Pursuant to San Francisco Green Building Code sections 4.106.4 and 5.106.5 up to 8 percent of parking spaces would be developed with electric vehicle charging stations and other spaces would be electric vehicle ready.

~~**D**~~ **C** Residential class 1 spaces would be located within storage rooms in the proposed buildings. Class 2 spaces would be located along adjacent sidewalks near proposed retail and residential entrances.

~~**E**~~ **D** Retail class 1 spaces would be located in two separate storage rooms in Basement Level B1 – one under the Plaza B Building and one under the Walnut Building.

*Source:* Laurel Heights Partners, LLC; Meyer Studio Land Architects; James Corner Field Operations; BAR Architects; Jensen Architects; Solomon Cordwell Buenz; BKF Engineers; and ARUP ~~and Jensen Architects~~ (February 2019) ~~(August 2017)~~

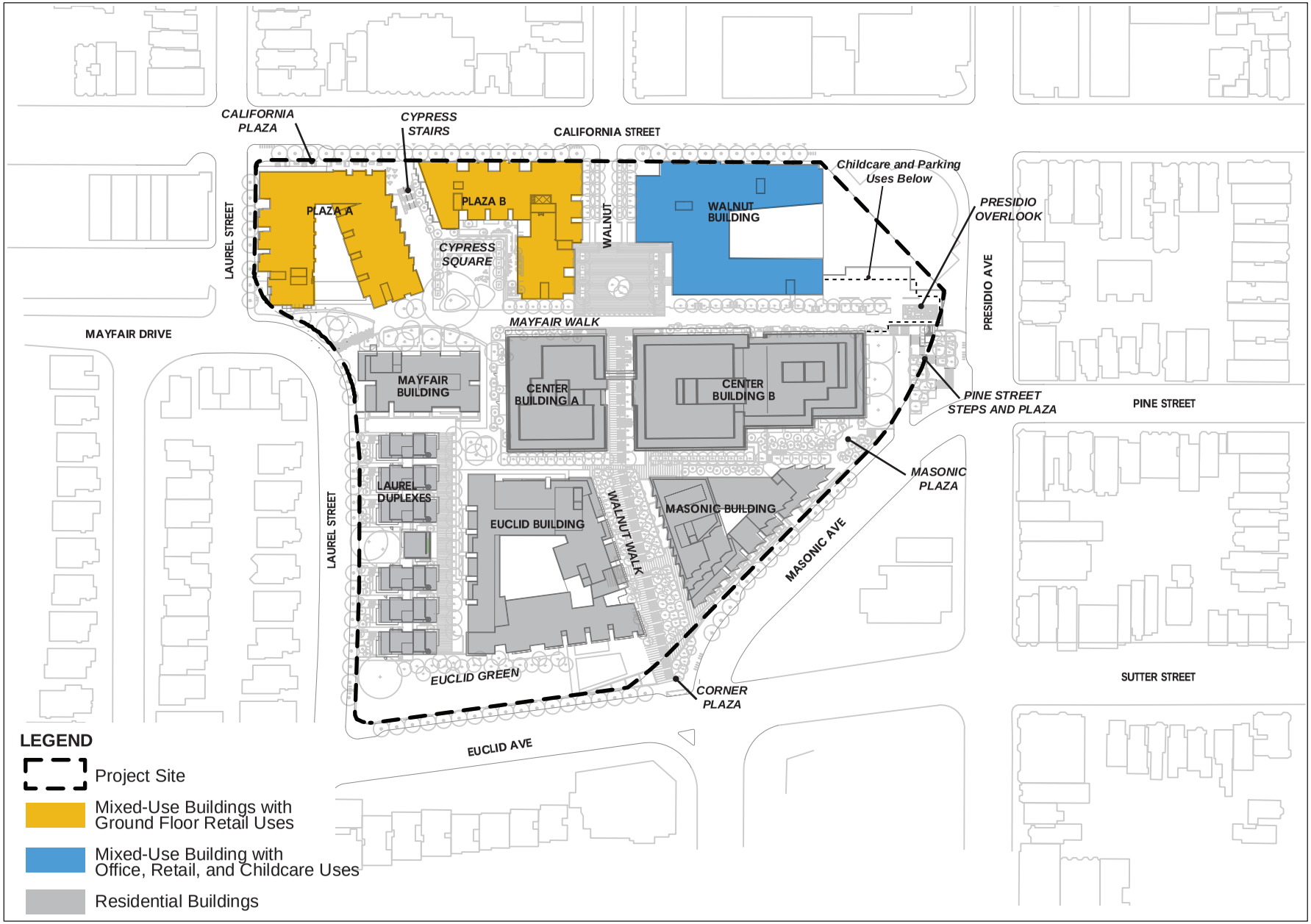
**Retail Programming**

As described in draft EIR Chapter 2, Project Description, there would be 54,117 gross square feet of retail uses at the ground-floor levels of the Plaza A, Plaza B, Walnut, and Euclid buildings in the proposed project. Under the revised project there would be 40,261 gross square feet of retail uses in total for all of these buildings – a decrease of 13,856 gross square feet from the proposed project. The 4,287 square feet of retail use in the Euclid Building would be eliminated; retail use in the Walnut Building would be reduced (10,059 fewer gross square feet); and retail uses in the Plaza A and B buildings would be slightly reduced (638 and 148 fewer gross square feet, respectively). The Euclid Building space that was to be used as ground-floor retail under the proposed project or project variant would instead be a residential amenity space. Under the revised project, the total gross square footage of the Walnut and Euclid buildings would be reduced by approximately 33,000 gross square feet and 7,000 gross square feet, respectively. RTC Table 2.2 compares the proposed project and revised project, with changes shown in strikethrough and double underline, as explained above; RTC Figure 2.3: Site Plan for Revised Project, shown on RTC p. 2.8, has been modified to show these changes to the proposed project.

Revisions to the project variant would be similar to those for the revised project. As described in draft EIR Chapter 2, Project Description, the project variant would provide 48,593 gross square feet of retail space at the ground-floor levels of the Plaza A, Plaza B, Walnut, and Euclid buildings. Under the revised variant, there would be 34,496 gross square feet of retail uses – a decrease of 14,097 gross square feet. Retail use in the Euclid Building would be eliminated and the proposed retail uses in the Plaza A and B buildings would be reduced by approximately the same amount as with the revised project. The proposed retail use in the Walnut Building would be reduced by 10,300 gross square feet under the revised variant. The total gross square footage of the Walnut and Euclid buildings would be reduced by approximately 31,000 and 7,000 gross square feet, respectively. RTC Table 2.6 compares these components of the project variant to the revised variant, with changes shown in strikethrough and double underline, as explained above; RTC Figure 2.32: Site Plan for Revised Variant, shown on RTC p. 2.9, has been modified to show these changes to the project variant.

**Reduction in Vehicle Parking Spaces**

As described in the draft EIR, the proposed project and variant would provide 896 and 970 parking spaces, respectively. With the proposed revisions, the project and variant would have 763 and 857 parking spaces, respectively (or 133 and 113 fewer parking spaces, respectively than described in the draft EIR). The overall reduction in parking spaces reflects a decrease in the amount of gross square footage for retail uses; the elimination of the 60 commercial parking spaces proposed to replace the existing public parking spaces on the project site; and, for the




Source: Laurel Heights Partners, LLC (2019) and SWCA

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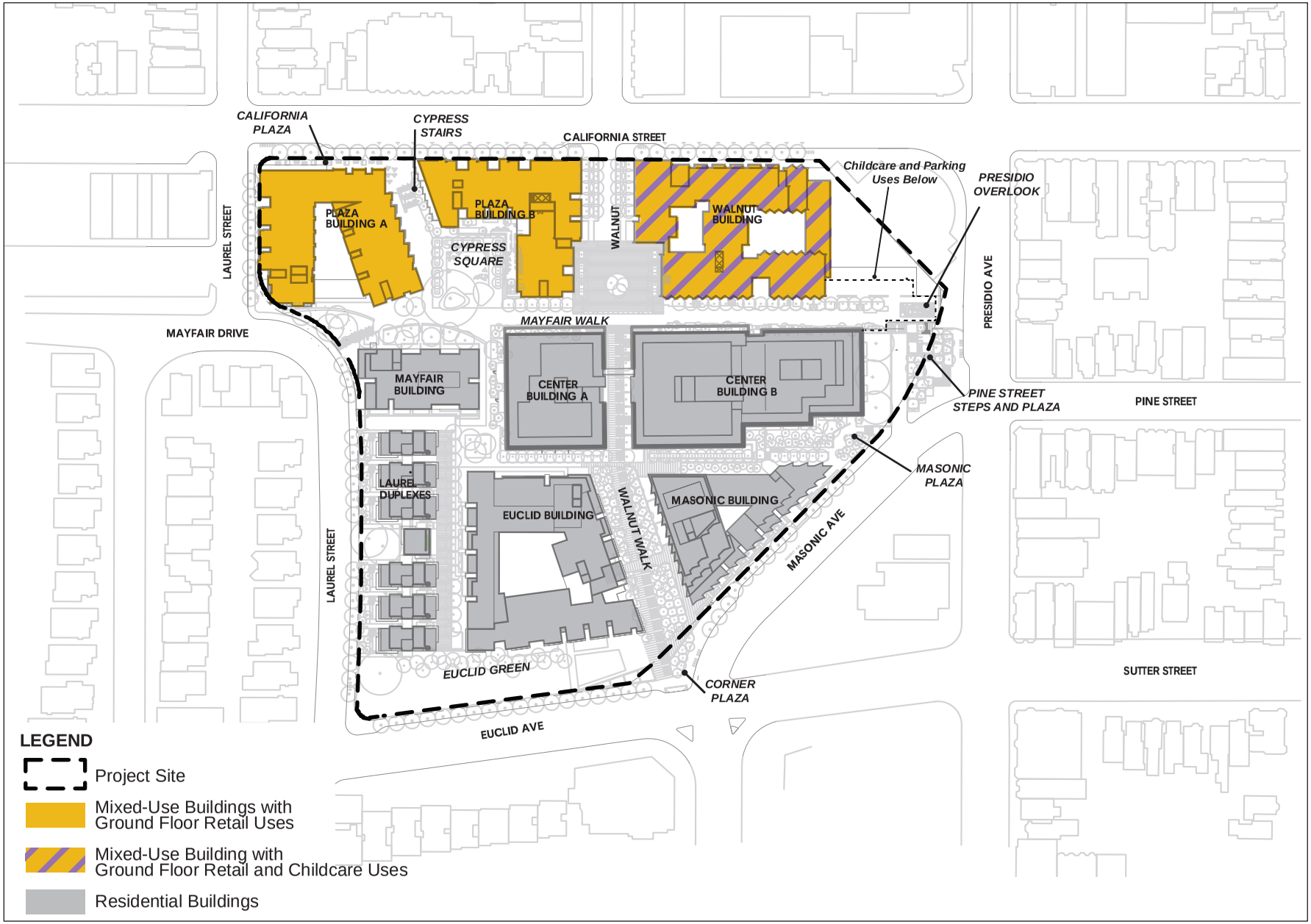
RTC FIGURE 2.3: SITE PLAN FOR REVISED PROJECT




Source: Laurel Heights Partners, LLC (2019) and SWCA

0 180 FT

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RTC FIGURE 2.32: SITE PLAN FOR REVISED VARIANT

revised project, a reduction in the number of parking spaces for the office uses. RTC Table 2.3: Parking Summary for Revised Project, taken from draft EIR p. 2.13, has been modified, with ~~strikethrough~~ and double-underline indicating changes from the proposed project. As shown in RTC Table 2.2, above on RTC p. 2.3, and in RTC Table 2.3, the number of parking spaces in the California Street Garage, the Masonic Garage, and the Laurel Duplexes has been modified.

**RTC Table 2.3: Parking Summary for Revised Project**

| Proposed Garage | Primary Entrances | No. of Parking Spaces | Assigned Use |
|---|---|---|---|
| California Street Garage *(Under Plaza A, Plaza B, and Walnut buildings)* | Laurel Street | 128 | Residential uses in Plaza A and Plaza B buildings |
| | Walnut Street | ~~103~~ 73 | Retail uses in Plaza A, Plaza B, and Walnut~~, and Euclid~~ buildings |
| | | ~~106~~ 102 | Residential uses in Center Buildings A and B (renovated Basement Level B1 under Center Buildings A and B) |
| | | 10 | Car-share spaces for members |
| | Presidio Avenue | ~~100~~ 80 | Office use in Walnut Building |
| | | ~~35~~ 13 | Retail use in Walnut Building |
| | | 29 | Child care use in Walnut Building |
| | | ~~11~~ 26 | ~~Car-share space for members~~ Renovated Basement Level B3 for residential uses in Center Buildings A and B) |
| | | ~~60~~ | ~~Commercial spaces for public~~ |
| ~~Center B Building Garage *(Renovated Parking Levels)*~~ | | | |
| ~~Basement Level B1~~ | ~~Walnut Street~~ | ~~6~~ | ~~Residential uses in Center Buildings A and B~~ |
| ~~Basement Level B3~~ | ~~Presidio Avenue~~ | ~~26~~ | ~~Residential uses in Center Buildings A and B~~ |
| Masonic Garage *(Under Masonic and Euclid buildings)* | Masonic Avenue | ~~52~~ 62 | Residential uses in Center Buildings A and B |
| | | ~~61~~ 57 | Residential uses in Masonic Building |
| | | ~~135~~ 139 | Residential uses in Euclid Building |
| | | ~~2~~ | ~~Residential use for one Laurel Duplex~~ |
| Mayfair Garage *(Under Mayfair Building)* | ~~Mayfair Drive~~ Laurel Street | 30 | Residential uses in Mayfair Building |
| Laurel Garages *(Under ~~6 of~~ the 7 Laurel Duplexes)* | Laurel Street | ~~12~~ 14 | Residential use in ~~six~~ Laurel Duplexes |
| **Total No. of Parking Spaces** | | **~~896~~ 763** | **558 for residential uses**<br>**~~138~~ 86 for retail uses**<br>**~~100~~ 80 for office use**<br>**29 for child care use**<br>**~~60 commercial spaces~~**<br>**~~11~~ 10 car-share spaces** |

*Source:* Laurel Heights Partners, LLC; Meyer Studio Land Architects; James Corner Field Operations; BAR Architects; Jensen Architects; Solomon Cordwell Buenz; BKF Engineers; and ARUP ~~and Jensen Architects~~ (February 2019) ~~(August 2017)~~

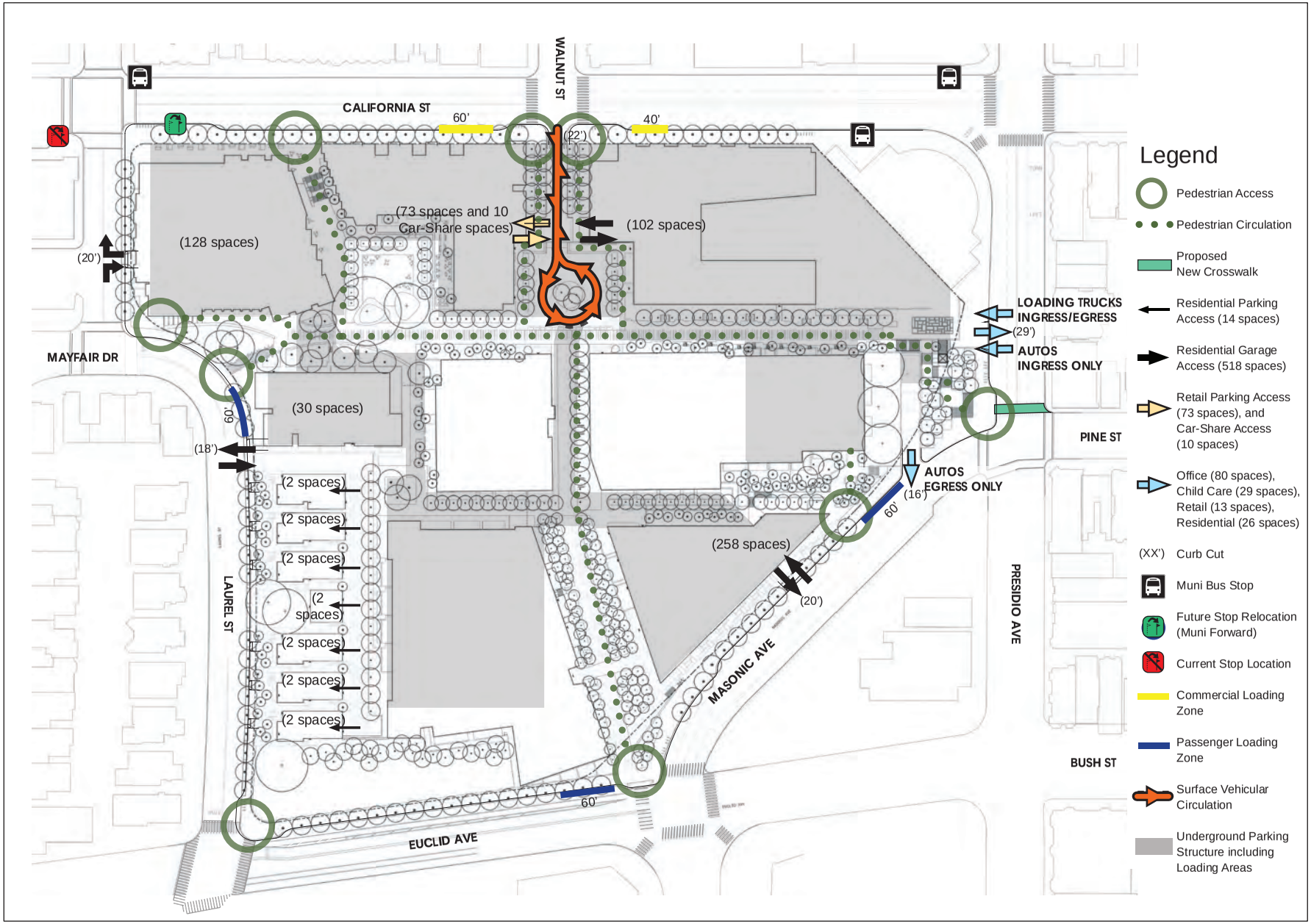
The parking program for the revised project would provide a total of 763 off-street parking spaces: the same 558 spaces for residential uses, 86 spaces for retail uses (compared to 138 spaces with the proposed project), 80 spaces for office uses (compared to 100 spaces with the proposed project), the same 29 spaces for the child care use, and 10 car-share spaces (compared to 11 spaces with the proposed project). (See RTC Table 2.2 on RTC pp. 2.3-2.4.)

The parking program for the revised variant would provide a total of 859 off-street parking spaces: the same 744 spaces for residential uses, 74 spaces for retail uses (compared to 86 spaces with the project), the same 29 spaces for the child care use, and 10 car-share spaces (compared to 11 spaces with the project variant). (See RTC Table 2.6 on RTC pp. 2.5-2.6.) The only differences in the parking summary for the revised variant, compared to the revised project details shown in RTC Table 2.3, above, would be the substitution of 186 residential spaces for the 80 office spaces under the revised project with the Walnut Building's programmatic conversion from office, retail, and child care to residential, retail, and child care. In addition, ten fewer retail parking spaces would be accessed in the California Street Garage via the extension of Walnut Street. All other entry/access points and vehicle parking space counts would be the same as those for the revised project, and a separate table is not needed for the revised variant.

**Site Circulation**

The site access program for the revised project and revised variant is shown in RTC Figure 2.22: Revised Project or Revised Variant Site Access, on RTC p. 2.12. Except for access to the parking garages for the Laurel Street Duplexes and the Mayfair Garage, site circulation and access would be similar to that described for the proposed project or project variant on draft EIR pp. 2.74-2.75 and illustrated in Figure 2.22 on draft EIR p. 2.62. However, the number of curb cuts, the width of the curb cuts, and the entry/exit points for vehicles accessing the below-grade parking spaces dedicated to some land uses as well as the number of vehicle parking spaces have been revised on the RTC figure. RTC Table 2.3, above, shows the modified entry/exit program for each garage, with strikethrough and double underline indicating changes from the proposed project.

Other minor changes are proposed. The 100-foot-long commercial loading zone on the south side of California Street would be divided into two separate commercial loading zones: a 60-foot-long zone immediately west of the California Street/Walnut Street intersection and a 40-foot-long zone immediately to the east of the intersection. Vehicular entry/exit changes would be limited, with an overall reduction in vehicle movements due to less parking for the retail and commercial uses and other variations based on the location of the parking spaces. For example, the car-share spaces under the revised project or revised variant would be located in Basement Level B2 of the California Street Garage with vehicle egress/ingress from the Walnut Street extension rather than in Basement Level B3 of the California Street Garage with vehicle egress/ingress from Presidio Avenue. The proposed crosswalk on the east side of the Mayfair Drive/Laurel Street intersection




Source: Laurel Heights Partners, LLC (2019) and SWCA

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2015-014028ENV

RTC FIGURE 2.22: REVISED PROJECT OR REVISED VARIANT SITE ACCESS

would be eliminated under the revised project and revised variant. All other streetscape changes would remain the same including the increase in the widths of the sidewalks along Laurel Street, Euclid Avenue, and Masonic Avenue.

*Change in Curb Cuts and Garage Access*

California Street and Masonic Garages

As described in draft EIR Chapter 2, Project Description, on p. 2.75, on the segment of Laurel Street between California Street and Mayfair Drive, a new 18-foot wide curb cut would provide right-turn in and right-turn out access to the portion of the California Street Garage under the Plaza A and B buildings. Under the revised project or project variant, the width of this new curb cut would be modified from 18 feet to 20 feet. Under the revised project or revised variant, the curb cut widths on Masonic Avenue, for egress from the California Street Garage (including the renovated parking garage level [Basement Level B3] under Center Buildings A and B), and for exit/entry to the Masonic Garage, would be reduced from 20 and 24 feet wide, respectively, to 16 and 20 feet, respectively.

Laurel Street Duplexes

As described in draft EIR Chapter 2, Project Description, on p. 2.75, six of the seven Laurel Duplexes would have individual two-car parking garages that would be accessed via six curb cuts and individual driveways extending from Laurel Street between Mayfair Drive and Euclid Avenue. Under the proposed project or project variant, the middle duplex would have dedicated parking in the proposed Masonic Garage. As revised, each of the Laurel Duplexes, including the middle duplex, would have individual two-car parking garages, and the parking garages would be relocated to the rear of the duplexes. Driveway access would be provided through a separate entry/exit driveway just south of the Mayfair Building that would be shared to provide access to the Laurel Duplexes and Mayfair Garage. See RTC Figure 2.22, on RTC p. 2.12, and RTC Figure 2.20: Laurel Duplexes Elevations and Typical Section for Revised Project or Revised Variant, on RTC p. 2.15.

Mayfair Garage

As described in draft EIR Chapter 2, Project Description, on p. 2.75, the existing 27-foot-wide curb cut on Laurel Street (between Mayfair Drive and Euclid Avenue) would be removed and the existing 22-foot-wide curb cut on Mayfair Drive would be relocated to the south on Laurel Street (between Mayfair Drive and Euclid Avenue) and reduced to an 18-foot-wide curb cut that would provide access to the Mayfair Garage. Access to the Mayfair Garage would be modified under the revised project or revised variant as follows. As revised, the existing curb cuts would be consolidated into a single, 18-foot-wide curb cut and driveway (instead of 12-foot-wide) and

would be located immediately south of the proposed Mayfair Building. Vehicles destined for the Mayfair Garage would share an entry/exit driveway from Laurel Street with the Laurel Duplexes described above. See RTC Figure 2.22, on RTC p. 2.12; RTC Figure 2.21: Mayfair Building Elevations and Section for Revised Project or Revised Variant, on RTC p. 2.17; and RTC Figure 2.27: Proposed Mayfair Garage for Revised Project or Revised Variant, on RTC p. 2.19.

**Other Minor Revisions**

The project sponsor has introduced a number of minor revisions to clarify specific details of the proposed project or project variant described in the draft EIR. These minor revisions to the project description include updates to the sizes of the common open spaces, a change in the amount of excavation and soil exported, changes to the residential unit count by building and the unit mix, a reduction in bicycle parking spaces, and design refinements.

*Open Space*

As described in draft EIR Chapter 2, Project Description, on pp. 2.83-2.87; listed in Table 2.4: Proposed Open Space, p. 2.84; and illustrated on Figure 2.29: Proposed Open Space, p. 2.85, the open space program would include common open spaces that would also be accessible to the public. The sizes of the proposed California Plaza, Cypress Square, and other open spaces have been modified by the project sponsor, as shown in RTC Table 2.4a: Proposed Open Space for Revised Project, and RTC Table 2.4b: Proposed Open Space for Revised Variant, on RTC pp. 2.21-2.22, and shown on RTC Figure 2.29: Proposed Open Space for Revised Project or Revised Variant, on RTC p. 2.23.

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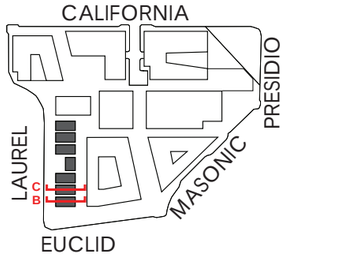
Laurel Street Elevation (West)



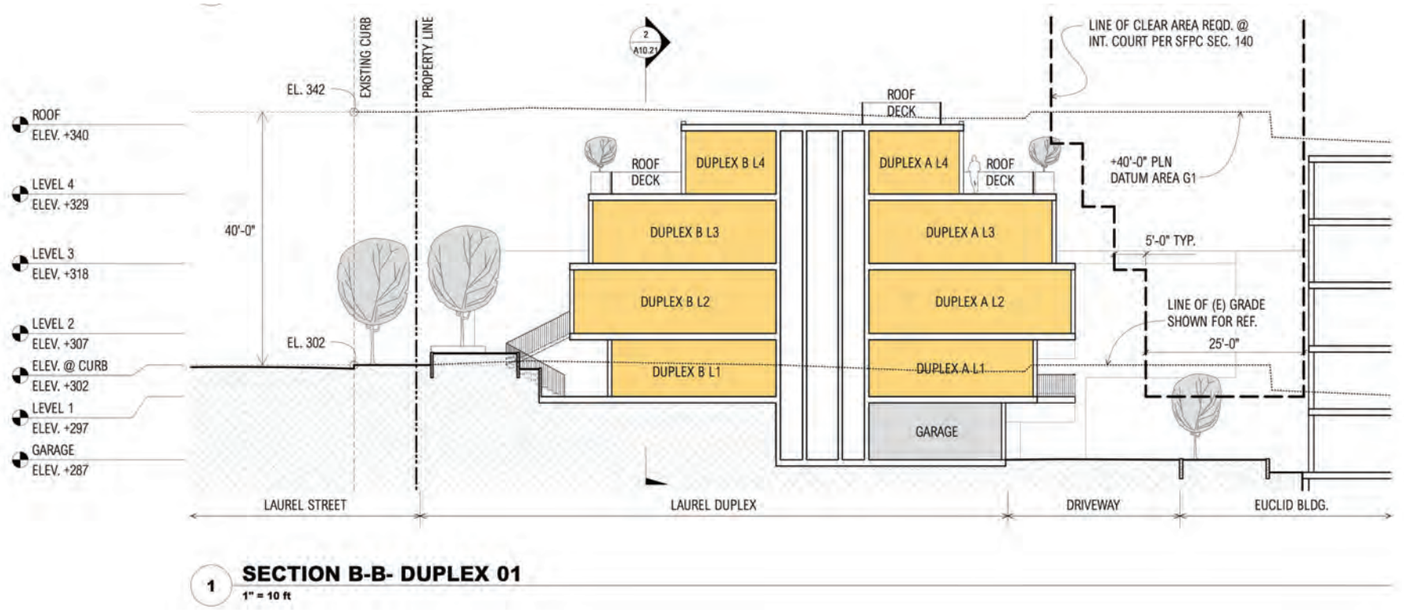

**MATERIALS KEY**

- **A.** CEMENT BOARD SIDING
- **B.** CEMENT PLASTER
- **C.** METAL PANEL
- **D.** ALUMINUM WINDOW
- **E.** ALUMINUM & GLASS STOREFRONT SYSTEM
- **F.** METAL GARAGE DOOR
- **G.** STEEL GUARDRAIL / SCREEN
- **H.** COMPOSITE WOOD PLANK SIDING
- **I.** GREEN WALL
- **J.** METAL FASCIA / SUNSHADE
- **K.** ARCHITECTURAL CONCRETE
- **L.** SLAT SCREEN / RAIL
- **M.** BOARD AND BATTEN SIDING
- **N.** WOOD SHINGLES
- **O.** WOOD SIDING
- **P.** BRICK

Typical Laurel Duplex Section (East/West Section [1])




- PARKING
- RETAIL (USABLE)
- RETAIL (B.O.H.)
- COMMERCIAL
- COMMERCIAL (CORE)
- RESIDENTIAL (HOMES)
- RESIDENTIAL (CORE)
- LANDSCAPED ROOF




1 **SECTION B-B- DUPLEX 01**
1" = 10 ft

Source: Laurel Heights Partners, LLC (2019) and SWCA

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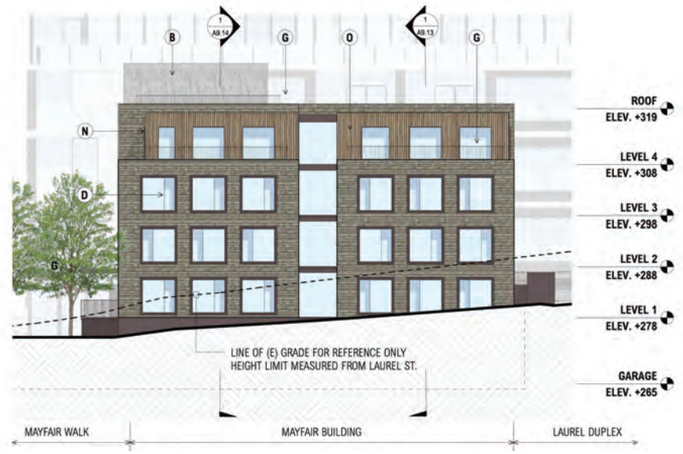
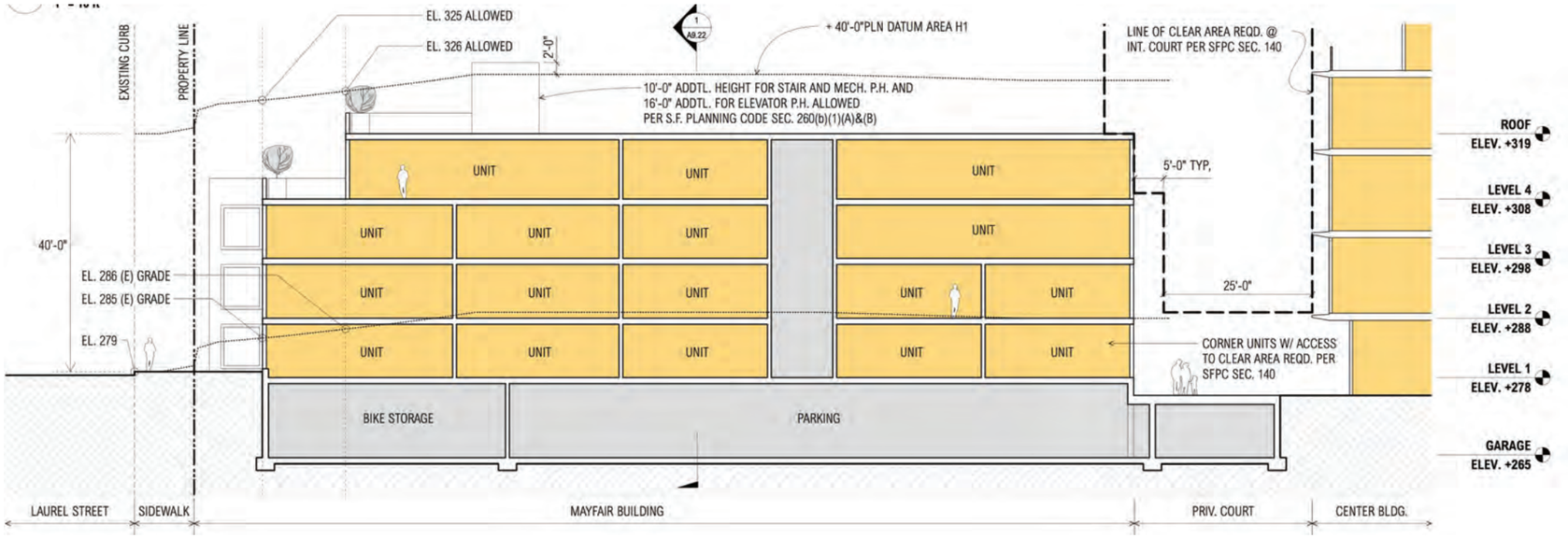
Mayfair Walk Elevation (North)

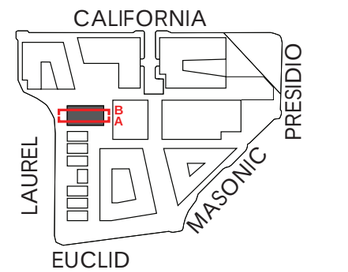



Laurel Street Elevation (West)




Mayfair Building Section (East/West Section [1])




PARKING
RETAIL (USABLE)
RETAIL (B.O.H.)
COMMERCIAL
COMMERCIAL (CORE)
RESIDENTIAL (HOMES)
RESIDENTIAL (CORE)
LANDSCAPED ROOF

Source: Laurel Heights Partners, LLC (2019) and SWCA

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**RTC FIGURE 2.21: MAYFAIR BUILDING ELEVATIONS AND SECTION FOR REVISED PROJECT OR REVISED VARIANT**

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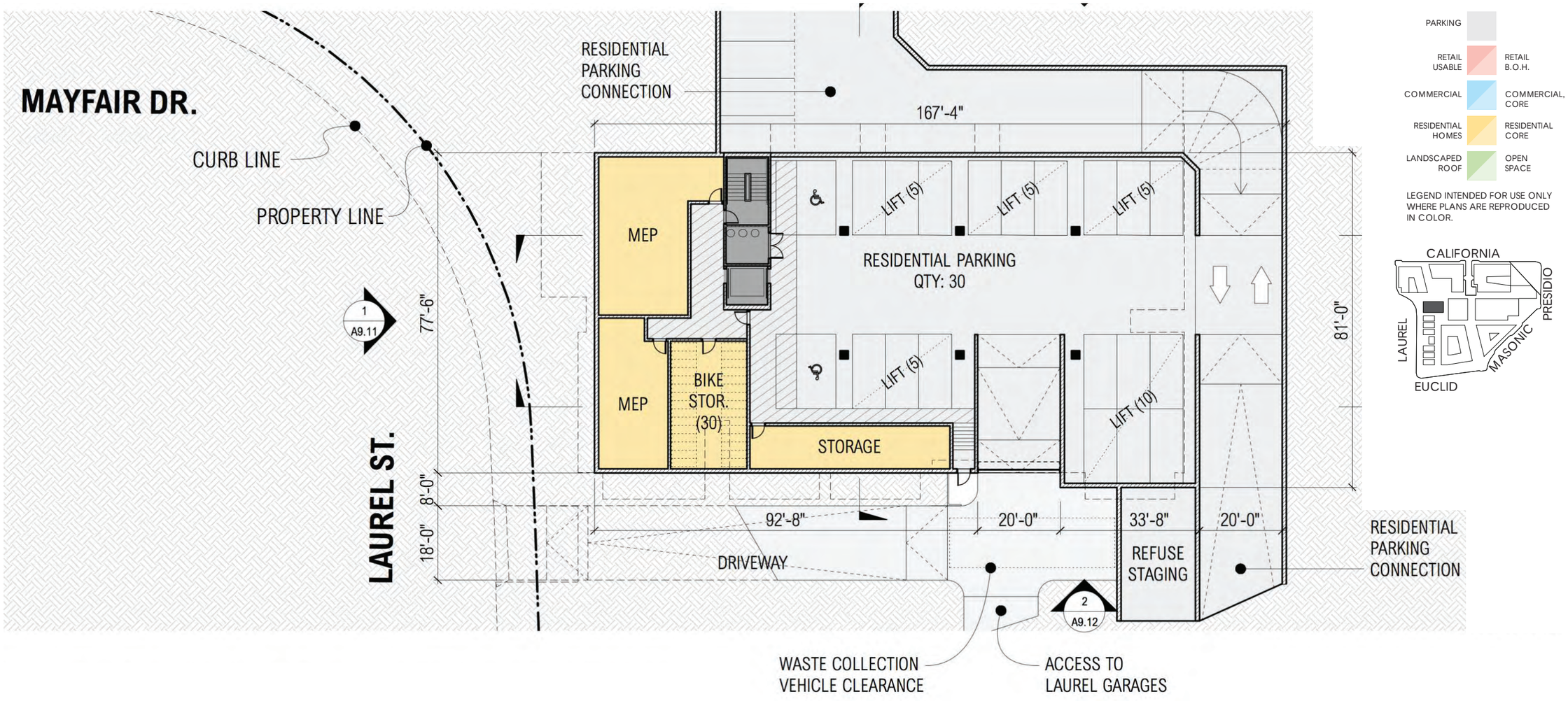


Source: Laurel Heights Partners, LLC (2019) and SWCA

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**RTC FIGURE 2.27: PROPOSED MAYFAIR GARAGE FOR REVISED PROJECT OR REVISED VARIANT**

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**RTC Table 2.4a: Proposed Open Space for Revised Project**

| Open Space | Approximate Size (Square Feet) | Location |
|---|---|---|
| **Common Open Space** [NOTE A] | | |
| California Plaza | ~~3,300~~ 4,290 | Within the setback of the proposed Plaza A Building along California Street, extending east from the Laurel Street/California Street intersection to the proposed Cypress Stairs |
| Cypress Square and western Mayfair Walk | ~~28,150~~ 24,780 | Between the Plaza A and B buildings and the portion of the east-west walkway between the Plaza B Building and Laurel Street |
| Lower Walnut Walk | ~~16,760~~ 16,850 | The portion of the north-south walkway between Center Buildings A and B to Masonic and Euclid avenues at Corner Plaza |
| Euclid Green | ~~18,760~~ 18,004 | Extending from the intersection of Euclid Avenue and Laurel Street at the southwest corner of the site toward the corner of Masonic and Euclid avenues |
| Presidio Overlook and part of Mayfair Walk | ~~3,800~~ 10,450 | At the eastern terminus of Mayfair Walk, accessed from Mayfair Walk or the Pine Street Steps and Plaza |
| Cypress Stairs | ~~32,230~~ 52,752 | Between the Plaza A and B buildings |
| Walnut Extension and Roundabout | | Between Plaza B and Walnut buildings |
| Eastern Mayfair Walk | | Between Center Building B and the Walnut Building east of Walnut Extension and Roundabout |
| Pine Street Steps and Plaza | | On east side of Walnut Building and Center Building B near intersection of Masonic and Presidio avenues |
| Masonic Plaza | | Between Center Building B and the Masonic Building along Masonic Avenue |
| *Subtotal* | *~~103,000~~ 127,126* | |
| **Private Open Space** [NOTE B] | | |
| Ground-level terraces, interior courtyards and private internal walkways | ~~85,000~~ 81,618 | Throughout the project site including the Cypress Square residential open space~~, and~~ the Euclid Residential Terrace, and site area that is not counted towards the public open space |

*Notes:*

[A] ~~A portion of t~~The common open space would be open to the public.

[B] The private open space ~~does~~ include~~s~~ rooftop decks.

*Source*: Laurel Heights Partners, LLC; Meyer Studio Land Architects; James Corner Field Operations; BAR Architects; Jensen Architects; Solomon Cordwell Buenz; BKF Engineers; and ARUP (February 2019)~~, 2017~~, Sheet G3.03 dated 7/3/19

**RTC Table 2.4b: Proposed Open Space for Revised Variant**

| Open Space | Approximate Size (Square Feet) | Location |
|---|---|---|
| **Common Open Space** [NOTE A] | | |
| California Plaza | ~~3,300~~ 4,290 | Within the setback of the proposed Plaza A Building along California Street, extending east from the Laurel Street/California Street intersection to the proposed Cypress Stairs |
| Cypress Square and western Mayfair Walk | ~~28,150~~ 24,780 | Between the Plaza A and B buildings and the portion of the east-west walkway between the Plaza B Building and Laurel Street |
| Lower Walnut Walk | ~~16,760~~ 16,850 | The portion of the north-south walkway between Center Buildings A and B to Masonic and Euclid avenues at Corner Plaza |
| Euclid Green | ~~18,760~~ 18,004 | Extending from the intersection of Euclid Avenue and Laurel Street at the southwest corner of the site toward the corner of Masonic and Euclid avenues |
| Presidio Overlook and part of Mayfair Walk | ~~3,800~~ 10,450 | At the eastern terminus of Mayfair Walk, accessed from Mayfair Walk or the Pine Street Steps and Plaza |
| Cypress Stairs | ~~32,230~~ 50,852 | Between the Plaza A and B buildings |
| Walnut Extension and Roundabout | | Between Plaza B and Walnut buildings |
| Eastern Mayfair Walk | | Between Center Building B and the Walnut Building east of Walnut Extension and Roundabout |
| Pine Street Steps and Plaza | | On east side of Walnut Building and Center Building B near intersection of Masonic and Presidio avenues |
| Masonic Plaza | | Between Center Building B and the Masonic Building along Masonic Avenue |
| *Subtotal* | *~~103,000~~ 125,226* | |
| **Private Open Space** [NOTE B] | | |
| Ground-level terraces, interior courtyards and private internal walkways | ~~85,000~~ 81,618 | Throughout the project site including the Cypress Square residential open space~~, and~~ the Euclid Residential Terrace, and site area that is not counted towards the public open space |

*Notes:*

[A] ~~A portion of t~~The common open space would be open to the public.

[B] The private open space ~~does~~ includes rooftop decks.

*Source*: Laurel Heights Partners, LLC; Meyer Studio Land Architects; James Corner Field Operations; BAR Architects; Jensen Architects; Solomon Cordwell Buenz; BKF Engineers; and ARUP (February 2019)~~, 2017~~, Sheet G0.01v, dated 8-20-19




Source: Laurel Heights Partners, LLC (2019) and SWCA

0 180 FT

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

RTC FIGURE 2.29: PROPOSED OPEN SPACE PLAN FOR REVISED PROJECT OR REVISED VARIANT

*Changes in Excavation*

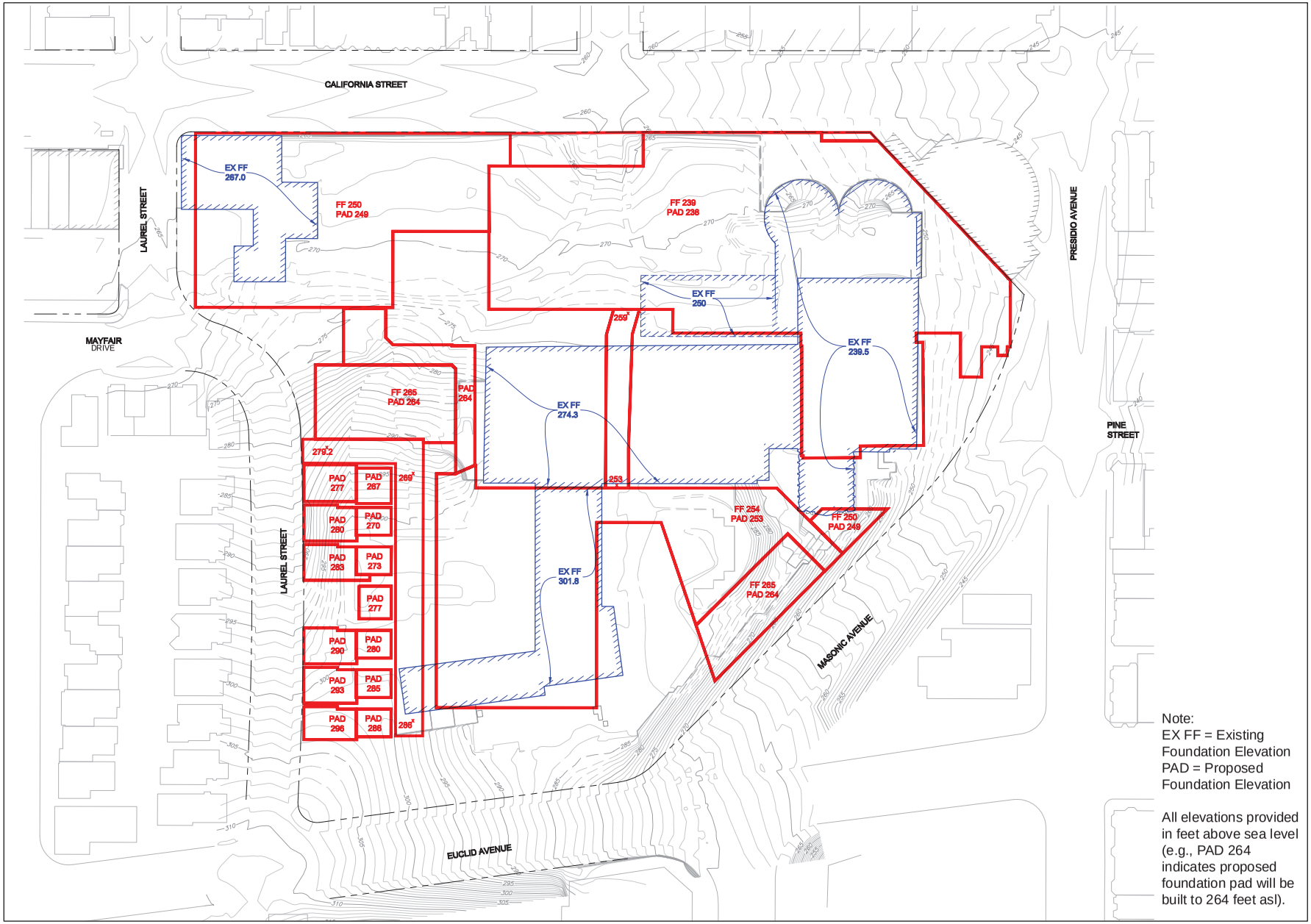
As a result of the change to the parking program and changes to the Masonic and Euclid building's basement level for below-grade parking and off-street loading, the amount of excavation required to be hauled off site would be reduced slightly under the revised project or revised variant from 241,300 cubic yards to 241,000 cubic yards (a reduction of approximately 300 cubic yards of excavated soils). Approximately 10,000 cubic yards of excavated soils would be reused on site as clean fill, an increase of approximately 6,000 cubic yards, compared to the proposed project and project variant amount of 3,700 cubic yards. A similar amount of demolition debris – approximately 47,000 cubic yards – would be generated under the revised project or revised variant, as identified for the proposed project or project variant; therefore, the amount of demolition debris and excavated soils requiring off haul and disposal would be reduced by approximately 300 cubic yards from that under the proposed project or project variant (from 288,300 cubic yards to 288,000 cubic yards).

This slight change in the preliminary excavation plan is based on the minor reduction to the underground parking structure as shown in RTC Figure 2.22, on RTC p. 2.12; RTC Figure 2.31: Preliminary Excavation Plan for Revised Project or Revised Variant, on RTC p. 2.25; and in RTC Figure 2.26: Proposed Masonic Garage for Revised Project or Revised Variant, on RTC p. 2.27. As shown on RTC Figure 2.31, there would be somewhat less excavation on the central southern portion of the site along the alignment of the lower portion of the proposed Walnut Walk. This change is also shown in RTC Figure 2.26. Refinements in the preliminary excavation plan result in slightly larger amounts of excavation elsewhere on the project site, and show more areas where excavated soil could be used as fill on the project site, resulting in a slight reduction in the overall amount of soil exported from the site.

*Residential Unit Count and Mix*

With the proposed revisions, there would be no change in the overall number of residential units developed under the proposed project or project variant (558 and 744, respectively). However, the residential unit counts in the Masonic and Euclid buildings would be altered slightly (see RTC Table 2.2 for the revised project, starting on RTC p. 2.3, and RTC Table 2.6 for the revised variant, starting on RTC p. 2.5). As shown, the number of residential units in the Masonic Building would be reduced from 61 to 57 units, and the number of residential units in the Euclid Building would increase slightly from 135 to 139 units. These adjustments would not result in a net change in the overall number of residential units under the revised project or revised variant.

The residential unit mix for the revised project or revised variant would be slightly modified compared to the proposed project or project variant described in draft EIR Chapter 2, Project Description. As shown in RTC Table 2.2, overall there would be one less studio or one-bedroom




Source: Laurel Heights Partners, LLC (2019) and SWCA

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

RTC FIGURE 2.31: PRELIMINARY EXCAVATION PLAN FOR REVISED PROJECT OR REVISED VARIANT

unit and one more unit with two or more bedrooms. The changes on a building-by-building basis are also shown in RTC Table 2.2. In particular, one Laurel Duplex would be a two-bedroom unit rather than a three-bedroom unit; the Mayfair Building would include two less studio or one-bedroom units, one more two-bedroom unit, and one more three-bedroom unit; the Euclid Building would have five more studio or one-bedroom units and one less three-bedroom unit; the Masonic Building would have five less studio or one-bedroom units and one more two-bedroom unit; and Center Building B would have one more studio or one-bedroom units, two less two-bedroom units, and one more three-bedroom unit.

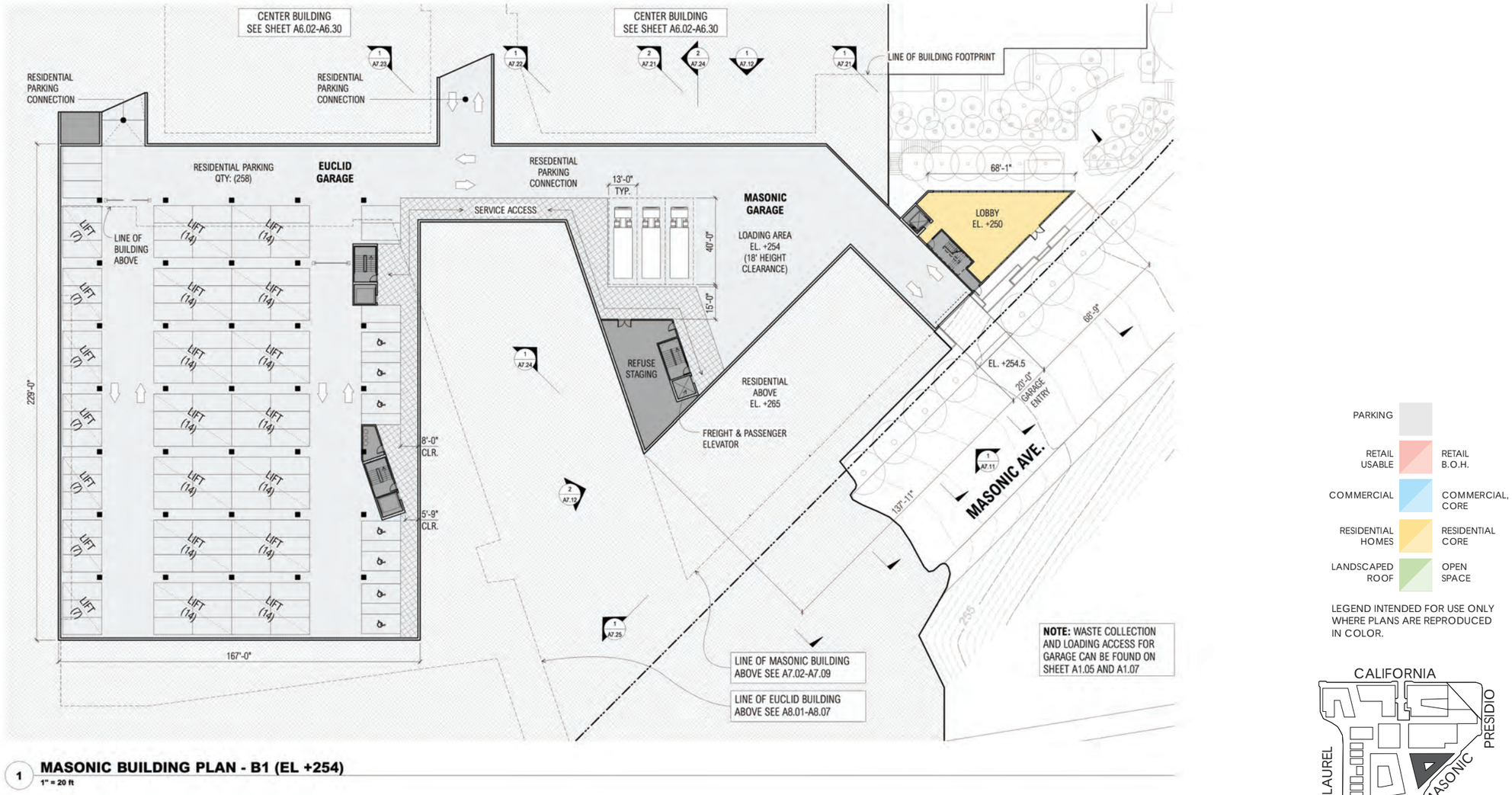
The revised variant would include all the changes described for the revised project and would retain the residential unit count and mix described for the Walnut Building in the project variant on draft EIR pp. 2.99-2.104.

*Reduction in Bicycle Parking Spaces*

As described in the draft EIR, the proposed project and project variant would provide 693 and 890 class 1 and class 2 bicycle parking spaces, respectively. With the proposed revisions, the proposed project and project variant would have 656 and 839 class 1 and class 2 bicycle parking spaces, respectively (or 37 and 51 fewer spaces, respectively) than described in the draft EIR. The overall reduction reflects a decrease in the amount of gross square footage for retail uses. The new values include at least the required bicycle parking spaces for residential, retail, child care, and office (for revised project only) uses, with class 1 bicycle parking spaces provided at a ratio of one per dwelling unit for residential uses, which is greater than the number of required spaces. Of the 656 bicycle parking spaces that would be provided by the revised project, 584 would be class 1 spaces and 72 would be class 2 spaces. Of the 839 bicycle parking spaces that would be provided by the revised variant, 762 would be class 1 spaces and 77 would be class 2 spaces.

*Auxiliary Water Supply System (AWSS)*

The revised project and revised variant would include funding toward a high pressure hydrant on the public sidewalk at the Walnut and California street intersection and funding to install a connection on Walnut Street from the new hydrant to the existing AWSS main running east to west on Sacramento Street. This extension would be designed and installed by the SFPUC at a later date.




1 **MASONIC BUILDING PLAN - B1 (EL +254)**
1" = 20 ft

Source: Laurel Heights Partners, LLC (2019) and SWCA

3333 CALIFORNIA STREET MIXED USE PROJECT

2015-014028ENV

**RTC FIGURE 2.26: PROPOSED MASONIC GARAGE FOR REVISED PROJECT OR REVISED VARIANT**

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*Minor Design Refinements*

The revisions to the proposed project and project variant include minor design refinements developed to address planning department comments on Planning Application Submittal 1, dated June 28, 2017. These include, but are not limited to, minor modifications to garage door widths, the depth of recessed garage doors, balcony treatments, building frontage step-backs, and the methodology for measurement of building heights, e.g., the location where the measurement is taken.

Laurel Duplexes and Mayfair Building

As described above, the revised parking program for the Laurel Duplexes would result in the relocation of the individual garages to the rear of the duplexes with a single shared access driveway off Laurel Street. The shift from direct access off Laurel Street via six separate curb cuts to internal off-street access via Laurel Street and a shared internal driveway would alter the appearance of the Laurel Duplexes and Mayfair Building, with less building frontage devoted to garage entrances. This change in the design of the Laurel Duplexes, resulting in the elimination of six 10-foot-wide curb cuts along Laurel Street, would accommodate an increase in the number of street trees that could be planted on the Laurel Street sidewalk. See RTC Figure 2.20 and RTC Figure 2.21 on pp. 2.15 and 2.17, respectively.

Walnut Street Roundabout

As described on draft EIR p. 2.77, the Walnut Street roundabout and the extension of Walnut Street would primarily function as a site access and service road. The revised project and revised variant would modify the proposed roundabout at the south end of the extension of Walnut Street to enhance its presence as a pedestrian plaza rather than vehicular roundabout. Under the revised project or revised variant, the perimeter of the roundabout would be defined with bollards, trees, and hedge plantings. The center of the roundabout would include a central planted area with trees, and paving materials would be chosen to visually differentiate it from the extension of Walnut Street.

## C. ENVIRONMENTAL EFFECTS OF THE REVISED PROJECT

CEQA Guidelines section 15088.5(a) requires recirculation of an EIR when "significant new information" is added to the EIR after publication of the draft EIR but before certification. The CEQA Guidelines section 15088.5(a) states that information is not "significant" unless "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement." Section 15088.5(a) further defines "significant new information" that triggers a

requirement for recirculation to include, for example, disclosure of a new significant impact, a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact to a less-than-significant level), or identification of a new feasible alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the proposed project, but the project sponsor declines to adopt it. CEQA Guidelines section 15088.5(b) states that recirculation is not required if "new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR."

The current revisions and clarifications to the project descriptions for the proposed project or project variant would not result in any new significant impacts that were not already identified in the draft EIR, nor would these changes increase the severity of any of the proposed project's or project variant's impacts identified in the draft EIR. Mitigation measures identified in the draft EIR and the initial study would continue to be required in order to reduce or avoid the significant environmental impacts of the proposed project or project variant. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project or project variant (as revised) in either the draft EIR or the initial study.

The analysis of environmental effects presented in this section reviews environmental topics from the draft EIR and the initial study and considers the revisions and clarifications to the project description for the proposed project and project variant. The responses to comments presented in RTC sections 4 and 5 include consideration of the environmental effects of the revised project and revised variant in the analyses provided below.

**Cultural Resources**

The revised project or revised variant would not include any changes to the adaptive reuse strategy for the existing office building or a reduction in the number of new buildings that would be developed on open areas of the site that line the perimeter. As such, the alterations to the existing office building and the redevelopment of the remainder of the site under the revised project or revised variant would have the same historic architectural resource impacts as the proposed project or project variant, i.e., significant and unavoidable with mitigation. Therefore, Mitigation Measure M-CR-1a: Documentation of Historical Resources and Mitigation Measure M-CR-1b: Interpretation of a Historical Resource, identified for the proposed project and project variant and described on EIR pp. 4.B.45-4.B.46, would also apply to the revised project or revised variant. However, as with the proposed project or project variant, the impact would remain significant and unavoidable with mitigation. The installation of a high pressure hydrant and water connection to the existing AWSS facility by the SFPUC with funding from the project sponsor would not adversely affect the historic AWSS because the connection may be completed without material impairment to the resource. In particular, there would be limited removal of pipe and no removal of other AWSS elements. These minor changes to the proposed project and

project variant would not alter any of the conclusions regarding historic architectural resource impacts at the project level or under cumulative conditions.

**Transportation and Circulation**

The revised project or revised variant would include a similar mix of residential, retail, office (revised project only), child care, and below-grade parking uses. Under the revised project or revised variant, the reduction in retail (both general retail and restaurant) and child care space; the reduction in the number of vehicle parking spaces, including elimination of the 60 commercial parking spaces; modifications to site circulation; modification to the proposed commercial loading zone on California Street; elimination of the proposed eastside crosswalk at the Laurel Street/Mayfair Drive intersection; small changes to the mix of residential units; and reductions in the number of class 1 and class 2 bicycle parking spaces would all be minor changes. Although the capacity of the child care use would not change, the reduction in the child care space (approximately 1,060 gross square feet) would not be substantial enough to alter the trip generation calculation shown in the EIR. Further, neither the revised project nor the revised variant would alter the overall residential land use program, and the minor variations in the residential unit mix (studio and one-bedroom units versus two-bedroom units and above) would not have a demonstrable effect on trip generation calculations associated with that land use. Thus, transportation issues related to these minor programmatic changes are not discussed further for either the revised project or revised variant.

With the proposed revisions and modifications to the land use program (primarily retail), the revised project or revised variant would generate fewer person-trips and, as a result, fewer trips by mode (e.g., vehicle trips, transit trips, walk trips). Trip distribution would be similar to that under the proposed project or project variant because site access would be the same with one modification along Laurel Street between Mayfair Drive and Euclid Avenue – the consolidation of seven curb cuts under the proposed project or project variant (one 12-foot-wide and six 10-foot-wide curb cuts) into one 18-foot-wide curb cut for shared access to the Mayfair Garage and Laurel Duplex garages (see RTC Figure 2.22 on RTC p. 2.12). Changes to proposed new curb cut widths at two locations along Masonic Avenue between Presidio and Euclid avenues (reductions in width for these locations) would be implemented under the revised project or revised variant. At one location on Laurel Street (between California Street and Mayfair Drive) the width of the proposed new curb cut accessing Basement Level B1 of the California Street Garage would be increased (from 18 feet to 20 feet). However, there would be no change to the locations of any curb cuts or driveways accessing the various garages.

*Construction*

Construction activities associated with the revised project or revised variant would be similar to, but slightly less than, those described for the proposed project or project variant and would occur

over the same 7- to up-to-15-year time frame with four construction phases. With the revised excavation plan, the volume of excavated soils that would be hauled off site for reuse at other locations or for disposal would be slightly reduced (see RTC p. 2.24 and RTC Figure 2.31 on RTC p. 2.25). Although there would be a slight reduction in construction haul trips, with no other changes, that reduction in itself would not affect the conclusions of the construction transportation impact analysis. Therefore, construction truck traffic attributable to the revised project or revised variant would be substantially the same as that for the proposed project or project variant. Overall, as with the proposed project or project variant, the construction-related transportation impacts of the revised project or revised variant would be less than significant due to their temporary nature and limited duration. As with the proposed project or project variant, the revised project or revised variant would also adhere to all construction-related regulations identified in the SFMTA's blue book as well as the public works code and public works department orders. This would include, among other requirements, the preparation of construction logistics, traffic control, and parking plans for each phase of project construction to reduce potential conflicts between construction activities and pedestrians, transit, and autos. Improvement Measure I-TR-1: Project Construction Updates, identified for the proposed project or project variant and described on EIR pp. 4.C.74, would apply to the revised project or revised variant to reduce their less-than-significant, construction-related transportation effects. Improvement Measure I-TR-1 could require the project sponsor to provide nearby residences and adjacent businesses with regularly updated information regarding project construction. These minor changes to the proposed project and project variant would not alter any of the conclusions regarding construction-related transportation impacts at the project level or under cumulative conditions.

*Operation*

Vehicle Miles Traveled (VMT) Impacts

The reduction in the amount of retail land use compared to that proposed as part of the original project and its variant (from 54,117 to 40,261 gross square feet for the revised project and from 48,593 to 34,496 for the revised variant) would result in 52 fewer parking spaces for the retail component. Twenty fewer spaces would be provided for the office use under the revised project only, because the revised variant (like the project variant) would not include an office use. The 60 commercial parking spaces originally intended to replace the existing public parking spaces on the project site would be eliminated under the revised project and revised variant. See RTC Table 2.2 on RTC p. 2.3, text on pp. 2.7 and 2.10-2.11, and RTC Table 2.3 on RTC p. 2.10.

With the same number of parking spaces provided for the residential use, the residential parking rate under the revised project or revised variant would continue to be about 11 percent higher than the neighborhood parking rate of 0.7 space per residential unit.

With fewer spaces provided for the "other non-residential uses," (office and child care uses) the parking rate under the revised project or revised variant for those uses would continue to be greater than the neighborhood parking rate for the same uses. The neighborhood parking rate for the office and child care uses combined is approximately 1.44 spaces for each 1,000 gross square feet of the use, and the revised project or revised variant would continue to be in excess of that rate but would not be as far above as the proposed project (18 percent versus 38 percent above) and would be the same as the project variant (37 percent above).

The neighborhood parking rate for the retail use is approximately 1.55 spaces for each 1,000 gross square feet of the use, and with the revised project or revised variant would continue to be in excess of that rate but would not be as far above as the proposed project (38 percent versus 136 percent above) or the project variant (38 percent versus 150 percent higher).

Thus, VMT attributable to the residential component of the revised project or revised variant would be similar to the proposed project or project variant (58 percent below the existing regional average daily VMT for residential use), and the provision of residential parking spaces at a one-to-one ratio (558 and 744 spaces, respectively) would not result in the generation of substantial VMT such that the threshold of 15 percent below the regional average for residential use would be exceeded. The parking rate for the office and child care uses under the revised project and the child care use under the revised variant would be closer to the existing neighborhood parking rate for those uses than the proposed project or project variant. Therefore, as with the proposed project or project variant, the revised project or revised variant would not result in the generation of substantial VMT such that the threshold of 15 percent below the regional average for these uses would be exceeded. Accordingly, as with the proposed project or project variant, the VMT impacts of the residential component of the revised project or revised variant would also be less than significant.

The proposed project or project variant would have a significant project-level and cumulative VMT impact (see EIR pp. 4.C.74-4.C.81 and 4.C.102-4.C.104). Under the revised project or revised variant the reduction in the number of retail parking spaces (from 198 spaces to 86 spaces for the revised project and from 188 spaces to 74 spaces for the revised variant) would result in the provision of parking at approximately 2.14 spaces per 1,000 gross square feet. The existing neighborhood parking rate for retail is approximately 1.55 spaces for each 1,000 gross square feet. The revised project or revised variant would exceed this rate by approximately 38 percent. The City has determined that exceeding the neighborhood parking rate by 38 percent would not result in the generation of substantial VMT, and thus the threshold of 15 percent below the regional average for retail use would not be exceeded. Mitigation Measure M-TR-2: Reduce Retail Parking Supply, described on EIR p. 4.C.80, would continue to apply to the revised project or revised variant. The measure would be satisfied by the reduced retail parking program and elimination of the 60 commercial parking spaces in both the revised project and revised variant.

Compliance would be verified during the building permit review process for the revised project or revised variant.

Traffic Hazard Impacts

The revised project or revised variant would not alter site circulation beyond the consolidation of the previously proposed curb cuts on Laurel Street into a single curb cut for a shared access driveway. All other curb cut and garage driveway locations would be similar to those under the proposed project or project variant. Streetscape changes at the intersections of Masonic Avenue/Presidio Avenue/Pine Street and Masonic Avenue/Euclid Avenue as well as sidewalk widening and corner bulbouts proposed under the project or variant would be implemented under the revised project or revised variant; however, the proposed crosswalk at the Laurel Street/Mayfair Drive intersection would not be implemented under the revised project or revised variant.

Thus, as with the proposed project or project variant, traffic hazards associated with the revised project's or revised variant's vehicle movements in and out of garage driveways or with the traffic operation effects of the streetscape changes would be less than significant. Improvement Measure I-TR-3: Driveway Queue Abatement, identified for the proposed project or project variant and described on EIR pp. 4.C.82, would apply to the revised project or revised variant to reduce its less-than-significant, traffic hazard effects. Improvement Measure I-TR-3 could require the project sponsor to ensure that queues do not form on public rights-of way and, if they do, to abate such a condition. These minor changes to the proposed project and project variant would not alter any of the conclusions regarding traffic hazard impacts at the project level or under cumulative conditions.

Transit Impacts

Travel demand and trip distribution would be slightly reduced under the revised project or revised variant, with any changes being a reduction in person trips due to the reduced retail component of the land use program. However, changes would be minor, and, similar to the proposed project or project variant, impacts of the revised project or revised variant on local transit capacity utilization (Muni's 43 Masonic route) would also be significant for the weekday a.m. peak hour. Thus, Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to 43 Masonic Capacity, identified for the proposed project and project variant and described on EIR pp. 4.C.87-4.C.88, would also apply to the revised project or revised variant. As with the proposed project and project variant, impacts of the revised project or revised variant on local transit capacity utilization would be significant and unavoidable even with implementation of Mitigation Measure M-TR-4. Similar to the proposed project or project variant, impacts on regional transit capacity utilization would be less than significant. The less-than-significant transit delay effects of the proposed project or project variant would also be less than significant under the revised project or

revised variant as there would be a slight reduction in vehicle trips. The minor changes to the proposed project and project variant would not alter any of the conclusions in the draft EIR regarding transit impacts at the project level or under cumulative conditions.

Pedestrian Impacts

Travel demand for the revised project or revised variant would be slightly less than that for the proposed project or project variant due to the reduction in the retail use. With the proposed revisions, the proposed crosswalk on the east side of the Laurel Street/Mayfair Drive intersection would not be implemented, and the number of curb cuts on Laurel Street would be reduced from both existing conditions and those described in the draft EIR for the proposed project or project variant. All other driveway and curb cut locations, as well as all other streetscape improvements, under the revised project or revised variant would remain as under the proposed project or project variant. The effects of the streetscape changes on traffic operation and the potential for pedestrian/vehicle conflicts at the locations of the streetscape improvements would remain less than significant under the revised project or revised variant; moreover, the consolidation of the curb cuts along Laurel Street could limit the potential for pedestrian/vehicle conflicts along this segment of Laurel Street. None of the minor changes to the proposed project and project variant would alter the conclusions in the draft EIR regarding pedestrian impacts at the project level or under cumulative conditions.

Bicycle Impacts

Revisions to the proposed project and project variant described in the Pedestrian Impacts above would also result in the same less-than-significant impacts on bicycle circulation and the potential for bicycle/vehicle circulation as identified for the proposed project or project variant. None of the minor site circulation changes to the proposed project and project variant would alter the conclusions in the draft EIR regarding bicycle impacts at the project level or under cumulative conditions.

Loading Impacts

*Commercial Loading*

Commercial loading demand for the revised project or revised variant would be less than that for the proposed project or project variant due to the reduction in the retail use proposed. As described on EIR pp. 4.C.96-4.C.98 for the proposed project or project variant, the demand for freight loading would be met by the off-street loading spaces; however, the distance of the retail spaces from the off-street loading docks would create an uneven distribution of demand. As a result, a 100-foot-long commercial loading zone along the south side of California Street was proposed to address the spatial mismatch between the source of the demand (retail in the Plaza A,

Plaza B and Walnut buildings) and the location of the off-street loading facilities (within the California Street and Masonic garages). In response to public concern with the loss of on-street parking and potential effects from on-street commercial loading operations along California Street, the project sponsor, in consultation with the SFMTA, has modified the commercial loading zone by separating it in two: a 60-foot-long zone just west of the Walnut Street/California Street intersection and 40-foot-long zone just east of the intersection.

As with the proposed project and project variant, the revised project or revised variant would not rely on the use of the proposed California Street loading zones to satisfy any planning code loading requirements, and all commercial loading operations could be accommodated from within the proposed off-street loading docks. As with the proposed project and project variant described in the draft EIR, commercial loading impacts would remain less than significant under the revised project or revised variant. Improvement Measures I-TR-9a: Schedule and Coordinate Deliveries and I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies as Needed, identified for the proposed project or project variant and described on EIR pp. 4.C.97-4.C.98 to reduce the less-than-significant commercial loading impacts, would apply to the revised project or revised variant. The minor change to commercial loading and in the size and location of the proposed on-street commercial loading zone would not alter the conclusions regarding commercial loading impacts at the project level or under cumulative conditions (i.e., less than significant).

*Passenger Loading*

As with the proposed project and project variant, adequate passenger loading for the revised project or revised variant would be provided along the perimeter of the site at three designated passenger loading zones and also onsite at the Walnut Street roundabout (see RTC Figure 2.22 on RTC p. 2.12). There would be a minor change to passenger loading demand associated with the reduction in retail uses on the site. The minor change in demand and the design changes to the Walnut Street roundabout would not alter the conclusions in the draft EIR regarding passenger loading impacts at the project level or under cumulative conditions (i.e., less than significant) as the passenger loading space provided would meet anticipated demand.

Emergency Access Impacts

Under the revised project or revised variant emergency access would remain similar to that presented on EIR pp. 4.C.99-4.C.101 and pp. 4.C.114-4.C.115. As stated above, under the revised project or revised variant travel demand would be slightly less than that for the proposed project or project variant due to the reduction in the retail use, with any changes from the revisions being a reduction in total person trips. Trip distribution would be substantially similar under the revised project or revised variant. With project or variant revisions, the proposed crosswalk on the east side of the Laurel Street/Mayfair Drive intersection would not be implemented, and the number

of curb cuts on Laurel Street would be reduced from both existing conditions and those described in the draft EIR for the proposed project or project variant. All other driveway and curb cut locations, as well as all other streetscape improvements, under the revised project or revised variant would remain as under the proposed project or project variant. The effects of an increase in traffic, and operational effects of streetscape changes and the potential for conflicts with emergency access at those locations (e.g., lower Walnut Walk) would remain less than significant under the revised project or revised variant. None of the minor changes would alter the conclusions regarding emergency access impacts at the project level or under cumulative conditions.

Parking (for informational purposes)

As described on RTC pp. 2.7 and 2.10-2.11 and shown in RTC Tables 2.2 and 2.3 on RTC pp. 2.3 and 2.10, respectively, the revised project or revised variant would reduce the amount of off-street parking provided under the proposed project or project variant due to the reduced retail component of the land use program, and the reduced office component in the revised project (but not the revised variant because it would not include any office space). Under the revised project and revised variant, 52 fewer spaces for retail uses, and 20 fewer spaces for office uses (revised project only) would be provided. (See RTC Table 2.3 on RTC p. 2.10.) With the consolidation of curb cuts along Laurel Street between Mayfair Drive and Euclid Avenue under the revised project or revised variant, fewer of the existing on-street parking spaces along this segment of Laurel Street would be removed. Thus, with the revised project or revised variant the overall reduction in on-street parking spaces adjacent to the site would not be as great as under the proposed project or project variant (i.e., fewer than 36 on-street parking spaces would be removed [see EIR p. 4.C.117]).

*Conclusion*

The revised project or revised variant would not alter any of the conclusions in the transportation impact analysis in EIR Section 4.C, Transportation and Circulation, starting on p. 4.C.68. All the mitigation measures and all improvement measures applicable to the proposed project or project variant, would also apply to the revised project or revised variant.

**Noise and Vibration**

*Construction*

Under the revised project or revised variant, redevelopment of the project site would proceed in a similar fashion to that for the proposed project or project variant, with construction occurring over a 7- to up-to-15-year time frame with four construction phases. The proposed project's or project variant's construction activities and construction equipment would be similar to the

revised project or revised variant, with a slight reduction associated with changes in the amount of cut and fill on site resulting in slightly fewer haul trips. As with the proposed project or project variant, sensitive receptors surround the site and on-site sensitive receptors would be introduced during construction of later phases of the program. Therefore, construction noise attributable to the revised project or revised variant would be substantially similar to that for the proposed project or project variant in terms of the frequency of events and their duration.

As discussed above and shown on RTC Figure 2.31 (see RTC p. 2.25), the preliminary excavation plan would be slightly modified, resulting in a minor reduction in the volume of excavated soils that would be hauled off site for reuse at other locations or for disposal. Although there would be a slight reduction in construction haul trips, that reduction would not result in a noticeable change in construction truck traffic noise. Thus, construction truck traffic noise that would be generated under the revised project or revised variant would be substantially similar to that for the proposed project or project variant.

As with the proposed project or project variant, the construction noise impacts under the revised project or revised variant would be significant. Mitigation Measure M-NO-1: Construction Noise Control Measures, identified for the proposed project or project variant and described on EIR pp. 4.D.42-4.D.43, would also apply to the revised project or revised variant to reduce the significant construction noise impact. As with the proposed project or project variant, the impact would remain significant even with implementation of Mitigation Measure M-NO-1. Additionally, because all construction activities would be substantially similar to those described for the proposed project or project variant, construction-related vibration impacts on the SF Fire Credit Union Building could be a significant impact prior to mitigation. Mitigation Measure M-NO-2: Vibration Monitoring Program for the SF Fire Credit Union Building, identified for the proposed project or project variant and described on EIR pp. 4.D.55-4.D.56, would also apply to the revised project or revised variant to reduce the significant construction vibration impact to less than significant. The minor changes in the number of construction truck trips and change to a discrete area of the preliminary excavation plan (the central southern portion) would not alter the conclusions regarding construction noise and vibration impacts at the project level or under cumulative conditions.

*Operation*

There would be no change related to the number of buildings, building footprints, or the height and massing of the new buildings and adaptively reused buildings under the revised project or revised variant. There would be a slight change in travel demand, with a minor reduction in vehicle traffic due to the reduction in the retail portion of the land use program. Without any other changes introduced with the revisions and clarifications to the proposed project or project variant the operational noise effects of the revised project or revised variant would be substantially similar to those described for the proposed project or project variant on EIR pp. 4.D.58-4.D.67.

As with the proposed project or project variant, the effects of noise from stationary equipment on on-and off-site sensitive receptors under the revised project or revised variant would also be significant. Mitigation Measure M-NO-3: Stationary Equipment Noise Controls, identified for the proposed project or project variant and described on EIR p. 4.D.60, would apply to the revised project or revised variant and would ensure that noise levels would comply with article 29 of the police code and be less than significant. With implementation of Mitigation Measure M-NO-3, the revised project or revised variant would result in a less-than-significant impact on existing and new sensitive receptors from onsite stationary equipment noise. Project-related increases in traffic and the associated noise increases under the revised project or revised variant, like the proposed project or project variant, would be less than significant. Thus, none of the changes in the revised project or revised variant would alter the conclusions regarding operational noise impacts at the project-level or under cumulative conditions.

**Air Quality**

*Construction*

Under the revised project or revised variant, redevelopment of the project site would proceed in a similar fashion to that for the proposed project or project variant, with construction occurring over a 7- to up-to-15-year time frame with four construction phases. The proposed project's or project variant's construction activities and construction equipment would be similar to the revised project or revised variant, with a slight reduction in haul trips associated with changes in the excavation plan and fewer haul trips. As with the proposed project or project variant, sensitive receptors surround the site and on-site sensitive receptors would be introduced during construction of later phases of the program. As discussed above and shown on RTC Figure 2.31 (see RTC p. 2.25), the preliminary excavation plan would be slightly modified, resulting in a minor reduction in the volume of excavated soils that would be hauled off site for reuse at other locations or for disposal. Although there would be a slight reduction in construction haul trips, that reduction would not result in a substantial change in the contribution of off- and on-road construction vehicles to criteria air pollutant emissions or toxic air contaminants such as diesel particulate matter. As with the proposed project or project variant, site mitigation, construction dust control, and asbestos dust control plans would be required for the revised project or revised variant to minimize construction air quality effects including the effects from the release of naturally-occurring asbestos. Therefore, the less-than-significant construction air quality impacts attributable to the revised project or revised variant would be substantially similar to those identified for the proposed project or project variant. Emissions of criteria air pollutants during construction of the revised project or revised variant would be substantially similar to those for the proposed project or project variant, and would remain less than significant. The construction air quality impacts on the air basin and on off-site and on-site sensitive receptors under the revised project or revised variant (including combined effects of construction and operation

during the later phases of construction) would continue to be less than significant. The minor changes in the number of construction truck trips and change to a discrete area of the preliminary excavation plan (the central southern portion) would not alter the conclusions regarding construction air quality impacts or the health risk assessment at the project level or under cumulative conditions.

*Operation*

Under the revised project or revised variant there would be a change in travel demand with a minor lessening in vehicle traffic due to the reduction in the retail portion of the land use program. The operational air quality effects of the revised project or revised variant would be substantially similar to those described for the proposed project or project variant on EIR pp. 4.D.58-4.D.67. Air quality effects associated with project-generated traffic under the revised project or revised variant, like the proposed project or project variant, would be less than significant. The revised project or revised variant would conform with the 2017 Bay Area Clean Air Plan and would implement the same suite of transportation demand management measures identified for the proposed project or project variant. Furthermore, the revised project or revised variant would not trigger a significant VMT impact (see discussion above on RTC pp. 2.32-2.34); and the revised project or revised variant would include all the same TDM features as the proposed project or project variant, and therefore would not interfere with implementation of the 2017 Bay Area Clean Air Plan, similar to the proposed project or project variant,. Thus, none of the changes to the proposed project or project variant would alter the conclusions regarding operational air quality impacts at the project level or under cumulative conditions.

**Initial Study Topics**

*Land Use and Planning*

The revised project or revised variant would include the same mix of residential, retail, office (revised project only), child care, and below-grade parking uses. Under the revised project or revised variant, the residential land use and proposed residential density would remain the same as that for the proposed project or project variant; however, less retail space would be developed, the child care space would be reduced slightly, and the amount of parking provided for the various land uses would be reduced. As with the proposed project or project variant, the revised project or variant would not physically divide an established community, and, on balance, would conform with most provisions of the planning code, the objectives and policies of the general plan's Urban Design Element among other elements, and other local and regional plans and policies. As with the proposed project or project variant, a similar set of approval actions, e.g., the creation of a special use district and modification or revocation of Resolution 4109, would be required. Thus, land use and planning impacts of the revised project or variant would be the same as those for the proposed project or project variant – less than significant. Like the proposed

project or project variant, neither the revised project nor variant would make a cumulatively considerable contribution to a significant cumulative land use impact.

Because of the partial demolition of the existing office building at the center of the site, the revised project or revised variant may be inconsistent with San Francisco's Priority Policy No. 7, which calls for the preservation of landmark and historic buildings, as with the proposed project or project variant. The revised project or revised variant would still result in a significant and unavoidable historic architectural resource impact, as described above in the discussion of Cultural Resources on RTC pp. 2.30-2.31.

*Population and Housing*

The revised project or revised variant would include a similar mix of residential, retail, office (revised project only), child care, and below-grade parking uses. Under the revised project or revised variant, the residential land use would remain the same; thus, projected population growth under the revised project or revised variant would be the same as described on initial study pp. 113-115 (see EIR Appendix B). The demand for housing related to employment growth would also be similar to that for the proposed project or project variant, although slightly reduced due to the reduction in the proposed retail component of the land use program. The proposed AWSS high pressure fire hydrant and connection would be designed to serve the revised project or revised variant and immediate vicinity, and therefore no indirect impacts related to unplanned population growth as a result of expansion of infrastructure would occur. Thus, population and housing impacts under the revised project or revised variant would continue to be less than significant. Like the proposed project or project variant, neither the revised project nor the revised variant would make a cumulatively considerable contribution to a significant cumulative population and housing impact.

*Cultural Resources (Archeological Resources, Human Remain)*

Excavation required for the revised project or revised variant would be essentially the same as that for the proposed project or project variant, with some potential variation in part of the central southern area of the site. The depth of excavation throughout the site would continue to range from 7 to 40 feet below ground surface, and the amount of surface area to be disturbed would not substantially change from that described for the proposed project or project variant (approximately 274,000 square feet). See RTC Figure 2.31 on RTC p. 2.25 for an illustration of the modified preliminary excavation plan. Although a change in the volume of soil removed from one area of the site based on the preliminary excavation plan for the revised project or revised variant would occur under the revised project or revised variant, the minor change in soils-disturbing activities would not result in any substantial changes to the impact analysis for archaeological resources or human remains. Therefore, impacts under the revised project or revised variant would be similar to those under the proposed project or project variant, i.e.,

significant prior to mitigation. Mitigation Measures M-CR-2a: Archeological Testing, Monitoring, Data Recovery and Reporting; and M-CR-2b: Interpretation, identified for the proposed project and project variant and described on initial study pp. 129-133 (see EIR Appendix B), would also apply to the revised project or revised variant to ensure that, similar to the proposed project or project variant, potential project-level impacts on archaeological resources and human remains, if present within the project site, would be less than significant (with mitigation incorporated) and that contributions to significant cumulative impacts to archaeological resources and human remains would not be cumulatively considerable.

*Tribal Cultural Resources*

As stated above, excavation required for the revised project or revised variant would be essentially the same as that for the proposed project or project variant, with some potential variation in a portion of the central southern portion of the site. The depth of excavation throughout the site would continue to range from 7 to 40 feet below ground surface, and the amount of surface area to be disturbed would not substantially change from that described for the proposed project or project variant (approximately 274,000 square feet). See RTC Figure 2.31 on RTC p. 2.25 for an illustration of the modified preliminary excavation plan. Although a change in the preliminary excavation plan for the revised project or revised variant would occur under the revised project or revised variant, the minor change in soils-disturbing activities would not result in any substantial changes to the impact analysis for tribal cultural resources. Therefore, impacts under the revised project or revised variant would be similar to those under the proposed project or project variant, i.e., significant prior to mitigation. Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretive Program, identified for the proposed project and project variant and described on initial study p. 135 (see EIR Appendix B), would also apply to the revised project or revised variant to ensure that, similar to the proposed project or project variant, potential project-level impacts on tribal cultural resources, if present within the project site, would be less than significant (with mitigation incorporated) and that contributions to significant cumulative impacts on tribal cultural resources would not be cumulatively considerable.

*Greenhouse Gas Emissions*

As described on initial study pp. 146-150, the proposed project or project variant would adhere to all applicable ordinances and regulations identified in the City's Greenhouse Gas Compliance Checklist to demonstrate compliance with requirements in the city's GHG Reduction strategy and would have a less-than-significant impact with respect to GHG emissions. The revised project or project variant would also comply with the identified ordinances and regulations. Thus, none of the changes in the revised project or revised variant would alter the conclusions regarding GHG emissions impacts.

*Wind and Shadow*

The revised project or revised variant would not alter the location, height, massing, or configuration of the proposed new buildings or the proposed vertical additions to the adaptively reused building at the center of the site. Minor design changes to exterior building features under the proposed project or project variant, such as the locations of balconies, would also be introduced. With minor changes to exterior design elements of the proposed buildings and adaptively reused building, but no changes to the sites, shapes, and heights of the buildings, wind and shadow impacts under the revised project or revised variant (with a 67-foot-tall Walnut Building as under the project variant) would be substantially similar to those described for the proposed project or project variant on initial study pp. 151-162, i.e., less than significant (see EIR Appendix B). Thus, wind conditions in the vicinity would be substantially similar to those under the proposed project or project variant and would remain suitable for the pedestrian environment in accordance with the wind hazard criterion specified in section 148 of the planning code, as applicable to the site for purposes of CEQA. Similarly, contributions to any cumulative wind and shadow impacts would not be cumulatively considerable.

*Recreation*

As described in the initial study on pp. 163-172, the demand for recreational resources generated by the proposed project's or project variant's new residents and employees would result in less-than-significant impacts on those resources (see EIR Appendix B). The impact of the construction of the various plazas and open spaces on the 10.25-acre site under the proposed project or project variant would also be less than significant. Neither the proposed project nor the project variant would contribute considerably to any significant cumulative recreational resources impact.

Changes to the open space network under the revised project or revised variant are described on RTC p. 2.14, listed in RTC Tables 2.4a and 2.4b on RTC pp. 2.21-2.22, and shown on RTC Figure 2.29 on RTC p. 2.23. The revised project or revised variant would include minor modifications to the sizes of some of the proposed open spaces, including some that would be publicly accessible. There would be a minor increase in the total amount of open space on the project site that would be common open space, for both the revised project (an increase from 103,000 square feet to 127,126 square feet) and the revised variant (an increase from 103,000 square feet to 125,226 square feet), and there would be a decrease in the total amount of private open space (from 85,000 square feet to 81,618 square feet) for both the revised project and the revised variant. The demand for recreational resources would not change noticeably, because the revised project or revised variant would not alter the residential component of the land use program and would only slightly reduce the amount of retail space and its related employment. Thus, with no changes in demand for recreational resources, or in the construction program, and minor increases in the total amount of open space, recreational resources impacts under the revised project or revised variant would be similar to those under the proposed project

or project variant, and would be less than significant. Similarly, contributions to any significant cumulative recreational resources impacts would not be cumulatively considerable.

*Utilities and Service Systems*

As described in the initial study on pp. 173-188, the demand generated by the proposed project's or project variant's new residents and employees would not result in the need for new or expanded water, wastewater, or stormwater drainage facilities; new or expanded water supply sources; or new or expanded solid waste infrastructure. The proposed project or project variant would not generate wastewater that would exceed service capacity or wastewater treatment requirements. As noted in the initial study, project level impacts on utilities and service systems and contributions to any significant cumulative impacts would be less than significant (see EIR Appendix B and Response UT-1 starting on RTC p. 5.J.57 for effects on water supply).

As with the proposed project or project variant, all construction and operational stormwater management requirements and best management practices would be implemented under the revised project or revised variant, e.g., an erosion and sediment control plan, a stormwater control plan, and non-potable water catchment systems. Thus, with no change to the residential demand input, e.g., number of residents; a modest reduction in the employee demand input (less retail space would be developed under both the revised project and revised variant); and the minor changes to the preliminary excavation plan, the impacts of the revised project or revised variant on utilities and service systems would be substantially similar to those described in the initial study, i.e. less than significant. Similarly, contributions to any impacts on utilities and service systems would not be cumulatively considerable.

*Public Services*

As described on initial study pp. 189-197, the demand for fire protection and emergency medical services, police protection services, school facilities, or library facilities generated by the proposed project's or project variant's new residents and employees would be met by existing and planned capacity increases and would not result in the need for any new or expanded facilities. As noted, project level impacts on public services and contributions to any significant cumulative impacts would be less than significant (see EIR Appendix B).

The revised project or project variant would not include any changes that would alter the demand for public services. Thus, the revised project's and revised variant's impacts to public services would be substantially similar to those described in the initial study for the proposed project or project variant, i.e., less than significant. Similarly, contributions to any cumulative impacts on public services would not be cumulatively considerable.

*Biological Resources*

There would be no change related to the number of buildings, building footprints, or the height and massing of the new buildings and adaptively reused buildings under the revised project or revised variant. As described on initial study pp. 197-204, the proposed project or project variant would remove site landscaping including trees and could displace nesting and/or migratory birds, resulting in a significant impact prior to mitigation. Other biological resources impacts were determined to be less than significant because the site does not support or provide suitable habitat for candidate, sensitive, or special status species; and would be consistent with tree preservation policies or ordinances. Effects on birds related to feature-related hazards would be addressed through required compliance with planning code section 139. With no changes to the construction program, the biological resources impacts of the revised project or revised variant would be similar to or the same as those under the proposed project or project variant, i.e., less than significant except for the significant impact on nesting and/or migratory birds. Mitigation Measure M-BI-1: Preconstruction Nesting Birds Survey and Buffer Area, identified for the proposed project and project variant and described on initial study pp. 200-201 (see EIR Appendix B), would also apply to the revised project or revised variant to ensure that, similar to the proposed project or project variant, potential project-level impacts on nesting and/or migratory birds would be less than significant (with mitigation incorporated) and that contributions to any cumulative impacts on biological resources impacts would not be cumulatively considerable. Thus, none of the changes in the revised project or revised variant would alter the conclusions regarding biological resources impacts.

*Geology/Soils*

Under the revised project or revised variant, construction of the proposed new buildings and the adaptive reuse of the existing office building at the center of the site would be the same as for the proposed project or project variant. Although excavation for the revised project or revised variant would change slightly, the depth of excavation throughout the site would continue to range from 7 to 40 feet below ground surface. (See RTC Figure 2.31 on RTC p. 2.25 for an illustration of the modified excavation plan.) Although a minor change in the preliminary excavation plan would be introduced under the revised project or revised variant, the same construction program as that for the proposed project or project variant would be followed and all applicable regulations of the San Francisco and California building codes, as well as building department implementing procedures, would be in force. Therefore, geology and soils impacts under the revised project or revised variant would be similar to or the same as those under the proposed project or project variant, i.e., less than significant except for the paleontological resources impact, which would be significant prior to mitigation (see initial study pp. 205-216). Thus, Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources, identified for the proposed project and project variant and described on initial study pp. 214-215, would also apply to the revised project

or revised variant to reduce potential project-level impacts on paleontological resources, if present within the project site, to a less-than-significant level (with mitigation incorporated). Contributions to any significant geology and soils cumulative impacts would not be cumulatively considerable, and, with mitigation, the project level contribution to any significant cumulative impact related to paleontological resources would not be cumulatively considerable.

*Hydrology and Water Quality*

Excavation required for the revised project or revised variant would change slightly compared to that for the proposed project or project variant. The depth of excavation throughout the site would continue to range from 7 to 40 feet below ground surface, and the amount of surface area to be disturbed would not substantially change from that described for the proposed project or project variant. The minor change in soils-disturbing activities would not result in any changes to the impact analysis for hydrology and water quality.

The revised project or revised variant has relocated garages for the Laurel Duplexes to the rear of the duplexes and these garages would be accessed from a shared driveway instead of six individual driveways from Laurel Street. The new shared driveway has been extended past the Mayfair Building and the northernmost Laurel Duplex, turning south to continue along the rear of the Laurel Duplexes. This new access driveway behind the duplexes would slightly alter the ratio of impervious to pervious surfaces on the western part of the project site. As described in the Hydrology and Water Quality discussion on initial study pp. 216-227, the proposed project or project variant would have a less-than-significant impact on hydrology and water quality. The revised project or revised variant would be governed by the same permits, policies, and regulations described on initial study pp. 218-220, for construction-related activities and for operations. Additionally, the revised project or revised variant would comply with the Stormwater Management Ordinance, as described on initial study p. 223. Therefore, impacts under the revised project or revised variant would be similar to those under the proposed project or project variant, i.e., less than significant. Similarly, contributions to any cumulative impacts on hydrology and water quality would not be cumulatively considerable.

*Hazards and Hazardous Materials*

As with the proposed project or project variant, construction of the revised project or revised variant would follow the recommendations in the required site mitigation, construction dust control, and asbestos dust control plans as well as the required erosion and sediment control and stormwater pollution prevention plans. Construction activities including the use, transport, and disposal of any hazardous materials, would comply with all required local, state, and federal regulations. Therefore, the revised project and revised variant would have the same less-than-significant impacts as identified for the proposed project and project variant. With no substantial change to the mix of land uses, the revised project or revised variant would continue to have less-

than-significant impacts related to the routine use of common hazardous materials used for residential, retail, office, child care and parking uses. Thus, with a limited change to the preliminary excavation plan, no change to the building demolition plan, and limited changes to the land use program (reduced retail use), the revised project or revised variant would have less-than-significant impacts, similar to those described for the proposed project or project variant on initial study pp. 227-240.

*Mineral and Energy Resources*

Excavation required for the revised project or revised variant would be slightly different from that required for the proposed project or project variant. (See RTC Figure 2.31 on RTC p. 2.25 for an illustration of the modified preliminary excavation plan.) With substantially similar construction program and land use program as the proposed project or project variant, the revised project or revised variant would be expected to have substantially similar impacts on mineral and energy resources as the proposed project or project variant, i.e., less than significant. (See discussion on initial study pp. 240-246.) Similarly, contributions to any cumulative mineral and energy resources impacts would not be cumulatively considerable.

*Agriculture and Forestry Resources*

The analysis of the proposed project and project variant on initial study pp. 246-247 found that impacts on agricultural and forestry resources were not applicable. The project site is located within an urbanized area and does not contain traditional or urban agricultural uses, nor is it zoned for such uses. Additionally, the project site does not contain forest land or timberland and is not zoned for such uses. The revised project or revised variant do not involve any changes that would affect the "not applicable" finding.

**Conclusion**

For these reasons, the proposed minor revisions and clarifications to the proposed project and project variant descriptions in the draft EIR described above do not present significant new information as defined by CEQA Guidelines section 15088.5; therefore, recirculation of the draft EIR is not required.

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# 3. PUBLIC AGENCIES AND COMMISSIONS, NON-GOVERNMENTAL ORGANIZATIONS, AND INDIVIDUALS COMMENTING ON THE DRAFT EIR

Public agencies, commissions, non-governmental organizations including neighborhood associations, and individuals submitted written comments (letters and emails) on the 3333 California Street Mixed-Use Project Draft EIR (draft EIR), which the City received during the 47-day public comment period starting on November 8, 2018. On December 13, 2018, the San Francisco Planning Commission held a public hearing about the draft EIR and received comments about the draft EIR as oral testimony.

The San Francisco Planning Commission in consultation with the planning department's Environmental Review Officer agreed to the request made by members of the public at the public hearing and in written comments for a 15-day extension to the public comment period as allowed under the CEQA Guidelines and chapter 31 of the administrative code. Therefore, the close of the public comment was extended from December 24, 2018, to January 8, 2019 (from 47 days to 62 days). Written comments have been received following the close of the public comment period on the draft EIR. For the most part, these comments discuss the merits of the project and do not raise issues concerning the adequacy and accuracy of the analysis in the draft EIR. These comments are provided in RTC Attachment C: DEIR Comment Letters and Emails Received After Close of Public Comment Period, and are organized alphabetically by the commenters' last names. In the two cases where the written comments raise issues concerning environmental topics, they have already been responded to in RTC responses to other comments.

RTC Tables 3.1 through 3.3, list, respectively, the public agencies and commissioners commenting on the draft EIR; the non-governmental organizations commenting on the draft EIR; and individuals commenting on the draft EIR. Along with the commenters' names, the tables include the corresponding comment codes used in RTC Section 5, Comments and Responses, to denote each set of comments, the comment format, and the comment date. This Responses to Comments document codes the comments in three categories:

- Comments from local, state, or federal agencies and commissions are designated by "A-" and the acronym of the agency's or commission's name. Comments from the San Francisco Planning Commission are designated by "A-CPC-" and the commissioner's last name.
- Comments from non-governmental organizations, including neighborhood associations, are designated by "O-" and the acronym of the organization's or association's name.
- Comments from individuals are designated by "I-" and the individual's last name.

Within each category, comments are listed in alphabetical order. In cases where a commenter spoke at the public hearing and submitted written comments, or submitted more than one letter or email, comment codes end with a sequential number, e.g., O-JCCSF1, O-JCCSF2. In cases where

commenters have the same last name, the comment codes end with the last name and the first letter(s) of the first name, e.g., FrisbieJ, FrisbieR.

**RTC Table 3.1: Public Agencies and Commissions Commenting on the Draft EIR**

| Comment Code | Name of Person and Agency Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| A-CPC-Hillis | Commissioner Rich Hillis, President, San Francisco Planning Commission | Draft EIR Hearing Transcript, pp. 86-91 | December 13, 2018 |
| A-CPC-Koppel | Commissioner Joel Koppel, San Francisco Planning Commission | Draft EIR Hearing Transcript, pp. 83-84 | December 13, 2018 |
| A-CPC-Melgar | Commissioner Myrna Melgar, Vice-President, San Francisco Planning Commission | Draft EIR Hearing Transcript, pp. 80-83 | December 13, 2018 |
| A-CPC-Moore | Commissioner Kathrin Moore, San Francisco Planning Commission | Draft EIR Hearing Transcript, pp. 75-80 | December 13, 2018 |
| A-CPC-Richards | Commissioner Dennis Richards, San Francisco Planning Commission | Draft EIR Hearing Transcript, pp. 84-91 | December 13, 2018 |
| A-HPC | Andrew Wolfram, President, San Francisco Historic Preservation Commission | Letter | December 11, 2018 |
| A-NAHC | Gayle Totten, M.A., Ph.D., Associate Governmental Program Analyst, Native American Heritage Commission | Letter | November 29, 2018 |
| A-OPR1 | Scott Morgan, Director, State Clearinghouse, State of California Office of Planning and Research | Letter | December 26, 2018 |

**RTC Table 3.2: Non-Governmental Organizations Commenting on the Draft EIR**

| Comment Code | Name of Person and Organization Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| O-CSHG1 | Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group | Letter | December 11, 2018 |
| O-CSHG2 | Joe Catalano, California Street Homeowners Group | Draft EIR Hearing Transcript, pp. 61-63 | December 13, 2018 |
| O-JCCSF-1 | Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco | Letter | January 8, 2019 |
| O-JCCSF-2 | Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco | Letter | June 8, 2018 |

| Comment Code | Name of Person and Organization Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| O-JCCSF-3 | Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco | Letter | October 20, 2017 |
| O-JCCSF-4 | Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco | Letter | June 3, 2016 |
| O-LHIA1 | Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc. | Letter | December 5, 2018 |
| O-LHIA2 | Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc. | Email and Attachment | December 10, 2018 |
| O-LHIA3 | Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc. | Draft EIR Hearing Transcript, pp. 44-46 and Handout | December 13, 2018 |
| O-LHIA4 | Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc. | Letter | January 8, 2019 |
| O-LHIA5 | Richard Frisbie, Laurel Heights Improvement Association of San Francisco, Inc. | Draft EIR Hearing Transcript, pp. 27-29 | December 13, 2018 |
| O-LHIA6 | Zarin E and Perviz Randeria, Laurel Heights Improvement Association of San Francisco, Inc. | Draft EIR Hearing Transcript, pp. 39-40 | December 13, 2018 |
| O-LHIA7 | M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc. | Draft EIR Hearing Transcript, pp. 51-52 | December 13, 2018 |
| O-LIUNA1 | Michael R. Lozeau, Lozeau Drury LLP on behalf of Laborers' International Union of North America, Local Union No. 261 | Letter | December 11, 2018 |
| O-LIUNA2[1] | Hannah Hughes, Legal Assistant, Lozeau Drury LLP on behalf of Laborers' International Union of North America, Local Union No. 261 | Letter | December 12, 2018 |
| O-SFHAC | Cory Smith, San Francisco Housing Action Coalition | Draft EIR Hearing Transcript, pp. 67-70 | December 13, 2018 |
| O-YIMBY1 | Laura Clark, SF YIMBY Action | Draft EIR Hearing Transcript, pp. 35-36 | December 13, 2018 |

[1] The second letter from the Laborers' International Union of North America, Local Union No. 261, is a request to retract their first comment letter (O-LIUNA1). Both are reproduced in RTC Attachment B but they are not bracketed because these are not comments on the EIR.

| Comment Code | Name of Person and Organization Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| O-YIMBY2 | Ed Munnich, SF YIMBY Action | Draft EIR Hearing Transcript, pp. 63-65 | December 13, 2018 |

**RTC Table 3.3: Individuals Commenting on the Draft EIR**

| Comment Code | Name of Individual Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| I-Ahani | Sal Ahani | Email | January 8, 2019 |
| I-Alschueller | Donna Alschueller | Draft EIR Hearing Transcript, p. 72 | December 13, 2018 |
| I-Bassuk | Jim and Jessica Bassuk | Email | January 7, 2019 |
| I-Bercovich | David Bercovich | Email | January 7, 2019 |
| I-Berkley | David Berkley | Email | January 7, 2019 |
| I-Boken | Eileen Boken | Draft EIR Hearing Transcript, pp. 24-25 | December 13, 2018 |
| I-Boyer | Gail Boyer | Email | January 2, 2019 |
| I-Bransten | Robert Bransten | Email | November 26, 2018 |
| I-Brenner | Barbara and Jim Brenner | Email | January 3, 2019 |
| I-Catalano | Joe Catalano and Joan Varrone | Email | January 8, 2019 |
| I-Coholan | Michael Coholan | Email | January 6, 2019 |
| I-Cole | Adam Cole | Email | January 6, 2019 |
| I-Cutler1 | Bill Cutler | Draft EIR Hearing Transcript, pp. 25-26 | December 13, 2018 |
| I-Cutler2 | Bill Cutler and Judy Doane | Email | January 5, 2019 |
| I-Davidson | Evelyn Davidson | Email | January 8, 2019 |
| I-Day | Linda Day | Email | December 10, 2018 |
| I-Delp | Shanan Delp | Email | December 10, 2018 |
| I-Desby | Krisanthy Desby | Draft EIR Hearing Transcript, pp. 30-32 | December 13, 2018 |
| I-Devincenzi1 | Kathryn Devincenzi | Letter and Attachments | January 8, 2019 |
| I-Devincenzi2 | Kathryn Devincenzi | Letter and Attachments | January 8, 2019 |
| I-Devincenzi3 | Kathryn Devincenzi | Letter and Attachments | January 8, 2019 |
| I-Devincenzi4 | Kathryn Devincenzi | Letter and Attachments | June 6, 2018 |
| I-Dishotsky | Jon Dishotsky | Email | December 10, 2018 |

| Comment Code | Name of Individual Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| I-Doane | Judy Doane | Draft EIR Hearing Transcript, pp. 29-30 | December 13, 2018 |
| I-Dolan | Sonya Dolan | Draft EIR Hearing Transcript, pp. 52-53 | December 13, 2018 |
| I-Drake | Jane Drake | Email | January 7, 2019 |
| I-Esker | Sharon Esker | Email | January 5, 2019 |
| I-Fardis | Zhubin Fardis | Email | January 8, 2019 |
| I-Filippi1 | Arlene Filippi | Email | December 13, 2018 |
| I-Filippi2 | Arlene Filippi | Email | January 7, 2019 |
| I-Fong | Shannon Fong | Email | January 8, 2019 |
| I-Fridlyand | Jane Fridlyand | Email | January 7, 2019 |
| I-FrisbieJ1 | Janet Frisbie | Email | December 12, 2018 |
| I-FrisbieJ2 | Janet Frisbie | Email | January 7, 2019 |
| I-FrisbieR1 | Richard Frisbie | Letter | January 7, 2019 |
| I-FrisbieR2 | Richard Frisbie | Letter and Attachments | January 8, 2019 |
| I-Galbrecht1 | Holly Galbrecht | Draft EIR Hearing Transcript, pp. 46-47 | December 13, 2018 |
| I-Galbrecht2 | Holly Galbrecht | Email | January 2, 2019 |
| I-Giampaoli | Ronald Giampaoli | Email | January 8, 2019 |
| I-Glick1 | Linda S. Glick | Draft EIR Hearing Transcript, pp. 55-57 and Handout | December 13, 2018 |
| I-Glick2 | Linda S. Glick | Letter | January 6, 2019 |
| I-Goldbrenner1 | David Goldbrenner | Draft EIR Hearing Transcript, pp. 32-33 | December 13, 2018 |
| I-Goldbrenner2 | David Goldbrenner | Email | December 18, 2018 |
| I-Goldbrenner3 | David Goldbrenner and Zhenya Fridlyand | Email | January 4, 2019 |
| I-Gordon | Theo Gordon | Email | December 10, 2018 |
| I-Gwynn | Mary Gwynn | Email | January 7, 2019 |
| I-Harvey1 | Anne Harvey | Email | December 13, 2018 |
| I-Harvey2 | Anne Harvey | Draft EIR Hearing Transcript, pp. 58-60 | December 13, 2018 |
| I-Harvey3 | Anne Harvey | Email | January 8, 2019 |

| Comment Code | Name of Individual Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| I-Hillson1 | Rose Hillson | Draft EIR Hearing Transcript, pp. 47-48 and Handout | December 13, 2018 |
| I-Hillson2 | Rose Hillson | Letter | January 8, 2019 |
| I-Holleran | William Holleran | Email | December 10, 2018 |
| I-JohnsonCh | Chris Johnson | Draft EIR Hearing Transcript, p. 42 | December 13, 2018 |
| I-JohnsonCo | Corey Johnson | Email | December 10, 2018 |
| I-KuechlerIV | Henry Kuechler IV | Email | January 3, 2019 |
| I-Kwok1 | Tina Kwok | Email | December 4, 2018 |
| I-Kwok2 | Tina Kwok | Draft EIR Hearing Transcript, pp. 53-55 | December 13, 2018 |
| I-Kwok3 | Tina Kwok | Email | January 8, 2019 |
| I-Kwok4 | Tina Kwok | Email | January 9, 2019 |
| I-Laufman | Gary Laufman | Email | January 9, 2019 |
| I-Lawlor | Ian Lawlor | Email | December 13, 2018 |
| I-Lee | Abe Lee | Email | December 13, 2018 |
| I-Luthra | Ankur Luthra | Email | January 2, 2019 |
| I-Massenburg | Maryann Massenburg | Draft EIR Hearing Transcript, pp. 65-67 | December 13, 2018 |
| I-Mathews1 | Larry Mathews | Email | December 13, 2018 |
| I-Mathews2 | Larry Mathews | Email | January 8, 2019 |
| I-McConkey | Susan McConkey | Draft EIR Hearing Transcript, p. 40 | December 13, 2018 |
| I-McDonough1 | Adam McDonough | Draft EIR Hearing Transcript, pp. 22-24 | December 13, 2018 |
| I-McDonough2 | Adam McDonough | Email | January 7, 2019 |
| I-McMichael | Adam McMichael | Draft EIR Hearing Transcript, pp. 33-34 | December 13, 2018 |
| I-McNulty | Marie McNulty | Letter | December 18, 2018 |
| I-Meehan | Kevin Meehan | Email | December 16, 2018 |
| I-Miles1 | Roger Miles | Draft EIR Hearing Transcript, pp. 19-21 | December 13, 2018 |
| I-MillerE | Ellen Miller | Letter | January 8, 2019 |
| I-MillerL | Liz Miller | Email | December 12, 2018 |
| I-Morris1 | Cristina Morris | Email | December 10, 2018 |

| Comment Code | Name of Individual Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| I-Morris2 | Cristina Morris | Email | December 12, 2018 |
| I-Moulller | Arielle Moulller | Draft EIR Hearing Transcript, pp. 60-61 | December 13, 2018 |
| I-Munnich | Ed Munnich | Email | December 13, 2018 |
| I-Neill | Anne Neill | Email | December 12, 2018 |
| I-Nonn1 | Marsha and Wolfgang Nonn | Email | December 13, 2018 |
| I-Nonn2 | Marsha and Wolfgang Nonn | Email | January 8, 2019 |
| I-Paul | Phillip Paul | Email | January 7, 2019 |
| I-Piombo1 | Donald Piombo | Email | December 19, 2018 |
| I-Piombo2 | Donald Piombo | Email | January 3, 2019 |
| I-Poliakin | Gilda Poliakin | Email | December 30, 2018 |
| I-Ponce | Brandon Ponce | Email | January 8, 2019 |
| I-Powers | Cornelia Powers | Email | January 2, 2019 |
| I-Prato | Ann Prato | Email | January 7, 2019 |
| I-Price | Sandra Price | Email | January 7, 2019 |
| I-Randeria1 | Zarin E. Randeria | Email | December 3, 2018 |
| I-Randeria2 | Zarin E. Randeria | Email | January 5, 2019 |
| I-Roberson1 | Kelly Roberson | Draft EIR Hearing Transcript, pp. 48-50 | December 13, 2018 |
| I-Roberson2 | Kelly Roberson | Email | January 8, 2019 |
| I-Rosenberg | Stefanie Rosenberg | Email | January 8, 2019 |
| I-Rubenstein | Laura Rubenstein | Email | January 2, 2019 |
| I-RyanC | Colleen Ryan | Draft EIR Hearing Transcript, pp. 38-39 | December 13, 2018 |
| I-RyanJ | Jim Ryan | Email | January 8, 2019 |
| I-Sater | Rita Sater | Email | January 8, 2019 |
| I-Scarampi | Sebastiano Scarampi | Email | January 8, 2019 |
| I-Scaroni | Joe Scaroni | Draft EIR Hearing Transcript, pp. 41-42 | December 13, 2018 |
| I-Schuttish1 | Georgia Schuttish | Email | November 17, 2018 |
| I-Schuttish2 | Georgia Schuttish | Email | November 27, 2018 |
| I-Seglund | Debra Seglund | Draft EIR Hearing Transcript, pp. 57-58 | December 13, 2018 |
| I-Stoll | Nathan Stoll | Email | January 18, 2019 |
| I-Stratton | Michele D. Stratton | Letter | January 8, 2019 |

| Comment Code | Name of Individual Submitting Comments | Comment Format | Comment Date |
|---|---|---|---|
| I-Sullivan | Andrew Sullivan | Email | December 11, 2018 |
| I-ThomasZ | Zachary Thomas | Email | December 14, 2018 |
| I-Thomson | Joanna Thomson | Draft EIR Hearing Transcript, pp. 42-44 | December 13, 2018 |
| I-UnderwoodA | Adrienne Underwood | Email | December 10, 2018 |
| I-UnderwoodV1 | Victoria Underwood | Letter | December 4, 2018 |
| I-UnderwoodV2 | Victoria Underwood | Letter | December 12, 2018 |
| I-UnderwoodV3 | Victoria Underwood | Letter | January 4, 2019 |
| I-Varrone | Joan Varrone | Draft EIR Hearing Transcript, pp. 70-72 | December 13, 2018 |
| I-Vega | Tony Vega | Email | January 8, 2019 |
| I-Yuen | Alex Yuen | Draft EIR Hearing Transcript, pp. 36-37 | December 13, 2018 |
| I-Zeluck | Steven C. Zeluck | Email | November 10, 2018 |
| I-Zlatunich1 | John Zlatunich | Email | December 9, 2018 |
| I-Zlatunich2 | John Zlatunich | Email | January 5, 2019 |

RTC Table 3.4 lists the commenters who submitted comments after the close of the public comment period.

**RTC Table 3.4: Commenters Who Submitted Comments After the Close of the Public Comment Period**

| Name of Commenter | Comment Format | Comment Date |
|---|---|---|
| Terry McGuire, President, Pacific Heights Residents Association | Letter | August 12, 2019 |
| Charles Ferguson, President, Presidio Heights Association of Neighbors | Email and Attachment | July 30, 2019 |
| Kristy Wang, Community Planning Policy Director, San Francisco Bay Area Planning and Urban Research Association (SPUR), for Charmaine Curtis and Diane Filippi, Co-Chairs, SPUR Project Review Advisory Board | Email and Attachment | July 10, 2019 |
| William Bartlett | Letter | June 1, 2019 |
| Suzanne Blumenthal | Letter | June 16, 2019 |
| Lynn Burrows Bunim | Email | June 2, 2019 |
| Ryan Chatley | Email | May 7, 2019 |
| Shanan Delp | Email | May 7, 2019 |
| Richard Frisbie | Email and Attachment | July 12, 2019 |

| Name of Commenter | Comment Format | Comment Date |
|---|---|---|
| Bella Shen Garnett | Email | August 9, 2019 |
| Massimiliana Boyer Glynn | Email | June 5, 2019 |
| Jeremiah Hallisey | Email | May 15, 2019 |
| William Holleran | Email | May 13, 2019 |
| Dennis Hong | Email | August 2, 2019 |
| Martine Krumholz | Email | April 26, 2019 |
| David Levine | Email | May 18, 2019 |
| Daniel S. Mason | Email | May 14, 2019 |
| Anna Morfit | Email | May 14, 2019 |
| David L. Morse | Email | May 15, 2019 |
| Tyler Norsworthy | Email | April 29, 2019 |
| Marie Que | Email | May 7, 2019 |
| Francis Scarpulla | Email | May 8, 2019 |
| Karen Scarpulla | Email | May 14, 2019 |
| Kristina Scarpulla | Email | May 7, 2019 |
| Stephen Scarpulla | Email | April 28, 2019 |
| Jeff Schlarb | Letter | May 10, 2019 |
| Frances Stark | Email | August 13, 2019 |
| Zachary Thomas | Email | August 16, 2019 |

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# 4. MASTER RESPONSE – TRANSPORTATION AND CIRCULATION

## A. INTRODUCTION

This Master Response addresses transportation and circulation issues raised in many public comments received on the Draft EIR for the 3333 California Street Mixed-Use Project and published on November 7, 2018. This Master Response provides a comprehensive response to these issues and allows readers to readily review all the of the pertinent information in one place rather than in separate responses. Three main transportation and circulation topics are discussed:

- Travel Demand Methodology
- Trip Distribution/Increased Traffic Congestion
- Vehicle Miles Traveled Methodology and Findings

RTC Section 5.E, Transportation and Circulation, presents excerpts of comment letters and supplementary materials received by the City from commenters, and responses to each comment, with cross-references to relevant topics and subtopics of this Master Response, as necessary. All documents referenced in this chapter are available for review at the planning department's offices as part of Case File No. 2015-014028E.[1]

## B. TRAVEL DEMAND METHODOLOGY

This response addresses comments about the travel demand methodology, including the trip generation rates and estimates, mode share, internal trip capture, calculation of net new trips, and freight and passenger loading demand. The analysis in the EIR is consistent with the San Francisco Planning Department *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (*2002 SF Guidelines*)[2] and the travel demand estimates are more conservative as they overestimate the number of person trips and vehicle trips generated by the proposed project and project variant relative to the *Transportation Impact Analysis Guidelines*, February 2019 (*2019 TIA Guidelines).*[3] This response contains the following subsections to explain these guidelines and the draft EIR's consistency with them.

- Background on Transportation Impact Analysis Guidelines
- Travel Demand Forecasting Process

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1 The administrative record is also online at https://www.ab900record.com/3333cal.

2 San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, (*2002 SF Guidelines*), http://default.sfplanning.org/publications_reports/Transportation_Impact_Analysis_Guidelines.pdf, accessed June 10, 2019.

3 San Francisco Planning Department, *Transportation Impact Analysis Guidelines*, February 2019 (*2019 TIA Guidelines)*, http://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf, accessed May 21, 2019.

- Trip Generation Estimates, including a comparison between the 2002 and 2019 guidelines
- Mode Share
- Internal Trip Capture
- Net New Trips
- Loading Demand

### *B.1 Background on Transportation Impact Analysis Guidelines*

To assist in the preparation of transportation impact studies, the department provides to consultants and city staff a guidance document, the *Transportation Impact Analysis Guidelines.* The guidelines are not intended to be exhaustive to cover every potential scenario that could be encountered in the process of evaluating a project's transportation-related impacts. The department uses the guidelines to develop individual transportation study scopes of work tailored to the complexity of transportation issues associated with specific projects. Once the department approves a scope of work for a specific project, the specific direction contained within that scope will provide more details than that which appears in the guidelines.

The travel demand estimates calculated and the impact analysis for the proposed project and project variant followed the methodology presented in the *2002 SF Guidelines*[4] to the extent applicable. The specific approach used for the proposed project and project variant is provided in the Transportation Scope of Work, which is included in EIR Appendix D, Transportation and Circulation, p. 6.

In March of 2016, the planning commission adopted a resolution to use a vehicle miles traveled metric instead of intersection level of service regarding transportation impacts. After the draft EIR publication in November 2018, the department comprehensively updated its guidelines related to analysis for all transportation subtopics for the first time since 2002. Among other changes, the updated guidelines removed automobile delay as a measure to determine a project's significant impact on the environment, and to instead require (in most circumstances) analysis of a project's impact on vehicle miles traveled (VMT). This change did not change the conventional travel demand forecasting process described below and used for this project. Instead, the updated guidelines include new data based on recent observations documented at existing San Francisco developments.

[4] San Francisco Planning Department, Transportation Impact Analysis Guidelines, October 2002, http://default.sfplanning.org/publications_reports/Transportation_Impact_Analysis_Guidelines.pdf, accessed June 10, 2019.

### *B.2 Travel Demand Forecasting Process*

Trip generation is the first step in the conventional four-step travel forecasting process, followed by trip distribution, mode choice, and route assignment. The goal of trip generation is to estimate the number of *person*-trips that are generated by a particular land use or development. Person trips are distinct from, but include, *vehicle*-trips. Person-trips include travel by all modes such as auto, transit, taxi, bicycle, and walk trips. Mode choice predicts the travel mode used for each person trip. Vehicle trips are derived from auto person-trips based on the average number of people expected to be traveling in each vehicle (or average vehicle occupancy). Trip distribution seeks to answer the question, where do these person-trips go to or come from. Trip assignment determines the routes travelers choose to reach their destinations.

As is the standard approach for transportation studies in San Francisco, the analysis considers the weekday p.m. peak hour, the 60-minute time period of highest trip generation during the afternoon period between 4 and 6 p.m., which is typically the peak period of vehicle travel and represents the time period of greatest congestion on the street network. Additionally, given the number of residential units proposed and the expected level of trip generation that would occur during weekday mornings, the analysis also considers the weekday a.m. peak hour, the 60-minute time period of highest trip generation during the morning period between 7 and 9 a.m. A street's uses, demands, and activities are subject to change over the course of a day. A peak hour analysis is conducted for transportation to evaluate the potential impacts of the project during peak congestion conditions. There are other time periods, such as the after-school afternoon peak, where there are generally higher traffic volumes than during other off-peak periods (e.g., midday or overnight). However, the vehicle traffic generated by the proposed project or project variant and background traffic volumes on the surrounding roadway would be lower during those time periods than during the weekday a.m. and p.m. peak hours analyzed in the EIR. Therefore, the peak hour analysis included in the EIR analysis adequately covers the impacts during non-peak hour conditions. Daily vehicle traffic generated by the proposed project and project variant was estimated and used in the analysis of other environmental topics, including air quality and noise. This information was provided by Kittelson & Associates, Inc. on November 14, 2017 in the form of a memorandum titled "Average Daily Traffic Volumes – Methodology and Results Memorandum."

The EIR used the conventional four-step travel demand forecasting process for an analysis of localized transportation impacts (e.g., loading, transit). The four-step travel demand forecasting process consists of 1) trip generation, 2) trip distribution, 3) mode choice, and 4) trip assignment. The EIR used a different modeling process to assess VMT transportation impacts. The EIR analysis calculates the *number* of person trips based on the size and type of the project land uses. The EIR VMT analysis relies on substantial evidence to describe the *way or mode* of the person trips (e.g., vehicle trips) would change based on options provided at the project site, specifically the number of project vehicular parking spaces (refer to subsection D.4, Vehicle Miles Traveled (VMT) and

Vehicular Parking, beginning on RTC p. 4.39). Refer to EIR pp. 4.C.48-4.C.51 and in this Master Response on RTC pp. 4.33-4.39 for discussion of the VMT calculation.

### *B.3 Trip Generation Estimates*

Table 4.C.11: Person-Trip Generation (Internal and External Trips Combined), on EIR p. 4.C.54, presents the weekday daily, a.m. peak hour, and p.m. peak hour person-trip generation estimates (internal and external combined) for the proposed project and project variant. The table presents trips that would occur within the project site (internal trips) and person-trips that would begin or end outside of the project site (external trips). The proposed project would generate fewer weekday a.m. and p.m. peak hour trips than the project variant. Contrary to assertions made in several comments on the EIR, daily and p.m. peak hour trips are provided (see e.g., Table 4.C.11 on EIR p. 4.C.54). Contrary to the comment, the approach used is consistent with the *2002 SF Guidelines* Appendix C, and the analysis presented in the EIR considers both the work and non-work trips generated by retail and other uses. The same comment correctly states that the percentage splits between work and non-work trips for retail is 4 percent work and 96 percent non-work. Therefore, of the total 19,644 daily person-trips generated by the proposed project, 12,753 would be generated by the retail uses (including 12,243 non-work and 510 work trips). Some of these trips would remain internal to the site and some would be external trips, beginning or ending outside the site.

Table 4.C.14: External Person-Trip Generation by Mode, on EIR p. 4.C.58, presents the weekday daily, a.m. peak hour, and p.m. peak hour external person-trip generation estimates for the proposed project and project variant. The table presents trips that would begin or end outside of the project site (external trips). Contrary to assertions presented in the comments, the proposed project (including the retail/restaurant, office, daycare, and residential land uses) would generate a total of approximately 16,462 daily external person-trips, including 10,057 daily auto person-trips (equivalent to 5,760 vehicle trips) and not 16,000 vehicle trips as stated in the comments. As presented on EIR pp. 4.C.58-4.C.59, the proposed project's retail use would account for 31 percent and the restaurant uses would account for 35 percent of the total vehicle trips, a combined 66 percent of the 5,760 vehicle trips and not the 80 percent stated in the comments for the combined retail and restaurant uses. The proposed project's office use would account for about 4 percent of daily vehicle trips. Combined, the retail, restaurant, and office uses would account for 69 percent of the daily vehicle traffic to/from the site, or approximately 3,974 daily vehicle trips and not the 12,000 to 15,000 daily vehicle trips stated in the comments. Detailed travel demand calculations are provided in the Travel Demand Memorandum (EIR Appendix D, pp. 15-176). Work and non-work trip generation values are presented in EIR Appendix D on pp. 57-128.

*Trip Generation Comparison – 2002 SF Guidelines and 2019 TIA Guidelines Update*

The transportation demand forecasting process discussed on p. 4.3 of this Master Response has not changed. The *2019 TIA Guidelines* refines the process through use of additional data. Based on a

comparison of the person- and vehicle-trip generation estimated for the proposed project and project variant using the *2002 SF Guidelines* and *2019 TIA Guidelines*, it is reasonable to conclude that the transportation analysis in the EIR using the *2002 SF Guidelines* can be considered conservative as it overestimates the number of person trips and vehicle trips generated by the proposed project and project variant under the *2019 TIA Guidelines*.

The *2019 TIA Guidelines* were not available when the transportation analysis for the 3333 California Street Mixed-Use Project EIR was conducted. The scope of the update to the *2002 SF Guidelines* included reviewing the existing methodology and data; conducting primary data collection and analysis; deriving updated parameters including trip generation rates, mode split, trip distribution, and loading demand rates; and reviewing the current geographic analysis structure. In addition to planning department staff, the San Francisco Municipal Transportation Agency (SFMTA) and San Francisco County Transportation Authority (SFCTA) provided input and feedback on the effort.

The update was published on February 14, 2019, well after the draft EIR's transportation analysis was completed and the draft EIR was published in November 2018. The *2019 TIA Guidelines* uses the conventional four-step travel forecasting process but with new data. It applies person trip rates, accounting for size and type of land use, to estimate the number of person trips generated by a proposed project (see Appendix F of the *2019 TIA Guidelines*). The new trip generation rates and mode splits were developed based on data collected in spring 2017 at 65 typical office, retail, residential, and hotel sites throughout San Francisco. The *2019 TIA Guidelines* distribute a project's person trips (excluding walk and bicycle trips) and vehicle trips to/from a project site's neighborhood district[5] or place type[6] to the 12 neighborhood districts based on origin/destination (residential, office, or retail), trip purpose (work or non-work), mode (drive alone, shared ride, and transit), and directionality (inbound or outbound). Vehicle trips are calculated using vehicle occupancy rates, defined as the number of passengers in a vehicle during a trip, and calculated as vehicle person trips divided by vehicle trips from the California Household Travel Survey[7] trips records between different neighborhood districts. Each neighborhood district's land use type has its own unique vehicle occupancy rate. During the assignment step of the trip generation process, the methodology multiplies the number of taxi/transportation network company (TNC) trips by two to account for separate vehicle trips both to and from a site.

[5] The San Francisco County Transportation Authority developed boundaries for 12 neighborhoods (nine in San Francisco proper, and three external districts – north bay, east bay, and south bay).

[6] Geographic area that shares a similar mode share for vehicle use. The department identified three place types: urban high density, urban medium density, and urban low density.

[7] California Department of Transportation, California Household Travel Survey, 2010, http://www.dot.ca.gov/hq/tpp/offices/omsp/statewide_travel_analysis/chts.html, accessed March 27, 2019.

*Person-Trip Generation Comparison*

Travel demand estimates for the proposed project and project variant using the *2019 TIA Guidelines* were developed after publication of the draft EIR.[8] The trip generation comparison worksheet presents the base calculations and due to updates to the data and refinement of the geographic analysis areas used in the *2019 TIA Guidelines*, the person- and vehicle-trip generation comparison does not apply trip credits for the existing use or reductions for internal trip capture. The weekday p.m. peak hour person-trip generation comparison is presented in RTC Table 4.1: Weekday P.M. Peak Hour Person-Trip Generation Comparison. The *2002 SF Guidelines* estimates presented in RTC Table 4.1 can also be found in EIR Table 4.C.11 on p. 4.C.54.

**RTC Table 4.1: Weekday P.M. Peak Hour Person-Trip Generation Comparison**

| Mode | Proposed Project | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|
| | 2002 SF Guidelines | 2019 TIA Guidelines | Difference NOTE A | Percent Change NOTE A | 2002 SF Guidelines | 2019 TIA Guidelines | Difference NOTE A | Percent Change NOTE A |
| Auto | 1,554 | 735 | (819) | -53% | 1,627 | 695 | (932) | -57% |
| Transit | 402 | 219 | (103) | -17% | 456 | 282 | (174) | -38% |
| Walk | 519 | 1,143 | 624 | 120% | 520 | 1,026 | 506 | 97% |
| Other NOTE B | 95 | 114 | 19 | 20% | 107 | 103 | (4) | -4% |
| Total Person-Trips | 2,570 | 2,291 | (279) | -11% | 2,710 | 2,106 | (604) | -22% |
| Total Vehicle Trips | 901 | 495 | (406) | -45% | 963 | 460 | (503) | -52% |
| Average Vehicle Occupancy | 1.72 | 1.59 | (0.13) | -8% | 1.69 | 1.61 | (0.08) | -5% |

*Notes*: Numbers may not sum to total due to rounding. The person-trip generation comparison presents the total internal and external trip generation and does not incorporate internal trip capture.

**A** Difference is calculated as *2019 TIA Guidelines* minus *2002 SF Guidelines* and percent change is calculated as difference divided by *2002 Guidelines*.

**B** The *2019 TIA Guidelines* includes the auto taxi and TNC person trips in the "other mode", consistent with the *2002 SF Guidelines*. These trips are incorporated into the *2019 TIA Guidelines* calculation of average vehicle occupancy.

*Source*: Kittelson & Associates, Inc. 2019; *SF Guidelines*, 2002; *2019 TIA Guidelines*; *ITE Manual, 9th Edition*, 2012.

As shown in RTC Table 4.1, with the updated methodology, during the weekday p.m. peak hour the proposed project would generate 279 fewer person trips (11 percent fewer) and 406 fewer vehicle trips (including taxi/TNC trips) (45 percent fewer) than the base person and vehicle trips analyzed in the EIR using the *2002 SF Guidelines*. During the weekday p.m. peak hour the project variant would generate 604 fewer person trips (22 percent fewer) and 503 fewer vehicle trips (52 percent fewer) than the person and vehicle trips analyzed in the EIR using the *2002 SF Guidelines*.

[8] Kittelson & Associates, Inc, 3333 California Street Travel Demand Comparison - SF Guidelines 2002 and 2019 Guidelines Update, July 25, 2019.

With the *2019 TIA Guidelines*, the proposed project would generate 53 percent fewer auto-person trips, 17 percent fewer transit-person trips, 20 percent more other trips (including taxi/TNC trips), and 120 percent more walk trips. The project variant would generate 57 percent fewer auto-person trips, 38 percent fewer transit-person trips, 4 percent fewer other trips (including taxi/TNC trips), and 97 percent more walk trips.

The relative increase in walk trips generated by the proposed project and project variant under the *2019 TIA Guidelines* methodology (compared to the *2002 SF Guidelines*) would not create potentially hazardous conditions for pedestrians or interfere with pedestrian accessibility to the site. The proposed project and project variant would include numerous sidewalk network and intersection modifications that would increase visibility of people walking and improve sight lines at intersections, shorten crossing distances, slow turning vehicles, and increase the amount of space available for people walking and waiting for transit. Project-generated walk trips would be distributed throughout the peak hour and throughout the site. Given the number of pedestrian access points discussed on EIR p. 4.C.42 and the permeability of the site to the surrounding roadway network, pedestrian trips would not be expected to concentrate in any particular area and could be accommodated on existing sidewalks and crosswalks and on the proposed internal pedestrian circulation network for the project site.

Based on this trip generation comparison, it is reasonable to conclude that the transportation analysis conducted in the EIR under the *2002 SF Guidelines* can be considered conservative as it overestimates the number of person trips and vehicle trips generated by the proposed project and project variant relative to the *2019 TIA Guidelines*. Similar results would occur for the daily and weekday a.m. time periods given that the trip generation rates in the *2019 TIA Guidelines* are equal to or lower than the *2002 SF Guidelines.*

*Passenger Loading Demand Comparison*

Passenger loading demand estimates using the *2019 TIA Guidelines* and a passenger loading demand comparison were developed for the proposed project and project variant after publication of the draft EIR. Passenger loading demand estimates presented in the travel demand comparison spreadsheet were calculated by using the mode split percentage of all person trips that would involve a passenger loading instance occurring at the curb near the project site. These percentages (also known as passenger loading percentage) vary based on land use and place type and include taxi/TNC and private vehicle drop-off.[9] These passenger loading percentages were calculated using the planning department's intercept survey data collected in spring 2017 and presented in the new *2019 TIA Guidelines*. The passenger loading demand comparison is presented in RTC Table 4.2: Passenger Loading Demand Comparison.

[9] The department applies a 50 percent factor for high-occupancy vehicle trips for purposes of loading analysis because the department did not ask survey respondents to specify if they were dropped off or part of a group arriving in a single vehicle.

As shown in RTC Table 4.2, with the *2019 TIA Guidelines*, when calculating demand generated by land use the proposed project and project variant would generate a peak demand for approximately two passenger loading spaces (about 36 linear feet) compared to the three spaces (about 60 feet) generated by the proposed project or project variant as analyzed in the EIR using the *2002 SF Guidelines*. The analysis included in the EIR conservatively assumed that 100 percent of "other" trips would be taxi/TNC trips or private vehicle pick-up/drop-off trips. Based on this passenger loading demand comparison it is reasonable to conclude that the transportation analysis conducted in the EIR can be considered conservative as it overestimates the passenger loading demand generated by the proposed project and project variant relative to the *2019 TIA Guidelines*.

**RTC Table 4.2: Passenger Loading Demand Comparison**

| Mode | Proposed Project | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|
| | 2002 SF Guidelines | 2019 TIA Guidelines | Difference NOTE A | Percent Change NOTE A | 2002 SF Guidelines | 2019 TIA Guidelines | Difference NOTE A | Percent Change NOTE A |
| Linear Space (feet) | 60 | 36 | (24) | -40% | 61 | 39 | (22) | -37% |
| Number of Spaces | 3.0 | 1.8 | (1.2) | | 3.1 | 1.9 | (1.2) | |

*Notes*:

A Difference is calculated as *2019 TIA Guidelines* minus *2002 SF Guidelines* and percent change is calculated as difference divided by *2002 Guidelines*.
- The *2002 SF Guidelines* calculation is based on the number of external person trips generated by the "other" mode and assumes 100 percent of the "other" mode are taxi or TNC trips. The passenger loading demand assumes an average stop time of 1.5 minutes.
- The *2019 TIA Guidelines* passenger loading demand is calculated by using the mode split percentage of all person trips going to a particular project site that would involve a passenger loading instance. Based on intercept survey data collected in spring 2017, these percentages (passenger loading percentage) are 13.4 percent for office use, 3 percent for retail use, and 7.2 percent for residential use. The passenger loading demand calculation assumes that half of the peak hour loading demand occurs during the peak 15 minutes and the average stop duration is one minute.

*Source*: Kittelson & Associates, Inc. 2019; *SF Guidelines*, 2002; *2019 TIA Guidelines.*

However, as noted on p. F-12 of the *2019 TIA Guidelines*, for projects that consist of more than one building, passenger loading demand should be calculated for the lobby entrance at each individual building. Therefore, the proposed project and project variant would generate a peak demand for nine passenger loading spaces (or one passenger loading space for each building). The proposed project and project variant would provide three 60-foot-long passenger loading zones (white curb) (nine total spaces) and passenger loading also would be conducted on site within the Walnut Street roundabout. Given that the supply of passenger loading spaces would exceed the passenger loading demand estimated using the *2019 TIA Guidelines*, the proposed project's and project variant's passenger loading impacts would remain less than significant.

### *B.4 Mode Share*

As shown in Table 4.C.13: Vehicle Trip Distribution on EIR p. 4.C.57, person-trips generated by the proposed project and project variant were distributed to San Francisco's four Superdistricts and

the greater Bay Area, and then assigned to travel modes based on mode shares presented in the *2002 SF Guidelines* in order to determine the number of auto, transit, walk, and "other" trips. Mode share (the proportion of person trips made by automobile, transit, and other [walk/bicycle/taxi/TNC] modes) and average vehicle occupancy for the proposed project and project variant were calculated using American Community Survey five-year (2011-2015) estimates for the project's census tract (Census Tract 154) for the proposed residential work trips. Mode share of residential non-work trips, office work and non-work trips, retail work and non-work trips, restaurant work and non-work trips, and daycare work and non-work trips use rates provided in the *2002 SF Guidelines* for Superdistrict 2.[10] Work and non-work trips by mode for all land uses are presented in EIR Appendix D, pp. 57-128. Additional discussion of TNC mode share and passenger loading demand is presented in subsection B.7, Loading Demand, of this Master Response on pp. 4.15-4.16.

### *B.5 Internal Trip Capture*

Contrary to the comments received, the internal trip capture rates applied do not represent the highest possible values resulting from the most favorable balance of land uses; comments may imply that the department selected an internal capture rate that would result in fewer project vehicle trips than other rates. This is incorrect. Mixed-use development creates less demand on the external transportation network than single-use developments because some amount of travel would occur within the development, for example, between the proposed residential units and the retail and office space. The internal trip capture calculation accounts for the portion of the total person-trips generated by the proposed project and project variant that would remain on site and would not use the external transportation network.

Internal trips are trips made using internal roadways or walkways and could be made by any mode, including walk trips, bicycle trips, linked or pass-by trips.[11] The detailed internal trip capture calculations are provided in the Travel Demand Memorandum (EIR Appendix D, pp. 130-133).

As explained on EIR pp. 4.C.55-4.C.56, the methodology used to estimate internal trip capture accounts for trips internal to the proposed project or project variant that would still occur but would not be made by automobile or transit, and would instead remain within the project site and occur by walking, bicycling, and linked trips. The internal trip capture analysis is described in more detail in the Travel Demand Memorandum (EIR Appendix D, pp. 22-24). The following steps were used to develop the internal trip capture rates for the proposed project and project variant:

[10] As explained on EIR p. 4.C.2, footnote 2, under the *2002 SF Guidelines*, San Francisco is divided into four superdistricts, or geographic areas. Superdistrict 1 is the northeast quadrant, Superdistrict 2 is the northwest quadrant, Superdistrict 3 is the southeast quadrant, and Superdistrict 4 is the southwest quadrant.

[11] Linked and pass-by trips are trips that are already on the way from an origin to a primary trip destination that make an intermediate stop at the site being studied without a route diversion.

- Determine the total number of person-trips generated during the daily, weekday a.m. and weekday p.m. peak hour periods by each individual land use (see Table 4 and Table 5 in EIR Appendix D, p. 21).
- Estimate the number of person-trips by place of origin/destination and calculate respective mode split for each land use.
- Group the auto and transit-person trips into producers (land uses where the trips typically originate, e.g., residential) and attractors (land uses where the trips typically arrive, e.g., office, retail, restaurant).
- Use unconstrained internal capture percentages to estimate the number of potential internal trips between each pair of land uses. Apply the internal capture rate to each individual land use within the producer and attractor categories based on National Cooperative Highway Research Program Report 684[12] and Institute of Transportation Engineers[13] data. The internalization ratios selected are within the range of published observed internalization for various land uses published by the National Cooperative Highway Research Program and calculated according to the recommended estimation method.
- Iteratively adjust the internal capture rate applied to each individual land use to balance the number of trips generated at both ends of each interacting pair of producer and attractors.
- Shift the resulting number of attractor and producer trips calculated for each individual land use from the original auto and transit modes to walk and other modes; these represent the additional person-trips that would be considered internal to the project.
- Validate the resulting internal person-trip capture rates by comparing the results against similar results available from the Institute of Transportation Engineers and other sources, such as previous EIR analyses.[14]

As explained in the step-by-step process outlined above and presented in the Travel Demand Memorandum (EIR Appendix D, pp. 7-9), the internal trip capture rates used in the analysis are constrained by the number of trips generated by the producer uses (e.g., residential use) or the number of trips received by the attractor uses (e.g., retail use), whichever is less. The internalization ratios selected and used in the analysis are within the range of published observed internalization for various land uses published by the National Cooperative Highway Research Program and calculated according to the recommended estimation method. Using the unconstrained internal trip capture rates as an initial point of analysis, the project- and scenario-specific internal trip capture rates were identified through an iterative balancing process. The differences between the internal trip capture rates used for the proposed project and project variant reflect the mix of uses within each scenario and the potential to match residential trips with office trips, office trips with restaurant trips, and so on. Contrary to the comments received, the internal trip capture rates applied do not

[12] Transportation Research Board, National Cooperative Highway Research Program Report 684, *Enhancing Internal Trip Capture Estimation for Mixed-Use Developments*, 2011.

[13] ITE Journal, *Improved Estimation of Internal Trip Capture for Mixed-Use Development*, 2010; *Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Projects*, 2011.

[14] As noted on EIR p. 4.C.56, the approach used in the EIR is "similar to the approach used" in other EIR analyses and not the results of other EIR analyses as some comments imply.

represent the highest possible values resulting from the most favorable balance of land uses. This is discussed in further detail below for the proposed project and project variant.

*Proposed Project*

As presented in the Travel Demand Memorandum (see EIR Appendix D, Table 6, p. 9), the proposed project would have an internal trip capture rate of 13.6 percent for office use, 13.7 percent for retail use, 10.6 percent for restaurant use, and 20 percent for residential use during the weekday a.m. peak hour. The internal trip capture rates (or *constrained rates)* for the proposed project used in the analysis in the EIR are 58 percent lower, 54 percent lower, and 66 percent lower than the *unconstrained* internal trip capture rates for office, retail, and restaurant uses, respectively, during the weekday a.m. peak hour. The unconstrained internal trip capture rates during the weekday a.m. peak hour are 32 percent for the office use, 30 percent for the retail use, 31 percent for the restaurant use, and 20 percent for the residential use.

During the weekday p.m. peak hour the proposed project would have an internal trip capture rate of 15.6 percent for the office use, 15 percent for the retail use, 14.7 percent for the restaurant use, and 20 percent for the residential use. The internal trip capture rates (or *constrained rates)* for the proposed project are 50 percent lower, 25 percent lower, 27 percent lower, and 62 percent lower than the *unconstrained* internal trip capture rates for the office, retail, restaurant, and residential uses, respectively, during the weekday p.m. peak hour. The unconstrained internal trip capture rates during the weekday p.m. peak hour are 31 percent for the office use, 20 percent for the retail use, 20 percent for the restaurant use, and 53 percent for the residential use.

*Project Variant*

As presented in the Travel Demand Memorandum (see EIR Appendix D, Table 6, p. 9), the project variant would have an internal trip capture rate of 13.7 percent for retail use, 10.8 percent for restaurant use, and 19.9 percent for residential use during the weekday a.m. peak hour. The internal trip capture rates (or *constrained rates)* are 54 percent lower, 65 percent lower, and 1 percent lower than the *unconstrained* internal trip capture rates for the retail, restaurant, and residential uses, respectively, during the weekday a.m. peak hour. The unconstrained internal trip capture rates during the weekday a.m. peak hour for the proposed land uses are the same as those cited for the proposed project.

During the weekday p.m. peak hour, the project variant would have an internal trip capture rate of 18.7 percent for the retail use, 18.6 percent for the restaurant use, and 19.2 percent for the residential use. The *unconstrained* internal trip capture rates during the weekday p.m. peak hour for the proposed land uses are the same as those cited in the previous paragraph for the proposed project. Therefore, the internal trip capture rates (or *constrained rates)* are 94 percent lower, 93 percent lower, and 38 percent lower than the *unconstrained* internal trip capture rates for retail, restaurant,

and residential uses, respectively, during the weekday p.m. peak hour. The unconstrained internal trip capture rates during the weekday p.m. peak hour for the proposed land uses are the same as those cited for the proposed project.

*Mode Share*

Table 4.C.14 on EIR p. 4.C.58 presents the weekday daily, a.m. peak hour, and p.m. peak hour external person-trip generation estimates for the proposed project and project variant. The table presents trips that would begin or end outside of the project site (external trips). Contrary to the comment, walk trips were not double counted. The walk trips presented in this table are the people who would walk to and from nearby land uses, such as between the proposed residential units and the Laurel Village Shopping Center, or from nearby houses to the proposed retail and office space. As reported in Table 4.C.14, the proposed project would generate 376 walk trips (19.6 percent of total person-trips) during the weekday a.m. peak hour and 398 walk trips (19.1 percent of total person-trips) during the weekday p.m. peak hour. The project variant would generate 359 walk trips (18.3 percent of total person-trips) during the weekday a.m. peak hour and 387 walk trips (17.7 percent of total person-trips) during the weekday p.m. peak hour. The text on EIR p. 4.C.58 supporting the information presented in Table 4.C.14 refers to the proportion of *external* person-trips by mode generated by each land use.

Table 4.C.12: Person-Trip Generation (Internal Trip Capture), on EIR p. 4.C.55, presents the total internal and external person-trips for the weekday a.m. peak hour and p.m. peak hour for the proposed project and project variant. The information presented in this table includes person-trips by all modes, not only walk trips. As shown in Table 4.C.12, the proposed project and project variant are estimated to result in an internal trip capture rate of 17.6 percent (409 person-trips) and 19.0 percent (460 person-trips), respectively, during the weekday a.m. peak hour. During the weekday p.m. peak hour, the proposed project and project variant are estimated to result in an internal trip capture rate of 18.9 percent (485 person-trips) and 19.2 percent (521 person-trips), respectively. Internal trips presented in Table 4.C.12 account for the portion of the total person-trips generated by the proposed project and project variant that would remain on site and would not use the external transportation network. Internal trips are trips made using internal roadways or walkways and could be made by any mode, including walk trips, bicycle trips, linked or pass-by trips. Assuming a single-use development with no internal trip capture, these trips would occur on the external roadway network and may be made by modes suitable to longer distance travel, such as auto and transit. The detailed internal trip capture calculations are provided in the Travel Demand Memorandum (EIR Appendix D, pp. 130-133).

*Analysis Time Periods*

For purposes of the transportation analysis conducted for the EIR, internal trip capture rates were presented for the weekday a.m. and p.m. peak periods (see EIR p. 4.C.55, Table 4.C.12, and EIR

Appendix D, Attachment C, pp. 130-133). While daily trip generation calculations are not necessary for the transportation analysis in the EIR, the daily trip generation and internal trip capture rates were calculated using the same methodology as was applied to calculate the weekday a.m. and p.m. peak period trip generation and internal trip capture and are presented in EIR Tables 4.C.11, Person-Trip Generation (Internal and External Trips Combined) on EIR p. 4.C.54 and 4.C.14, External Person Trip Generation by Mode, on EIR p. 4.C.58. The daily *vehicle* trip generation values were developed for use in the EIR's noise and air quality analysis, and are presented in a Kittelson & Associates memorandum entitled "Average Daily Traffic Volumes – Methodology and Results Memorandum." This document is discussed on EIR pp. 4.D.62 and 4.E.50 and is available for review in the planning department's office as part of Case File 2015-014028ENV. This memorandum does not account for any internal trip capture and therefore provides worst-case values as used in the noise and air quality analyses.

For informational purposes, the daily internal trip capture calculations are publicly available as part of the AB 900 Application for Environmental Leadership Development Project, in its Attachment C, Transportation Efficiency. In the application materials, the proposed project and project variant are estimated to result in a daily internal vehicle trip capture rate of 14.3 percent (reduction of 954 daily vehicle trips) and 14.9 percent (reduction of 1,003 daily vehicle trips), respectively.

### *B.6 Net New Trips*

Consistent with planning department guidance presented on p. 9 of the *2002 SF Guidelines*, observations of existing levels of trip activity were conducted to "net-out" existing land uses. The 3333 California Street project travel demand includes trip credits, based on empirical data collection at the project site. Consistent with standard practice for transportation studies conducted in San Francisco, the analysis contained in the EIR focuses on peak-hour net new vehicle trips while the air quality and noise analyses consider daily traffic volumes. See Impact NO-4 on EIR pp. 4.D.62-4.D.64 in Section 4.D, Noise and Vibration, for a discussion of operational noise impacts associated with project-related increases to local traffic on the adjacent roadway segments.

The project site is currently occupied by a 362,000-gross-square-foot, four-story office building with a three-level, partially below-grade parking structure with 212 spaces; a one-story, 14,000-gross-square-foot annex building; and three surface parking lots with 331 vehicle parking spaces. Turning movement counts were collected at the existing site driveways during the weekday a.m. and p.m. peak periods (7 to 9 a.m. and 4 to 6 p.m.) on December 1, 2016 (see EIR pp. 4.C.59-4.C.60). The turning movement counts are included in EIR Appendix D on pp. 134-140. Based on vehicle turning movement counts collected at the active site driveways (California Street/Walnut Street, Mayfair Drive/Laurel Street, and the Laurel Street driveway between Mayfair Drive and Euclid Avenue), the existing use was observed to generate 266 vehicle-trips (190 inbound, 76 outbound) and 296 vehicle-trips (102 inbound, 194 outbound) during the weekday a.m. and p.m.

peak hours, respectively. The existing driveway on Presidio Avenue south of California Street is not in active use and was not counted.

As presented in Table 4.C.14 on EIR p. 4.C.58, the proposed project would generate 5,760 daily vehicle trips, including 691 vehicle trips during the weekday a.m. and 752 vehicle trips during the weekday p.m. peak hour. The project variant would generate 5,744 daily vehicle trips, including 726 vehicle trips during the weekday a.m. and 804 vehicle trips during the weekday p.m. peak hour. Vehicle-trip credits were applied to the external vehicle-trip generation estimates to calculate the net-new weekday a.m. and p.m. peak hour vehicle-trip generation for the proposed project and project variant, as summarized in Table 4.C.15: Net-New External Vehicle-Trips, on EIR p. 4.C.60. As presented in Table 4.C.15, with the application of vehicle trip credits, the proposed project would generate 425 net new vehicle trips during the weekday a.m. and 456 net new vehicle trips during the weekday p.m. peak hour. The project variant would generate 460 net new vehicle trips during the weekday a.m. peak hour and 508 vehicle trips during the weekday p.m. peak hour.

Two minor discrepancies between the weekday a.m. peak hour vehicle trips for the proposed project and project variant reported in Table 4.C.14 and in the associated text on EIR p. 4.C.58 exist. To correct the discrepancy related to the proposed project's weekday a.m. peak hour vehicle-trips, the text in the last sentence of the paragraph starting on EIR p. 4.C.57 and continuing to EIR p. 4.C.58 has been modified as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double-underline):

> …Based on the expected mode share and average vehicle occupancy, the proposed project would generate ~~807~~ 691 vehicle-trips during the weekday a.m. peak hour, and 752 vehicle-trips during the weekday p.m. peak hour.

To correct the discrepancy related to the project variant's weekday a.m. peak hour vehicle-trips, the text in the last sentence of the first full paragraph on EIR p. 4.C.58 has been modified as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double-underline):

> …Based on the expected mode share and average vehicle occupancy, the project variant would generate ~~847~~ 726 vehicle-trips during the weekday a.m. peak hour, and 804 vehicle-trips during the weekday p.m. peak hour

### *B.7 Loading Demand*

*Commercial Loading*

As shown in Table 4.C.16: Freight Loading Demand, on EIR p. 4.C.61, the proposed project and project variant are estimated to result in a demand for about five commercial loading spaces during the average hour and about six commercial loading spaces during the peak hour of freight loading activity. The demand for commercial (and passenger) loading zones is generated by the land uses that those spaces would serve; no substantial evidence exists that the provision of the spaces

themselves would create additional demand or generate additional vehicle trips by delivery vehicles.

*Passenger Loading Demand – Transportation Network Company Vehicles*

As demonstrated by the comparison of *2002 SF Guidelines* and *2019 TIA Guidelines* passenger loading demand,[15] the analysis conducted for the proposed project and project variant included in the EIR provides a conservative estimate of trips that would occur by TNCs.

As noted on EIR p. 4.C.61, both the travel demand estimates and passenger loading demand estimates include demand for for-hire vehicles. Consistent with *2002 SF Guidelines*, bicycles, motorcycles, and other modes not accounted for in other mode categories are considered TNC trips or private vehicle pick-up/drop-off trips. With this conservative assumption, between three and four percent of all person trips would be passenger pick-up/drop-off trips.

As discussed on EIR pp. 4.C.61-4.C.62, the proposed project would generate 49 passenger drop-off/pick-up trips (24 drop-off, 25 pick-up) during the weekday a.m. peak hour and 60 passenger drop-off/pick-up trips (31 drop-off, 29 pick-up) during the weekday p.m. peak hour. A portion of these passenger drop-off/pick-up trips would be via TNC vehicles. About 30 vehicles would be anticipated to arrive during the peak 15-minute period, resulting in a peak demand for passenger loading during any one-minute equivalent to about three vehicles. Assuming an average vehicle length of 20 feet, this would be equivalent to about 60 linear feet of curb.

The project variant would generate 48 passenger drop-off/pick-up trips (23 drop-off, 25 pick-up) during the weekday a.m. peak hour and 61 passenger drop-off/pick-up trips (34 drop-off, 27 pick-up) during the weekday p.m. peak hour. A portion of these passenger drop-off/pick-up trips would be served by TNC vehicles. About 31 vehicles would be anticipated to arrive during the peak 15-minute period, resulting in a peak demand for passenger loading during any one-minute equivalent to about four vehicles.[16] Assuming an average vehicle length of 20 feet, this would be equivalent to about 80 linear feet of curb.

Based on data collected by the planning department in spring 2017 and incorporated into the *2019 TIA Guidelines*, of the 5 percent of total weekday p.m. peak hour person trips classified as "other" trips, approximately 2 percent would be TNC trips. These data were not available for use in the *2002 SF Guidelines*, and for that reason they were not presented in the EIR. Assuming an average

[15] Kittelson & Associates, Inc, 3333 California Street Travel Demand Comparison - SF Guidelines 2002 and 2019 Guidelines Update, July 25, 2019.

[16] EIR Appendix D, pp. 37-38 presents the calculation methodology for passenger loading, explaining that the total number of vehicles dropping off and/or picking up during the peak 15-minute period is multiplied by the average duration of a stop; this result is divided by 15 minutes to arrive at the approximate number of vehicles during the peak demand. Thus, 31 * 1.5 = 46.5/15=3.1, rounded to 4 to be conservative and avoid presenting fractions of a vehicle.

vehicle occupancy of 1.67 persons per TNC vehicle per the *2019 TIA Guidelines*, the proposed project would generate about 26 TNC trips and the project variant would generate about 23 TNC trips during the weekday p.m. peak hour. Based on this comparison, using the *2019 TIA Guidelines*, the proposed project and project variant would generate 57 percent and 62 percent fewer TNC trips than the proposed project and project variant under the *2002 SF Guidelines*.

## C. TRIP DISTRIBUTION/INCREASED TRAFFIC CONGESTION

This response addresses comments about the effect of project-generated vehicle trips and proposed streetscape modifications on intersection operations and automobile and transit delay. The EIR is consistent with the *2002 SF Guidelines;* San Francisco Planning Commission Resolution Modifying Transportation Impact Analysis, March 3, 2016;[17] and Governor's Office of Planning and Research, CEQA Guidelines Update.[18] This response contains the following subsections to explain these requirements and guidelines and the draft EIR's consistency with them.

- CEQA Guidelines Update
- Trip Distribution and Trip Assignment
- Intersection Operations Analysis

### *C.1 CEQA Guidelines Update*

Automobile delay is not a CEQA topic. On March 3, 2016, the San Francisco Planning Commission adopted a resolution to modify the environmental review process by removing automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, as a significant impact on the environmental pursuant to the CEQA and replaced it with VMT criteria.[19] Since adoption of the updated CEQA Guidelines on December 28, 2018, automobile delay is not a CEQA topic statewide.[20] In this Master Response refer to subsection D.1, CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT) on RTC pp. 4.19-4.30 for more information.

[17] San Francisco Planning Commission, Resolution Modifying Transportation Impact Analysis, March 3, 2016, http://commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf, accessed June 10, 2019.

[18] California Governor's Office of Planning and Research, Current CEQA Guidelines Update webpage, http://opr.ca.gov/ceqa/updates/guidelines/, accessed June 10, 2019.

[19] San Francisco Planning Department, Resolution Modifying Transportation Impact Analysis, March 3, 2016, http://commissions.sfplanning.org/cpcpackets/Align-CPC%20exec%20summary_20160303_Final.pdf, accessed June 10, 2019.

[20] California Governor's Office of Planning and Research, Current CEQA Guidelines Update webpage, http://opr.ca.gov/ceqa/updates/guidelines/, accessed June 10, 2019.

### *C.2 Trip Distribution and Trip Assignment*

The proposed project and project variant would provide parking in four below-grade parking garages that would be accessed from five driveways on the perimeter of the site (see Figure 2.22 on EIR p. 2.62). The vehicle trips generated by the proposed project and project variant were assigned to travel routes and study intersections based on the vehicle trip distribution shown in Table 8 on p. 25 of the Travel Demand Memorandum included in EIR Appendix D. The vehicle trips were assigned to the driveways based on the land use/building generating the trip and the associated garage access location. Vehicle trips were then distributed and assigned to the street network based on their origin or destination. The trip distribution routes and project variant vehicle trips on the surrounding roadway network are illustrated in EIR Appendix D (see Figure 2 and Figure 3 on pp. 32-33 of the Travel Demand Memorandum). The project variant would generate more vehicle trips than the proposed project and would have a similar trip distribution and assignment. Therefore, the project variant was analyzed and the effects of the proposed project would be the same as or less than the project variant. The revisions to the proposed project and project variant described in RTC Section 2, Revisions and Clarifications to the Project Description, pp. 2.2-2.29, including consolidation of the six Laurel Duplex driveways into one curb cut, would not change the analysis summarized here.

The project-generated vehicle traffic at study intersections and at proposed driveways for the project variant are shown in Figure 4 and Figure 5 (see EIR Appendix D, pp. 34-35). Figure 4 was incorrectly included twice in the EIR Appendix D, Travel Demand Memorandum and Figure 2 was excluded. To correct the discrepancy related to the figures, Figure 2 has been inserted to replace the first presentation of Figure 4 in EIR Appendix D on p. 32 of the Travel Demand Memorandum. See RTC Section 6, DEIR Revisions, for a copy of Figure 2 that has been placed in the Travel Demand Memorandum.

As shown in Figure 2 in Appendix D, during the weekday a.m. peak hour, the project variant would add 117 vehicle trips to the 1,219 vehicle trips on California Street west of Presidio Avenue (9.6 percent), 145 vehicle trips to the 427 vehicle trips on Laurel Street between California Street and Euclid Avenue (34 percent), 132 vehicle trips to the approximately 1,111vehicle trips on Euclid Avenue east of Laurel Street (11.9 percent), and 218 vehicle trips to the approximately 1,095 vehicle trips on Masonic Avenue between Presidio and Euclid avenues (19.9 percent). The project variant would add fewer than 100 vehicle trips to all other study segments. As shown in Figure 4 (EIR Appendix D, p. 34), during the weekday p.m. peak hour, the project variant would add 176 vehicle trips to the 1,511 vehicle trips on California Street west of Presidio Avenue (11.6 percent) and 140 vehicle trips to the approximately 937 vehicle trips on Presidio Avenue between California Street and Euclid Avenue (14.9 percent). The project variant would add fewer than 100 vehicle trips on all other study segments.

### *C.3 Intersection Operations Analysis*

An intersection operations analysis was conducted for informational purposes to help inform the project design and evaluate transit delay along specific corridors. This analysis was conducted at a subset of study intersections. The scope of the intersection operations analysis was based on the results of the trip generation, distribution, and assignment analyses, and accounted for the streetscape modifications proposed for the project. The operations analysis consists of an evaluation of the project-related contribution to existing traffic volumes and estimated increases in vehicle delay and 95th percentile queue lengths.[21] The intersection operations analysis was performed using Synchro software and conducted using the San Francisco Planning Department's Guidelines for Synchro Intersection Level of Service Analysis.

*Transit Delay*

The intersection operations and transit delay analysis conducted for intersections along California Street (i.e., California Street/Laurel Street, California Street/Walnut Street, and California Street/Presidio Avenue) is included in the Travel Demand Memorandum on pp. 40-44 in EIR Appendix D. The project variant would generate more vehicle trips than the proposed project and would have a similar trip distribution and assignment. Therefore, the project variant was analyzed and the effects of the proposed project would be the same or less than the project variant. The operations analysis shows that the project variant would not result in substantial delays or queue lengths at the three study intersection locations as a result of the project-related increase in vehicle traffic. Therefore, as documented in the Travel Demand Memorandum, the proposed project and project variant would not result in substantial delay to buses operating along California Street. Additionally, the proposed project and project variant would not increase potential for conflicts between passenger vehicles and buses on California Street. The analysis findings were reviewed and approved by SFMTA, including staff from the transit services division. The results of the transit delay analysis are summarized in the EIR under Impact TR-5 on EIR p. 4.C.88.

*Streetscape Modifications*

The intersection operations analysis was conducted for informational purposes to help inform the project design. Intersection operations analyses conducted at locations where streetscape modifications were proposed (i.e., Presidio Avenue/Pine Street/Masonic Avenue, Masonic Avenue/Euclid Avenue, and Mayfair Drive/Laurel Street) are documented in the Streetscape Modifications Analysis Summary, dated December 2017, summarized on EIR p. 4.C.83.

Proposed streetscape modifications are detailed on EIR pp. 4.C.39-4.C.42 and illustrated in Figure 2.28a: Existing Streetscape and Proposed Streetscape Changes – Presidio Avenue and Figure 2.28b:

[21] The 95th percentile queue length is the queue length (in vehicles or feet) that has only a five percent probability of being exceeded during the analysis time period.

Existing Streetscape and Proposed Streetscape Changes – Masonic Avenue, in Chapter 2, Project Description, on EIR pp. 2.81 and 2.82, respectively. The intersection operations analysis shows that the project variant would not result in substantial delays or queue lengths as a result of the project-related increase in vehicle traffic and proposed removal of the channelized right turns (Presidio Avenue/Pine Street/Masonic Avenue and Masonic Avenue/Euclid Avenue) or installation of bulb-outs (Mayfair Drive/Laurel Street). The project variant would generate more vehicle trips than the proposed project and would have a similar trip distribution and assignment. Therefore, the effects of the proposed project would be the same as or less than those of the project variant. As demonstrated by the analysis, the transportation network would accommodate the increase in traffic volumes generated by the proposed project or project variant with minimal increases in intersection delay and queue lengths.

Furthermore, as documented on EIR p. 4.C.83, the addition of the corner bulb-out and eastside crosswalk at Mayfair Drive/Laurel Street would increase pedestrian visibility and improve sight distance for drivers. Revisions to the proposed project and project variant described in Section 2, Revisions and Clarifications to the Project Description, include elimination of the eastside crosswalk at Mayfair Drive/Laurel Street; this revision would not change the analysis summarized here.

The removal of the triangular-shaped pedestrian island and the right-most travel lane for southbound traffic on Presidio Avenue merging onto Masonic Avenue, the construction of a corner bulb-out on the west side of the Masonic Avenue/Presidio Avenue/Pine Street intersection, the installation of a continental crosswalk crossing Presidio Avenue (to Pine Street), and the widening of the Presidio Avenue sidewalk (from 10 to 15 feet) would improve visibility of pedestrians, increase space for people walking along Presidio Avenue, establish a new crosswalk for people crossing Presidio Avenue, and slow vehicle traffic turning from Presidio Avenue onto Masonic Avenue.

## D. VEHICLE MILES TRAVELED METHODOLOGY AND FINDINGS

### *D.1 CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT)*

This response addresses comments about the vehicle miles traveled (VMT) transportation analysis in the EIR. VMT is a measure of the amount and distance of automobile travel. Generally, higher VMT corresponds to increased vehicle tailpipe, including greenhouse gas, emissions, while lower VMT corresponds to lower vehicle tailpipe, including greenhouse gas, emissions. Thus, a project will have a significant effect on the environment if it would cause substantial additional VMT. Comments state that the draft EIR is inadequate because it fails to state the total VMT of the project and cumulative projects. Other comments state that the EIR lacks substantial evidence for using

the regional average as a VMT threshold of significance and omits the citywide average VMT effects.

The EIR is consistent with state and local requirements and guidelines about VMT analysis and is supported by substantial evidence. This response includes the following sections to explain these requirements and guidelines and the EIR's consistency with them:

- Requirement of CEQA Transportation Analysis – summarizes 2013 state legislation about CEQA transportation analysis.
- History of VMT in CEQA Transportation Analysis – summarizes the process to arrive at state and local requirements and guidelines about VMT in CEQA transportation analysis.
- VMT Efficiency Metric and Thresholds of Significance – defines key terms and summarizes state requirements and guidelines about VMT in CEQA transportation analysis. This section also addresses the department's use of efficiency metrics in VMT analysis, instead of total VMT and the use of a VMT threshold of significance compared to the regional average, instead of the city average.
- Draft EIR VMT analysis – restates the draft EIR analysis conducted for the project in relation to the VMT efficiency metric and thresholds of significance.

Refer to EIR pp. 4.D.27-4.D.28, and 4.D.62-4.D.64 for discussions of vehicular travel impacts on noise, and EIR pp. 4.E.43-4.E.44, 4.E.49-4.E.52, and 4.E.53-4.E.60 for discussions of vehicular travel impacts on air quality. For a discussion of how the proposed project or project variant would adhere to ordinances and regulations adopted by the City to reduce greenhouse gas emission from mobile sources (e.g. vehicles) see initial study section E.7, Greenhouse Gas Emissions (EIR Appendix B, pp. 146-150).

*Requirement of CEQA Transportation Analysis*

CEQA section 21099(b)(1), enacted with passage of California Senate Bill 743, effective September 2013, required that the California Office of Planning and Research develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to section 21099(b)(1), automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA.

*History of VMT in CEQA Transportation Analysis*

The City and County of San Francisco long understood the problems associated with the use of automobile delay as a measure of transportation impacts under CEQA. San Francisco published or adopted numerous reports, resolutions, studies, and policy initiatives documenting issues related to

LOS and recommending use of an alternative metric.[22] The reports noted that analyzing and mitigating automobile delay does not meet the basic purposes of CEQA, including to help protect the environment. For example, a common solution to reducing automobile delay and improving LOS is widening a roadway. Widening a roadway often causes harmful effects on the environment. These effects include increasing intersection crossing distances for people walking; increasing vehicular traffic levels and associated air pollutant emissions because of induced demand; and requiring overall more space for cars, which may lead to physical displacement of people's businesses or homes.

In response to the mandate in Senate Bill 743, the California Office of Planning and Research published three documents between September 2013 and January 2016 related to evaluating transportation impacts under CEQA. The first document provided a preliminary evaluation of several alternative criteria to LOS, including VMT. The second document provided a preliminary discussion draft of updates to the CEQA Guidelines. This second document recommended VMT as the "most appropriate measure of transportation impacts." As described on EIR pages 4.C.47 to 48, the third document, a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA,* recommended that lead agencies measure transportation impacts for projects using a VMT metric.[23]

On March 3, 2016, based on evidence in the Office of Planning and Research's documents and on the department's independent review of the literature on LOS and VMT, and after the city's own public process, the San Francisco Planning Commission adopted the Office of Planning and Research's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (planning commission Resolution 19579). The resolution became effective immediately for all projects that had not receive a CEQA determination and all projects that had previously received CEQA determinations but required additional environmental analysis. The EIR cited this resolution and the January 2016 Office of Planning and Research document.

Following the commission's adoption of Resolution 19579, the Office of Planning and Research released three more technical advisories, with the latest in December 2018. Those three technical advisories continued to recommend that lead agencies measure transportation impacts for projects using a VMT metric. The advisories listed the same or similar methodologies and thresholds of significance and cited the same or similar reasons for its recommendations as the earlier Office of Planning and Research documents.

[22] For a summary regarding city and state automobile delay reform history, refer to San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Attachment C, March 3, 2016.

[23] Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013),* January 20, 2016.

After a five-year public process, the California Natural Resources Agency amended the CEQA Guidelines in 2018 and added section 15064.3 "Determining the Significance of Transportation Impacts," and amended Appendix G: Environmental Checklist Form to remove automobile delay as a measure to determine a project's significance on the environment, and to instead require (in most circumstances) analysis of a project's impact on VMT.

*Vehicle Miles Traveled Efficiency Metrics and Thresholds of Significance*

This section summarizes state requirements and guidelines about VMT in CEQA transportation analysis. Definitions for key terms in this section are:

> **Absolute or numerical metric** – total VMT. The total amount of VMT associated with a project.
>
> **Efficiency metric** – VMT per capita or per employee. For example, VMT per capita may estimate the average daily VMT per person in one household's location. It may compare the VMT efficiency at that location to another location or to the average of a larger geographic area (e.g., a region).
>
> **Threshold of significance or threshold** – "an identifiable quantitative, qualitative or performance level of a particular environmental effect, non-compliance with which means the effect will normally be determined to be significant by the agency and compliance with which means the effect normally will be determined to be less than significant." (CEQA Guidelines § 15064.7(a).)

CEQA section 21099(b)(1) requires the Office of Planning and Research to "recommend potential metrics to measure transportation impacts that may include, but are not limited to, vehicle miles traveled, vehicle miles traveled per capita…." The Office of Planning research identified vehicle miles traveled, including per capita, metrics as the most appropriate measure of transportation impacts and the Natural Resources Agency agreed.

As amended in 2018, CEQA Guidelines section 15064.3(b)(1) states for land use projects that "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact." In addition, a "lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure."[24]

The Natural Resources Agency agreed with the Office of Planning Research regarding the use of VMT in CEQA for several reasons. The agency's reasons included:

- VMT achieves the purposes set forth in CEQA section 21099(b)(1),
- the language in CEQA section 21099(b)(1) suggested the use of VMT to meet that purpose, and

[24] CEQA Guidelines section 15064.3(b)(4).

- lowering VMT may result in numerous public and private benefits, such as better health, reduced transportation costs and greenhouse gas emissions, reductions in travel times to destinations for people, and cleaner water.[25]

In its December 2018 technical advisory, the Office of Planning and Research recommended a per capita and per employee VMT threshold of significance (i.e., efficiency metrics) of 15 percent below the regional average for residential and office projects, respectively. The Natural Resources Agency did not identify a threshold of significance in the CEQA Guidelines. The agency stated that Senate Bill 743 did not authorize them to do so.[26]

Consistent with the State CEQA Guidelines and technical advisory, the planning department uses efficiency metrics and the VMT threshold of significance of 15 percent below the daily regional average for residential and office projects, and retail projects for the reasons set forth below.

Refer to subsection D.2, Vehicle Miles Traveled (VMT) and Retail Uses, beginning on p. 4.30 below, for detailed explanation of the department's approach to analyzing retail projects. In summary, the department uses a consistent approach for analyzing different land uses, and the department's approach allows for the uncertainty in knowing the type of proposed retail during the CEQA review process.

*Efficiency Metrics*

Senate Bill 743 and the CEQA Guidelines identify VMT efficiency metrics as potential metrics to evaluate transportation impacts. Consistent with the guidelines, the department uses efficiency metrics in VMT analyses, instead of total VMT, for the following reasons.

First, the Office of Planning and Research writes that the "State has clear quantitative targets for greenhouse gas emissions reductions set forth in law and based on scientific consensus, and the depth of VMT reduction needed to achieve those targets has been quantified."[27] However, those targets do not translate directly into absolute VMT thresholds of significance for individual projects because new land use projects will not be the sole source of VMT. Among other factors, interactions

[25] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action*, Amendments to the State CEQA Guidelines, OAL Notice File No. Z-2018-0116-12, November 2018, pp. 3-4 and 74-75, http://resources.ca.gov/ceqa/docs/2018_CEQA_Final_Statement_of%20Reasons_111218.pdf, accessed July 17, 2019.

[26] Ibid, p. 15.

[27] For a listing of those quantitative targets for greenhouse gas emissions reductions, refer to pp. 8 and 9 in the Office of Planning and Research, "Technical Advisory on Evaluating Transportation Impacts in CEQA," December 2018. The 3333 California Street Mixed-Use Project EIR, under Section 4.C, Transportation and Circulation; and in the initial study, in Section E.7, Greenhouse Gas Emissions, also discuss some of these targets.

between existing and new land use projects, and between land use and transportation projects, affect and are sources of VMT.[28]

VMT efficiency metric thresholds are reasonably feasible for land use projects. Efficiency metrics disclose the environmental consequences of approving development in a location by comparing the development transportation efficiency to other locations. For example, locating jobs and housing in an area with low average VMT (e.g., infill site) typically allows new employees, visitors, and residents there to travel by public transit, walking, or bicycling for many trips. Additional development in these areas is less impactful on the transportation network and leads to less greenhouse gas emissions, both in absolute and per capita terms, than locating those jobs and housing in an area with high average VMT (e.g., greenfield site) where typically new employees, visitors, and residents there must drive, often long distances, for all trips.

If governments approve land use projects in higher VMT areas without including project components that reduce VMT substantially (e.g., sustainable travel options) or in lower VMT areas with project components that increase VMT substantially (e.g., high vehicular parking, refer to subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking, below, beginning on RTC p. 4.39), the state, region, and city will likely not meet its greenhouse gas emissions targets.[29] Therefore, meeting greenhouse gas reduction targets will require reductions in existing VMT per capita or per employee through actions such as governmental support of development in low VMT areas.

Second, CEQA is not intended as a population control measure, as supported by recent California case law. Discussing land use projects that are designed to accommodate long-term population and economic growth and the fact that the reduction targets assumed such growth, the California Supreme Court noted that: "a certain amount of greenhouse gas emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is

[28] California Governor's Office of Planning and Research, Technical Advisory – "On Evaluating Transportation Impacts in CEQA" (pp. 9 and 10), December 2018, http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf, accessed July 17, 2019.

[29] California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017, states on page 101: "Through developing the Scoping Plan, CARB staff is more convinced than ever that, in addition to achieving GHG [greenhouse gas] reductions from cleaner fuels and vehicles, California must also reduce VMT…It is recommended that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities. It is important that VMT reducing strategies are implemented early because more time is necessary to achieve the full climate, health, social, equity, and economic benefits from these strategies." https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed August 10, 2019.

superior to a simple numerical threshold because CEQA is not intended as a population control measure."[30]

*Thresholds of Significance*

CEQA section 21099(b)(1) required that the Office of Planning and Research develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that "promote the reduction of greenhouse gas emissions", among others. Section 15064.3, adopted in December 2018, does not specify "an applicable threshold of significance." The Office of Planning and Research December 2018 technical advisory recommends thresholds of significance for residential and office projects of 15 percent below the regional average VMT per capita and per employee, respectively.

The department used the VMT threshold of significance of 15 percent below the regional average for the land uses in the EIR. The department does not use a citywide average threshold of significance because it is not appropriate for San Francisco's urban context and the department follows state guidance and Planning Commission direction to use a regional average. The Office of Planning and Research December 2018 technical advisory recommends the use of a city threshold in only one instance, as an option: for residential projects, the office recommends the use of 15 percent below regional *or* city VMT per capita.

The Office of Planning and Research January 2016 technical advisory explains the reasons for including city average as an option for residential projects. They include this because "some variation in thresholds may be appropriate in different parts of the region and the state" and the "threshold recommendations provide that outside of central urban locations, reference to a city's average, or within unincorporated county areas, the average of the cities in the county, may be appropriate."[31]

To state another way, use of a "city average" as a threshold of significance streamlines development in locations that are near existing or proposed transit (e.g., a suburban BART station) for non-urban locations, but those locations may exceed the regional average threshold under existing conditions. If a substantial amount of residential development were to occur in these non-urban locations, the region would not achieve its VMT reduction goals. Therefore, the Office of Planning and Research recommends a cap on the amount of residential development in those locations that use the city threshold. The office's December 2018 technical advisory states that "development referencing a

[30] *Center for Biological Diversity v. California Department of Fish & Wildlife* (Newhall Ranch), 62 Cal.4th 204, http://ascentenvironmental.com/files/8014/5030/2694/Center_for_Biological_Diversity_v._CDFW_11-30-15_Newhall_Ranch_GHG_BAU.pdf, accessed July 17, 2019.

[31] Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013)*, January 20, 2016, p. I.3.

threshold based on city VMT per capita…should not cumulatively exceed the number of units specified in the SCS [sustainable communities strategy] for that city." Due to the urban nature of San Francisco, the department determined that use of a city average threshold of significance for residential projects was not appropriate.

The "15 percent below the regional average" threshold is both generally achievable (e.g., through project site location or characteristics) and is supported by evidence that connects this level of reduction to California's and the region's greenhouse gas emission reduction goals, as demonstrated in the technical advisory and summarized below.

State

The Office of Planning and Research's recommended 15 percent below regional average threshold supports California's greenhouse gas reduction goals. In January 2019, the California Air Resources Board prepared "2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals."[32] This document identifies what level of statewide VMT reduction would promote achievement of statewide greenhouse gas emissions reduction targets and would be consistent with California's 2017 Climate Change Scoping Plan.[33] The purpose section of the document states that the "analysis in this document may serve multiple uses, including providing non-binding technical information that acts as an optional aide to local governments and lead agencies when evaluating an individual project's transportation-related GHG [greenhouse gas] impacts to determine whether they are consistent with statewide 2030 and 2050 GHG emissions reduction goals."

The document identifies a "rate of per capita VMT reduction [that] is scalable to a fair share reduction at the project level."[34] The document finds that:

> Certain land use development projects located in areas that would produce rates of total VMT per capita that are approximately 14.3 percent lower than existing conditions, or rates of light-duty VMT per capita that are approximately 16.8 percent lower than existing conditions (either lower than the regional average or other appropriate planning context) could be, by virtue of their location and land use context, interpreted to be consistent with

[32] California Air Resources Board, 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goal, January 2019, https://ww2.arb.ca.gov/sites/default/files/2019-01/2017_sp_vmt_reductions_jan19.pdf, accessed July 17, 2019.

[33] California Air Resources Board, California's 2017 Climate Change Scoping Plan. November 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed July 17, 2019.

[34] Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013)*, January 20, 2016, p. 8.

the transportation assumptions embedded in the 2017 Scoping Plan and with 2050 State climate goals.[35,36]

Region

The Office of Planning and Research's recommended 15 percent below regional average threshold is also supportive of the region's greenhouse gas reduction goals as stated in California Senate Bill 375. The senate adopted that bill in 2008 and it requires all metropolitan regions in California to complete a Sustainable Communities Strategy as part of a Regional Transportation Plan. State law requires this strategy to integrate transportation investments and forecast development patterns to meet per capita greenhouse gas reduction targets below 2005 levels for cars and light trucks set by the California Air Resources Board. Since 2008, the Bay Area region has adopted two strategies, one in 2013 and one in 2017. The 2035 target set by the air resource board that is applicable to the first two Bay area regional strategies is 15 percent. The air resources board determined that the strategies would, if implemented, achieve the targets established by the board.[37]

As stated under the "Efficiency Metrics" subsection above, governments should support land use projects in low VMT areas to help the state, region, and city to meet its greenhouse gas emissions targets. To meet its regional greenhouse gas reduction targets, the first Bay Area regional strategy

[35] Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, Implementing Senate Bill 743 (Steinberg, 2013)*, January 20, 2016, p. 11.

[36] California Air Resources Board, Vision Scenario Planning Downloads: 2016 Vision 2.1 Limited Release, https://www.arb.ca.gov/planning/vision/downloads.htm#2016vision21lr, accessed July 17, 2019. California Department of Finance website, Total Estimated and Projected Population for California and Counties: July 1, 2010 to July 1, 2060 in 1-year Increments, http://www.dof.ca.gov/Forecasting/Demographics/Projections/documents/P1_County_1yr_interim.xlsx, accessed July 17, 2019. Note: the air resources board document lists existing conditions as 2015-2018 statewide average daily VMT. The EIR presents existing daily VMT using SF-CHAMP, which is based on several sources, including California Household Travel Survey 2010-2012. The air resources board document identifies per capita reductions based on a 2050 cleaner and technologies fuel scenario statewide average total and light-duty daily VMT of 1.035 billion and 908 million, respectively. If the air the resources board were to have used 2010-2012 statewide total and light-duty average daily VMT (926 and 833 million, respectively), instead of 2015-2018 (972 and 878 million, respectively), and assuming the same population projections in 2050 (49 million), then the rates of total VMT per capita would be 14.2 percent lower than existing conditions, or rates of light-duty VMT per capita that are approximately 16.3 percent lower than existing conditions.

[37] CARB, Executive Order G-14-028, April 2014, https://www.arb.ca.gov/cc/sb375/mtc_exec_order.pdf, accessed July 17, 2019 and CARB, Executive Order G-18-047, CARB Acceptance of GHG Quantification Determination, June 2018, https://www.arb.ca.gov/cc/sb375/mtc_eo_g_18_047.pdf, accessed July 17, 2019.

estimates 102,000 new households in San Francisco between 2010 and 2040.[38] The second Bay Area regional strategy estimates 95,000 new households in San Francisco between the years 2015 and 2040.[39] The city's VMT cumulative growth projections are consistent with these regional strategy growth projections and account for nearby cumulative projects. No other known reasonably foreseeable projects would exceed these sustainable community strategy projections.

As of quarter 4, 2018, the planning department estimates that approximately 71,000 net new units are entitled or under review.[40] Approximately 29,000 of these units are part of long-term housing plans and developments (such as redevelopment of Candlestick Point, Treasure Island, and Park Merced) and will take decades to complete. Therefore, every new housing development in low VMT San Francisco, like the proposed project, will help the city and region achieve its households' estimates and its regional greenhouse gas reduction targets.

In February 2019, two regional agencies, the Metropolitan Transportation Commission and Association of Bay Area Governments, prepared "Regional Growth Strategies: Perspective Paper."[41] This paper is the third in a series of papers which "aims to explore strategies that will help to achieve regional goals and to start the discussion about a potential suite of strategies to consider in Plan Bay Area 2050." Plan Bay Area 2050, when adopted in 2021, will serve as the region's third Sustainable Communities Strategy.

In the paper, the regional agencies wrote that Plan Bay Area 2050 will need to "Reduce per capita transportation-related greenhouse gas emissions by at least 19 percent" between the years 2005 and 2035. This reduction is the new target set by the California Air Resources Board for the Bay Area region, as of October 1, 2018. The regional agencies wrote that "VMT reduction [is] the primary available strategy" to achieve the 19 percent reduction. It will require "focusing the growth of new homes and jobs in places that are already below the regional target (low VMT areas)." The regional agencies also wrote that the "Bay Area could accelerate its progress toward meeting GHG reduction and housing production targets by focusing a larger share of housing and jobs are built in low VMT

[38] Metropolitan Transportation Commission and Association of Bay Area Governments. Plan Bay Area. Where We Live, Where We Work (table 15), https://www.planbayarea.org/sites/default/files/pdfs_referenced/3-where_we_live_where_we_work.pdf, accessed July 17, 2019.

[39] Metropolitan Transportation Commission and Association of Bay Area Governments, Plan Bay Area 2040, Draft EIR, April 2017, Table 1.2-10, http://2040.planbayarea.org/cdn/farfuture/JHbwWZgw24OSpVBL0b8cJ5_2KHOdckVexpxYp5McOkI/1499352691/sites/default/files/2017-07/PBA%202040%20DEIR_0_1.pdf, accessed July 17, 2019.

[40] San Francisco Planning Department. Pipeline Report, https://sfplanning.org/project/pipeline-report, accessed July 17, 2019.

[41] Metropolitan Transportation Commission and Association of Bay Area Governments, Regional Growth Strategies – Perspective Paper, February 2019, https://mtc.ca.gov/sites/default/files/Horz_Perspective3_022719.pdf, accessed July 17, 2019.

areas." Figure 11 within the paper shows the project site within a "low" VMT area defined as "resident per capita VMT at least 20% below regional average."

The California Air Resources Board acknowledged that the 2018 regional targets will not meet the full VMT reductions assumed in the 2017 Scoping Plan Update. The board considered a "substantially more stringent targets alternative" that would meet those full VMT reductions. The alternative "would mean increasing [board] staff's proposed targets by two to three percentage points for the largest four MPOs [Metropolitan Planning Organizations] in the State…"[42] The four largest MPOs, which includes the Bay Area, represented 82 percent of the state's 2015 population.[43] The board rejected this alternative, but it would have increased the Bay Area region's targets to 21 or 22 percent between the years 2005 and 2035.[44]

*EIR VMT Analysis*

The EIR compares the VMT efficiency of the project site, under existing and cumulative conditions, to the region. Refer to EIR pp. 4.C.6-4.C.8, 4.C.48-4.C.51, 4.C.74-4.C.80, and 4.C.102 and 4.C.103 for this comparison.

The EIR analysis relies on a VMT estimate at a transportation analysis zone level for this comparison. EIR p. 4.C.6 states that transportation analysis zones "are subdivisions of census tracts. There are 981 [transportation analysis zones] TAZs within San Francisco that vary in size from single city blocks in the downtown core, to multiple blocks in outer neighborhoods, to even larger geographic areas in historically industrial areas like the Hunters point Shipyard."

The EIR relies on the San Francisco Chained Activity Model Process (SF-CHAMP) to provide transportation analysis zone level estimates of VMT throughout the region. The EIR explains that the department uses maps to illustrate those zones that are at least 15 percent below the regional average or the threshold of significance. These maps exhibit areas below threshold of significance VMT to screen out projects that may not require a detailed VMT analysis. This methodology is consistent with the Office of Planning and Research January 2016 and December 2018 Technical Advisories and planning commission Resolution 19579.

[42] California Air Resources Board. Final Environmental Analysis, Prepared for the Proposed Update to the SB 375 GHG Emissions Reduction Targets, March 9, 2018, Appendix F, https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_ea.pdf, accessed July 17, 2019.

[43] California Air Resources Board, Final Environmental Analysis, Prepared for the Proposed Update to the SB 375 GHG Emissions Reduction Targets, March 9, 2018, Appendix E, https://www.arb.ca.gov/cc/sb375/appendix_e_feb2018.pdf?_ga=2.181886119.1630335037.1555684671-223600865.1491835512, accessed July 17, 2019.

[44] Note: it is not reasonably feasible to provide a direct comparison between the state's regional targets for the Bay Area and the VMT estimates in the EIR. The state targets are between the years 2005 and 2035 and based on complex modeling conducted by the regions. The EIR compares VMT within the project site transportation analysis zone to the region for the year 2010-2012 and the year 2040 and uses different modeling software than the regions.

The EIR explains that locating development within the project site's transportation analysis zone, 709, would have reduced VMT and reduced associated environmental effects in comparison to other areas of the region. By locating housing in a low VMT area, the project would help the region meet its greenhouse gas reduction targets in Plan Bay Area 2040 and those that would apply in Plan Bay Area 2050.

The VMT efficiency metric levels for the project's land uses are more than twice below the more stringent targets alternative considered by the California Air Resources Board and do not account for implementation of the project's transportation demand management measures, which would further decrease project VMT. As shown in EIR Table 4.C.10, the existing average daily VMT for the transportation analysis zone in which the project site is located is at least 44 percent below the regional average for each project land use. As shown in EIR Table 4.C.23, the future year 2040 daily VMT for the transportation analysis zone in which the project is located is at least 47 percent that future year regional average for each project land use.

The use of VMT estimates at the transportation analysis zone level is appropriate and reliable for the project. The project is an infill development. The project site encompasses most of the transportation analysis zone 709. While the density and type of land use varies somewhat in the greater neighborhood, the overall development pattern of the project site is like that of the greater neighborhood. People at the project site, in the transportation analysis zone, and in the neighborhood, independent of income, generally have access to public transit, streets, services, and other factors that influence VMT similar to that available to those in the neighborhood. This contrasts with development located within much larger transportation analysis zones and/or in undeveloped areas. In these non-infill locations, the established development patterns may vary substantially or they are not established. Thus, in these non-infill locations, the VMT estimates at the transportation analysis zone level may be less reliable or require more detailed analysis to confirm their reliability.

Further, the project site is within one-half mile of an existing major transit stop and high quality transit corridor. CEQA Guidelines section 15064.3(b)(1) states that land use projects within these locations should "Generally … be presumed to cause a less than significant transportation impact." EIR page 4.C.50 explains this screening criterion.

In summary, the EIR is consistent with state and local requirements and guidelines about VMT analysis and is supported by substantial evidence.

### *D.2 Vehicle Miles Traveled (VMT) and Retail Uses*

This section addresses comments about the VMT analysis in the EIR relating to retail uses. Comments state the EIR is inadequate because it fails to state the total VMT of the project's retail

uses as recommended by the Office of Planning and Research. Other comments state that the EIR's analysis of VMT from retail uses only accounts for employees, not customers.

The department's approach to analyzing VMT for retail uses is permissible under the CEQA Guidelines, and the department does not strictly follow the Office of Planning and Research's technical advisory recommendation for retail uses. Instead, the department uses a consistent approach for analyzing different land uses. As described in subsection D.1, CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), beginning on RTC p. 4.19, VMT efficiency metric thresholds of significance are reasonably feasible for land use projects and are supported by substantial evidence. Further, the department's approach allows for the uncertainty in knowing the type of proposed retail during the CEQA review process. The EIR analysis of VMT from retail uses includes retail customer VMT.

The Office of Planning and Research recommended a net increase in total VMT as a threshold of significance in their December 2018 technical advisory. The advisory states:

> Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e., the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts.
>
> By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, may tend to have a significant impact. Where such development decreases VMT, lead agencies should consider the impact to be less-than-significant.
>
> Many cities and counties define local-serving and regional-serving retail in their zoning codes. Lead agencies may refer to those local definitions when available, but should also consider any project-specific information, such as market studies or economic impacts analyses that might bear on customers' travel behavior. Because lead agencies will best understand their own communities and the likely travel behaviors of future project users, they are likely in the best position to decide when a project will likely be local-serving. Generally, however, retail development including stores larger than 50,000 square feet might be considered regional-serving, and so lead agencies should undertake an analysis to determine whether the project might increase or decrease VMT.[45] (pages 16 and 17)

As described in subsection D.1, CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), beginning on RTC p. 4.19, CEQA Guidelines section 15064.3(b)(4) states that a "lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute

[45] California Governor's Office of Planning and Research, Technical Advisory – "On Evaluating Transportation Impacts in CEQA", December 2018, pp. 16 and 17, http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf, accessed July 17, 2019.

terms, per capita, per household or in any other measure." VMT efficiency metrics disclose the environmental consequences of approving development in a location by comparing its transportation efficiency to other locations. Using the efficiency metric for retail uses is consistent with the residential and office land uses and CEQA.

The department does not use the technical advisory recommendation for retail uses because the San Francisco Planning Code does not specifically differentiate between "local-serving" and "regional-serving retail." As defined in planning code section 102, "neighborhood-serving business" "cannot be defined by the type of use, but rather by the characteristics of its customers, types of merchandise or service, its size, trade area, and the number of similar establishments in other neighborhoods. The primary clientele of a 'neighborhood-serving business,' by definition, is comprised of customers who live and/or work nearby." Although this definition meets the intent of the "local-serving" retail noted in the technical advisory, the planning code does not include definitions about regional-serving retail.

In addition, when discussing retail uses for projects generally, including this project specifically, the project sponsor typically does not know the future retail tenant at the time environmental review begins. Therefore, the department cannot use any market studies or economic impact analyses to aid in its analysis of VMT.

However, if the department were to use the general guidance from the technical advisory of "retail development including stores larger than 50,000 square feet might be considered regional-serving," no such stores are possible under the proposed project. The proposed project includes a total of approximately 54,117 square feet of retail spread across four different new buildings. The largest of these spaces is included in the proposed Walnut Building and would be 24,324 square feet, or approximately 49 percent of the technical advisory general guidance for regional-serving retail stores. Since publication of the draft EIR the project sponsor has revised the proposed project and project variant to reduce the amount of retail space. As described in RTC Section 2, Revisions and Clarifications to the Project Description, on RTC pp. 2.2-2.7, the revised project would include 40,261 gross square feet of retail uses in three buildings, rather than 54,117 gross square feet of retail uses in four buildings. The revised variant would include 34,496 gross square feet of retail space in three buildings, rather than 48,593 gross square feet in four buildings. The retail space proposed for the Euclid Building was eliminated in both the revised project and revised variant. Thus, none of the retail spaces would be larger than 50,000 square feet in the revised project or revised variant, as for the proposed project and project variant. The revisions would not change the analysis or conclusions in the EIR.

As described in the EIR, the department uses a methodology that estimates VMT efficiency metrics for retail uses throughout transportation analysis zones in the region and accounts for visitors.[46] This methodology consists of trip-based analysis using San Francisco Chained Activity Model Process (SF-CHAMP). EIR Table 4.C.3 uses "Visitors (Retail)" in displaying VMT for retail uses. EIR pp. 4.C.7 and 4.C.8 describe the retail methodology and explains in footnote 8 that the retail efficiency metric accounts for VMT by visitors but uses the "denominator of employment (including retail…) [because it] represents the size, or attraction, of the [transportation analysis] zone." In other words, the retail efficiency metric uses "per employee" to estimate the size (e.g., square footage) or opportunity for retail travel of a transportation analysis zone. If all other factors (e.g., location) were held constant, the model would estimate more retail customer travel and VMT with a zone containing 100 retail employees than a zone with 50 retail employees.

### *D.3 Vehicle Miles Traveled (VMT) Calculation*

This response addresses comments about the EIR failing to provide the methodology used for its VMT analysis. This response also addresses comments questioning the VMT analysis validity given the recent increase in transportation network companies and delivery services.

The methodology used to achieve the VMT efficiency metric data is provided on EIR pp. 4.C.6-4.C.7. The methodology used available information regarding travel behavior, and the VMT analysis is valid.

*General Methodology*

As described in subsection D.1, CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), beginning on RTC p. 4.19 under "Efficiency Metrics" on RTC p. 4.23, VMT efficiency metric thresholds of significance are reasonably feasible for land use projects and are supported by substantial evidence. Therefore, the department uses a VMT efficiency metric to determine significance. The following repeats or provides additional explanation of the methodology explained in the EIR for informational purposes.

Following the guidance of the Office of Planning and Research, the San Francisco County Transportation Authority calculated VMT for each transportation analysis zone[47] in the 9-county San Francisco Bay Area for residential, office, and retail land uses. These VMT estimates were

[46] For further discussion beyond that included in the EIR, refer to subsections D.1, CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), beginning on RTC p. 4.19 and D.3, Vehicle Miles Traveled (VMT) Calculation beginning on RTC p. 4.33, and San Francisco Planning Department, "Executive Summary: Resolution Modifying Transportation Impact Analysis," Attachment F, Appendix A (February 25, 2016), pp. 3 of 5 and 4 of 5, March 3, 2016.

[47] Transportation analysis zones are representations of geography within a travel demand model. They have land use attributes including population and jobs by sector. Within the travel demand model framework, these zones generate activity, and are the origins and destinations of trips.

calculated using model outputs from the San Francisco Chained Activity Model Process (SF-CHAMP) travel demand model.[48] Residential and office VMT estimates are "tour-based", meaning that they account for the whole sequence of daily travel, rather than simply the trips departing from or arriving at the zone.

The SF-CHAMP model is an activity-based model that uses a synthetic population (which represents the population of the San Francisco Bay Area) to generate travel patterns for a typical weekday. This allows analysis of the entire day's worth of travel for each synthetic person. Retail VMT estimates are "trip-based," meaning they represent only trips to or from the zone. Unlike residential and office, which relate travel to a long-term anchor location (home and work), retail destinations may change daily and are typically chosen for their accessibility from home and work.

**Residential VMT per capita** – the transportation authority calculated residential VMT per capita for each transportation analysis zone by summing the VMT from all automobile trips taken by residents of the zone, accounting for carpooling, and dividing by the total population of the zone.

**Office VMT per job** – the transportation authority calculated office VMT per job for each transportation analysis zone by summing the VMT from all automobile trips taken by workers that were part of a work-related tour[49] with a work location in that zone, accounting for carpooling, and dividing by the total number of jobs in the zone.

**Retail VMT rates** – the transportation authority calculated retail VMT rates for each transportation analysis zone by summing:

- 100 percent of VMT from all automobile trips to or from the zone where neither trip end is at home, work, or school.
- 50 percent of VMT from all automobile trips to or from the zone where one trip end is home, work, or school, and the other is not.
- 0 percent of VMT from all automobile trips to or from the zone where both trip ends are home, work, or school.

The total retail VMT, accounting for carpooling, was then divided by a retail size term representing the relative attractiveness of that zone as a retail destination.[50]

The EIR analysis relies on VMT estimates for the transportation analysis zone the project site is in (709) and not nearby zones. The VMT estimates at the transportation analysis zones within 0.75 mile of the project site are similar due to the importance of location in influencing VMT. For

[48] San Francisco County Transportation Authority. Tools and Data, https://www.sfcta.org/modeling-and-travel-forecasting#doc, accessed July 17, 2019.

[49] A work-related tour includes tours with a primary destination at the work place, or work-based subtours which start and end at the work place.

[50] Refer to footnote 8 on Draft EIR page 4.C.8 and subsection D.2, Vehicle Miles Traveled (VMT) and Retail Uses, beginning on RTC p. 4.30 for information about the use of retail travel in SF-CHAMP.

example, existing average daily VMT per capita for residential uses is 7.3 for the project site's zone and it ranges between 5.7 and 7.9 for zones within 0.75 mile of the project site. Existing VMT per employee is 8.3 and 10.1 for retail and office uses, respectively, for the project site (zone 709) and ranges from 5.9 to 8.6 and 9.3 to 10.4 for other nearby zones, respectively. Cumulative VMT per capita for residential use is 6.6 for the project site (zone 709) and ranges from 5.2 to 7.5 for other nearby zones. Cumulative VMT per employee is 7.8 and 8.9 for retail and office uses, respectively, for the project site (zone 709) and ranges from 5.8 to 8.1 and 7.9 to 9.7 for other nearby zones, respectively.

*Transportation Network Companies and Delivery Services*

Comments state the EIR VMT analysis is invalid because it relies on data prior to the recent increase in transportation network companies and delivery services. The comments cite various studies for support of this assertion.

The increased prevalence of for-hire vehicles, like transportation network companies, and delivery services in San Francisco has changed the way people travel and interact with goods. However, the VMT estimates for the project site are well below the VMT threshold of significance and any VMT increase from the increased prevalence of for-hire vehicles and delivery services would be unlikely to change the EIR VMT analysis conclusions. No recent studies allow for the department to make VMT estimates at the project level and, based on inference of available data, recent studies do not indicate a magnitude of an increase in VMT that would change the conclusions. The following substantiates how the draft EIR VMT analysis is consistent with CEQA and supported by substantial evidence based on available information.

*CEQA Guidelines*

CEQA Guidelines section 15064.3 defines VMT as the "amount and distance of automobile travel attributable to a project." In its December 2018 technical advisory, the Office of Planning and Research advises that "automobile" refers to "on-road passenger vehicles, specifically cars and light trucks. … For an apples-to-apples comparison, vehicle types considered should be consistent across project assessment, significance thresholds, and mitigation."[51] The "apples" refers to the vehicles to include in the VMT analysis.

*Automobile Travel*

The EIR analysis is consistent with the guidance that VMT refers to automobile travel and specifically on-road passenger vehicles. As described under "General Methodology," above, and

[51] Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, pp. 4-5, http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf, accessed July 18, 2019.

on EIR page 4.C.7, the VMT analysis used SF-CHAMP to "estimate VMT by private automobiles and taxis for different land use types within individual [transportation analysis zones] TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012." Taxis, like transportation network companies, are a type of for-hire vehicle included in that observed behavior.

Since 2012, the prevalence of for-hire vehicles has increased in San Francisco, mostly due to growth in the number of transportation network company vehicles. SF-CHAMP estimates the probability of a person driving based on auto ownership, household income, and other variables. To the extent that people would have traveled in another personal or for-hire vehicle (i.e., taxi), but not traveled using a transportation network company, this would be accounted for in previous household travel surveys and thus would be accounted for in VMT estimates from SF-CHAMP. As explained further below, transportation network companies transport persons but their VMT effect attributable to a project is not available.

The Office of Planning and Research spent over five years to determine the appropriate metric to evaluate transportation impacts, VMT, and to define what VMT to consider. Their December 2018 Technical Advisory excluded delivery vehicles from that definition and included passenger vehicles. One reason for the delivery vehicle exclusion from the Office of Planning and Research's VMT definition could be the lack of available data of such vehicles throughout the city, region, and state to allow for an "apples-to-apples" VMT comparison or attribute the VMT from those vehicles to a project. For example, the San Francisco County Transportation Authority's *TNCs & Congestion*, October 2018, states "there is no source for comprehensive citywide information on how freight and commercial delivery and loading volumes … have changed between 2010 and 2016." The California Vehicle Code, Division 1, section 465 defines a "passenger vehicle" as "any motor vehicle, other than a motortruck, truck tractor, or a bus, as defined in Section 233, and used or maintained for the transportation of persons." The passenger vehicle definition does not include delivery services, as those are not used for the transportation of persons. Therefore, the EIR VMT analysis appropriately does not include those delivery services in the analysis.

The draft EIR analyzes the localized impacts (i.e., potentially hazardous conditions, loading) of delivery vehicles. Refer to responses in Section 5.E Transportation and Circulation, Response TR-8, Pedestrian/Bicycle Hazards (starting on RTC p. 5.E.74), and Response TR-10, Loading (starting on RTC p. 5.E.91) for more details.

*Attributable to a Project and "Apples-to-Apples" Comparison*

The VMT effect of transportation network companies on a San Francisco and Bay Area regional household level is not available. Recent studies on transportation network companies do not provide such data. Therefore, the department cannot attribute transportation network company VMT to a particular project (e.g., a specific land use or location) or make an "apples-to-apples"

comparison of using transportation network companies vehicle types in a CEQA VMT analysis. This section responds to comments concerning recent studies and their relationship with CEQA VMT analysis.

*Planning Department Transportation Impact Analysis Guidelines*

In February 2019, the Planning Department completed its first comprehensive update to its Transportation Impact Analysis Guidelines since 2002. The guidelines are used for CEQA analysis and include an update to the department's travel demand data. As described in the Summary of Changes memorandum, summarizing the changes to the planning department's 2002 guidelines reflected in the updated 2019 guidelines, the department concluded based on recent observed data at existing San Francisco developments that "the data the department used to previously estimate trips generally *overestimated* the number of vehicle trips to and from a site, even accounting for the increase of for-hire vehicles."[52] The department observed more walking trips than previously estimated by the department. The observations indicated that the percentage of for-hire vehicles is only between 1 and 6 percent of the total person trips during the extended p.m. peak period (3 p.m. to 7 p.m.) trips for office, retail, and residential land uses, except it was 11 percent for office land uses in one San Francisco geography.

Refer to subsection B.3, Trip Generation Estimates, under "Trip Generation Comparison – 2002 SF Guidelines and 2019 TIA Guidelines Update," beginning on RTC p. 4.4, for more discussion of the guidelines travel demand update and a trip data comparison between the draft EIR and the guidelines update.

*San Francisco Transportation Network Company (TNC) Studies*

The Planning Department is working with the transportation authority and SFMTA on studies that address analytic and policy questions regarding transportation network company activity in San Francisco. To date, the agencies have released four studies, two of which relate to VMT. The two studies, summarized below, do not provide data on transportation network companies' effects on household level VMT.

- "TNCs Today" (San Francisco County Transportation Authority, June 2017) – provides information on transportation network company activity in San Francisco based on estimated local transportation network usage (trips made entirely within San Francisco) from mid-November to mid-December 2016. The study reports VMT associated with transportation network companies, but not does provide household-level travel behavior data. Further, this data is limited to trips made in San Francisco which does not provide an "apples-to-apples" comparison to transportation network company activity in the region,

[52] San Francisco Planning Department. Summary of Changes Memorandum, February 14, 2019, p. 3, http://default.sfplanning.org/publications_reports/TIA_Guidelines_Summary_of_Changes_Memo.pdf, accessed July 17. 2019.

which the threshold of significance is based on. This 2016 activity data was used in the second study described below.

- "TNCs & Congestion" (San Francisco County Transportation Authority, October 2018) – identifies the extent to which transportation network companies contributed to increased roadway congestion in San Francisco between 2010 and 2016, relative to other potential contributing factors. The study reports congestion metrics, including VMT. As described in subsection D.1, CEQA Section 21099(B)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), on RTC p. 4.19, the state legislature has decided that automobile delay, as described by measures of traffic congestion, is not considered a significant impact on the environment under CEQA. The study notes that total VMT in San Francisco would have increased between 2010 and 2016 with or without TNCs, but transportation network companies accounted for 47 percent of the *increase* in VMT on study roadways in that period. "TNCs & Congestion," like "TNCs Today," does not provide household-travel behavior data or external San Francisco trips that would allow for an "apples-to-apples" comparison to transportation network company activity in the region, which the threshold of significance is based on.

*Other Studies*

Researchers have published numerous other studies on the effects of transportation network companies in the last few years. Some studies acknowledge that transportation network companies increase VMT due to items like induced vehicle trips, driving without any passengers, and people switching some trips from non-vehicular or transit travel to transportation network company trips. As described in subsection D.1, CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), beginning on RTC p. 4.19, total VMT is not the metric used to evaluate VMT impacts. No known studies attribute VMT increases to land uses or locations or provide the opportunity for an "apples-to-apples" comparison in a CEQA VMT analysis.[53]

*Hypothetical "Apples-to-Apples" Comparison*

If studies existed that allowed for an "apples-to-apples" comparison in a CEQA VMT analysis, it is unlikely that the VMT estimates presented in the EIR would increase to a level that they would change the project's impact conclusions because while recent data on transportation network companies shows an increase in VMT as a result of transportation network companies, the increase is not of a magnitude that would result in a significant VMT impact. To illustrate this point, the following uses VMT and San Francisco population data reported in the "TNCs & Congestion" study to compare VMT per San Francisco population in 2010 and 2016. This data is presented for

[53] Fehr & Peers, "Estimated TNC Share of VMT in Six US Metropolitan Regions (Revision 1)," August 6, 2019, also does not allow for such comparison. The study identifies the percent of VMT attributable to the TNC companies within the bay area region and San Francisco County during September 2018. This study does not attribute VMT increases to land uses or refined locations (e.g., transportation analysis zones) or identify the percentage of people switching from non-vehicular or transit travel to TNC trips. This study also does not provide TNC data for independent verification of the study's findings or independent analysis to facilitate attribution of VMTs to particular land uses, locations, or mode choices.

informational purposes and does not represent household-travel behavior data and cannot be directly compared to the EIR VMT estimates.

In 2010, assuming a daily VMT on study roadways of 4.9 million miles and San Francisco population of 805,000, the daily VMT per San Francisco population was 6.1. In 2016, including transportation network companies, assuming a daily VMT on study roadways of 5.6 million miles and San Francisco population of 876,000, the daily VMT per San Francisco population was 6.4. Thus, even if *all* increases in VMT from 2010 to 2016 were attributable to transportation network companies (and not other factors such as employment growth and network changes), the increase in daily VMT per San Francisco population would have been only five percent or an absolute increase of 0.3 daily VMT.

Assuming a five percent increase in the VMT estimates presented in the EIR would not change the conclusions of the EIR because the transportation analysis zone for which the project is located VMT is substantially lower than both the regional average and the threshold of significance, 15 percent below the regional average. As shown in EIR Table 4.C.10, the existing average daily VMT for the transportation analysis zone in which the project site is located is at least 44 percent below the regional average for each project land use. As shown in EIR Table 4.C.23, the future year 2040 daily VMT for the transportation analysis zone in which the project is located is at least 47 percent below the future year regional average for each project land use.

The EIR analyzes the localized impacts (i.e., potentially hazardous conditions, transit delay, and passenger loading) of transportation network companies. Refer to responses in Section 5.E Transportation and Circulation Responses TR-8 Pedestrian/Bicycle Hazards (starting on RTC p. 5.E.74), TR-9 Transit Impacts (starting on p. 5.E.83), and TR-10 Loading (starting on p. 5.E.91) for more details.

### *D.4 Vehicle Miles Traveled (VMT) and Vehicular Parking*

This response addresses comments about the VMT analysis in the EIR related to vehicular parking. Comments state the EIR analysis concerning the project's significant VMT impact for retail uses due to the amount of parking proposed is not supported by substantial evidence, including the literature review and neighborhood parking rate methodology. Comments state that Mitigation Measure TR-2: Reduce Retail Parking Supply, which reduces that significant VMT impact to less-than-significant levels, is also not supported by substantial evidence. Instead, comments state, the EIR should have included a mitigation measure that reduced the retail square footage and provided for residential permit parking restrictions to avoid the significant VMT impact.

The EIR VMT analysis is supported by substantial evidence that "indicates an area with more parking influences higher demand for more automobile use" (EIR p. 4.C.75). The EIR relies on a robust literature review and methodology to substantiate its VMT impact conclusions, including its

significant VMT impact finding for the project's retail uses due to the amount of parking proposed. This response includes the following sections to further explain:

- Overview – summarizes the relationship between parking and VMT, including the EIR's overview of this relationship.
- Literature Review – restates the EIR literature review about parking and VMT, responds to comments on the EIR concerning the relevance of the cited studies to this project, and summarizes another study that documents the relationship between parking and VMT at urban retail sites.
- Neighborhood Parking Rate Analysis – summarizes and substantiates the use of the neighborhood parking rate analysis in the EIR and Mitigation Measure TR-2: Reduce Retail Parking Supply to reduce project impacts to less-than-significant levels.

*Overview*

Transportation systems consist of three main elements: vehicles, surface, and terminals. "Vehicles" refer to the various ways used to travel between destinations, such as a bicycles, transit vehicles, and private automobiles. "Surface" is that used by the vehicle in traveling between destinations, such as bicycle lanes, transit-only lanes, and mixed-flow traffic lanes. "Terminals" refer to the locations where vehicles are stored when arriving at a destination or when not in use, such as secured bicycle parking, transit vehicle storage yard, and automobile parking lots. Many transportation policies implemented by a government agency directly or indirectly affect each of these three main elements. For example, policies directly related to the surface to allocate or expand existing space dedicated for a way of travel (e.g., highway widening) can indirectly affect the vehicle type that can use that space (e.g., private automobile) and the potential need for terminals to accommodate the vehicle type (e.g., automobile parking spaces).[54]

Similarly, policies that restrict the amount of automobile or vehicular parking spaces (terminal) in an area will indirectly affect the capacity of vehicles that can access an area and thus the VMT associated with the area. Although numerous variables affect travel behavior, in general, people are less willing to drive as parking becomes less available. The literature cited on EIR pp. 4.C.75-4.C.76 substantiates this relationship between vehicular parking and VMT.[55] The relationship between willingness to drive and availability of parking is not inconsistent with the other factors that affect travel behavior mentioned in the EIR and captured in data for SF-CHAMP. This relationship is one among many relationships that affect travel behavior, but SF-CHAMP does not directly account for this relationship. A February 25, 2016 San Francisco County Transportation

[54] Paragraph adapted from the introduction of Weinberger, Rachel, "Death by a Thousand Curb-cuts: Evidence on the Effect of Minimum Parking Requirements on the Choice to Drive," *Transport Policy 20*, March 2012, pp. 93-102 (also footnote 73 on EIR page 4.C.75).

[55] While for-hire vehicles, including transportation network companies, have increased recently and they often do not require a terminal while in service, these trips represent a low percentage of overall person trips and vehicle trips (refer to subsection D.3, Vehicle Miles Traveled (VMT) Calculations, about transportation network companies) and thus the relationship still applies.

Authority memorandum provided in support of planning commission Resolution 19579, which adopted VMT criteria in San Francisco, states:

> SF-CHAMP accounts for a variety of land use and transportation network characteristics that influence travel behavior. The model represents density and diversity of land uses using total numbers of households (including the household size and socio-economic attributes) and numbers of jobs (by employment sector). These are important both in making work location choices, but also for anticipating where trips for other purposes will be made. The model also uses transportation networks to calculate the accessibility by mode between origins and destinations, accounting both for travel time and cost of travel. Street grid design, presence of bicycle facilities, pedestrian network attributes, and transit networks are accounted for.[56]

EIR p. 4.C.74 summarizes this information, but states "SF-CHAMP is not sensitive to site-level characteristics such as project-specific TDM [transportation demand management] measures or the amount of parking provided on a site, which itself is considered a TDM measure." SF-CHAMP includes several inputs that affect travel behavior at the geographic scale of a transportation analysis zone, but the model does not include the amount of parking at a site as an input. As stated though, parking supply for many land uses, including retail, has a relationship with VMT, as documented by literature cited on EIR pp. 4.C.75-4.C.76 and described further under "Literature Review."

*Literature Review*

The EIR demonstrates the relationship between parking and VMT using a literature review. The studies from that review are cited in the EIR and included in the planning department's files. This section restates the EIR literature review, responds to comments concerning the studies cited in the EIR purported inapplicability to this project with a focus on retail uses, and summarizes another study that documents the relationship between parking and VMT.

*TDM Technical Justification, Appendix A*

The TDM Technical Justification document, cited on EIR p. 4.C.75, provides the technical basis for applicability, targets, and assignment of points to individual measures on the TDM menu used for the San Francisco TDM Program. Appendix A to the document defines four land use categories used in the TDM program (Planning Code section 169) based on the trips associated with the land use and parking spaces for each category. Appendix A states:

> Land uses in Category A most closely reflect retail use. Sample land uses include formula retail, museums, entertainment venues, and grocery stores. Many Category A trips are associated with visitors and customers. These trips tend to be shorter in nature, and each parking space accommodates significantly more driving than parking spaces in other groups [land uses] (see Attachment 1).

[56] San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Attachment F, Appendix A (February 25, 2016), p. 2 of 5, March 3, 2016.

Attachment 1 shows that there are 10 to 20 times more auto trips per retail parking space than per residential parking space. This data demonstrates the relationship between parking spaces for land uses, although not necessarily the relationship between parking spaces and VMT. Other studies do show that relationship.

*CAPCOA, PDT-1*

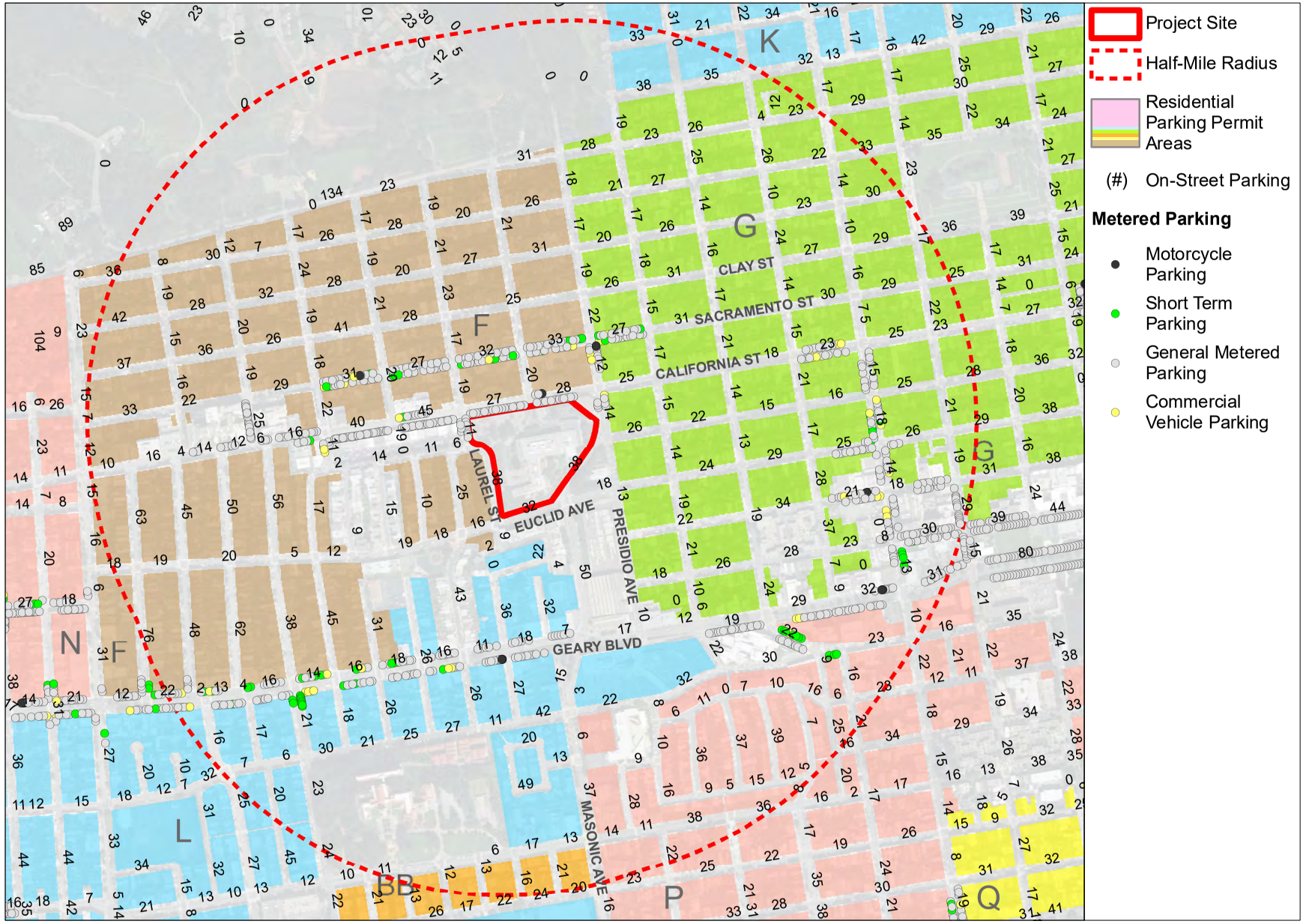
The California Air Pollution Control Officers Association (CAPCOA) report, as cited on EIR p. 4.C.75, quantifies project-level land use, transportation, energy use, and other measures of effects on greenhouse gas emissions based on studies. The CAPCOA report "identifies a maximum 12.5 percent reduction in VMT related to parking supply (PDT-1)." The measure definition includes elimination or reduction of minimum parking requirements, the creation of maximum parking requirements, or the provision of shared parking. The report states that the measure and associated maximum reduction is applicable in urban and suburban contexts; for residential, retail, office, industrial and mixed-use projects; and if spillover parking is controlled via residential permits and on-street market rate parking.

The project site is in an urban context; the project consists of a mix of uses; and the project vicinity is controlled via residential parking permits and on-street metered (demand responsive market rate) parking. Most streets within 0.5 mile of the project site are either permit parking or metered (see Figure RTC-4.1: Neighborhood Parking, Residential Parking Permit Areas, On-Street Parking, and Parking Meters). Most streets to the west, north, east, and south of the project site are SFMTA Residential Parking Permit parking areas F, G, and BB, respectively. Portions of California and Sacramento streets and north-south intersecting streets, near the project site, contain on-street metered parking.

Refer to neighborhood parking rate analysis below in relation to the Residential Parking Permit mitigation suggested in a comment.

*Fehr & Peers, Parking and Analysis and Methodology Memo*

The Fehr & Peers memo, as stated on EIR p. 4.C.76, focused on whether not a relationship exists between the provision of off-street parking and the choice to drive among individuals traveling to or from sites in San Francisco. The study "found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with these developments, relative to projects with the same land uses in similar contexts that provide more off-street vehicular parking."




Source: San Francisco Municipal Transportation Agency, ESRI, SWCA (2019)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

RTC FIGURE 4.1: NEIGHBORHOOD PARKING, RESIDENTIAL PARKING PERMIT AREAS, ON-STREET PARKING, AND PARKING METERS

For retail uses, Fehr & Peers collected count and survey data at 14 sites in 2014. The selected retail establishment closest to the project site was Standard 5 & 10 Ace at 3545 California Street, located within the Laurel Village Shopping Center.[57] Fehr & Peers selected retail sites in pairs and used the following site selection guidelines:

- Both sites were either the same retail establishment (e.g., two Walgreens stores) or the same type of retail use with a similar type of clientele (e.g., two specialty grocery stores)
- Pairs were in the same transportation analysis zone or in a transportation analysis zone with similar automobile mode split
- One member of each pair provided off-street parking and the other did not
- Sites focused on grocery stores, pharmacies, hardware stores, and other higher trip generating retail

Fehr & Peers counted all travelers to and from the retail sites during the a.m. and p.m. peak periods. During those periods, they intercepted as many individuals entering and exiting the stores as possible, asking about their primary mode of travel to the site, and recording their responses. [58]

The memo cited in the EIR identifies the following key observations from the retail models Fehr & Peers developed:

> Auto orientation of the site is a significant predictor of retail auto mode share, while the relationship between auto mode share and parking is notably smaller than for the residential and office models, particularly in the morning. As an example, the AM retail model predicts that for a site with moderate auto orientation, the absence of parking is associated with a 20% reduction in auto mode share. The PM retail model predicts that for a site with moderate auto orientation, the absence of parking is associated with a 30% reduction in auto mode share.

In other words, a relationship exists between the provision of off-street parking and the choice to drive among individuals traveling to or from retail sites in San Francisco.

*Other Literature*

The EIR cited four other recent studies (see footnotes 74, 75, 76, and 77 on EIR pp. 4.C.75 and 4.C.76) that "indicates that an area with more parking influences higher demand for more automobile use." While three of those studies do not focus specifically on retail uses, they all point to the same relationship between parking and driving.

One study of those four cited in the EIR, "Does Transit-Oriented Development Need the Transit?," did estimate "how rail access and other TOD [transit-oriented development] characteristics affected the frequency of car trips to buy groceries." The study found that "Households with both scarce on-

[57] Fehr & Peers, *SF TDM Framework for Growth: Summary of Survey Results*, May 2015.
[58] Fehr & Peers, *San Francisco TDM Quantification Data Collection Strategy*, May 28, 2015.

and off-street parking took substantially fewer auto-based grocery trips, a reduction of about 25 percent."

Other studies also support the relationship between increased parking and increased use of automobiles. For example, a study from Philadelphia looked at households in dense urban environments living within a one-half mile walking distance of six supermarkets.[59] Three supermarkets had large surface parking lots ("auto-oriented"), while the other three had little to no surface parking ("pedestrian-oriented").[60] The study states:

> Results of the models show that, controlling for distance, number of children, store loyalty, auto ownership and other factors, residents of study areas near auto-oriented supermarkets are more likely to drive, even though they are less likely to own automobiles, than their counterparts living near pedestrian-oriented markets. (page 10)

Based on the foregoing, substantial evidence supports the statement on EIR p. 4.C.76 that "more off-street vehicular parking is linked to more driving, indicating that people without dedicated parking spaces are less likely to drive."

*Neighborhood Parking Rate*

The department uses a neighborhood parking rate analysis to determine whether the project would substantially increase VMT at a site level that would be above modeled-based transportation analysis zone level estimates. This section summarizes and justifies the use of the neighborhood parking rate analysis in the EIR and Mitigation Measure TR-2: Reduce Retail Parking Supply to reduce project impacts to less-than-significant levels.

As documented in the EIR and restated above, substantial evidence supports the *relationship* or correlation between parking and VMT. However, the department has not identified with more precision the correlation between these two factors, that is, what *degree* reduction in VMT would result from a specific degree of parking reduction, or vice versa. This relationship is an evolving area within transportation planning[61] and the department is using the best available information to document the relationship.

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[59] Transportation Research Board, Maley and Weinberger, "Food Shopping in the Urban Environment: Parking Supply, Destination Choice, and Mode Choice, February 17, 2011, https://trid.trb.org/view/1091759 for abstract, http://www.streetsblog.org/wp-content/uploads/2012/02/MaleyWeinberger2011.pdf for full paper, accessed July 17, 2019.

[60] This methodology for site selection is like the Fehr & Peers study cited in the EIR, although the Philadelphia study did include "pedestrian-oriented" supermarkets with smaller amounts of surface lot parking or above-grade parking, and the Philadelphia study was focused on surface parking.

[61] The department, in partnership with the transportation authority and SFMTA, is studying this relationship as part of the San Francisco TDM Program implementation and hopes to provide more precision in its analyses. The department is also part of a technical committee for a Caltrans-funded study looking into this relationship in different contexts throughout the state.

Instead of a precise degree calculation, the department compares the neighborhood parking rate to the project's parking rate. The transportation analysis zone VMT estimates may not be applicable for the project if its parking rate is substantially above the neighborhood parking rate. EIR p. 4.C.76 states the "neighborhood parking rate is the number of existing parking spaces provided per dwelling unit or per 1,000 square feet of non-residential uses for each transportation analysis zone within San Francisco." The neighborhood parking rate methodology is based on a robust data set summarized below for both residential and non-residential uses.

*Residential Uses*

EIR, p. 4.C.77 describes the "existing neighborhood parking rate for the project site (TAZ [transportation analysis zone] 709) and surrounding area is approximately 0.90 spaces per residential unit." citing *Transportation Demand Management Technical Justification*, January 2018, Appendix B. To arrive at the neighborhood parking rate for transportation analysis zone 709, staff reviewed building permit records and created a cross-classification model consisting of the following residential building factors: year constructed, number of units, and planning district/area type.

EIR p. 4.C.77, footnote 82 explains the differences between:

- the existing or total neighborhood parking rate presented in the EIR, consisting of all buildings with a dwelling unit including single-family homes, and
- the multi-unit neighborhood parking rate used for the Transportation Demand Management Program, consisting of only those buildings with two or more dwelling units.

These differences are shown visually in figures 2 and 3 of *Transportation Demand Management Technical Justification*, January 2018, Appendix B. The figures display the multi-unit neighborhood parking rate is lower than the total neighborhood parking rate. The EIR incorrectly lists the multi-unit neighborhood parking rate as 0.90, instead of the correct rate of 0.70. The following updates EIR p. 4.C.77, footnote 82:

> …For TAZ 709, that multi-unit residential neighborhood parking rate is approximately ~~0.90~~ 0.70.

Although the footnote incorrectly states the neighborhood parking rate in TAZ 709, the analysis correctly uses the *total* neighborhood parking rate of 0.90, and no further changes to the text are required.

*Non-Residential Uses*

EIR p. 4.C.77 notes that the "analysis splits non-residential into retail and other non-residential (office and daycare) uses and compares those to the neighborhood parking rates, which accounts for parking associated with retail and other non-residential uses along California Street and

Sacramento Street near the project site." The neighborhood parking rate for retail is 1.55 and for other non-residential uses is 1.44. The sentence ends with a footnote, which summarizes an email from Wade Wietgrefe, San Francisco Planning Department on February 20, 2018 regarding the methodology for non-residential uses. The email, which references an associated attachment, states:

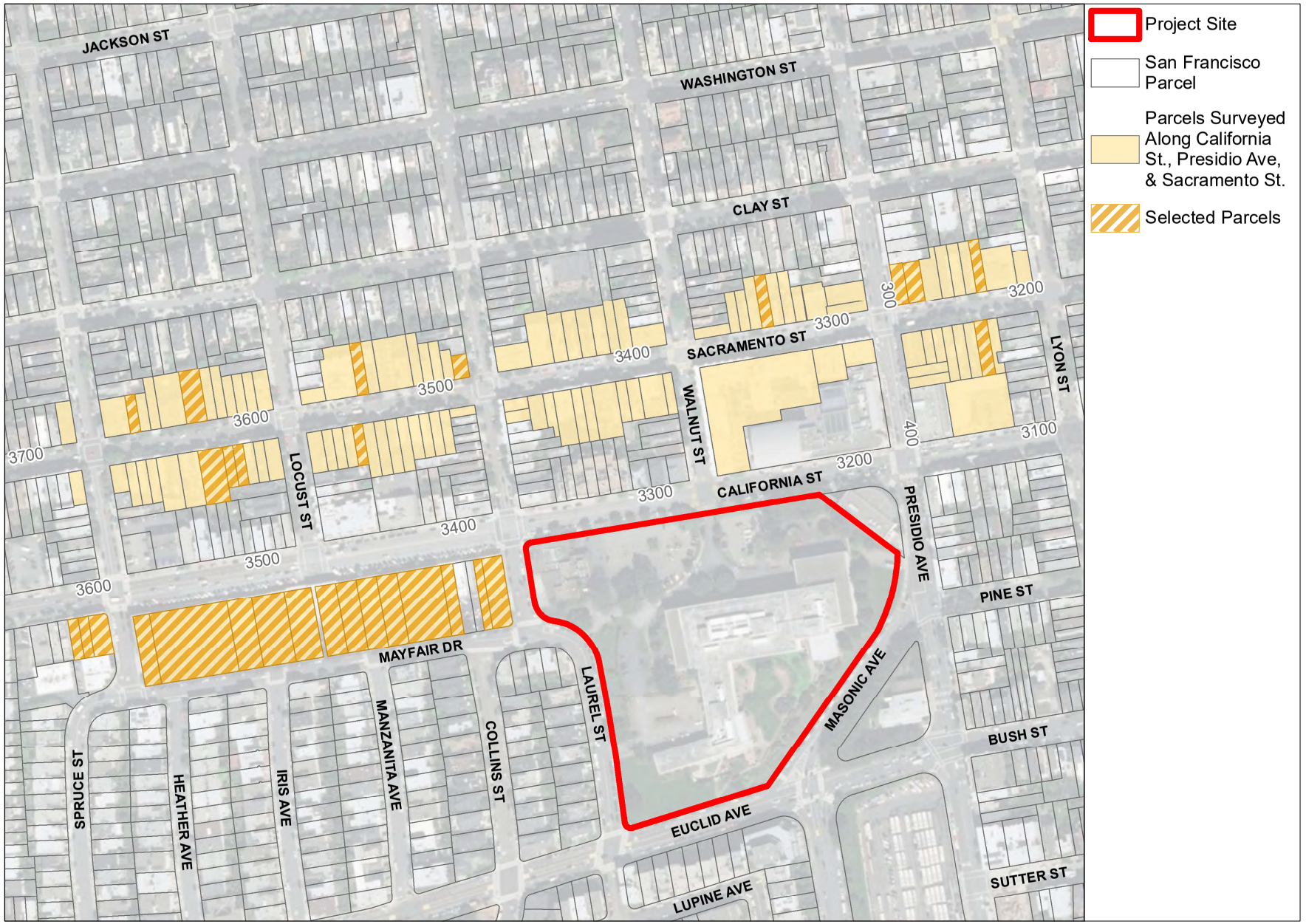
> [P]lanning department staff reviewed assessor and planning department records and street view/aerial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site (see attached – "Numerous Land Uses" tab). Many lots along Sacramento Street do not contain off-street parking. In addition, many lots along Sacramento Street contain residential over retail uses and others contain non-retail sales and service office type uses. The assessor records do not differentiate between the size of those uses for reporting building area square footage. Therefore, staff removed any building that contained office uses and residential uses based on assessor records, 3R report, or visually (see attached – "Usable Retail Records" tab). This results in an underestimation of the retail square footage in the surrounding area and likely an overestimation of how much parking is provided per square footage for those retail uses.

Although the footnote and email text do not list Presidio Avenue, the attachment also included non-residential uses along Presidio Avenue near the project site. The parcels surveyed by the department for the retail neighborhood parking rate are shown on Figure RTC 4.2: Parcels Surveyed to Develop Existing Retail Neighborhood Parking Rate.

*Neighborhood Parking Rate Analysis*

As amended in 2018, CEQA Guidelines section 15064.3(b)(4) states "A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence." Consistent with this section, the department uses the SF-CHAMP model to estimate the project's vehicle miles traveled, using an efficiency metric, and then qualitatively described the changes to those estimates based on substantial evidence documenting the relationship of parking and VMT and comparing the project parking rate to the neighborhood parking rate.

For each project land use, EIR pp. 4.C.78-4.C.80 compares the VMT efficiency metric for the project site transportation analysis zone to the region and then compares the project parking rate to the neighborhood parking rate. For retail uses, EIR p. 4.C.80 describes that the project's parking rate, 3.66, which is 136 percent higher than the neighborhood parking rate, "may increase VMT per employee enough to exceed the threshold of 15 percent below the regional average for retail uses." The EIR includes Mitigation Measure M-TR-2: Reduce Retail Parking Supply, to reduce the proposed project's or project variant's retail parking rate to the existing neighborhood parking rate. Therefore, the mitigation measure has a nexus to the VMT impact: the project's parking rate. The mitigation measure also does not exceed constitutional constraints by requiring that the project mitigate more than its impact.




Source: San Francisco Planning Department (2018), ESRI, SWCA (2019)



3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

RTC FIGURE 4.2: PARCELS SURVEYED TO DEVELOP EXISTING RETAIL NEIGHBORHOOD PARKING RATE

Mitigation Measure M-TR-2, on EIR p. 4.C.80, requires the proposed project or project variant to provide retail parking in an amount not to exceed the existing neighborhood rate of 1.55 spaces per 1,000 gross square feet by 38 percent, or 2.14 spaces per 1,000 gross square feet. As shown in Table 4.C.19: Parking Rate Summary, on EIR p. 4.C.77, the proposed project would provide 198 vehicle parking spaces and the project variant would provide 188 vehicle parking spaces for the retail use. The retail parking supply for the proposed project would need to be reduced by 114 vehicle parking spaces (to 84 parking spaces) and the retail parking supply for the project variant would need to be reduced by 113 parking spaces (to 74 parking spaces) to achieve a retail parking rate of 2.14 parking spaces per 1,000 gross square feet and mitigate the significant VMT impact to less-than-significant levels.

Other mitigation measures are not required, because this mitigation measure would reduce the impact to less-than-significant levels. A mitigation measure to reduce the size of the retail space would not reduce impacts because the EIR uses, for the reasons described in subsections D.1,CEQA Section 21099(b)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), beginning on RTC p. 4.19 and D.2 Vehicle Miles Traveled (VMT) and Retail Uses, beginning on RTC p. 4.30, a VMT efficiency metric threshold of significance as opposed to an absolute threshold of significance. In addition, mitigation measures limiting the ability of future residents of the project to get residential permit parking would also not reduce impacts because the significant impact is relevant to parking for the retail uses, not residential parking. Revisions to the proposed project and project variant described in Section 2, Revisions and Clarifications to the Project Description, include elimination of the retail use in the Euclid Building and reduction in the amount of ground floor retail space in the buildings fronting California Street (see RTC p. 2.7). These revisions would not change the analysis and results summarized here.

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# 5. COMMENTS AND RESPONSES

## 5.A. INTRODUCTION

Section 5, Comments and Responses, presents quoted excerpts of comments received on the draft EIR and the responses to those comments. For the full text of each comment in the context of the public hearing transcript or the comment letter or email in which it appears, refer to RTC Attachments A and B, respectively.

Comments are organized by topic, and within each topical section, similar comments are grouped together under subheadings designated by the topic code and a sequential number. For example, the first group of comments in Section 5.B, Project Description, coded as "PD," is organized under heading PD-1. Comments related to cultural resources, presented in Section 5.D, Cultural Resources, are coded as "CR" and organized under headings CR-1, CR-2, etc. The order of the comments and responses in this section is shown below, along with the prefix assigned to each topic code.

| Section | Topic | Topic Code |
|---|---|---|
| 5.B | Project Description | PD |
| 5.C | Plans and Policies | PP |
| 5.D | Cultural Resources | CR |
| 5.E | Transportation and Circulation | TR |
| 5.F | Noise and Vibration | NO |
| 5.G | Air Quality | AQ |
| 5.H | Alternatives | AL |
| 5.I | Cumulative Impacts | CU |
| 5.J | Initial Study Topics | |
| | Population and Housing | PH |
| | Greenhouse Gas Emissions | GHG |
| | Wind and Shadow | WS |
| | Recreation | RE |
| | Utilities and Service Systems | UT |
| | Public Services | PS |
| | Biological Resources | BR |
| | Geology and Soils | GEO |
| | Hydrology and Water Quality | HWQ |
| | Hazards and Hazardous Materials | HZ |
| | Energy Resources | EN |
| 5.K | CEQA Process | CEQA |

| Section | Topic | Topic Code |
|---|---|---|
| 5.L | Merits of the Proposed Project | ME |
| 5.M | General Comments | GC |

Each comment is presented verbatim, except for minor typographical corrections, and concludes with the commenter's name and, if applicable, title and affiliation; the comment source (i.e., public hearing transcript, letter, or email); the comment date; and the comment code, as described on RTC pp. 3.1-3.2. **Boldface**, *italicized*, and CAPITALIZED text from the original comments is reproduced in the comment excerpts. Photos, figures, and other attachments submitted by commenters and referenced in individual comments are presented in RTC Attachment B. Some comments include citations to sections of the California Environmental Quality Act (CEQA) and/or CEQA Guidelines that may be from a previous edition of the CEQA Guidelines. The Office of Planning and Research recently amended the CEQA Guidelines and some of the CEQA Guidelines sections cited in the comments may have been renumbered.

Following each comment or group of comments, a comprehensive response is provided to address physical environmental issues raised in the comments and to clarify or augment information in the draft EIR, as appropriate. Each response begins with a brief summary of the substantive environmental issues raised by the comments. The responses provide clarification of the draft EIR text and may also include corresponding revisions or additions to the draft EIR. Revisions to the draft EIR are shown as indented text, with new text double-underlined and deleted material shown with ~~strikethrough~~ text. Revisions to the draft EIR presented in the responses to comments in this section are also shown in Section 6, Draft EIR Revisions.

Documents and other information cited in the subsequent sections of this RTC document are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

# 5.B. PROJECT DESCRIPTION

The comments and corresponding responses in this section relate to EIR Chapter 2, Project Description. The comments are further grouped according to the following project description-related issues that the comments raise:

- PD-1, Construction Duration, Phasing and Staging, and Development Agreement
- PD-2, Disclosure of Project Setting
- PD-3, Project Characteristics
- PD-4, Site Access
- PD-5, Permanent Right of Recreational Use/Prescriptive Easement
- PD-6, Project Objectives
- PD-7, Project Approvals

A corresponding response follows each grouping of comments.

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## COMMENT PD-1: CONSTRUCTION DURATION, PHASING AND STAGING, AND DEVELOPMENT AGREEMENT

"I get there's nervousness about what this will do and the impacts, and it seems like a major construction project, but trust me, it's not. And we've seen this happen around the city. Not much here. I know the folks who live here haven't experienced it because we don't see it happen around this corridor too much," *(Commissioner Rich Hillis, President, San Francisco Planning Commission, Draft EIR Hearing Transcript, December 13, 2018 [A-CPC-Hillis-8])*

"Onward. I made a couple of notes here. When I hear the concerns about the length of suggested construction, project implementation, I would agree 17 years or whatever the accurate time frame is -- I heard a different number, but all of them are excessively long.

The first thing I would ask is what is actually the phasing of this project? I think it's one of the most important projects -- most important questions, because the cumulative impact over extended periods of time in construction is more accentuated when it occurs over this length of time, and a healthy phasing diagram would clearly allow people to understand what the actual impacts are, relative to their own location near the project." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp. 77-78, December 13, 2018 [A-CPC-Moore-6])*

"Based on the construction plan reported in the Draft EIR, our neighborhood will bear an overwhelmingly disproportionate burden from the construction of this Project. We are concerned by the potential duration of the construction and the planned location of construction staging.

As described in the EIR, construction will continue for between seven (7) and fifteen (15) years. The elderly residents of our neighborhood could look forward to facing construction across their street for the remainder of their life expectancies." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-3])*

"This plan (and the staging plan described below) will diminish our ability to enjoy our homes and could adversely impact any residential sale process for an unnecessarily long time.

The Developer appears to be acting in its own self-interest. It seeks to prolong entitlements for use or sale to other developers; to time the market; and, to change product mix over time if more profit would result. It is attempting this by seeking permission for this extraordinarily prolonged construction period. If permitted, the Developer's construction timetable will unjustly prolong the disproportionate environmental impact that the families in our neighborhood will endure." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-6])*

"In fact, on numerous occasions, the Developer indicated they could build the complete project in three (3) years.

The most obvious way to mitigate this impact would be to require the Developer to complete construction within three years of commencement.

**CONSTRUCTION STAGING**

The Developer plans to stage three of the four phases of the entire Project directly across the street from our neighborhood, near the already challenged corner of California and Laurel. This is an unfair and incredible burden on our neighborhood.

The current plan would mean that even when direct construction is not happening in front of our homes, we would still uniquely bear the brunt of the construction noise by being exposed to the sound of construction trucks and machinery (back up beeping), and the non-residential aspect of having a truck parking lot at your front door for years.

This staging plan is the least impactful to the developer, but the most intrusive to us. The most obvious way to mitigate this impact would be to require the Develop[r] to move its construction staging throughout the project during the construction and have no one adjacent neighborhood to the 10.5 acre site unduly carry the burden. This is only reasonable and fair." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-8])*

"I am not in favor of seven to 15 years of ongoing construction," *(M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, p. 51, December 13, 2018 [O-LHIA7-3])*

"We love the fact that all the neighbors are advocating for the streamline construction process. I hope that that can also apply to the permitting and approval process. So I echo all of them, and

make this go faster. Let's build this faster. I think that's commendable, because everybody does understand that we do need more homes for people to live in." *(Cory Smith, San Francisco Housing Action Coalition, Draft EIR Hearing Transcript, pp. 69-70, December 13, 2018 [O-SFHAC-5])*

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"The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-1])*

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"
- The proposed seven to fifteen-year construction period would hold our neighborhood hostage to the traffic, noise, disruption and dirt that it will create and would likely result in a negative impact on any residents that might need to sell their homes during such an egregiously long construction period. Moreover, the Developers have met with our neighborhood group and advised us on several occasions that they could complete all construction within 2 to 4 years from Project commencement. We surmise that the longer time frame being requested is to reduce the economic risk of the Project and increase return to their investors, perhaps creating many extra years of valuable tax "losses". The Developers need to go back to the drawing board to present a more realistic construction time frame, even if it means altering their proposed design.
- The current proposal has construction staging for three of the four phases and most of this time period directly across from our front doors. We have proposed that the Developer move staging next to each phase in the 10 acre site during construction." *(David Bercovich, Email, January 7, 2019 [I-Bercovich-4])*

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"15-year construction timeline is excessive and unnecessary and as costs spiral invites the sale of an up-zoned property." *(Barbara and Jim Brenner, Email, January 3, 2019 [I-Brenner-5])*

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"The Draft EIR fails to include adequate mitigation for the adverse and persistent impact a potential 15 year construction period will have on the neighbors of the Project." *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-2])*

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"First, the developer is proposing to take up to ***15 years*** to complete it. That's absurd. The Golden Gate Bridge was completed in four years. Fifteen years of construction is also deeply unfair to us who live here and must suffer the noise. The timeframe also casts doubt on the developer's bona fides, suggesting that the goal isn't to develop the property at all but to flip it after approval or otherwise manipulate the City's approval process. Each of these concerns by itself militates against approval of the developer's proposal." *(Adam Cole, Email, January 6, 2019 [I-Cole-3])*

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"I understand it is currently scheduled to take fifteen (15) years to complete." *(Evelyn Davidson, Email, January 8, 2019 [I-Davidson-2])*

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"The developer's request for 15 years to complete the project is a **ludicrously** long time. It seems like something in the 3-5 year range would be more reasonable and would limit the construction impact of traffic, noise and pollution on the neighborhood. Considering that there are already

several other large developments happening in the same neighborhood (e.g.3700 California, Lucky Penny) there will already be a lot of ongoing construction." *(Zhubin Fardis, Email, January 8, 2019 [I-Fardis-4])*

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"The requested fifteen years to construct the project is unreasonable. Why should neighbors be subjected to fifteen years of demolition, excavation, noise and pollution?" *(Arlene Filippi, Email, January 7, 2019 [I-Filippi2-3])*

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"The developer's request for 15 years to construct the project seems like a ludicrously long time to construct a project. It seems like something into the 3-5 year range would be more reasonable and would limit the construction impact of traffic, noise and pollution on the neighborhood. Considering that there are already several other large developments happening in the same neighborhood (e.g. 3700 California, Lucky Penny) there will already be a lot of ongoing construction." *(Shannon Fong, Email, January 8, 2019 [I-Fong-4])*

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"
- The proposed 7-15 year time frame for the project is mind-boggling. It will disrupt the very fabric of the neighborhood as its very important areas will become unusable for entire childhood of kids of our daughters age.
- The long timeframe makes it more likely that in the case of an economic downturn, such as in 2008, the project could halt indefinitely." *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-4])*

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"The project construction would last for 7-15 years and there is substantial community opposition to the developers concept." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-1])*

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"…nor the consequences of dragging this construction out for up to 15 years. This length of construction would be intolerable for the surrounding neighborhoods. In addition, I find it shocking that the developers would be allowed up to 15 years to complete this project when there is a very real housing crisis in The City." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-4])*

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"I find it shocking that the Developers would propose to need up to 15 years to complete this project. Again, up to 15 years to complete this project! That makes a mockery of The City's very real and current housing crisis and shows zero concern for the residents in the surrounding neighborhoods. Fifteen years of construction would make this area unlivable for these neighborhoods. I fully expect that my husband and I will have to move out for at least part of this intolerable construction period. Not a pleasant experience to look foreword to for a couple in their 70's." *(Janet Frisbie, Email, January 7, 2019 [I-FrisbieJ2-3])*

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"**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within**

**three years.**" *(Richard Frisbie, Letter, January 7, 2019 [I-FrisbieR1-2] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-8])*[1]

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"There is another project in the making as Children's Hospital will be closing down and there will a large project of just housing being built and they say it will be much faster compilation compared to this project then the 15 years at 3333 California St. I think this timeline of 10 to 15 years is not the way to go it should be must faster." *(Ronald Giampaoli, Email, January 8, 2019 [I-Giampaoli-3])*

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"**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**" *(Linda S. Glick, Letter, January 6, 2019 [I-Glick2-1])*

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"The developer has asked for a 7-15 year time frame. I cannot imagine having this important area and intersection under construction for this amount of time. We use the JCC frequently and we transit down California and Presidio streets constantly as well. I have a 5-year-old daughter--will she really be 20 by the time this project is finished? That is mind-boggling to me." *(David Goldbrenner, Email, December 18, 2018 [I-Goldbrenner2-2])*

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"We are concerned that the proposed project would affect us in numerous ways, the most important of which I outline below:

- The proposed 7-15 year time frame for the project is mind-boggling to us. Will our five year old daughter really be 20 when this is finished? Dealing with construction delays, noise, dust, traffic congestion, diesel smoke, torn up road, and other hindrances for up to 15 years as we visit the JCC, take the 1 bus from California and Presidio, etc, is deeply troubling.
- The long timeframe makes it more likely that in the case of an economic downturn, such as in 2008, the project could halt indefinitely." *(David Goldbrenner and Zhenya Fridlyand, Email, January 4, 2019 [I-Goldbrenner3-3])*

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"**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an upzoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**" *(Mary Gwynn, Email, January 7, 2019 [I-Gwynn-1])*

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"The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up zoned property. Developers all over town are selling new entitlements rather than build housing." *(Henry Kuechler IV, Email, January 3, 2019 [I-KuechlerIV-2])*

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[1] Comment I-Kwok4 includes Comment I-FrisbieR1 as an attachment to her e-mail. These comments are not called out separately; instead, the excerpted comment is attributed to both persons to minimize duplication of the same exact comments.

"Millions of tons of dirt to be excavated. The construction takes almost half of a generation, assuming the 15-year build-out proposal. If you have a toddler in your household, similar to the gentleman earlier here who was supporting the site, this toddler will be in college by the end of this project.

And San Francisco needs housing right now, not to wait for 15 years. San Francisco has a need for housing now. Please consider that. I'm sure that people don't want to wait that long." *(Tina Kwok, Draft EIR Hearing Transcript, pp. 53-54, December 13, 2018 [I-Kwok2-5])*

"Some of my concerns, as examples and not comprehensive list, is as follows:…- The lengthy construction period" *(Tina Kwok, Email, January 8, 2019 [I-Kwok3-2] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-3])*[2]

"I just cannot imagine going through 7-15 years of construction (a toddler today would be going to college 15 years from now).

There's also the possibility of the current developer using the approved plans to "sell" to other developers in the future in order to get out of the high cost of construction in the market place now.

And the site can be morphed into an unforeseeable development then." *(Tina Kwok, Email, January 9, 2019 [I-Kwok4-1])*

"Every day for 7 years maybe up to 10 years, dozens if not hundreds of construction related heavy trucks would be driving down residential streets in the area. Pine St and Bush St for example, have higher speed limits and are one way - these trucks would be barrelling down these streets, polluting them massively, dirtying all the homes, and creating huge noise pollution - for 7 YEARS or more!! - in areas where the units are mostly dwelling units and many children live and play." *(Ankur Luthra, Email, January 2, 2019 [I-Luthra-3])*

"Turning now to the EIR, I share the concerns about…the duration of the construction of the currently proposed…" *(Maryann Massenburg, Draft EIR Hearing Transcript, p. 66, December 13, 2018 [I-Massenburg-3])*

"4. It inadequately represents the negative impacts of a potential 15-year construction period to the families living in proximity to the site;" *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-7])*

"This is a beautiful site that should not be destroyed, and housing can be built sooner in an alternative than in the project. The 15 years the developer is requesting raises a red flag for real estate speculation." *(Anne Neill, Email, December 12, 2018 [I-Neill-10])*

[2] Comment I-Kwok4 includes many of the same comments as Comment I-Kwok3. These comments are not called out separately; instead, the excerpted comment is attributed to both emails to minimize duplication of the same exact comments.

"I am deeply concerned by the developer's request for 15 years to construct the project. This length of time makes me suspect an alternate motive, such as planning a new entitlement on an up-zoned property. Developers all over San Francisco appear to be using this tactic, create entitlements rather than build housing. The draft EIR considered construction in 3 to 5 years. The Community Preservation Alternate would complete construction in 3 years. If they must have 15 years then they need to agree that there can be no entitlement up-zoning trick.

The DEIR really does not consider the impact on the neighborhood and in this aspect is woefully incomplete. Particularly in that no consideration is given to asking the residents to live in a construction zone for 15 years with streets being blocked by cranes and cement trucks, subjected to construction dust and pollutants, with construction noise dawn-to-dusk. Three to five years of this is asking a lot, 15 years is excessive particularity where everything across the street from the site and on all sides is essentially residential housing for families with children." *(Phillip Paul, Email, January 7, 2019 [I-Paul-1])*

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"**Intense construction:** The construction period should not be allowed to take too long. The developer's estimate of a decade or more of construction is ridiculous." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-1])*

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"I can hardly bear the idea of a prolonged construction project on that scale depressing the neighborhood. I walk, transit and bike everywhere and cannot imagine a decade of construction to negotiate (I also frequently lock my bike up in the current Walnut street parking lot to use ZipCar that are parked there and I will really miss that!!!)" *(Cornelia Powers, Email, January 2, 2019 [I-Powers-2])*

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"The proposed 15 year length of construction time is unreasonable and it is unconscionable to expect the neighborhood to be subjected to demolition, noise, construction, air pollution, traffic and congestion for that length of time." *(Ann Prato, Email, January 7, 2019 [I-Prato-4])*

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"**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**" *(Zarin E. Randeria, Email, January 5, 2019 [I-Randeria2-1])*

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"I specifically wanted to speak to the point of construction duration. Fifteen years, seven years, seems crazy to me. So I did a few things. I just looked up a few other buildings that had similar unit counts. This is the NEMA Building. It's at 10th and Market. It has 754 units. Construction started in November 2011 and completed in March 2014. So that's less than three years.

The two towers at Rincon near the Embarcadero were 709 units, started in July 2012, finished August 2014. Less than three years.

The Paramount Building, Mission and 3rd, 495 units, started in 2002 -- sorry, started in 2000, completed in 2002. That's less than three years. All of these projects, soup to nuts, done. Obviously, we have very competent construction companies in San Francisco; I'm sure they can manage it." *(Kelly Roberson, Draft EIR Hearing Transcript, p. 49, December 13, 2018 [I-Roberson1-2])*

"A 15 year construction schedule is equally out of proportion as well. There are three SOMA buildings, with at least 500 apartments, which were completely constructed in less than three years. These are The Paramount building, the Nema building, and the two Rincon towers. All of these projects had much more difficult site access conditions the relatively open site on Laurel Hill. San Francisco has highly competent construction firms willing and able to build 550 apartments in less than three years.

A 15 year development period has practically 0 to do with providing housing for families which might actually need it. I suspect it has much more to do with developers hedging their financial bets over fluctuating market valuations, pro-forma spreadsheets, and the ability to sell future development rights rather than to provide housing for people." *(Kelly Roberson, Email, January 8, 2019 [I-Roberson2-3])*

"**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an upzoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**" *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-1])*

"The thought of 15 years of construction, removal of existing beneficial trees and all the ensuing disruption and environmental impacts are a heavy price to pay. We are hopeful that the planning commission can be consensus builders while still fulfilling their mission." *(Jim Ryan, Email, January 8, 2019 [I-RyanJ-3])*

"I understand it is currently scheduled to take fifteen (15) years to complete.

Apart from the incredibly drawn out length [Even the great wonder of the world, the Great Pyramid in Giza, supposedly took only twenty years." *(Rita Sater, Email, January 8, 2019 [I-Sater-2])*

"I understand it is currently scheduled to take fifteen (15) years to complete. Apart from the incredibly drawn out length [Even the great wonder of the world, the Great Pyramid in Giza, supposedly took only twenty years. http://www.unmuseum.org/mob/kpyramid.htm] of such a project,…" *(Sebastiano Scarampi, Email, January 8, 2019 [I-Scarampi-1])*

"During the 15-year construction period the developer is requesting, the developer would be able to apply for changes to make the project bigger, expand the retail and increase the heights and amounts of development. This suggests further entitlements and profiting from real estate speculation on the back of the neighborhoods affected by the proposed Project. The Applicant is trying to make us all believe that their proposed project is for the better good and will address the more immediate issue the City has for additional and affordable housing. It is ludicrous that it would take 15 years of construction to accomplish that. It is clear that anyone who supports the Proposed Project and the proposed construction schedule does not live within the immediate proximity of this site." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-8])*

"The proposed time frame of seven to 15 years, not only will have a negative impact on our neighborhood, the neighborhood with the 100 residents. Let's not forget about those people that

are directly across the street. But everyone here has mentioned how unconscionable it is that this neighborhood will be held hostage to a seven to 15-year construction period when, in fact, many people have recognized here -- because I've been here during the whole time -- that this does not have to take that long, and that the residential alternative which we support could be done in far fewer years. In fact, people have talked about three years.

When we – We've had many discussions with the developers, and we really appreciate that they have had those discussions. However, in those discussions when we asked how long will the development take, we were told two to three years, many times. So when I looked at the draft EIR, I almost dropped my teeth. Seven to 15 years, that is so unconscionable." *(Joan Varrone, Draft EIR Hearing Transcript, p. 71, December 13, 2018 [I-Varrone-2])*

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"I am also **very concerned** about the level of noise and traffic disturbance caused by a construction project that is planned to last **7** years." *(Steven C. Zeluck, Email, November 10, 2018 [I-Zeluck-3])*

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**RESPONSE PD-1: CONSTRUCTION DURATION, PHASING AND STAGING, AND DEVELOPMENT AGREEMENT**

The comments express questions and concerns regarding the duration of the proposed construction, the phasing of construction, and the location of proposed temporary construction staging areas. Several comments state that the neighbors along California Street would bear a disproportionate burden of the effects from the 7- to 15-year construction period, and from the 15-year period of the development agreement. The expressed concerns include effects on existing residential values, retail market-related concerns within the neighborhood during the proposed construction period, or concern that a future economic downturn may halt project implementation indefinitely. Other comments express concern about the objectives of the proposed project as a long duration phased development, and raise questions about the project sponsor's intentions to develop the project as opposed to selling the project entitlements. Comments suggest modifications to the proposed project, such as reducing the duration of the overall construction period to five years or less, or modifying the staging plan for each phase. Comments also compare the construction duration for this project with those of other projects both proposed (3700 California Street) and existing (the high-rise buildings at NEMA - 10th and Market streets, the Rincon towers, and the Paramount Building at Mission and 3rd streets).

**Construction Duration and Phasing**

The proposed project or project variant would be fully constructed within 15 years; however, unlike the assertions in some comments, construction would not be continuous over a 15-year timeframe. As analyzed in the EIR, the proposed project or project variant would be constructed in four overlapping development phases, with full build-out expected to occur in approximately seven years in the aggregate, i.e., if construction were continuous over the four development phases (see Figure 2.30: Preliminary Construction Phasing Diagram, on EIR p. 2.92), then

construction would take approximately seven years. As noted on EIR p. 2.91, the impact analyses are based on an approximately seven-year construction duration and four-phase program that would result in full buildout of the proposed project or project variant in a seven-year timeframe. The proposed phasing schedule and construction scope are described in Chapter 2, Project Description, on EIR pp. 2.91-2.96. A detailed diagram depicting the overlapping phases of construction and operation (the occupancy and use of completed structures while others are under construction) under a seven-year timeframe is provided in Figure 4.E.3, Summary of Preliminary Phasing for Project Construction and Operation, on EIR p. 4.E.31, and the location of construction emission sources corresponding to each phase of the construction phasing program is provided in Figure 4.E.4: Modeled Construction Sources for Preliminary Construction Phasing Program, on EIR p. 4.E.42.

As discussed on EIR pp. 2.91-2.94, the project sponsor may choose to develop the proposed project or project variant in a different order than the preliminary four-phase construction program described in the EIR (see Table 2.5: Preliminary Construction Phasing Program, on EIR p. 2.94) but changing the order would not extend the duration of the overlapping seven-year construction time period analyzed in the EIR.

As explained on EIR p. 2.106, the project sponsor is proposing to enter into a development agreement with the City. The purpose of the development agreement is to set forth the parties' written agreement regarding, for example, the provision of affordable housing and public open space at the site, while protecting the proposed project's or project variant's entitlements from changes in laws that could affect the entitlements, such as the enactment of changes to the zoning regulations applicable to the site. The project sponsor has proposed a 15-year term for the development agreement in order to provide protection against such changes during that time period. The 15-year term would allow the project sponsor to construct one phase and then cease construction activity for a period of time due to, for example, an economic recession, without the possibility that its entitlements could be compromised by changes in law. However, the seven years of construction are anticipated to occur within the 15-year timeframe, but would not be continuous over a 15-year period; that is there would be periods of time between development phases when the construction would cease. Full build-out would occur within an aggregate period of seven years, not 15 years. However, it is possible that the aggregate seven-year construction period might be spread out over the 15-year period if, as noted above, a phase is completed and there is no construction on the site for a period of time before the next phase is commenced. Physical environmental impacts associated with construction air quality, noise, and truck trips are anticipated to be less severe if the same construction program were spread out over a greater-than-seven-year period, because fewer pieces of equipment would be running concurrently, and the extended timeframe would result in periods without any construction activity rather than continuous construction for the entire 15 years.

**Construction Staging**

Construction staging involves the temporary placement and storage of construction material and equipment, construction-related parking and other typical, temporary construction-related staging activities. As stated on EIR pp. 2.94-2.96 and in Section 4.C, Transportation and Circulation, on EIR pp. 4.C.70-4.C.74, construction staging during Phase 1 (anticipated to be Masonic and Euclid buildings) and Phase 2 (anticipated to be Center Buildings A and B) would occur on site on existing surface parking lots along California and Laurel streets and the on-site internal roadways. During Phase 3 (anticipated to be Plaza A, Plaza B, and Walnut buildings), some staging would occur within existing on-street parking lanes along the south side of California Street and the east side of Laurel Street. During Phase 4 (anticipated to be Mayfair Building and Laurel Duplexes), staging would also occur on a portion of the existing parking lane on the north side of Euclid Avenue. A comment requests that the City impose a construction staging program that shifts staging activities around the site. As described in the EIR, during each construction phase staging areas would be focused in specific locations, not the whole site, with most staging in the early phases occurring off-street in open flat areas on the site. These areas are predominantly located along California and Laurel streets. As noted on EIR pp. 4.C.70-4.C.74, a construction logistics plan and a construction parking plan would be developed by the project sponsor and their general contractor in accordance with the SFMTA's *Regulations for Working in San Francisco Streets* (or blue book) and section 2.4.20 of the public works code (Action on Applications for Permits to Excavate). These plans would be submitted for review by various City agencies, including the SFMTA and public works, with the primary goal of minimizing the temporary effects of construction on pedestrians, bicycles, transit operations, and vehicular traffic.

Impacts associated with the use and transport of construction equipment on traffic and circulation are discussed in Impact TR-1 on EIR pp. 4.C.68-4.C.74. To the extent that staging equipment on or off site would generate temporary construction noise and vibration, those impacts are discussed in Impact NO-1, on EIR pp. 4.D.36-4.D.51, and Impact NO-2, on EIR pp. 4.D.51-4.D.58. Impacts associated with air emissions generated by construction equipment are discussed in Impact AQ-1 on EIR pp. 4.E.38-4.E.49. As discussed in these sections, compliance with regulatory requirements, including the Construction Dust Control Ordinance and the Noise Ordinance, would establish controls applicable to the use of construction equipment for the purposes of protecting the health of the general public and on-site workers, minimizing public nuisance complaints, and avoiding orders to stop work by the Department of Building Inspection (building department).

**Merits of the Proposed Construction Duration**

The project sponsor for the 3700 California Street project, located on the approximately 5-acre site of the former California Pacific Medical Center (CPMC) campus, anticipates construction would take approximately 3.5 years.[3] The 3700 California Street Project would construct 273 residential units, less than half the 558 to 774 units under the proposed project or project variant (plus commercial uses). This number of units reflects the design and scale of the existing neighborhood. The new units would include 14 new single-family homes and 19 new multi-family residential buildings ranging in height from 36 to 80 feet (or 3 to 7 stories). The project would also include the adaptive reuse of a portion of the Marshall Hale hospital building as a residential building and the renovation of an existing, nine-unit residential building at 401 Cherry Street. Other projects within San Francisco cited as examples (including a number of high-rise projects such as the NEMA building at 10th and Market streets, Rincon towers, and the Paramount Building at Mission and 3rd streets are high-rise residential and office projects with a limited lot size. These high-rise projects are single building structures with one or two towers developed at one time without phasing. The comments do not provide evidence supporting the assertion that construction of a mixed-use, multi-building project – composed of predominantly wood- or steel-framed low-rise buildings and with some mid-rise construction limited to the adaptive reuse of the existing building – on a multi-acre site could feasibly be completed in a three-year time period. Construction schedules are largely influenced by site-specific construction limitations, including financing and market conditions for single building high-rise projects like the examples cited that are not directly comparable to those for a multi-building development like the proposed project or project variant. However, other mixed-use, multi-building projects on multi-acre sites evaluated in the city indicate the range of reasonable development periods that could be expected. Examples include the following:

- Balboa Reservoir Project – Redevelopment of a 17-acre surface parking lot with 1,100 to 1,500 residential units; about 4 acres of open space; a childcare facility; a community room available for public use; retail space; on- and off-street parking; and new streets, utilities, and other infrastructure. To be developed in three construction phases lasting approximately 6 years
- Pier 70 Mixed-Use District Project – Redevelopment of a 35-acre site with about 1,645 residential units and about 2.8 million gross square feet of commercial and retail space or about 3,025 residential units and about 1.6 million gross square feet of commercial and retail space; about 9 acres of open space; on- and off-street parking; and new streets, utilities, and other infrastructure. To be developed in five construction phases lasting approximately 11 years

[3] A draft environmental impact report for the 3700 California Street project was published on June 13, 2019. The document can be accessed online at https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=4595d1d5d3a94c1007295e922610d9afeeb2a48a415e46e91107c6d30938d458&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0.

- Potrero Power Station Mixed-Use Development Project – Redevelopment of a 29-acre site with 2,400 residential units and 1.2 to 1.9 million gross square feet of commercial and retail space; about 6 acres of open space; on- and off-street parking; and new streets, utilities, and other infrastructure. To be developed in seven construction phases lasting approximately 15 years
- Parkmerced Project – Redevelopment of the existing 152-acre site with 8,900 residential units; about 310,000 gross square feet of commercial and retail space; an educational use; approximately 68 acres of re-designed open space; on- and off-street parking; and new streets, utilities, and other infrastructure. To be developed in four construction phases lasting approximately 20 years[4]

Comments express a desire for the proposed housing to be developed much more quickly than the seven-year (to up to 15-year) timeframe proposed by the project sponsor. The speed with which the residential units are built is not by itself considered an impact under CEQA except to the extent that physical environmental impacts would occur due to the construction activities. The duration of project construction activities, including consideration of construction phasing, is evaluated for a number of environmental issues in the initial study and EIR. Regarding population and housing issues, CEQA is generally concerned with whether a project would result in significant unplanned population or employment growth, or in displacement of housing units or people. As discussed in the initial study on pp. 112-120 under Impact PH-1 and Impact PH-2, the proposed project or project variant would not result in substantial unplanned population and employment growth on the project site or displace any residents; this conclusion is not dependent on the speed of construction.

Certain comments allege manipulation of the construction schedule to "time" construction to the market or question the ultimate goal of the project sponsor to develop the site or to entitle the site to sell to another developer. These comments, in themselves, do not raise any specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. However, to the extent that they may be based on concerns about impacts related to the topics of transportation and circulation, noise, and air quality, responses are also found in RTC Sections 5.E, Transportation and Circulation; 5.F, Noise and Vibration; and 5.G, Air Quality, respectively.

As directed by CEQA, the purpose of the EIR is to analyze the physical environmental impacts of the proposed project. Although comments on the merits of the proposed project do not raise issues concerning the adequacy or accuracy of the EIR's coverage of environmental impacts under CEQA, such comments, including recommendations for the development agreement and the proposed project or project variant, may be considered and weighed by the decision-makers as

[4] EIRs and environmental documents prepared by the City are available at: https://sfgov.org/sfplanningarchive/environmental-impact-reports-negative-declarations.

part of their decision to approve, modify, or disapprove the proposed project or project variant. This consideration is carried out independent of the environmental review process.

**Socioeconomic Concerns**

CEQA does not require analysis of socioeconomic issues such as real estate market conditions; thus, these issues are typically not addressed in environmental review documents. The focus of CEQA is to address whether and how a proposed project's physical change to the environment could result in adverse physical impacts on the environment, such as impacts of a project on air quality, water quality, or wildlife habitat. CEQA Guidelines section 15360 defines "environment" for the purposes of CEQA as "the *physical* conditions which exist within the area which will be affected by the proposed project…" (emphasis added). As stated in CEQA Guidelines section 15131(a),

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

Thus, the CEQA Guidelines provide that social or economic impacts shall not themselves be treated as significant effects on the environment.

Assertions regarding anticipated economic impacts (e.g., property value decreases, retail vacancy) that do not contribute to, or are not caused by, adverse physical changes to the environment do not constitute substantial evidence of a significant effect on the environment. However, a social or economic change related to a physical change may be considered in determining whether the physical change is a significant environmental impact. Additionally, an EIR or other CEQA document must consider the reasonably foreseeable indirect environmental consequences or physical changes resulting from a project's economic or social changes. In short, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment.

To the extent that physical environmental impacts would occur as a result of construction and operation of the proposed project or project variant, these impacts have been analyzed in detail in the EIR. Further analysis of secondary socioeconomic impacts would be largely speculative and would not necessarily predict reasonably foreseeable outcomes. The comments do not present any evidence that the construction and operation of the proposed project or project variant would result in any new significant environmental impacts not disclosed in the draft EIR, increases in the severity of significant environmental impacts identified in the draft EIR, or lead to any

economic or social changes that would in turn result in a significant adverse physical environmental impact.

## COMMENT PD-2: DISCLOSURE OF PROJECT SETTING

"My name is Joan Varrone and I live directly across the street from the project at 3320 California Street, between Laurel and Walnut. And we are actually a residential neighborhood. I think no one has really acknowledged that, particularly when I read the Draft EIR and I look at what is being proposed." *(Joan Varrone, Draft EIR Hearing Transcript, p. 70, December 13, 2018 [I-Varrone-1])*

## RESPONSE PD-2: DISCLOSURE OF PROJECT SETTING

The comment states that the existing residential neighborhood has not been acknowledged in the EIR.

The EIR describes the existing neighborhood context in Chapter 2, Project Description, on pp. 2.14-2.19, and in Chapter 4, Environmental Setting and Impacts, on pp. 4.A.13-4.A.17. The initial study (see EIR Appendix B) discusses the existing residential setting in Section A, Project Description, on pp. 12-16, and in Section B, Project Setting, on pp. 88-94. For example, EIR p. 2.14 states that low-to mid-rise residential uses surround the project site to the north, east, south, and west across California Street, Presidio Avenue, Euclid Avenue, and Laurel Street. Several of the project objectives, listed on EIR p. 2.12, address features selected to promote compatibility with neighboring residential uses, including building new housing units, neighborhood-serving retail, and pedestrian and bicycle pathways. This existing condition of the neighborhood and its primarily residential character are discussed throughout the EIR in the descriptions of the environmental setting that begin each topic section in Chapter 4, and in the analysis of environmental impacts that would have the potential to affect existing residents, such as traffic, noise, and air pollution as described in EIR Chapter 4. To the extent that the proposed project or project variant would result in physical environmental impacts associated with existing land use plans and policies, those policies are discussed in EIR Chapter 3, Plans and Policies, and impacts are discussed in the initial study (Section E.1, Land Use and Land Use Planning). The comment does not present new information that would require changes or updates to the EIR.

## COMMENT PD-3: PROJECT CHARACTERISTICS

"And I'm a pretty good reader and quite versed in reading EIRs, and I'm quite versed in reading drawings, many of which were missing in this document. There were more elevations and sections than a proper description about the project and its planning diagrams and urban design intentions." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp. 76-77, December 13, 2018 [A-CPC-Moore-4])*

"I would be interested in a further examination how below-grade parking which, from an environmental visual point of view, is desirable, increases proportionately the cost of construction. And I would like to see that mirrored against the expressed need that was affordability on this site.

The site already has particular issues which makes construction more complicated because it has significant topography which adds to construction costs. Adding completely below-grade parking will further accentuate that. I'd like the issue of affordability further examined." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 78, December 13, 2018 [A-CPC-Moore-8])*

"I spoke about…looking more closely at affordability relative to below-grade parking and affordability not being properly yet or clearly addressed in the document that's in front of us," *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 80, December 13, 2018 [A-CPC-Moore-14])*

"The Draft EIR disregards the Project's strategy of privatizing open space which is currently a community resource." *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-7])*

"The DEIR's allegation that the developer's proposal would redevelop an underutilized commercial site into a new mixed-use community is inaccurate. The 446,490 square-foot site is currently mixed-use commercial and retail (cafe) and is completely utilized for a 362,000 square foot commercial main structure which contains an 1,183 assignable square foot cafe and an 11,500 gsf childcare center (455,000 gsf office building minus 93,000 gsf of largely below grade parking garage), a 14,000 gsf service building, historically significant landscaping throughout the site and approximately 93,000 square feet of largely below grade parking. (DEIR p. 2.1; Ex. H, cafe permit; Ex. I, census data describing project site as "MIXED" land use with existing retail use)…" *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-13])*

"The DEIR states that a proposed 4,000 square-foot open space called a corner plaza would be constructed near the intersection of Masonic and Euclid avenues and this open space would be activated by the proposed retail use in the adjacent Euclid Building, and the residential lobby and amenity spaces in the adjacent Masonic and Euclid buildings. DEIR p. 2.80. Please describe in detail the nature of the potential amenity spaces that could be placed in the adjacent Masonic and Euclid buildings.

THE DEIR claims that the proposed project would retain approximately 53 percent of the overall lot area (approximately 236,000 square feet, excluding green roofs) as open area with portions to be developed with a combination of common and private open space. DEIR p. 2.83. Please provide the calculation of this proposed open space, including without limitation the amount of open space that could be provided in each component of the open space and state whether each component of the open space would be paved or planted into soils that drain toward groundwater. In this calculation, please specify the location and square footage of such open space that would consist of paved pathways or other paved areas and state how each component of such proposed "open space" meets the requirements of the Planning Code as to usable open space. The DEIR indicates that the proposed Cypress Stairs and Walnut Walk (excluding the Walnut Street "extension," roundabout and walkway between Center Building A and Center Building B) would constitute open space; please explain in detail why the walkway between Center Building A and

Center Building B would not constitute open space, including without limitation under the San Francisco Planning Code. (DEIR pp. 2.83)

The DEIR states that access to the proposed Euclid Green would be developed at the corner of laurel Street and Euclid Avenue. These spaces would be designed to be compliant with the Americans with Disabilities Act. DEIR pp. 2-76-2.77. The DEIR and plan sheets do not explain the changes proposed to the Euclid Green. The DEIR acknowledges that the existing green lawns at the corner of Euclid Avenue and Laurel Street (23,600 square feet) and along Presidio Avenue (10,700 square feet) are accessible to the general public. DEIR p. 2.9. Please describe in detail each and every change that the developer proposes to make to the existing green spaces that currently exist along Euclid Avenue and Laurel Street. The City's Urban Design Team review notes state that "Euclid Park seems to show retaining walls and other interruptions. It seems strongest as a single zone of lawn." (Ex. M, November 16, 2017 UDAT Notes) Please describe in detail what was meant by this statement and what documents) the Planning Department reviewed before it made this comment. The DEIR and plan sheets submitted to the City do not show any such proposed modifications to the existing lawn and landscaped spaces along Euclid Avenue or Laurel Street.

In addition, if there is a possibility of any portion of the site being used for a community garden, please explain the proposed location and size of the proposed community garden and which existing site features would be changed to install it. If there is a possibility of any portion of the site being used for a farmer's market at any time, please explain the proposed location and size of the proposed farmer's market and the anticipated times of operation." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-24])*

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"The landscaping and green areas are our only relief and I think as much as possible should be preserved." *(Sharon Esker, Email, January 5, 2019 [I-Esker-10])*

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"There's a lot of talk about preserving neighborhood character. Laurel Hill has always been a place where neighbors gather, children learn sports from their parents, and a community is formed. These community bonds will not be formed along meandering concrete pathways." *(Linda S. Glick, Draft EIR Hearing Transcript, December 13, 2018, pp. 56-57 [I-Glick1-5])*

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"There is a lot of talk about preserving neighborhood character.

Laurel Hill has always been a place where neighbors gather; children learn sports from their parents; and a community is formed.

These community bonds will not be formed along meandering concrete pathways." *(Linda S. Glick, Draft EIR Hearing Transcript and Handout, December 13, 2018 [I-Glick1-9])*

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"Volume 1:

Page S.2: In order to develop 558 "dwelling" units under the proposed project or 744 "residential" units on the 10.25-acre site, "…the existing annex building, surface parking lots, and circular garage ramp structures would be demolished." Why would there need to be 13 new structures to be erected with either proposal?

In the 896 parking spaces that are to be provided in "four below-grade parking garages and in 2-car parking garages serving the duplexes on Laurel, would there be 60 public parking spaces for the "60 existing public parking spaces" that are going to be removed? If not, what would be the

total number of public parking spaces on the site at each phase of the development and at full completion?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-1])*

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"It is especially important to plant and keep large mature trees where there is space in light of the fact that "open space" does not mean *ON THE GROUND* but rather includes green rooftops, walls, and sidewalks where large mature trees could not thrive." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-4])*

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"Small privately-owned-public-open-space (POPOs) behind walls and on rooftops are no substitute for grass on the ground, especially to dog owners who bring their pets there. The community sees this as an asset to their lifestyle in this area." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-68])*

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"Although non-reflective glass might be used, the current glass is reflective of the open space and greenery of its surroundings so the building blends in almost in a semi-camouflage manner. Is expensive and is unknown as to its appropriateness to the existing historic building. The current building is slung low and hugs the topography but if the building gets too tall, the reflection may become too much. The current windows reflect the skyline of the city and has an effect such that the reflections of the surrounding trees and other landscape elements almost camouflage the building." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-77])*

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"I have concerns, too, about the open space, …" *(Maryann Massenburg, Draft EIR Hearing Transcript, p. 66, December 13, 2018 [I-Massenburg-4])*

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"3. It overstates the value of "open space" at the expense of "green space", depriving the neighborhood of a local park in return for paved walkways;" *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-6])*

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"Greenspace: The loss of what little green space that exists on Presidio Avenue, is a loss to all of us who have come to use it as a mini park and enjoy the views of the redwoods (which the proposed project will hide from public view)." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-6])*

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*"So roughly speaking each unit in the 2-unit townhouses could approximately be on average approximately 4,200 square feet....which I guess means that the remaining 544 non-townhouse units could be on average approximately 1,400 square feet?*

*Please consider this email as Comment on the DEIR if possible." (Georgia Schuttish, Email, November 17, 2018 [I-Schuttish1-1])*

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"Has the size (square footage) of the 7 multi-story townhomes proposed for this project been determined and is it included in the DEIR?" *(Georgia Schuttish, Email, November 17, 2018 [I-Schuttish1-2])*

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"I was curious about the two Renovation Buildings: 51 units in Center Building A and 139 in Center Building B. Do you know what the square footage of these units, particularly the 3 and 4

bedroom units would be? (The average size of the units for these two buildings would be approximately 1,754 sq. feet and 1,818 sq. feet respectively….but this can't be for the studio and one-bedroom or maybe even the two bedroom units.)" *(Georgia Schuttish, Email, November 27, 2018 [I-Schuttish2-1])*

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"A. Street view greenery and open space. The EIR fails to consider one of the most important attributes of the property and the effect of losing it-- providing a substantially green and calm oasis in an area that is densely developed and congested.

Right now the north edge of the property along California Street is an arcade of greenery, a significant visual resource. Fifteen mature evergreen street trees (New Zealand Christmas trees) arc over the wide sidewalk for two blocks and meet the high shrubs extending above the brick wall along the property. Between the sidewalk and the brick wall (set back from the property) is a row of greenery with flowering azaleas, camellias and dietes. It is a beautiful, calm and event spacious place to walk, unlike most of California Street in the vicinity, where buildings meet the sidewalks and the street trees (pollarded sycamores) are leafless much of the year."
*(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-2])*

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"The idea that open space in the interior of the Project will compensate for significant changes along the streets is false. One or two plazas surrounded by concrete and glass walls hardly substitutes for the expansiveness of the greenery at Euclid viewed by thousands of people a day or the green archway on California Street enjoyed by pedestrians and passing riders alike. This greenery is a unique visual resource in an area largely devoid of anything green, and contributes to the wellbeing of anyone in the area. (See it with a virtual walk around the site on Google maps using street view.)

Note: There is very little visible greenery nearby or within walking distance of the Project. The closest park is Alta Plaza, 8-9 blocks away. Otherwise, there is only a patch of grass in front of the Presidio Library. The Presidio Heights Playground is fully paved; and the Laurel Hill Playground, also paved and with a ball field, sits out of sight, down a steep walkway below Euclid Avenue. The minipark on Bush is a dark, narrow lot squeezed between 3-4 story buildings, totally shaded all day long. The Presidio looks close, but it is on the other side of hill surrounded by a wall and the backs of houses. Access is through the Presidio Gate, along a busy and steep thoroughfare with no sidewalks." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-4])*

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**RESPONSE PD-3: PROJECT CHARACTERISTICS**

Comments express concerns regarding the characteristics of the proposed project. Some comments generally state that items were missing from the project description such as urban design intentions (including drawings such as floor plans). Other comments ask for more information about how the construction of below-grade parking would affect affordability and the overall increase in construction costs, whether the project would be higher density than the existing uses in the neighborhood, why the project is comprised of 13 new structures, how many public parking spaces would be provided, and what the sizes of various residential units are.

Other comments express concerns regarding the merits of the proposed site plan and the characterization of the existing site in the EIR. One comment asserts that the EIR inaccurately states that the existing commercial site is underutilized. One comment expresses concern regarding the proposed midblock passageway alignment. Several comments express concern regarding project open space, assert that the project would cause the privatization of open space, indicate a preference for certain types of "green" open spaces and large mature trees and the lack of existing greenery outside the project site, and express concern about the quality and accessibility of existing green spaces, parks, and open spaces. One comment asks for information about any proposed community garden and the location and size of any proposed farmer's markets.

**Urban Design**

One comment states that many drawings were missing in the EIR, including floor plans and urban design intentions. Another comment asserts that the north edge of the property along California Street is a significant visual resource containing mature evergreen street trees, high shrubs, and a variety of flowering greenery.

The EIR provides several graphics depicting the proposed project. Plan-view diagrams include Figure 2.3: Proposed Site Plan, on EIR p. 2.5; and Figure 2.29: Proposed Open Space, on EIR p. 2.85. Figures 2.4 through 2.6 on EIR pp. 2.20-2.22 depict the elevations of the proposed project as seen from within the project site, California Street, Presidio/Masonic avenues, Euclid Avenue, and Laurel Street. Detailed elevations and sections of each proposed building are also depicted in Figures 2.14 through 2.21 on EIR pp. 2.37-2.59. Figures 2.7 through 2.13 on EIR pp. 2.27-2.33 depict the forms of the proposed buildings and open spaces in photosimulations. CEQA Guidelines section 15124 provides that the EIR project description need not supply extensive detail beyond that needed for evaluation and review of the environmental impacts. The project description in the EIR and initial study provided sufficient detail to analyze the environmental impacts of the proposed project and project variant.

To the extent that comments express concern with the proposed project's or project variant's architectural style, scale, massing, and choice of building materials, the proposed project or its variant meets each of the criteria listed in CEQA section 21099(d); thus, the determination of significance of environmental impacts of the proposed project or its variant does not consider aesthetics, as discussed in EIR Chapter 1, Introduction, on pp. 1.11-1.12. Detailed architectural and landscape plans are available in the project sponsor's Planning Application Re-Submittal 2 (dated July 3, 2019).[5] To the extent that urban form and building materials may be reviewed and

[5] Laurel Heights Partners, LLC; Meyer Studio Land Architects; James Corner Field Operations; BAR Architects; Jensen Architects; Solomon Cordwell Buenz; BKF Engineers; and ARUP, Planning Application Re-Submittal 2, July 3, 2019.

amended, this will occur during the review for project approval. For further response to comments regarding aesthetics, see Response CEQA-2: Aesthetics/CEQA Section 21099, on RTC pp. 5.K.9-5.K.13.

**Construction Costs and Affordability**

As provided in planning code section 167, costs associated with parking are required to be separated from housing costs in lease or sale of residential units for all off-street parking spaces accessory to residential uses in new structures or in new conversions of non-residential buildings to residential use of 10 dwelling units or more. This provides potential renters or buyers the option of renting or buying a residential unit at a price lower than would be the case if there were a single price for both the residential unit and an associated parking space. Renters or buyers of on-site inclusionary affordable units provided pursuant to planning code section 415 are also required to have an equal opportunity to rent or buy a parking space on the same terms and conditions as offered to renters or buyers of other dwelling units, and at a price determined by the Mayor's Office of Housing.

CEQA does not specifically require an analysis of construction cost on affordability as part of the EIR. CEQA Guidelines section 15124 provides that the project description need not supply extensive detail beyond that needed for evaluation and review of the environmental impacts and shall contain "a general description of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public facilities." Furthermore, CEQA Guidelines sections 15144 to 15147 also provide guidance regarding the degree to which forecasting, speculation, specificity, and technical detail are appropriate in CEQA documents.

As stated above under Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement, on RTC p. 5.B.14, CEQA does not require analysis of socioeconomic issues, unless it can be demonstrated that a secondary physical environmental impact may result from the socioeconomic impact. To the extent that physical environmental impacts would occur as a result of construction and operation of the proposed project or project variant, these impacts have been analyzed in detail in the EIR. Further analysis of secondary socioeconomic impacts would be largely speculative and would not necessarily predict reasonably foreseeable outcomes, and therefore has not been included pursuant to CEQA Guidelines sections 15144 to 15147.

Nonetheless, if approved, the proposed project or project variant would be required to comply with the affordable housing requirements in the planning code, as discussed in the initial study (see Section E.2, Population and Housing, on pp. 118-119, and EIR Chapter 3, Plans and Policies, on p. 3.11). In its objectives (see EIR p. 2.12), the project sponsor commits to providing on-site affordable units. This commitment would be reflected in actions taken by the planning commission and the board of supervisors in approval of a development agreement with respect to,

among other community benefits, the project sponsor's commitment to the amount of affordable housing developed as part of the proposed project or project variant, as described on EIR pp. 2.106-2.107.

**Midblock Passageway**

The comment regarding placement of the north-south midblock pedestrian way was originally submitted in 2016 during preliminary public outreach concerning the project. The comment was considered by the project sponsor, and the proposed site plan has since been modified as presented in the Notice of Preparation, initial study, and EIR. The proposed open space plan is described in EIR Chapter 2, Project Description, on pp. 2.83-2.86, and illustrated in Figure 2.29: Proposed Open Space, on p. 2.85.

**Proposed Project Density and Site Utilization**

The first project objective listed on EIR p. 2.12 is to "redevelop a large underutilized commercial site into a new high quality walkable mixed use community…". A comment presents an opinion regarding the existing utilization of the project site, listing the range of existing office, retail, and child care uses, along with the site's parking and landscaping features. The comment's implication is that the existing café is a retail use open to the public. This is incorrect. The café is open only to UCSF employees and available to visitors to the UCSF uses in the building. As visitors entering the main office building must sign in and indicate their appointment(s) at the main entrance, members of the public cannot enter simply to visit the existing café use. Therefore, the café use is not a traditional retail use making the site a mixed-use site, as suggested in the comment. The annex building is not considered a separate land use because it provides mechanical services to the office use. As shown in Table 2.1: Project Summary, on EIR p. 2.8, the current use of the property for offices is comprised of the 338,000-gross-square-foot office building and a 14,000-gross-square-foot annex building. As explained on EIR p. 2.25, the current office use is considered a legal, non-conforming use in the RM-1 zoning district. In the context of this objective, the term "underutilized" refers to the available buildout of residential dwelling units and floor area as provided by the RM-1 zoning district. The project site could accommodate significantly more building square footage given the existing building's footprint of approximately 24 percent of the project site.[6] The objectives of the proposed project and project variant include the addition of new neighborhood-serving uses, such as neighborhood-serving retail and open spaces that would promote activation of the site for community interaction.

The proposed development plan, comprised of 13 new structures and the adaptive reuse of the existing office building as two separate residential buildings, is informed by several site-specific considerations, including the adaptive re-use of the existing office building; increasing the

[6] Don Bragg, The Prado Group, email to Peter Mye, Senior Planner, SWCA, July 25, 2019.

utilization of the project site for residential and neighborhood-serving uses while accounting for the site's topography; providing an open and connected site through internal pedestrian and bicycle pathways and open spaces; providing a mix of compatible uses; and providing a high-quality and varied architectural and landscape design that is compatible with the site's diverse surrounding context, topography, and other unique characteristics. These objectives are discussed in Chapter 2, Project Description, on EIR p. 2.12. Furthermore, the project site design is informed by feedback solicited from the planning department, other City agencies, and neighbors, as reflected in the current design presented in the EIR and the project sponsor's Planning Application Re-Submittal 2 (see RTC Section 2).

Table 2.2: Characteristics of Proposed Buildings on the Project Site, on EIR p. 2.23, lists the total residential floor area and number of dwelling units by number of bedrooms. The new and adaptively reused buildings would contain a range of dwelling units, from studios/one-bedroom units to four-bedroom units. As unit size is determined in part by the number of bedrooms provided, there would be no single average unit size. The environmental analyses are not based on the average square footage of any residential units but on the total number of residential units and, in some cases, the unit mix (i.e., number of bedrooms).

**Open Space**

Comments incorrectly characterize the existing open space on the project site as a public resource that would be owned by the project sponsor following UCSF's departure. As stated on EIR p. 2.19, there are approximately 34,300 square feet of existing grass lawns along Laurel Street, Euclid Avenue, and Masonic Avenue. The site was purchased by the project sponsor in March 2018 and is currently leased by UCSF pending the relocation of functions/offices to other UCSF sites. When UCSF owned the project site, it allowed the general public to have access to the grass lawns, as it does currently as the site's existing tenant. The proposed project or project variant would preserve approximately 18,760 square feet of the lawn area on Euclid Green, as discussed on EIR pp. 2.83-2.86. As shown in Table 2.4: Proposed Open Space, on EIR p. 2.84, the proposed project would include a total of 103,000 square feet of privately owned common open space, much of which would be open to the public. With the minor modifications to the open space program for the revised project or revised variant (see RTC Section 2, Revisions and Clarifications to the Project Description, p. 2.14 and RTC Table 2.4a and RTC Table 2.4b on RTC pp. 2.21 and 2.22), the Euclid Green area would be slightly reduced, from approximately 18,760 square feet to 18,004 square feet, and overall, the amount of common open space would increase from 103,000 square feet for the proposed project or project variant, to 127,126 square feet for the revised project or revised variant. the Euclid Green area would be slightly reduced, from approximately 18,760 square feet to 18,004 square feet, and overall, the amount of common open space would increase from 103,000 square feet for the proposed project or project variant, to

127,126 square feet for the revised project and 125,226 square feet for the revised variant. All of the common open space in the revised project and revised variant would be open to the public.

Community gardens are open spaces in which members of the community can grow produce and ornamental plants for personal use, such as those managed by the San Francisco Recreation and Park Department. The proposed project or project variant does not include a community garden or farmer's market space but would provide a variety of landscaped spaces throughout the project site. As described in the EIR, much of the open space would be accessible to the public.

As stated on EIR pp. 2.86-2.87, the proposed project or its variant would retain up to ten existing mature trees, if viable, and plant up to 270 new trees. The ten trees identified for retention would be subject to a number of tree-health-related measures to improve chances for survival, i.e., mulching, pruning, pest control, and monitoring irrigation and the need for nutritional supplements through laboratory analysis of soil and plant tissue. The proposed project or its variant would remove 185 on-site trees, including 19 on-site significant trees, which are analyzed in further detail in the initial study in Section E.12, Biological Resources, on pp. 202-204. Additional information regarding this topic is available in Response BR-1: Loss of Trees starting on RTC p. 5.J.81.

One comment asserts that the north edge of the property along California Street is a significant visual resource containing mature evergreen street trees, high shrubs, and a variety of flowering greenery. As discussed above, the proposed project or its variant would meet each of the criteria provided by CEQA section 21099(d), and thus the determination of significance of environmental impacts of the proposed project or its variant under CEQA does not consider aesthetics, as discussed in EIR Chapter 1, Introduction, pp. 1.11-1.12.

In general, the planning code does not provide a definition of, or requirements for, "green space." The proposed project or project variant would comply with planning code section 135 requirements, which call for private and common open space with a menu of design options including areas designed for outdoor living, recreation or landscaping, on the ground and on decks, balconies, porches and roofs. To the extent that the comments express preference for lawns and mature trees, these comments do not raise issues concerning the adequacy or accuracy of the EIR's analysis of environmental impacts under CEQA. Such comments may be considered and weighed by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project or project variant independently of the environmental review process. Further, as noted on EIR p. 2.106, the project sponsor has applied to enter into a development agreement with the City, to address, among other topics, the development and maintenance of certain parts of the proposed open space as publicly accessible. Comments related to the merits of that agreement will be forwarded to the decision-makers for their consideration, but do not concern the adequacy or accuracy of the EIR.

## COMMENT PD-4: SITE ACCESS

"3. **THERE IS AN EXISTING PATHWAY THROUGH THE BUILDING TO MASONIC.**

Opening at the front of the main building, there is a pathway through the building that opens into the Eckbo Terrace and continues to Masonic. See Attachment C, photos of pathway." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-7]) [Attachment C referenced in the comment is presented as Exhibit C in Comment Letter O-LHIA1 in RTC Attachment B.]*

"Under this Alternative, as well as the Community Full Preservation Alternative, the existing passageway which extends from the north of the building, through the building, into the Eckbo Terrace, and onto an open-air pathway that directly connects to Masonic Avenue can be used as a pathway open to the public. No division of the main building would be needed to produce a pathway. There is also an existing open-air passageway from the north gate through the property that connects with Laurel Street." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-13])*

"The DEIR is also inaccurate, because it does not acknowledge that the site is now highly walkable, with pathways throughout that lead out to Walnut, Mayfair, Laurel and Euclid/Masonic Streets. The EIR fails to acknowledge that there is currently a pathway that leads from the front of the existing office building, through the building to the Eckbo Terrace and out onto Masonic/Euclid streets.

The City's Preliminary Project Assessment specified that the proposed Walnut "walk" would not be an extension of a City street but would be an internal pathway. (See June 8, 2018 comments by Kathryn Devincenzi on Initial Study for 3333 California Street, Ex. M. p. 15, stating as to measurement of height "curb along the Walnut street extension may not be used as the base of measurement because the Walnut street extension is not a public right-of-way.") The same analysis applies equally to the proposed Mayfair "extension." Thus, the DEIR inaccurately described the project's objectives as extending the "surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces."" *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-15])*

## RESPONSE PD-4: SITE ACCESS

The comments state that the site is already highly walkable with existing internal pedestrian walkways that connect public sidewalks on California Street, Laurel Street/Mayfair Drive, and Euclid and Masonic avenues. Comments further assert that there is an existing publicly accessible path through the project site and main building that provides north-south connectivity from Walnut Street to Masonic and Euclid avenues (see the photographs in Attachment C to Letter O-LHIA1 in RTC Attachment B [pp. 14-17]). The comments and photographs indicate that public access is available through an entrance associated with the conference center (or auditorium) and near the northeast surface parking lot under the northerly extension of the main building's east wing. The comment further asserts that this entrance provides direct access through the building

into the private courtyard (terrace) and to Euclid Avenue via the wrought-iron gate near Euclid Avenue, as shown in the last photograph.

As described on EIR pp. S.1, 1.1, and 2.1, the project site is owned by Laurel Heights Partners, LLC, and is leased to the Regents of the University of California, who currently use the site for the UCSF Laurel Heights Campus. Existing site access for pedestrians is correctly described on EIR p. 2.16, which states that "pedestrian access to the campus is provided at California Street, Laurel Street, and Euclid Avenue, and an internal sidewalk system leads to the existing office building's entrances along its north and western facades." It would be inaccurate to state that there is a public pathway through the existing building connecting California Street with Masonic and Euclid avenues. Access to the building is limited to UCSF staff and requires display of a badge. As described below in more detail, visitors must check in with security at the main entrance and receive and display a visitor's pass to continue into and through the building. However, it is true that there is an existing sidewalk connecting California Street and Laurel Street using internal pedestrian walkways. The internal sidewalk system borders the surface parking lots and connects the gated north entry opposite Walnut Street and the gated western entries at Mayfair Drive/Laurel Street and at Laurel Street, just north of Euclid Avenue. Although not public sidewalks, a pedestrian could enter via Walnut Street (when the gates are open) and continue south parallel to Laurel Street via the internal pedestrian walkway adjacent to the west wing of the main building. This internal pedestrian walkway connects to the Laurel Street sidewalk at the southernmost entry just to the north of Euclid Avenue and generally parallels the west side of the project site. This internal sidewalk system does not provide the north/south and east/west connections that extend the surrounding street grid through the site for pedestrians and bicyclists as recommended by the planning department during its early reviews of the proposed site plan (see the description of proposed pedestrian network changes in Section 4.C, Transportation and Circulation, EIR p. 4.C.42).

Existing parking, circulation, and loading are correctly described on EIR pp. 2.15-2.17; it would be inaccurate to state that a public north-south pathway through the existing building that connects California Street with Masonic and Euclid avenues is part of existing conditions. As explained and illustrated in an April 8, 2019 letter from UCSF's Real Estate Division,[7] the UCSF Laurel Heights campus is a restricted access campus with strict security control measures. Only authorized UCSF faculty and/or employees with building security access cards are allowed unaccompanied access to the building and property. Non-UCSF visitor access is allowed only with permission and visitors must "enter the building through the main entrance where they must show their driver's license or other identification to the security guard, sign into a log book, and

[7] University of California, San Francisco (UCSF), Letter from Bruce Lanyan, Interim Assistant Vice Chancellor, UCSF Real Estate Division, to Kei Zushi, San Francisco Planning Department re: UCSF Laurel Height Campus Access, April 8, 2019.

state their business and/or reason for accessing the property in addition to the name of the UCSF employee they are visiting. On the rare occasions that public/community meetings are held at the site with permission of UCSF, the sign-in requirement is still in place and a university employee must remain on-site during that period."[8]

Thus, based on UCSF's response regarding site access, the assertion that passage through the existing building, including its interior private courtyard, is available to the general public is not accurate. The EIR project description provides accurate information regarding existing and proposed site access. The UCSF letter also provides information regarding entry protocols for the sub-lessees (Bright Horizons child care provider and the operator of the café). Access to the on-site café is also restricted to employees and to visitors who have signed in and are visiting a UCSF employee; the exterior café doors from private courtyard are accessible only with UCSF access cards (see also Response PD-3, Project Characteristics, particularly RTC p. 5.B.22).

One comment states that the proposed Mayfair and Walnut walks would be internal pathways, not extensions of city streets. The comment asserts that the inaccurate characterization of the proposed Mayfair and Walnut walks, in contrast to the project objective presented on EIR p. 2.12, to "…open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces,...," renders the project objective as flawed. As stated on EIR pp. 2.76-2.77, the project site would be redeveloped to enhance pedestrian accessibility:

> The project site would be integrated with the existing street grid. Pedestrian promenades would be developed to align with Walnut Street and connect to Masonic and Euclid avenues (north/south direction), and to align with Mayfair Drive and connect to Presidio and Masonic avenues and Pine Street (east/west direction) (see Figure 2.22, p. 2.62). The north-south running Walnut Walk and the east-west running Mayfair Walk would be closed to vehicular traffic. The northern portion of Walnut Walk would be the extension of Walnut Street into the project site, which would provide vehicular access to the California Street Garage and terminate at a roundabout. Pedestrians would be able to walk through the project site from Laurel, California, and Walnut streets to Presidio Avenue, Masonic Avenue, Pine Street, and Euclid Avenue. In addition, a pedestrian walkway between the Plaza A and Plaza B buildings (Cypress Stairs) would provide access from the California Street sidewalk (at the midblock between Laurel and Walnut streets) to Cypress Square, one of the proposed onsite plazas that would be open to the public. Pedestrian access would also be provided at Walnut Street, at Presidio Avenue near the corner of Pine Street at the eastern terminus of Mayfair Walk (the proposed Pine Street Steps and Plaza), at the intersection of Masonic and Euclid Avenues at the southern terminus of Walnut Walk (the proposed Corner Plaza), and at the western terminus of Mayfair Walk. In addition, access to the proposed Euclid Green would be developed at the corner of Laurel Street and Euclid Avenue. These spaces would be designed to be compliant with the Americans with Disabilities Act.

[8] Ibid.

Thus, the project objective referenced in the comment describes a conceptual extension of accessibility by providing pedestrian and bicycle pathways in connection with existing streets (the proposed Mayfair and Walnut walks). The objective does not state that that the project would provide new vehicular thruways within the project site. The EIR project description provides accurate information regarding the proposed open space program and its interconnectivity with the surrounding pedestrian network.

One comment notes that the alternative proposed by the Laurel Heights Improvement Association of San Francisco, Inc. (the LHIA Alternative) would not divide the existing building, as would the proposed project or project variant, and asserts that such a change to the building is not necessary. That comment asserts that the project objective to connect the site with the existing street network is obviated by an existing publicly accessible north-south connection (through the main building).

As discussed above, there is no existing public passageway through the building. However, one of the alternatives described in the EIR, Alternative C: Full Preservation – Residential Alternative, EIR pp. 6.65-6.88, is similar to the LHIA Alternative as it relates to the retention and reuse of the existing building. As depicted in Figure 6.5: Alternative C: Full Preservation – Residential Alternative Site Plan, on EIR p. 6.67, Alternative C would preserve the existing building form with no physical division and would adaptively reuse it for a residential use. Alternative C would include an east-west pedestrian and bicycle pathway because the proposed Mayfair Walk would be developed; however, without the division of the existing building, a north/south pedestrian and bicycle pathway would not be developed (see EIR p. 6.73). Thus, Alternative C, as well as other alternatives that preserve the existing structure without any physical division, would only partially meet the project objective to connect to the existing street grid because only the east-west connection would be developed. Furthermore, under the proposed alternatives that retain the existing building form, the courtyard on the southeast side of the building would be retained. Alternative C will be considered by City decision-makers along with the proposed project, project variant, and other alternatives, as discussed in EIR Chapter 6, Alternatives. For a discussion of the impacts of dividing the existing building, see EIR Section 4.B, Historic Architectural Resources, Impact CR-1 on EIR pp. 4.B.41-4.B.47. For responses related to the range of alternatives analyzed in the EIR and the request for inclusion of an alternative developed by the Laurel Heights Improvement Association of San Francisco, Inc. (the "LHIA Alternative"), see Response AL-1: Range of Project Alternatives and Response AL-2: LHIA Alternative in Section 5.H, Alternatives, RTC pp. 5.H.6-5.H.17 and pp. 5.H.54-5.H.69, respectively.

## COMMENT PD-5: PERMANENT RIGHT OF RECREATIONAL USE/PRESCRIPTIVE EASEMENT

**"6. The Public Has Acquired Rights of Recreational Use on Open Space on the Property.**

As explained in the letter from attorney Fitzgerald, the public has acquired recreational rights to the open space on the property as a result of the public's use of the used open space on the property as a park. See Attachment F." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-9]) [Attachment F referenced in the comment is presented as Exhibit F in Comment Letter O-LHIA1 in RTC Attachment B.]*

"The public has used the green landscaped areas surrounding the main building as recreational space for many years, and the public has acquired a permanent right of recreational use in these areas. (Ex. D, letter of attorney Fitzgerald)" *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-4])*

"I am writing regarding the development of the 3333 California Street development, currently the UCSF Laurel Heights Campus (the "Site"). It is my understanding that the San Francisco Planning Department is working with the developer of the Site regarding the initial project plans for the proposed development. The owner of the fee interest and the developer of the Site are limited in their joint ability to develop the Site because the owner of the Site does not have free and clear tide; rather the general public holds a permanent recreational interest in all of the open space at the Site. Therefore, any development plans at the Site may not impinge upon this open space.

The general public holds a permanent right of recreational use on all of the open space at 3333 California and such rights were obtained by implied dedication. Dedication is a common law principle that enables a private landowner to donate his land for public use. Implied dedication is also a common law principle and is established when the public uses private land for a long period of time, which period of time is five (5) years in California. In 1972, the California legislature enacted Civil Code Section 1009 to modify the common law doctrine of implied dedication and to limit the ability of the public to secure permanent adverse rights in private property. Here, however, the existing open space at the Site was well established and well used as a park by the general public long before the completion of the construction of the full footprint of the improvements at the Site in 1966. Therefore, the general public has permanent recreational rights to the open space at the Site; the rights were obtained by implied dedication prior to the enactment of Cal. Civil Code Sec. 1009 in 1972.

Even if the general public had not secured permanent rights to recreational use through implied dedication prior to 1972, the public and countless individuals have acquired a prescriptive easement over the recreational open space. The recreational use has been continuous, uninterrupted for decades, open and notorious and hostile (in this context, hostile means without permission). Every day, individuals and their dogs use the green space along Laurel, Euclid and along the back of the Site at Presidio. Individuals ignore the brick wall along Laurel and regularly use the green space behind the wall as a park for people and for their dogs. The use of the Site has not been permissive. For example, the owner of the Site has not posted permission to pass signs in accordance with Cal. Civil Code Sec. 1008. If such signs ever were posted, they have not been reposted at least once per year. Although it is counterintuitive, an owner typically posts such

signs to protect against the public securing adverse rights. One might assume the owner of the Site has not posted such signs, as the owner is aware of the pre-existing and permanent recreational rights the general public has secured to the open space. Because the public's rights to the open space were secured decades ago through implied dedication, it is not necessary for the general public to rely upon its prescriptive easement rights outlined in this paragraph; rather it is another means to the same end.

It is important that the Planning Department understand these legal issues as any project plan (or any future project description in an Environmental Impact Report ("EIR") for the Site) cannot include development of the open land over which the public has a secured permanent rights of recreational use. It would not be a concession by the owner/developer to leave the open space undeveloped and allow public recreational use as the general public holds permanent recreational rights to this space. It is important to note that even the open space behind the walls that has been used as park space is also included in this dedication to the public. According to well-established case law, a wall or fence is not effective in preventing the development of adverse property rights if individuals go around the wall, as is the case here.

In sum, the open space at the Site cannot be developed as the public secured such rights through implied dedication prior to 1972 (or, alternatively, by prescriptive easement). In reviewing the development plans for the Site, the City cannot decide to allow development of any of the open space as the recreational rights to the space are held by the public at large. Any project description in the future EIR for the Site that contemplates development of any of the open space would be an inadequate project description and would eviscerate any lower impact alternative presented in the EIR. One only need to look to the seminal land use case decided by the California Supreme Court regarding this very Site' to see that an EIR will not be upheld if the project alternatives are legally inadequate. It would be misleading to the public to suggest that a lesser impact alternative is one that allows the public to use the space to which it already has permanent recreational use rights.

In sum, please be advised of the public's permanent recreational rights to all of the existing open space at the Site and please ensure that a copy of this letter is placed in the project file." *(Kathryn R. Devincenzi, Letter, January 8, 2019, Exhibit D: Letter from Margaret Fitzgerald to Mary Woods, Planner – North West Quadrant, San Francisco Planning Department, February 26, 2018 [I-Devincenzi3-23])*

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"Through the years, the community has used the green landscape spaces for recreational purposes, and a lawyer has stated that the public has acquired permanent recreational rights on the green spaces." *(Linda S. Glick, Draft EIR Hearing Transcript, December 13, 2018, p. 56 [I-Glick1-4])*

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"Through the years, the community has used the green landscape spaces for recreational purposes, and a lawyer has stated that the public has acquired permanent recreational rights on the green spaces." *(Linda S. Glick, Draft EIR Hearing Transcript Handout, December 13, 2018 [I-Glick1-8])*

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"While no memorial park was created, the neighborhood residents and visitors today use this area of mature trees and open grassy areas as a park for recreation and to take in the views of the more urbanized downtown area to the east. This publicly used open space contributes to the health and well-being of the neighbors and the visitors in this area and is a healthful retreat from the pressures of urban life without having to trek farther to the Presidio National Recreation area nor

to travel much farther to the next available designated park." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-68])*

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**RESPONSE PD-5: PERMANENT RIGHT OF RECREATIONAL USE/PRESCRIPTIVE EASEMENT**

Several comments assert that the use of open space on the project site along Laurel Street, Euclid Avenue, and Presidio Avenue, as well as the courtyards and terraced areas, has resulted in the general public and numerous individuals holding a permanent right to recreational use of the site either through implied dedication or by a prescriptive easement. The comment is noted.

A prescriptive easement is a common legal theory advanced in boundary and easement disputes as a way to establish the right to use the land of another for a specific purpose. An easement is a lesser interest in real property than the right of ownership. Claims to a prescriptive easement are often invoked when a claimant seeks to establish a right to use real property based on historic usage. Anyone claiming a prescriptive easement has the burden of proving that their use of the property was open, notorious, continuous, and adverse for an uninterrupted period of five years. "Adverse use" means that the owner has not consented to the use of his/her property by silent permission, lease or license.

Similarly, the doctrine of implied dedication is a common law (non-statutory law) principle that confers the right of the public to use property of another in the absence of an oral or written agreement. Implied dedication is similar to a prescriptive easement; however, the easement is for the benefit of the general public, and not an individual. (See generally, CEB, California Easements and Boundaries: Law and Litigation.) The California Legislature in 1972 enacted Civil Code section 1009 to statutorily address claims of implied dedication.

Both a prescriptive easement and a recreational easement through implied dedication are ultimately established by court decree; a public entity having quasi-judicial functions, such as the San Francisco Planning Commission or Board of Supervisors, does not have authority to determine prescriptive easement rights. (See, generally, CEB, California Easements and Boundaries; Law and Litigation.)

In any event, as required by CEQA Guidelines section 15124, the EIR accurately describes the existing site conditions and existing site access, and accurately describes the proposed project including proposed open space. As stated in Chapter 2, Project Description, on EIR p. 2.11, Laurel Heights Partners, LLC, (the project sponsor) owns the project site and "leases the site to the Regents of the University of California, which uses the project site for the University of California, San Francisco (UCSF) Laurel Heights Campus." As stated on p. 2.19, when the project site was owned by UCSF, it allowed the general public access to the grass lawns. As the current tenant of the site, UCSF continues to allow the public access to the grass lawns.

As noted in Table 2.1: Project Summary, EIR pp. 2.8-2.9, the site includes 51,900 square feet of open space. The existing green lawns at the corner of Euclid Avenue and Laurel Street (23,600 square feet) and along Presidio Avenue (10,700 square feet) are accessible to the general public. The internal open spaces on the south and east sides of the existing office building (a 4,500-square-foot child care play space and a 13,100-square-foot courtyard) are for UCSF's exclusive use and are accessible only to UCSF staff and visitors to the UCSF facility. The remaining approximately 113,300 square feet of open area are inaccessible planted or landscaped areas. The open area does not include the existing surface parking lots (approximately 139,000 square feet).

The EIR identifies approximately 103,000 square feet of common open space to be provided as part of the proposed project and project variant, a portion of which would be accessible to the public, including access to Euclid Green (see EIR pp. 2.84-2.85). With the minor modifications to the open space program for the revised project or revised variant (see RTC Section 2, Revisions and Clarifications to the Project Description, p. 2.14, and RTC Table 2.4a, and RTC Table 2.4b on RTC pp. 2.21 and 2.22) the amount of common open space for the revised project would be 127,126 square feet (an increase of 24,126 square feet) and for the revised variant the amount of common open space would 125,226 square feet (an increase of 22,226 square feet), all of which would be open to the public.

As noted on EIR p. 2.106, the project sponsor has applied to enter into a development agreement with the City to address, among other topics, the development and maintenance of certain parts of the proposed open space as publicly accessible. Comments related to the merits of that agreement will be forwarded to the decision-makers for their consideration, but do not concern the adequacy or accuracy of the EIR.

## COMMENT PD-6: PROJECT OBJECTIVES

"**3. The EIR's Statement of Project Objectives Is Unreasonably Narrow, and the DEIR is Inadequate Because It Lacks a Reasonable and Accurate Statement of Project Objectives.**

The DEIR's statement of "Objectives" of the proposed project is unreasonably narrow, and biased toward the developer's proposed project concept, and inaccurately characterizes the proposed project/variant and its potential impacts on the environment. As a result, the DEIR fails to provide a reasonable or accurate statement of project objectives under CEQA standards."
*(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-12])*

"Also, since the plans do not specify the size of the proposed new retail uses, it cannot be determined whether the type of retail provided would be of a size that is neighborhood-serving, and some portions of the proposed retail space are very large and could accommodate on-local retail uses. (See August 17, 2017 plan sheet A4.03, and compare with sheet A4.02). Also, by its nature, the proposed 54,000 square feet of retail uses are of a size that would attract customers

from areas that are not in the neighborhood. Moreover, the proposed 9,826 square feet of composite food and beverage retail uses (DEIR p. 4.C.54) would attract substantial numbers of persons from outside the neighborhood and are one step up from fast food.

The project's objective to create complementary designs is inaccurate, because the design and architectural character of the proposed project/variant buildings would not be compatible with the scale or character of any of the neighborhoods surrounding the project site. Another objective acknowledges the incompatibility, acknowledging the "diverse surrounding context." Also the Preliminary Project Assessment stated that the architectural design should be made high quality, but the plans have not been revised to do so.

The description of the objective of creating a green, welcoming space that will encourage the use of the outdoors and community interaction is not applicable to the proposed project, which would create a concrete jungle with mostly strip planted beds constructed over underground concrete garage structures, in the place of natural, verdant expanses of lawns, shrubs, plants and trees planted into the ground. Also, the paved pathways proposed in the project fails to comply with the requirements of Planning Code section 135, which requires that "[u]sable open space shall be composed of an outdoor area or areas designed for outdoor living, recreation or landscaping." Proposed concrete pathways are inaccurately designated as open space on August 19, 2017 plan sheet L0.01.

The fact the proposed project/variant inaccurately characterized proposed paved pathways as open space is acknowledged by the objective to incorporate open space that would maximize pedestrian accessibility.

Also, the DEIR fails to acknowledge that the objective to integrate the existing office building into the development is inaccurate since the proposed project proposes to divide it in two and demolish its executive wing.

In addition, the DEIR and project plans do not specify the type and amount of affordable housing that might be constructed on site, and the San Francisco Planning Code allows a development agreement to increase or decrease the amount of affordable housing otherwise required by the Planning Code. Thus, the DEIR contains no evidence that the proposed project/variant would achieve the objective of providing on-site affordable units consistent with ABAG's Regional Housing Needs Allocation for the City of San Francisco. The DEIR fails to specify how the proposed project/variant would achieve such ABAG allocation or evaluate the manner in which the proposed project/variant and alternatives would actually meet such ABAG allocation for all income levels." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-16])*

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**RESPONSE PD-6: PROJECT OBJECTIVES**

The comments state that the project objectives, shown on EIR p. 2.12, are unreasonably narrow, biased toward the developer, and inaccurately characterize the project and its potential impacts. The comments also disagree with the assertion that the project would meet objectives such as the provision of neighborhood-serving retail (as compared to larger retail attracting regional customers outside the neighborhood); the use of complementary and high-quality designs; the creation of a green, welcoming, walkable environment; the integration of the existing office building; and the provision of affordable housing on site.

To the extent that the comment asserts that proposed project objectives are overly specific or express a particular preference in the character of land uses proposed by the project, this is a comment on the merits of the proposed project. CEQA Guidelines section 15124 provides that the project description of an EIR shall include a statement of objectives that includes the underlying purpose of the project and "may discuss the project benefits" to help the lead agency develop a reasonable range of alternatives and aid decision-makers in preparing findings or a statement of overriding considerations, if necessary (see also CEQA section 21082.4). Lead agencies have broad discretion to formulate project objectives, although project objectives should not be so narrow as to effectively preclude consideration of a reasonable range of alternatives. The objectives listed in the EIR provide adequate context of the project sponsor's goals to allow the lead agency to develop an appropriate range of alternatives to be evaluated in the EIR. City decision-makers will use the project objectives in their evaluation of the proposed project, project variant, and alternatives as part of the basis for findings if they determine to approve the project or the project variant. The range of alternatives considered need not achieve all of the same objectives as the proposed project but should include alternatives that could "feasibly attain most of the basic objectives."

Here, City decision-makers would consider each of the six alternatives analyzed in EIR Chapter 6, Alternatives, which address a variety of land use options, such as increased office use, increased residential use, historic preservation of the existing office building, mixed office and residential use, and conformance to code requirements, all of which could feasibly attain most of the project's basic objectives.

Under Article 1 of the planning code, a neighborhood-serving business is defined by the characteristics of its customers, its types of merchandise or service, its size and trade area, and the number of similar establishments in other neighborhoods. However, this definition does not provide a size limit to a neighborhood-serving retail business. As listed in Table 2.2: Characteristics of Proposed Buildings on the Project Site, on EIR p. 2.23, the proposed project would contain ground-floor retail uses in the Plaza A Building, Plaza B Building, Walnut Building, and Euclid Building. The size of retail space in each building would range from 4,287 to 24,324 square feet. Although the planning application submitted by the project sponsor to the City in August 2017 indicates that retail demising[9] and associated square footage is conceptual and final layouts may differ, the 54,117 gross square feet of retail space would not be developed in a single location on the project site and would not be a single large retail space. For purposes of the EIR transportation analysis, the 54,117 gross square feet of retail space is further refined by the type of retail in order to calculate the number of person trips that would be generated by the different types of retail uses proposed. Thus, the concern expressed in one comment about the trip

[9] The final number of tenants and a demising plan for tenants, which indicate the location of non-bearing walls that separate tenant spaces, are typically determined at the time buildings are leased.

generation potential of the 9,826 gross square feet of composite food and beverage retail uses is already reflected in the trip generation (see Section 4.C, Table 4.C.11: Person-Trip Generation (Internal and External Trips Combined), on EIR p. 4.C.54, for the daily, weekday a.m. peak, and weekday p.m. peak person trips generated by that subset of the proposed retail uses for both the proposed project and project variant).

Subsequent to the publication of the draft EIR, the total amount of gross retail square footage in the proposed project has been reduced by 13,856 gross square feet to 40,261 gross square feet. Under the revised variant, the retail use would be reduced by 14,097 gross square feet to 34,496 gross square feet. This information is presented in the detailed architectural and landscape plans, which provide conceptual retail demising, available in Planning Application Re-submittal 2 (dated July 3, 2019). As noted in Planning Application Re-submittal 2, there would be a total of 40,261 gross square feet of retail uses, with 14,816 gross square feet in the Plaza A Building, 11,180 gross square feet in the Plaza B Building, and 14,265 gross square feet in the Walnut Building. There would be no retail in the proposed Euclid Building. Appropriate land use controls for neighborhood-serving retail and restaurant uses would be reflected in actions taken by the planning commission and the board of supervisors in consideration of a development agreement and other approvals.

A comment presents an opinion that the project objective to create complementary designs ("Create complementary designs and uses that are compatible with the surrounding neighborhoods…," EIR p. 2.12) is inaccurate, because the proposed project or project variant would not be compatible with the scale or character of the surrounding neighborhoods, and that the architectural design plans are not high quality. The comment also declares that the proposed project or project variant would not achieve the objective of creating a green, welcoming, walkable environment ("Provide substantial open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage the use of the outdoors and community interaction," EIR p. 2.12) but would create a concrete jungle. The comment asserts that these spaces do not qualify as open space per planning code section 135.

As discussed in Response PD-3: Project Characteristics, RTC pp. 5.B.19-5.B.24, this comment asserts an opinion regarding the proposed site plan and open space. Furthermore, the EIR presents several characterizations of site trees and landscaping, including Figure 2.29: Proposed Open Space, on EIR p. 2.85. Comments on the project design, including the design of the open space program, do not raise specific issues concerning the adequacy or accuracy of the EIR under CEQA; such comments are considered comments on the merits of the project that may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project or project variant.

The comment asserts that the last objective on EIR p. 2.12, which states that the project sponsor seeks to "work to retain and integrate the existing office building into the development to promote sustainability and eco-friendly infill re-development," is an inaccurate objective because the project proposes to separate the existing building and demolish its east wing.

This objective refers to the adaptive reuse of the existing office building for residential use as part of a larger mixed-use development in an urban infill environment. This objective does not state that the building would necessarily be preserved in its entirety to achieve this objective. Retention and integration of the existing office building into the development was considered during the alternatives scoping process discussed on EIR pp. 6.5-6.9, with recognition that division of the building contributed to the significant and unavoidable historic resources impact. Two of the alternatives described in the EIR, Alternative B: Full Preservation – Office Alternative, EIR pp. 6.28-6.64, and Alternative C: Full Preservation – Residential Alternative, EIR pp. 6.65-6.88, include the preservation of much of the existing office building form including the east wing. These alternatives will be considered by City decision-makers along with the proposed project, project variant, and other alternatives, as discussed in EIR Chapter 6, Alternatives.

If approved, the proposed project or project variant would be required to comply with the affordable housing requirements in the planning code, which requires payment of a fee or provision of on-site or off-site affordable units. Providing on-site affordable units is one of the listed project objectives. The commitment to provide affordable units on site would be reflected in actions taken by the planning commission and the board of supervisors in approval of a development agreement, as described on EIR pp. 2.106-2.107. As discussed on initial study p. 118, the City is tasked with meeting a Regional Housing Needs Allocation (RHNA) goal of 28,869 residential units by 2022 as distributed by the Association of Bay Area Governments for households at the very low income, low income, moderate income, and above moderate income levels. As stated, the proposed project or its variant would be subject to the inclusionary affordable housing program requirements of planning code section 415; the development agreement negotiated with the City would define the percentages of affordable housing units to be provided by the proposed project or its variant by income level and the number of affordable residential units at each income level. The proposed project and its variant would contribute 558 units and 744 units, respectively, each fulfilling a portion of the City's assigned RHNA.

The comments do not present evidence supporting assertions that objectives listed in the EIR were narrowly defined or were not reasonable or accurate statements of the underlying purpose of the project such that the lead agency was limited in its development of a range of alternatives, or the objectives could not be used to aid decision-makers in their evaluation of the proposed project, project variant, and alternatives. As previously noted, the range of alternatives considered need not achieve all of the same objectives as the proposed project or project variant but must be able to "feasibly attain most of the basic objectives." (See CEQA Guidelines section 15126.6(a).)

The comments are noted and may be considered and weighed by the decision-makers as part of the basis for findings if they determine to approve the proposed project or the project variant.

## COMMENT PD-7: PROJECT APPROVALS

"**9. The Project Description is Not Stable.**

For purposes of CEQA, a "project" is defined as comprising "the whole of an action" that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. 14 CCR section 15378(a).

The Initial Study lists approval of a subdivision map by San Francisco Public Works as an approval that would be required to implement the proposed project or project variant. IS p. 86.

However the Initial Study fails to provide any information on the nature of the subdivision that would be sought, including whether spaces proposed to be used for retail or office uses would be subdivided. The EIR should disclose all information in the possession of the City as to the nature of the subdivision that would likely be sought.

In addition, the Initial Study indicates that the Walnut Street extension would be a pathway, and the EIR should clarify that approval would not be sought to make the Walnut Street extension a public street or public right of way. The EIR should also clarify that approval would not be sought to divide the project site into blocks, because the whole site is now one lot and block." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-12])*

"In addition, the project description is unstable in that the Initial Study indicates that the project proponent would seek a development agreement that would permit a 15-year period for construction and "limit the City's ability to rezone the site for a set period of time." IS p. 23. Thus, the development described in the Initial Study may not be the full extent of the contemplated development, especially in view of the proposed removal of the 4th floor of the existing office building and the strengthening of the building to accommodate additional floors.

The EIR must disclose all information as to the number of additional floors that the strengthening of the structure is being designed to accommodate and all other designs that are being prepared to accommodate expansion. Is the strengthening of the building being designed to accommodate more floors than three, and if so, how many such additional floors? The Initial Study discloses only that two to three stories are proposed to be added to the existing building. Also, are any of the new buildings being designed to accommodate expansion, and how many additional floors are they being designed to accommodate? An Initial Study must consider all phases of project planning, including phases planned for future implementation. 14 CCR section 15063(a)(1). The EIR must also disclose all available information as to the terms of the proposed development agreement that the project proponent and/or the City is considering.

Additional floors added to buildings would allow space for more residential units or other uses sought by the developer, and could increase the number of occupants or users of the site, and the consequent volumes of traffic, air emissions, noise and shadows. The impact of shadow would be greater if more than two to three additional stories were added to the existing building. Thus, the information sought is relevant to analysis of environmental impacts." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-14])*

**RESPONSE PD-7: PROJECT APPROVALS**

The comment states that the project description is not stable, that the construction duration coupled with the strengthening of the adaptively reused building to accommodate additional floors would allow for future expansion, that the extension of Walnut Street is not clearly defined as a pathway or a public street, that the EIR failed to provide information on the nature of the subdivision map that would be sought from San Francisco Public Works, and that the EIR should clarify that approval would not be sought to divide the project into blocks with public rights-of-way, where the existing site is one lot and one block.

For the purposes of CEQA, the project description has been presented in the Notice of Preparation (published September 20, 2017), the initial study (published April 25, 2018), and the draft EIR (published November 7, 2018). Overall, the project description presented in all three documents is consistent, and no material or substantial changes to the project site plan, the adaptive reuse strategy and required seismic and load strengthening of the existing building, the density of land uses, number of residential units, commercial square footage, or proposed open space plan have occurred. As discussed in the initial study and EIR project descriptions, foundation work would not be necessary to accommodate the two to three additional floors proposed for Center Buildings A and B, respectively; however, to improve the seismic systems for the Center A and B buildings new or expanded spread footings may be necessary where shear walls terminate at the foundation level (see EIR pp. 2.34-2.35 and 2.99). As discussed in the initial study and EIR project descriptions, the proposed Mayfair and Walnut walks would serve as pedestrian and bicycle pathways, not vehicular rights-of-way that would create a multi-block urban form. Furthermore, the extension of Walnut Street into the project site for access to the proposed California Street garage and the roundabout would not be a new public right-of-way but a private roadway. CEQA Guidelines section 15124 provides that a project description need only provide sufficient detail in order to adequately disclose, analyze, and address environmental impacts. Minor revisions and clarifications of the project description subsequent to publication of the draft EIR are provided in RTC Section 2, pp. 2.2-2.29.

The stability of a project description is determined by whether it is internally consistent, or whether it shifts over time in a manner that prevents the EIR from allowing the public to intelligently participate in the decision-making process. A project description must provide adequate detail to allow a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An EIR's project description "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact" (CEQA Guidelines section 15124). The comment does not provide examples or evidence of substantive changes to the project description that have occurred in a way to prevent informed public participation within the context of the CEQA process. However, as an example of how a project description evolves over time as a result of technical environmental analyses of the project as proposed, see

Figure 22: Proposed Site Access, on initial study p. 51 (EIR Appendix B) and Figure 2.22: Proposed Site Access, on EIR p. 2.62, and the associated text in each document. These figures illustrate the change to the entry/exit program for the proposed garage access from Laurel Street between California Street and Mayfair Drive. The change would limit access to right-turn in and right-turn out movements to minimize potential conflicts between cars accessing the garage and those entering and exiting the Laurel Shopping Center parking lot.

The EIR presents a preliminary list of San Francisco agencies' anticipated approvals and is subject to change, as discussed on EIR pp. 2.106-2.108. These approvals may not be granted until the required environmental review has been completed. Thus, some details of proposed actions are necessarily preliminary and subject to change. Applicable elements of the project description for the proposed project or project variant as described in EIR Chapter 2, including minor modifications identified in RTC Section 2, would be incorporated into the required development agreement, including the site plan and proposed mix of uses. Disclosing that a subdivision map would be approved is sufficient, and the additional detail sought in the comments is not required. Since publication of the draft EIR, the project sponsor submitted a Tentative Map application on April 9, 2019, for a phased subdivision in which the project sponsor proposes to create separate horizontal and vertical legal parcels in anticipation of the re-development of the project site. The Tentative Map would provide for the possibility of additional vertical and commercial condominium subdivision. Whether or not a subdivision of the project site is approved, the project would create a cohesive mixed-use development. As such, the specific nature of the subdivision map would not introduce material changes to the proposed project or project variant that would require further environmental review.

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# 5.C PLANS AND POLICIES

The comments in this section relate to the topic of Plans and Policies, evaluated in the draft EIR (Chapter 3) and the initial study (Section C). A corresponding response follows the grouped comments.

## COMMENT PP-1: GENERAL PLAN, RESOLUTION 4109, ZONING CONTROLS, HEIGHT LIMITS, AND DEVELOPMENT AGREEMENT

"Retail uses were banned as a commercial use on the site by Planning Commission Resolution 4109, which still applies, when the site zoning was changed from First Residential to commercial with limitations, in order to prevent adverse effects on the adjacent retail uses in Laurel Village Shopping Center and along the Sacramento Street neighborhood commercial area. See Attachment G, Resolution 4109. This resolution was recorded in the chain of title as a Stipulation as to Character of Improvements and can only be changed by the Board of Supervisors." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of SF, Inc., Letter, December 5, 2018 [O-LHIA1-4]) [Attachment G referenced in the comment is presented as Exhibit G in Comment Letter O-LHIA1 in RTC Attachment B.]*

"I am in favor of retaining zoning as residential only. That was the intention originally by the gentleman who developed Laurel Heights as well as Antivista Heights. He was going to develop this area; unfortunately, he died before that happened." *(M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, p. 51, December 13, 2018 [O-LHIA7-2])*

"In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods. "A deal is a deal" was how everyone felt. The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted. These signatures are in the hands of the District 2 Supervisor." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-7])*

"There is no hardship with the site and so in my opinion no reason to change the zoning to allow the increased height limit, retail etc. There is a reason that the zoning was changed and it should be respected." *(David Bercovich, Email, January 7, 2019 [I-Bercovich-3])*

"Under Resolution 4109/Stipulation as to Character of Improvements, the aggregate gross floor area is limited to the total area of the property (approximately 435,600 square feet, according to Dean Macris). (Ex. J, Dean Macris MEMO dated June 25, 1986.) According to the DEIR, the aggregate gross floor area of the existing buildings totals approximately 376,000 square feet, which is 84.2 percent of the size of the project site, so at present only 15.8% of the site may be covered by additional buildings. In addition, since the site zoning changed to R-4 in 1960 and then to RM-1 in 1978, while the prior stipulations of Resolution 4109 continue to apply, the property became a nonconforming use under the Planning Code, so the "total floor area in commercial use may not be expanded." (Ex. J, Macris MEMO and Ex. K, Passmore February 22, 1981 letter to John Cloudsley, Jr.) Under the current RM-1 zoning, office uses are generally not

permitted, and retail uses are generally not permitted. (Ex. L, March 5, 2015 Letter of Determination; see also San Francisco Planning Code section 209.2 and Table 209.2, Zoning Control Table for RM Districts)." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-14])*

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"In addition, the DEIR fails to identify the following conflicts between the developer's proposed project/variant and the requirements of Resolution 4109/Stipulation as to Character of Improvements. Those requirements provide that: (a) no residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended, (b) no dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than 3300 square feet, nor shall any such dwelling cover more than fifty percent of the area of such parcel or be less than twelve feet from any other such dwelling, or be set back less than 10 feet from any presently existing or future public street, or have a height in excess of forty (40) feet, and (c) no residential building in other portions of the subject property shall have ground coverage in excess of 50% of the area allotted to such dwelling. The developer's proposed Euclid Building and proposed Laurel duplexes violate these provisions, and the developer's proposed buildings on other portions of the site violate provision (c) because they have ground coverage in excess of 50% of the area allotted to such dwelling. Do you dispute that the developer's proposed project/variant would violate each of these provisions in the manner set forth above? The DEIR is inaccurate as to the proposed project's conflict with applicable laws.

In addition, under Resolution 4109/Stipulation as to Character of Improvements, development of the property was required to include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building, a site plan was required to be submitted to the City Planning Commission showing the character and location of the proposed building or buildings and related parking spaces and landscaped areas upon the property, or upon each separate portion thereof as is allotted to such building or buildings. Such site plan was to be submitted to the City Planning Commission for approval as to conformity with these stipulations. The DEIR fails to discuss or provide for analysis the site plan that was approved by the City Planning Commission pursuant to this provision, and the EIR must be revised to provide this information.

It is also important to note that under Planning Code section 174, Stipulations as to Character of Improvements become portions of the Planning Code, so only the Board of Supervisors can modify the Stipulations as to Character of Improvements that are recorded against this site. Section 174 provides that:

> "Every condition, stipulation, special restriction and other limitation imposed by administrative actions pursuant to this Code, whether such actions are discretionary or ministerial, shall be complied with in the development and use of land and structures. All such conditions, stipulations, special restrictions and other limitations shall become requirements of this Code, and failure to comply with any such condition, stipulation, special restriction or other limitation shall constitute a violation of the provisions of this Code. Such conditions, stipulations, special restrictions and other limitations shall include but not be limited to the following:
>
> (a) Conditions prescribed by the Zoning Administrator and the City Planning Commission, and by the Board of Permit Appeals and the Board of Supervisors on appeal, in actions on

permits, licenses, conditional uses and variances, and in other actions pursuant to their authority under this Code;

(b) Stipulations upon which any reclassification of property prior to May 2, 1960, was made contingent by action of the City Planning Commission, where the property was developed as stipulated and the stipulations as to the character of improvements are more restrictive than the requirements of this Code that are otherwise applicable. Any such stipulations shall remain in full force and effect under this Code. (Planning Code section 174)

The DEIR inaccurately claims that a project objective would be to incorporate open space in an amount equal to or greater than that required under the current zoning. DEIR 6.3. However the DEIR fails to acknowledge that this objective conflicts with the current zoning restrictions stated in Resolution 4109/Stipulation as to Character of Improvements require 100-foot landscaped set backs along the property's boundary with Euclid Avenue and along Laurel Street up to its intersection with Mayfair Drive. The EIR must be revised to state the amount of open space required under the current zoning applicable to the site (including Resolution 4109) and recirculated for public comment.

In addition, the Resolution 4109/Stipulation as to Character of Improvements requires one parking space for each 500 square feet of gross floor area in the commercial buildings on the site. The developer's proposed project/variant fail to comply with these provisions, and the DEIR fails to discuss this conflict." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-17])*

**"4. The Proposed Project Would Have a Significant Impact on the Environment Because the Project Would Conflict With Applicable Land Use Plans or Regulations and Would Have a Substantial Impact Upon the Existing Character of the Vicinity.**

**A. Urban Design Element of San Francisco General Plan and Residential Design Guidelines**

The proposed project would conflict with the following policies of the Urban Design Element, among others:

Policy 1.1: Recognize and protect major views in the city, with particular attention to those of open space and water.

Visibility of open spaces, especially those on hilltops, should be maintained and distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets.

Objective 3: Moderation of major new development to complement the City pattern, the resources to be conserved and the neighborhood environment.

Policy 3.3: Promote efforts to achieve high quality design for buildings to be constructed at prominent locations.

Policy 3.4: Promote building forms that will respect and improve the integrity of open spaces and other public areas.

Policy 3.5: Relate the height of buildings to important attributes of the city patterns and to the height and character of existing development.

Policy 3.6: Relate the bulk of the buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction....

> When buildings reach extreme bulk, by exceeding the prevailing height and prevailing horizontal dimensions of existing buildings in the area, especially at prominent and exposed locations, they can overwhelm other buildings, open spaces and the natural land forms, block views and disrupt the city's character. Such extremes in bulk should be avoided by establishment of maximum horizontal dimensions for new construction above the prevailing height of development in each area of the city...

Policy 3.7: Recognize the special urban design problems posed in development of large properties.

Policy 3.8: Discourage accumulation and development of large properties, unless such development is carefully designed with respect to its impact upon the surrounding area and upon the City.

Policy 3.9: Encourage a continuing awareness of the long-term effects of growth upon the physical form of the city.

Policy 4.1: Protect residential areas from the noise, pollution and physical danger of excessive traffic.

Policy 4.2: Provide buffering for residential properties when heavy traffic cannot be avoided. Ex. V, Urban Design Element of San Francisco General Plan.

The proposed project would also conflict with the following provisions of the Residential Design Guidelines:

DESIGN PRINCIPLE: Design buildings to be responsive to the overall neighborhood context, in order to preserve the existing visual character.

Many neighborhoods have defining characteristics such as street trees, buildings with common scales and architectural elements, and residential and commercial uses that make the neighborhood identifiable and an enriching place to be. The neighborhood is generally considered as that area around a home that can easily be traversed by foot....

Though each building will have its own unique features, proposed projects must be responsive to the overall neighborhood context. A sudden change in the building pattern can be visually disruptive. Development must build on the common rhythms and elements of architectural expression found in a neighborhood. In evaluating a project's compatibility with neighborhood character, the buildings on the same block face are analyzed. However, depending on the issues relevant to a particular project, it may be appropriate to consider a larger context.

Broader Neighborhood Context: When considering the broader context of a project, the concern is how the proposed project relates to the visual character and scale created by other buildings in the general vicinity.

**Defined Visual Character**

GUIDELINE: In areas with a defined visual character, design buildings to be compatible with the patterns and architectural features of surrounding buildings.

On some block faces, there is a strong visual character defined by buildings with compatible siting, form, proportions, texture and architectural details. On other blocks, building forms and architectural character are more varied, yet the buildings still have a unified character. In these situations, buildings must be designed to be compatible with the scale, patterns and

architectural features of surrounding buildings, drawing from elements that are common to the block.

**III. Site Design**

DESIGN PRINCIPLE: Place the building on its site so it responds to the topography of the site, its position on the block, and to the placement of surrounding buildings.

**TOPOGRAPHY**

Guideline: Respect the topography of the site and the surrounding area.

New buildings and additions to existing buildings cannot disregard or significantly alter the existing topography of the site. The surrounding context guides the manner in which new structures fit into the streetscape, particularly along slopes and hills. This can be achieved by designing the building so it follows the topography in a manner similar to surrounding buildings.

Similarly, a proposed project may be located next to a historic or architecturally significant building that is set back from the street or is on a wider lot with front and side gardens. The front setback of the proposed project must respect the historic building's setbacks and open space. Additionally, the front setback must serve to protect historic features of the adjacent historic building.

**SIDE SPACING BETWEEN BUILDINGS**

GUIDELINE: Respect the existing pattern of side spacing.

Side spacing is the distance between adjacent buildings...Projects must respect the existing pattern of side spacing.

**VIEWS**

GUIDELINE: Protect major public views from public spaces.

The Urban Design Element of the General Plan calls for protection of major public views in the City, with particular attention to those of open space and water. Protect major views of the City as seen from public spaces such as streets and parks by adjusting the massing of proposed development projects to reduce or eliminate adverse impact on public view sheds.

**IV. Building Scale and Form**

DESIGN PRINCIPLE: Design the building's scale and form to be compatible with that of surrounding buildings, in order to preserve neighborhood character.

**BUILDING SCALE**

GUIDELINE: Design the scale of the building to be compatible with the height and depth of surrounding buildings.

The building scale is established primarily by its height and depth. It is essential for a building’s scale to be compatible with that of surrounding buildings, in order to preserve the neighborhood character.

**Building Scale at the Street**

GUIDELINE: Design the height and depth of the building to be compatible with the existing building scale at the street.

If a proposed building is taller than surrounding buildings, or a new floor is being added to an existing building, it may be necessary to modify the building height or depth to maintain the existing scale at the street. By making these modifications, the visibility of the upper floor is limited from the street, and the upper floor appears subordinate to the primary facade.

In modifying the height and depth of the building, consider the following measures; other measures may also be appropriate depending on the circumstances of a particular project:

- Set back the upper story. The recommended setback for additions is 15 feet from the front building wall.
- Eliminate the building parapet by using afire-rated roof with a 6-inch curb.
- Provide a sloping roofline whenever appropriate.
- Eliminate the upper story.

**Building Scale at the Mid-Block Open Space**

GUIDELINE: Design the height and depth of the building to be compatible with the existing building scale at the mid-block open space.

**BUILDING FORM**

GUIDELINE: Design the building's form to be compatible with that of surrounding buildings.

Though the Planning Code establishes the maximum building envelope by dictating setbacks and heights, the building must also be compatible with the form of surrounding buildings.

GUIDELINE: Design the building's facade width to be compatible with those found on surrounding buildings.

**Proportions**

GUIDELINE: Design the building's proportions to be compatible with those found on surrounding buildings.

Proportions are the dimensional relationships among the building's features, and typically involve the relationship between the height and width of building features....Building features must be proportional not only to other features on the building, but also to the features found on surrounding buildings.

**Rooflines**

GUIDELINE: Design rooflines to be compatible with those found on surrounding buildings.

**V. Architectural Features**

DESIGN PRINCIPLE: Design the building's architectural features to enhance the visual and architectural character of the neighborhood.

In designing architectural features, it is important to consider the type, placement and size of architectural features on surrounding buildings, and to use features that enhance the visual and architectural character of the neighborhood. Architectural features that are not compatible with those commonly found in the neighborhood are discouraged.

**VI. Building Details**

DESIGN PRINCIPLE: Use architectural details to establish and define a building's character and to visually unify a neighborhood.

> The use of compatible details visually unifies a neighborhood's buildings, providing continuity and establishing the architectural character of the area.
>
> **WINDOWS**
>
> GUIDELINE: Use windows that contribute to the architectural character of the building and the neighborhood.
>
> Windows are one of the most important decorative features, establishing the architectural character of the building and the neighborhood.
>
> **EXTERIOR MATERIALS**
>
> GUIDELINE: The type, finish, and quality of a building's materials must be compatible with those used in the surrounding area.
>
> When choosing building materials, look at the types of materials that are used in the neighborhood, and how those materials are applied and detailed. Ensure that the type and finish of these materials complement those used in the surrounding area, and that the quality is comparable to that of surrounding buildings. Ex. K, Residential Design Guidelines, excerpts.

Defining characteristics of the single-family residential buildings on Laurel Street across the street from the site include one-story in height at the front, with a second set-back story, sloped roofs, consistent entrance and front setback patterns and compatible stucco materials. Defining characteristics on Euclid Avenue across the street from the site are two-unit flats or multiple-unit apartment buildings with rear yards sloping toward the site. Defining characteristics of the residences on California Street and Presidio Avenue are approximately four-story buildings designed with traditional architectural forms. The proposed project conflicts with the prevailing character of the surrounding areas and neighborhood in these and other respects, including the existing pattern of mid-block open space, as can be seen in the plans showing the incongruent scale and building forms of the proposed project. Also, the new buildings and additions to existing buildings proposed in the project would disregard or significantly alter the existing topography of the site.

**B. The Proposed Project Would Have a Significant Impact on the Environment Because the Project Would Conflict With Applicable Land Use Plans or Regulations and Would Have a Substantial Impact Upon the Existing Character of the Vicinity.**

The Housing Element EIR state that a proposed project would normally have a significant effect on the environment if it would:

> "Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
>
> Have a substantial impact upon the existing character of the vicinity." Ex. C, p. V.B-27-28.

On the Figure IV-3 of the Housing Element EIR, the Generalized Citywide Zoning Map, the project site is shown in a "Residential" area. Ex. C, 2014 Housing Element EIR, p. IV-14-15 and Figure IV-3.

"Figure IV-4 shows a generalized height map of the City." Ex. C, 2014. Housing Element EIR, p. IV-14 and Figure IV-4. This map shows that the project site is in a height district of "40 ft" or less.

Map 06 of the 2014 Housing Element shows average generalized permitted housing densities by Zoning Districts as 54 average units per acre in medium density areas. Ex. L, 2014 Housing Element p. I.70. Policy 11.4 of the 2014 Housing Element refers to this map and states the policy to:

> "Continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan." Ex. L, p. 37

Policy 11.4 text provides that:

> "The parameters contained in the Planning Code under each zoning districts [sic] can help ensure that new housing does not overcrowd or adversely affect the prevailing character of existing neighborhoods. The City's current zoning districts conform to this map and provide clarity on land use and density throughout the city. When proposed zoning map amendments are considered as part of the Department's community planning efforts, they should conform generally to these [sic] this map, although minor variations consistent with the general land use and density policies may be appropriate. They should also conform to the other objectives and policies of the General Plan. Ex. L, p. 37.

Housing Element policies do not provide for zoning changes to allow retail or commercial office uses. 2014 Housing Element Policy 1.6 provides:

> "Consider greater flexibility in number and size of units within established building envelopes in community based planning processes, especially if it can increase the number of affordable units in multi-family structures.
>
> However, in some areas which consist mostly of taller apartments and which are well served by transit, the volume of the building rather than number of units might more appropriately control the density.
>
> Within a community based planning process, the City may consider using the building envelope, as established by height, bulk, set back, parking and other Code requirements, to regulate the maximum residential square footage, rather than density controls that are not consistent with existing patterns. In setting allowable residential densities in established neighborhoods, consideration should be given to the prevailing building type in the surrounding area so that new development does not detract from existing character." Ex. L, p. 10.

In addition, Housing Element Policy 7.5 supports process and zoning accommodation for affordable housing, as it provides that:

> "Encourage the production of affordable housing through process and zoning accommodations, and prioritize affordable housing in the review and approval process....
>
> Local planning, zoning, and building codes should be applied to all new development, however when quality of life and life safety standards can be maintained zoning accommodations should be made for permanently affordable housing. For example, exceptions to specific requirements, including open space requirements, exposure requirements or density limits, where they do not affect neighborhood quality and meet with applicable design standards, including neighborhood specific design guideline, can facilitate the development of affordable housing. Current City policy allows affordable housing developers to pursue these zoning accommodations through rezoning and application of a Special Use District (SUD)." Ex. L, p. 29.

Thus, the proposed project would conflict with the Housing Element of the General Plan because the proposed project would seek to use a Special Use District to change the permitted uses to allow retail uses, new commercial office uses and public parking uses and to increase height and/or bulk limits, which would not be zoning accommodations "for permanently affordable housing." Also, the proposed project would be inconsistent with the prevailing building type in the surrounding area and/or detract from existing character, detract from neighborhood quality and/or conflict with provisions of the Residential Design Guidelines and Urban Design Element, for the reasons stated herein.

For these reasons, the proposed project would also conflict with the following other policies of the 2014 Housing Element:

> Policy 11.3 Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character.
>
> Accommodation of growth should be achieved without damaging existing residential neighborhood character. ...In existing residential neighborhoods, this means development projects should defer to the prevailing height and bulk of the area.
>
> Policy 11.5 Ensure densities in established residential areas promote compatibility with prevailing neighborhood character." Ex. L, p. 37.
>
> The Housing Element EIR explains that:
>
> "The San Francisco Planning Code, which incorporates by reference the City's Zoning maps, governs permitted uses, densities and the configuration of buildings in San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) cannot be issued unless either the proposed action conforms to the Planning Code, or an exception if granted pursuant to provisions of the Planning Code, or a reclassification of the site occurs....
>
> Section 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed height may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section." Ex. C, p. V-A-32-33.

The City's Preliminary Project Assessment ("PPA") states that:

> "various aspects of the project conflict with both the current RM-1 Zoning of the site, as well as City Planning Commission Resolution No. 4109. The Preliminary Project Assessment application indicates the intent of the property owner to pursue a rezoning, potentially to an NC District. Additionally, as noted in the comments below, a special Use District overlay to the current RM-1 District may also be a potential path for rezoning, In either case, rezoning of the property requires approval by the Board of Supervisors....various components of the project exceed the current 40 foot height limit. Accordingly, a height district reclassification of the property must be sought. This also requires approval by the Board of Supervisors." Ex. M, PPA, p. 10.

As further explained in the City's Preliminary Project Assessment:

> "The project proposes a combination of residential, office, commercial parking, retail and entertainment uses. Of these proposed land use categories, only residential uses are currently permitted in the existing RM-1 District. Accordingly, pursuing the project as proposed would require a rezoning of the subject property. The project description provided in the Preliminary

Project Assessment application indicates the owner's interest in pursuing a rezoning of the property to an NC (Neighborhood commercial) district, but does not specify which type of NC District...

The project proposed retail uses throughout the property.

The demolition of existing structures or conversion of floor area dedicated to the site's 363,218 square feet of existing nonconforming office use is an abandonment of that nonconforming use per Planning Code Section 183. Therefore, to re-establish office uses in the proposed new structures, the uses must comply with any applicable zoning controls.

The project includes 60 off-street parking spaces as part of a 'Public Parking Garage' defined in Planning Code Section 102. The existing RM-1 district does not permit public parking garages and, at this time, it is unclear if the described 60 'paid public parking spaces for community use' are legally noncomplying with regard to the Planning Code. Additional information is needed regarding the existing and proposed location of these spaces and the date of their establishment to make that determination...

The site has subsequently undergone additional rezoning, as it is now within an RM-1 District. However, the stipulations of future development as outlined in Resolution 4109 continue to apply, absent modification by the Board of Supervisors per Planning Code Section 174....In the project comments that follow, when there is an inconsistency, the more restrictive is noted as the guiding control. As indicated in the Preliminary Project Assessment application, the project may result in the rezoning of the property which requires review and approval by the Board of Supervisors. Amending Resolution 4109 would also require review and approval by the Board of Supervisors....

In general, the RM-1 District controls are more restrictive than the Stipulations of Resolution 4109. However, the stipulations are more restrictive when defining the density and buildable area requirements as applicable to a portion of the subject property fronting on Laurel and Euclid Avenues. At present, the project does not comply with these restrictions and would require amending the Resolution...

The subject property is within an RM-1 District which permits a residential density of up to one unit per 800 square feet of lot area. However, as a Planned Unit Development the proposal may seek approval for a density equal to one less unit than what is permitted by the district with the next greater density (RM-2)...While additional information is necessary to calculate the exact maximum density for the area subject to Resolution 4109, initial calculations estimate approximately 508 units are allowed pursuant to the current RM-1 zoning and Resolution an upon seeking the additional density allowed as a Planned Unit Development, the estimated maximum is 660 dwelling units. If the Resolution did not apply, these respective amounts become 558 and 743...

The subject property is within a 40-X Height and Bulk District, restricting the maximum height of buildings to 40 feet above grade, as measured generally from curb at the center of each existing and proposed building. The upper measurement of the height limit changes depending on the grade at that location per Planning Code Section 260(a)(1). Additionally, the upper measurement of the height of a building varies based on the roof form per Planning Code Section 260(a)(2). While in general the proposal accurately applies these methodologies, curbs along the Walnut Street extension may not be used as the base of measurements because the Walnut Street extension is not a public right-of-way...The additional stories proposed for the altered structures will require that the project seek a Height District reclassification which is reviewed and approved by the Board of Supervisors...

> The existing office building is 66.5 feet tall from the existing grade to the finished roof...
>
> The project proposed a lot line adjustment that would extend the property's Masonic Avenue Boundary into the public right-of-way. This adjustment requires a General Plan Referral because it includes the vacation of a public way and transportation route owned by the City and County. This adjustment will also require review by the Department of Public Works as a partial street vacation request...
>
> Open Space. Additional information is needed to determine how the project complies with this requirement for each individual unit and to confirm that the spaces comply with the dimensional requirements for either private or common spaces... (Ex. M, PPA. pp. 12-17.

Planning Code section 209.2 provides that in an RM-1 district, the "Residential Density, Dwelling Units" is [u]p to one unit per 800 square feet of lot area." Retail uses and commercial uses are not permitted.

As acknowledged in the Housing Element EIR, a proposed project "could result in impacts related to conflicts with existing land use policy, plans, or regulations" if it "resulted in housing development that was not consistent with zoning and land use designations as outlined in the governing land use plans and/or the City's Planning Code to the extent those regulations help to avoid or mitigate potential environmental impacts." Ex. C, p. V.B-29. In addition, there could be "impacts related to land use character if new housing is substantially out of scale with development in an existing neighborhood, or if new development is so different than existing development that the new development would change the existing character of an area." Ex. 2, p. V.B-33. "Similarly, substantial increases in residential densities in traditionally low-density neighborhoods could result in changes to land use character." Ex. C, p. V.B-33.

The Initial Study admits that the "project as proposed is not consistent with the provisions set forth in the planning code for the RM-1 Zoning District and would not comply with development restrictions identified in Resolution 4109, described below. The existing office use within the project site, as well as the scale of the existing office building within the project site, does not conform to the low-density residential character described for the RM-1 Zoning District." IS p. 22. The Initial Study misinterprets Resolution 4109 and fails to mention that it contains a limitation on the aggregate gross floor area of all buildings on the property of a gross floor area that "shall not exceed the total area of the property allotted to such use," a limitation of 50% as to lot coverage of residential development, and a prohibition on any residential dwelling other than a one-family dwelling or a two-family dwelling occupying any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended, occupying a parcel of land having an area of less than 3300 square feet, and a requirement that such buildings be set back 12 feet from any other building and 10 feet from any street. The new buildings proposed on the site propose to violate these limitations, including the gross floor area limitations, and the Mayfair and Euclid Buildings propose to violate the prohibition on any residential dwelling other than a one-family dwelling or a two-family dwelling being erected at the locations of the proposed buildings and/or would also violate the use limitations which prohibit retail uses. The Initial Study failed to analyze these provisions of Resolution 4109, and retail uses are not allowed under that Resolution. Ex. N, Resolution 4109 and Stipulation as to Character of Improvements.

The Initial Study states that the "proposed project would include amendments to the planning code and zoning maps to rezone a portion of the site from the current RM-1 zoning and 40-X Height and Bulk Districts." IS p. 22. First, the proposed planning code and zoning map

amendments were not provided in the Initial Study, so the IS is incomplete and its description of the proposed project is inadequate and incomplete. Also, the Initial Study states that these:

> "changes would be implemented through the creation of a Special Use District (SUD) that would establish land use zoning controls for the project site. An ordinance establishing the SUD would require a recommendation by the Planning Commission and approval by the Board of Supervisors. In addition, the project sponsor would seek approval of a Conditional Use authorization/Planned Unit Development to permit development of buildings in excess of 50 feet in height; to allow for more units than principally permitted in the RM-1 Zoning District, to allow certain planning code exceptions to open space requirements, dwelling unit exposure, and rear yard setback requirements mandated by the planning code in an RM-1 Zoning District; and to provide a waiver or modification of any applicable conditions of Resolution 4109." IS p. 23.

As discussed above, the City's Preliminary Project Assessment stated that amending Resolution 4109 would require review and approval of the Board of Supervisors.

Since the proposed project is within a 40-X Height and Bulk District, it does not meet the criteria required to allow the Planning Commission to increase the height limit pursuant to Planning Code section 253, which provides that "wherever a height limit of more than 40 feet in a RH District, or more than 50 feet in a RM or RC District, **is prescribed by the height and bulk district in which the property is located**, any building or structure exceeding 40 feet in height in a RH District, or 50 feet in height in a RM or RC District, shall be permitted only upon approval by the Planning Commission according to the procedures for conditional use approval in Section **303** of this Code." Further, under Planning Code section 253:

> "In reviewing any such proposal for a building or structure exceeding 40 feet in height in a RH District, 50 feet in height in a RM or RC District, or 40 feet in a RM or RC District where the street frontage of the building is more than 50 feet the Planning Commission shall consider the expressed purposes of this Code, of the RH, RM, or RC Districts, and of the height and bulk districts, set forth in Sections **101, 209.1, 209.2, 209.3**, and **251** hereof, as well as the criteria stated in Section **303**(c) of this Code and the objectives, policies and principles of the General Plan, and **may permit a height of such building or structure up to but not exceeding the height limit prescribed by the height and bulk district in which the property is located**. (Emphasis added.)

Since the property has a height limit of 40 feet in an RM-1 district, Planning Code section 253 does not authorize a height limit increase.

In addition, the proposed project would not meet the criteria applicable to conditional uses as stated in Section 303(c) and elsewhere in the Planning Code and further would not meet the requirements of Planning Code section 304 for a Planned Unit Development, including that the requirements that the project shall:

> (1) Affirmatively promote applicable objectives and policies of the General Plan;
>
> (2) Provide off-street parking adequate for the occupancy proposed;
>
> (3) Provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by this Code;
>
> (4) Be limited in dwelling unit density to less than the density that would be allowed by **Article 2** of this Code for a district permitting a greater density, so that the Planned Unit Development will not be substantially equivalent to a reclassification of property;

(5) In R Districts, include Commercial Uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts under this Code, and in RTO Districts include Commercial Uses only according to the provisions of 231 of this Code;

(6) Under no circumstances be excepted from any height limit established by **Article 2.5** of this Code, unless such exception is explicitly authorized by the terms of this Code. In the absence of such an explicit authorization, exceptions from the provisions of this Code with respect to height shall be confined to minor deviations from the provisions for measurement of height in Sections **260** and **261** of this Code, and no such deviation shall depart from the purposes or intent of those sections."

The IS has not explained the nature of the "minor deviations" from the provisions for measurement of height that would be sought, so the IS is incomplete, and the EIR must identify them so the nature of the project can be known, and comments can address inaccuracies and conflicts with land use policies.

The proposed project would fail to affirmatively promote applicable objectives and policies of the General Plan as to density and height.

Approval of a Planned Unit Development cannot be substantially equivalent to a reclassification of property, which it would if misused in this matter, because the 744 residential units in the project variant would exceed the additional density of 660 units allowed as a Planned Unit Development above existing density limits (which include Resolution 4109) and the 558 project units would exceed the approximately 508 units allowed under the applicable stipulations as to future development contained in Resolution 4109, which can only be changed by the Board of Supervisors. (See Ex. O, developer's calculation of permitted densities under alleged PUD boost)

Moreover, the proposed project ,which is located in an R District, would not "include Commercial Uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts under this Code." The Initial Study does not state that a rezoning from the RM-1 District would be sought. The project site is directly adjacent to the Laurel Village neighborhood commercial area, and one block away from the Sacramento Street neighborhood commercial area and one block away from Trader Joe's. Residents of the immediate vicinity are adequately served by retail uses.

Thus, the project may under no circumstances be excepted from any height limit established by Article 2.5 of this Code under the Planned Unit Development provisions, because no exception is explicitly authorized by the terms of the Planning Code in a 40-foot Height and Bulk District. The Initial Study fails to substantiate the nature of the proposed deviations from the provisions for the measurement of height as being minor and fails to establish that such deviation shall not depart from the purposes or intent of Planning Code sections 260 and 261. The Preliminary Project Assessment already warned the project proponent not to attempt to measure heights from the Walnut Street extension because it is a walkway and not a public right-of-way.

Further, the project would not provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by this Code.

Since plan sheet G3.03 shows that the project proponent counted the paved Lower Walnut walkway and the approximately 16 foot front set back in front of proposed retail uses on California Street (described as California Plaza) as open space, the project does not comply with the open space requirements of Planning Code section 135 that "[u]sable open space shall be composed of an outdoor area or areas designed for outdoor living, recreation or landscaping, including such areas on the ground and on decks, balconies, porches and roofs, which are safe

and suitably surfaced and screened, and which conform to the other requirements of this Section." Moreover, the Initial Study admits that "the network of proposed new common open spaces, walkways, and plazas within the project site" "would be shaded mostly by proposed new buildings for much of the day and year." IS p. 161. For this reason, as well, such network of new common open spaces does not qualify as open space under Planning Code section 135 because it is not "designed for outdoor living, recreation or landscaping."

The Housing Element EIR further explains that:

> "For construction of new residential buildings and alteration of existing residential buildings in R Districts, Section 311 of the Planning Code requires consistency with the design policies and guidelines of the General Plan and with the Residential Design Guidelines that are adopted for specific areas....The guidelines apply to development in all RH and RM districts, and are intended to maintain cohesive neighborhood identity, preserve historic resources, and enhance the unique setting and character of the City and its residential neighborhoods.
>
> The guidelines are based on the following design principles, which are also used to determine compliance with the guidelines:
>
> - Ensure that the building's scale is compatible with surrounding buildings.
> - Ensure that the building respects the mid-block open space.
> - Maintain light to adjacent properties by providing adequate setbacks.
> - Provide architectural features that enhance the neighborhood's character.
> - Choose building materials that provide visual interest and texture to a building.
> - Ensure that the character-defining features of an historic building are maintained."
>
> Ex. C, p. V.A-34.

The Housing Element EIR also explains that Proposition M, codified in Planning Code section 101.1, established eight Priority Policies including "protection of neighborhood character," "landmark and historic building preservation," "protection of open space," and "preservation and enhancement of neighborhood-serving retail uses." Ex. C, p. V.A-41-42.

The Housing Element EIR explains that "[s]ection 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed height limit may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section." Ex. C, p. V.B-2. None of these exceptions apply to the proposed project.

The Initial Study uses an erroneous legal standard in determining that the project's potential conflicts with land use plans (and other impacts analyzed in the IS) need not be studied as a significant impact in the EIR. As explained in the Initial Study for the 1629 Market Street Project:

> "The Initial Study evaluates the proposed 1629 Market Street Mixed Use Project to determine whether it would result in significant environmental impacts. The designation of topics as 'Potentially Significant' in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant." Ex. P, p. 4.

The Initial Study for the 3333 California Street project acknowledges that the proposed project "would not conform to the existing RM-1 zoning and 40-X Height and Bulk District, and amendments to the planning code would be required as part of the proposed project or project variant." The Initial Study then puts forth the erroneous conclusion that if "the Board of

Supervisors finds that amendments to the planning code are warranted to allow for implementation of the proposed project or project variant, the Board of Supervisors would adopt amendments to establish the Special Use District, which would resolve any conflicts between the planning code and the proposed project or project variant. To approve the proposed project or project variant, the city would be required to make findings of project consistency with the planning code. The proposed project or project variant, as approved, would thus be consistent with relevant plans and policies once amended." IS. p. 110-111. The project's proposed misuse of Special Use District procedures and other procedures was explained above.

The Initial Study errs in claiming that to approve the proposed project, the city would be required to make findings of project consistency with the planning code. In certain circumstances, the city is required to find that a proposed project is consistent with provisions of the General Plan. Planning Code section 101.1. The proposed project would be inconsistent with provisions of the Urban Design Element and Housing Element of the General Plan for the reasons set forth above, including that the bulk of the buildings does not relate to the prevailing scale of development and would have an overwhelming or dominating appearance, and that the height of buildings does not relate to important attributes of the city patterns and the height and character of existing development. Urban Design Element Policies 3.5 and 3.6. Policy 3.6 explains that it was intended to avoid disruption to the city's character from buildings that reach extreme bulk, by exceeding the prevailing height and prevailing horizontal dimensions of existing buildings in the area which "can overwhelm other buildings, open spaces and the natural land forms, block views." Thus, these provisions of the general plan were adopted for the purpose of mitigating or avoiding an environmental effect. At the project site, the proposed new buildings would block public views from the open green spaces and significantly shadow open spaces and overwhelm other buildings.

Also, application of a Special Use District is authorized by the Housing Element to encourage production of affordable housing, not to authorize deviations from residential use district classifications for retail or commercial uses. The Housing Element EIR identified "Policy 7.5: Encourage the production of affordable housing through process and zoning accommodations and prioritize affordable housing in the review and approval processes" as one of the "Policies With Potential for Physical Environmental Impacts." Ex. C, p. IV-35. The Housing Element EIR acknowledged that "[i]mplementation of the 2009 Housing Element could result in impacts related to existing character if new housing is out of scale with development in an existing neighborhood or if new development is so different it would change the existing character of an area." Such impacts would occur if a Special Use District or other deviations were used for the purposes proposed by the project proponent, especially for the improper purposes set forth above. The new buildings would still be out of scale with surrounding development and disrupt the area's character through their dominating appearance, so the significant adverse physical impacts would remain despite approval of an Special Use District under the circumstances requested by the project proponent. The project approval would not result in consistency with the policies of the Urban Design Element or Housing Element, because the IS does not identify those elements of the General Plan as proposed to be amended in connection with approval of the proposed project. IS p. 86.

The Initial Study also improperly asserted that the impact on land use plans and policies would be less than significant because that the proposed project "would adhere to applicable environmental regulations, and therefore, would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect such that a substantial adverse physical change in the environment related would result." IS p. 111. This is an unsupported conclusion which is inadequate under CEQA and is contradicted by the evidence discussed herein. No explanation is provided as to the nature of the environmental regulations that would be complied with, the

performance standards that would result in compliance or the specific expected management actions that would be taken. The IS's determination that regulatory compliance will be sufficient to prevent significant adverse impacts was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance.

Thus, the EIR must analyze the potentially significant impacts which the proposed project would have on conflicts with numerous applicable land use plans, policies and regulations, including those discussed herein, and the substantial impact that the proposed project would have upon the existing character of the vicinity. In the cumulative impact discussion, the Initial Study acknowledges that to some extent conflicts with land use plans and policies under the proposed project "could be embodied in a considerable contribution to a cumulative physical environmental impact" and "such cumulative physical impacts are addressed and analyzed under the specific environmental topics section in the initial study and will also be addressed in Chapter 4, Environmental Setting and Impacts, of the EIR." This statement constituted recognition that plans and policies with which the project would conflict were adopted for the purpose of avoiding or mitigating an environmental effect.

In addition, the Housing Element EIR recognized that

> "Implementation of the 2004 Housing Element and 2009 Housing Element could result in impacts related to conflicts with existing land use policy, plans, or regulations if the Housing Elements resulted in housing development that was not consistent with zoning and land use designations as outlined in governing land use plans and/or the City's Planning Code to the extent those regulations help to avoid or mitigate potential environmental impacts. For example, if a height limit in a particular area was designed to avoid impacting a view from a public vantage point, there could be an impact from a policy that increased the height limits." Ex. C, p. V.B-29.

The proposed project's increased heights and bulk would conflict with existing public views from the publicly accessible open space that currently exists on the project site, including on Euclid, Laurel and Presidio avenues and the Terrace." *(Kathryn Devincenzi, Letter, June 8, 2018 [I-Devincenzi4-7])*

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"In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods. "A deal is a deal "was how everyone felt. The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted. These signatures are in the hands of the District 2 Supervisor." *(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-6] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-12])*

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"Today I'd like to explain the history of the restrictions placed on the site by the planning commission and the community use of green space as a park. The same developer who built Laurel Heights residential tract in Antivista, was going to build a residential tract on this site, but he died. The school district acquired the property for a possible site for Laurel High School, but decided to locate that elsewhere and sell the site. The district could get 50 percent more money from the sale of it if it could rezone it from first residential to commercial.

The district went through its first attempt at rezoning due to community opposition, as can be seen here. Finally, a deal was struck with the community that resulted in restrictions stated in Resolution 4109 that include 100-foot landscape setbacks along Laurel and Euclid Streets and a ban on retail uses of this site.

Under Planning Code Section 174, such stipulations as to character of improvements become provisions of the planning code and can only be changed by the board of supervisors." *(Linda Glick, Draft EIR Hearing Transcript, pp. 55-56, December 13, 2018 [I-Glick1-2])*

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"I'm Linda Glick, a resident of Laurel Street. I'd like to explain the history of the restrictions placed on the site by the Planning Commission and the community use of the green space as a park.

The same developer who built the Laurel Heights residential tract and Anza Vista was going to build a residential tract on this site, but he died.

The School District acquired the property for a possible site for Lowell High School but decided to locate that elsewhere and sell this site. The District could get 50% more money from the sale if it could rezone it from First Residential to Commercial.

The District withdrew its first attempt at rezoning due to community opposition.

Finally a deal was struck with the community that resulted in the restrictions stated in Resolution 4109 that include 100-foot landscaped setbacks along Laurel and Euclid streets and a ban on retail uses of the site.

Under Planning Code section 174, such Stipulations as to Character of Improvements become provisions of the Planning Code and can only be changed by the Board of Supervisors." *(Linda Glick, Draft EIR Hearing Transcript Handout, December 13, 2018 [I-Glick1-7])*

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"In regards to a DEVELOPMENT AGREEMENT being entered into for this project, it seems the public cannot find out what are going into these agreements and if the mitigation and community benefits are not included in the publicly accessible DEIR/FEIR documents, then there could be problems down the road for the neighborhood.

While the text on the website states that it exists to "strengthen the public planning process," it is unclear if the agreements really help the residents with impacts. What was the criteria used to determine what projects and this one in particular to have a development agreement?

Development Agreements – Frequently Asked Questions

**What is a Development Agreement and why does the City have them?**

Development agreements are contracts approved by the Planning Commission and Board of Supervisors entered into by the City and a developer to expressly define a development project's rules, regulations, commitments, and policies for a specific period of time. The purpose is to strengthen the public planning process by encouraging private participation in the achievement of comprehensive planning goals and reducing the economic costs of development. A development agreement reduces the risks associated with development, thereby enhancing the City's ability to obtain public benefits beyond those achievable through existing ordinances and regulations.

Due to the dissolution of the City's Redevelopment Agency, each agreement is now negotiated on a case-by-case basis by the Office of Economic and Workforce Development and the City Attorney's Office.

**How are Development Agreements monitored by the City?**

The Planning Department and OEWD are working closely with the Controller's Office City Performance Unit and other City Departments to centralize development agreement requirements and mitigations into a comprehensive system that will encourage proactive monitoring and

tracking of developer and City responsibilities. Prior to this project, there was no centralized system that housed all development agreements and their requirements. In addition to this webpage, this project will produce a database that the City will use to track and monitor payments, community commitments, and other important data within the development agreements.

**Are there different types of Development Agreements?**

California Government Code Section 65864-65869.5 and Chapter 56 of the San Francisco City and County Administrative Code sets forth the procedures by which a development agreement is processed and approved. There are four common categories of agreements:

1. Development Agreements - Voluntary contractual agreements between a landowner and the City concerning provisions of infrastructure, public spaces, and amenities.
2. Disposition and Development Agreements - A contract between a developer and the City that involves the sale of City-owned land to the developer.
3. Lease Disposition and Development Agreements - A contract between a developer and the City that involves the lease of City-owned land or property to the developer.
4. Owner Participation Agreements - A contract between a property owner/developer and the City to allow for development of property owned by an entity other than the City, generally the owner/developer.

This information is here:

https://oewd.org/development-agreements-%E2%80%93-frequently-asked-questions

It is best to get some of the mitigation measures lined up in the DEIR which is a *FULLY* public document rather than in "Development Agreements"." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-73])*

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"Approximately 800 residents signed a petition against the rezoning requested by the developer and he would not plan the project with the community." *(Anne Neill, Email, December 12, 2018 [I-Neill-3]*

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"He wants to change the zoning to allow retail which was banned in Planning Commission Resolution 4109 to avoid adverse impacts to Laurel Village and Sacramento Street." *(Anne Neill, Email, December 12, 2018 [I-Neill-6])*

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"In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods. "A deal is a deal" was how everyone felt.

The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted. These signatures are in the hands of the District 2 Supervisor." *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-5])*

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"They look to changing the zoning to allow retail which was banned in **Planning Commission Resolution 4109** to avoid adverse impacts to Laurel Village and Sacramento Street." *(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-8])*

**RESPONSE PP-1: GENERAL PLAN, RESOLUTION 4109, ZONING CONTROLS, HEIGHT LIMITS, AND DEVELOPMENT AGREEMENT**

Comments delineate the history of the various zoning controls on the site from its use as the former Laurel Hill Cemetery to the current residential, mixed, low density zoning district (RM-1) with an allowed non-conforming office use (UCSF Laurel Heights Campus).

Comments assert that the project design and land use program conflict with policies in the Housing and Urban Design Elements of the general plan as well as provisions in the Residential Design Guidelines, and that new construction would impact the existing character of the neighborhood, aesthetics and views. Comments cite extensively from the Preliminary Project Assessment (PPA) letter regarding actions that would be necessary to approve the original proposal filed as part of the PPA application, and assert that the requirement for amendments to the RM-1 Zoning District and 40-X Height and Bulk District maps, need for a Special Use District, and other legislative actions demonstrate that the proposed project or project variant conflicts with applicable land use policies and that such conflicts themselves result in a substantial impact on neighborhood character. In addition, comments also disagree with the information in the initial study regarding potential conflicts of the proposed project or project variant with plans and policies.

Comments state that Planning Commission Resolution 4109 (Resolution 4109) banned retail as an allowed commercial use; established specific requirements for developing housing on the project site; was inaccurately described in the EIR; and still applies to the site. Comments also assert that Resolution 4109 was an agreement between the City and the surrounding neighborhoods that should not be rescinded. Other comments state that Resolution 4109 expressly curtailed retail as a commercial use on the site to limit competition with adjacent retail uses along California and Sacramento streets; presented restrictions on how much residential development would be allowed and how it could be sited; and established parking requirements for any commercial uses. Comments identify the board of supervisors as the decision-maker with respect to the ultimate disposition of Resolution 4109, assert that the stipulations in the resolution, called "Stipulation as to Character of Improvements" in the comments, were incorporated into the planning code pursuant to section 174 of the planning code, and state that any relief from the requirements in the stipulations in Resolution 4109 also requires action by the board of supervisors.

Comments express opposition to the requested rezoning and the revocation of Resolution 4109, stating that an all-residential project, with no changes to the height limit, is preferred and assert that an alternative to the proposed project or project variant developed by the Laurel Heights Improvement Association of San Francisco, Inc. (LHIA Alternative) would provide the same level of housing without such actions. Comments state that the LHIA Alternative would double the density on the project site compared to that of the surrounding community. Comments also reproduce information from the Office of Economic and Workforce Development website about

the development agreement process and assert that the details of the development agreement should be available for public review during the environmental review process.

**Preliminary Project Assessment**

The PPA letter provides the planning department's preliminary assessment of an early version of the proposed project. The PPA process is an early step in the planning department's overall review of a proposal to inform a project applicant regarding the anticipated process with the planning department prior to a formal review for entitlements based on a filed application, as well as to provide feedback on code compliance and design. It is not part of the environmental review process. Therefore, while the information in the PPA letter is accurate in relation to the information available about the proposed project at the time of the PPA review, the proposed project has been revised following receipt of the PPA letter.

**Analysis of Plans and Policies**

CEQA Guidelines section 15125(d) requires that the environmental setting section of an EIR discuss any conflicts between a project and general plans, specific plans, and regional plans. Regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan, area-wide waste treatment and water quality control plans, regional transportation and housing plans, and plans for the reduction of greenhouse gases, among others.

EIR Chapter 3, Plans and Policies, includes a review of local and regional plans and policies against the details of the proposed project or project variant, pursuant to CEQA Guidelines section 15125(d). For purposes of CEQA, conflicts with plans and policies pertain to those that were adopted with the purpose of avoiding or mitigating an environmental effect. To the degree that identified conflicts are connected with physical change to the environment, they are analyzed under the applicable environmental topic. As stated in EIR Chapter 3, the proposed project or project variant would not obviously conflict with objectives and policies in the general plan or the Housing, Recreation and Open Space, Transportation, Air Quality or Environmental Protection elements. Rather, the proposed project or project variant would support goals and policies in the Housing Element by increasing the supply of housing (see EIR p. 3.2).

However, conflicts were identified with Urban Design Element policies associated with the protection and rehabilitation of historic resources (Policies 2.4 and 2.5). Conflicts were also identified with provisions of the planning code related to proposed uses and height limits. Physical changes caused by the proposed project or project variant, including those that would arise as a result of these conflicts, are analyzed in the EIR or initial study. For an analysis of physical changes that would be caused by the proposed project or project variant, see initial study Section E.7, Greenhouse Gas Emissions (pp. 146-150); initial study Section E.8, Wind and Shadow (pp. 151-162); EIR Section 4.B, Cultural Resources, under Impact CR-1 starting on p. 4.B.41; EIR Section 4.D, Noise and Vibration, under Impact NO-4 starting on p. 4.D.62; and EIR Section 4.E,

Air Quality, under Impact AQ-4 starting on p. 4.E.60. The proposed project and project variant's physical changes would result in the loss of a historic resource (a significant and unavoidable environmental impact with mitigation) and increases in construction noise (a significant and unavoidable environmental impact with mitigation), operational noise (determined to be less-than-significant impacts with mitigation), air pollution and greenhouse gas emissions (determined to be less-than-significant impacts without mitigation), and wind and shadow impacts from changes to building height limits (determined to be less-than-significant impacts without mitigation).

Comments assert that the analysis of conflicts with applicable land use plans or regulations is not adequate because conflicts with objectives and policies in the Housing and Urban Design elements of the general plan and the Residential Design Guidelines are not disclosed and analyzed in the EIR. Comments further assert that the EIR is not adequate because, unlike the 2004 and 2009 Housing Element EIR, impacts on the existing character of the vicinity were not addressed in the EIR. Specific concerns were raised with regard to individual Housing Element and Urban Design Element objectives and policies. Conflicts with design principles in the Residential Design Guidelines such as neighborhood context and visual character, site design with respect to topography, building scale and form, exterior materials, among other design principles, are also asserted. Several comments, citing statements in the 2004 and 2009 Housing Element EIR, assert that the proposed project or its variant would conflict with these statements, resulting in adverse impacts on the existing scale and character of the surrounding neighborhood, as well as conflicts with existing views from the publicly accessible spaces on the project site.

A conflict with a plan or policy in and of itself is not indicative of a physical environmental change that must be analyzed under CEQA. As stated on EIR p. 3.1:

> Policy conflicts do not, in and of themselves, indicate a significant environmental effect within the meaning of CEQA. To the extent that physical environmental impacts may result from such conflicts, such impacts are analyzed in their specific topical sections in Chapter 4, Environmental Setting and Impacts, and in Section E, Evaluation of Environmental Effects, of the initial study that was published on April 25, 2018 (Appendix B to this EIR). The proposed project or project variant would intensify land uses on an urban infill site, and to the extent that there are conflicts between the proposed project or project variant and applicable plans, policies, and regulations, those conflicts would be considered by City decision-makers when they decide whether to approve, modify, or disapprove the proposed project or project variant. The staff reports and approval motions prepared for the decision-makers would include a comprehensive project analysis and findings regarding the consistency of the proposed project or project variant with applicable plans, policies, and regulations independent of the environmental review process.

As stated above, the EIR did evaluate the proposed project and project variant in relation to the Housing and Urban Design elements and disclosed conflicts related to historic resources. The Residential Design Guidelines relate primarily to neighborhood character. Some, but not all, of these guidelines would be applicable to the proposed project or project variant. For example, Side

Spacing Between Buildings is only applicable in the RH-1(D) zoning district, and not in the RM-1 zoning district. A request to waive or modify previously established site-specific controls or to amend the underlying zoning and height and bulk controls does not establish that a project is inconsistent with applicable land use objectives and policies, applicable general plan objectives and policies such as those in the Housing and Urban Design elements, or applicable standards in the Residential Design Guidelines.

In conclusion, the EIR's analysis complies with the requirement in CEQA Guidelines section 15125(d) that the EIR "discuss any inconsistencies between the proposed project" and applicable plans.

The CEQA Guidelines Appendix G checklist and San Francisco's Initial Study checklist no longer include a question in the Land Use and Planning subsection about an impact on existing character of the neighborhood. The land use and planning impact analysis in initial study Section E.1, in the discussions of Impact LU-1, Impact LU-2 and Impact C-LU-1 on pp. 110-112, focuses on whether or not the proposed project or project variant would divide an established community and if it would conflict with land use plans and policies adopted to avoid or mitigate an environmental effect. As explained in Impact LU-1, the proposed project or project variant would be incorporated within the overall street network with development of the north-south and east-west pedestrian pathways – the proposed Mayfair and Walnut walks. The proposed project or project variant would also include a number of other features to encourage and promote public access and circulation, including streetscape improvements at Masonic Avenue/Presidio Avenue/Pine Street and at Masonic Avenue/Euclid Avenue; and proposed plazas, pedestrian walkways and other open space within the project site. The impact analysis explains that land use impacts, including physical impacts related to conflicts with land use plans and policies, would be less than significant. As stated on initial study p. 111:

> [P]otential conflicts with applicable general plan objectives and policies will continue to be analyzed and considered in preparation of planning department case reports and draft motions as part of the review of entitlement applications required for the proposed project or project variant independent of environmental review under CEQA. They also will be considered by the decision-makers during their deliberations on the merits of the proposed project or project variant and as part of their actions to approve, modify, or disapprove the proposed project or project variant.

Comments suggesting that the Housing Element or Urban Design Element of the general plan must be amended for the proposed project or project variant to be approved are not correct. No amendments to the Housing Element or the Urban Design Element are needed or proposed. The general plan and its constituent elements are developed with the understanding that the attainment of its goals and objectives as spelled out through policies and implementation programs are ultimately the responsibility of the City decision-makers. City decision-makers have the discretion to weigh and balance competing goals and objectives against each other in the decision-making process, aimed at the achievement of the overall intent of the general plan. The initial study only

identifies conflicts with provisions of land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect.[1]

With respect to potential aesthetics and visual impacts of the proposed project or project variant, as stated in the initial study and in the EIR, the 3333 California Street site is located in an urban infill zone and transit priority area (see initial study Section D, pp. 105-106; EIR Chapter 1, p. 1.3; EIR Chapter 4.A, pp. 4.A.4-4.A.5; and Response CEQA-2: Aesthetics/CEQA Section 21099 on RTC pp. 5.K.9-5.K.13). As described in these documents, pursuant to CEQA section 21099, aesthetics impacts of a qualifying mixed-use or employment center project on an infill site located within a transit priority area are not, as a matter of law, considered significant impacts on the environment; and consequently potential aesthetics effects on existing character, scenic vistas, or views are not part of the CEQA analysis. However, aesthetics effects of the proposed project or project variant would still be considered by decision-makers as part of the design review approvals.

Accordingly, comments that assert the proposed project's or project variant's design and land use programs are not consistent with the existing character of the neighborhood are acknowledged, but do not require a further response, because this is no longer a required analysis under CEQA.

**San Francisco Planning Code**

Comments generally raise concerns regarding the complex set of mechanisms and processes needed to accommodate the proposed land use program. The EIR presents a list of anticipated project approvals on pp. 2.106-2.108. Among those approval actions are planning code and zoning map amendments, including an amendment to the height and bulk map; the creation of a special use district; modification or waiver of the provisions of Resolution 4109; a conditional use authorization/planned unit development; a development agreement; approval of an office allocation; and sidewalk widening legislation.

The planning code includes both very specific requirements for land development, such as a maximum number of residential units allowed on a parcel, and also mechanisms such as variances and/or exceptions allowed under a planned unit development approval to provide decision-makers with the flexibility to address unique site-specific characteristics and to further City policies.

Comments state that the EIR does not identify conflicts with provisions of the planning code. The RM-1 zoning district, 40-X height and bulk district, and other provisions of the planning code are described in Chapter 2, Project Description, on EIR pp. 2.6-2.10 and pp. 2.24-2.26 and in Chapter 3, Plans and Policies, on EIR pp. 3.6-3.12. The zoning and height and bulk designations on the site and in the surrounding area are shown on Figure 3.1: Zoning Districts and Figure 3.2: Height and Bulk Districts on EIR pp. 3.7 and 3.9, respectively. As explained in the EIR, the proposed project or project variant would be generally consistent with most of the main

[1] See CEQA Guidelines Appendix G, Section XI, Land Use and Planning.

development standards of the RM-1 zoning with required conditional use/planned unit development approval, approval of variances, exceptions and amendments to certain planning code standards as is permitted by the planning code; however, neither would be fully consistent with the zoning and height provisions in the planning code.

As acknowledged on EIR pp. 2.24-2.26, the project sponsor is requesting amendments to the planning code and underlying zoning and height district maps, and establishment of a special use district to accommodate the retail and office uses in the proposed California Street buildings,[2] the increased building height along California Street (from 40 to 45 feet for the proposed project and from 40 to 67 feet [proposed Walnut Building] for the project variant) to accommodate higher ceilings for ground-floor retail uses, and the increased height at the center of the site for the vertical additions to the Center A and B buildings (80 feet and 92 feet, respectively). The proposed project or project variant would be consistent with the provisions of the planning code and zoning maps, as amended; the need for these amendments in and of itself does not create significant physical environmental impacts.

Comments also question the use of a planned unit development to maximize the amount of housing on the project site, stating that the use of a planned unit development is not equivalent of a zoning reclassification. The project variant would seek approval of a conditional use authorization/planned unit development to allow for more residential units (744 units total, not 743 as incorrectly stated in one comment) than principally permitted in the RM-1 zoning district. The conditions for granting approval of a planned unit development state that such approval cannot amount to a reclassification of the property to another zoning district. Therefore, by definition, meeting the criteria in planning code section 304 for a planned unit development is not, in effect, a reclassification of the property's zoning, contrary to suggestions in the comments. Comments base the maximum allowable density on the stipulations in Resolution 4109, resulting in a smaller number of dwelling units than proposed in the proposed project or its variant. As discussed below, Resolution 4109 would no longer be applicable once the requested action to waive or rescind it is taken by the board of supervisors.

The comments state that the proposed 60 off-street commercial parking spaces intended for community use would be a public parking garage and would therefore not be allowed under the project site's RM-1 zoning district. Minor revisions and clarifications to the proposed project and project variant made subsequent to publication of the draft EIR include elimination of these 60 commercial parking spaces (see RTC Section 2, pp. 2.7-2.11). The removal of 60 commercial parking spaces in the revised project and revised variant, along with reductions in parking related to reduced retail space, would not result in a new significant environmental effect. As explained in RTC Section 2 in subsection 2.C, Environmental Effects of the Revised Project on pp. 2.33-2.34, Mitigation Measure M-TR-2: Reduced Retail Parking Supply, related to vehicle miles traveled.

[2] A special use district for the project variant would not include provisions for office uses.

would continue to be applicable to the revised project or revised variant and compliance would be verified through the building permit process.

**Planning Commission Resolution 4109**

Among the anticipated approval actions sought by the project sponsor is modification or waiver of the provisions of Resolution 4109. Comments indicate that there is not enough detail in the EIR about the specific text that will be acted on to make changes to Resolution 4109. Many of these comments were originally submitted as comments on the published initial study.

Additional information regarding proposed changes to Resolution 4109 is provided in the EIR that was published after the initial study (see EIR Chapter 2, Project Description, p. 2.10). Insofar as the comments could be interpreted as meaning that the EIR also fails to provide sufficient detail, some details of proposed actions are necessarily preliminary and subject to change. Nonetheless, the legislative changes and adjudicatory decisions needed to accommodate the proposed land use program and height changes have been disclosed throughout the environmental review process beginning with the September 17, 2017 publication of the Notice of Preparation of an Environment Impact Report and Notice of Public Scoping Meeting. For further responses to comments regarding project approvals, see Response PD-7: Project Approvals, on RTC pp. 5.B.38-5.B.39.

Comments assert that the EIR does not identify conflicts with the provisions of Resolution 4109. The EIR contains information about the development standards applicable to the site pursuant to Resolution 4109. The development requirements of Resolution 4109 identified in the comments, e.g., residential development restrictions along Euclid Avenue and Laurel Street, parking restrictions, and development and maintenance of open space, are included in the summary description of Resolution 4109 on EIR pp. 2.24-2.25 as well as on EIR pp. 3.10-3.11.

The board of supervisors has the authority to rescind Resolution 4109 and its stipulations. Any conflict with the provisions of the resolution would be resolved by board action to rescind or waive its provisions. Although conflicts with Resolution 4109 were disclosed in the EIR, the provisions of Resolution 4109 and its stipulations related to development set forth in Resolution 4109 on the site would no longer be applicable to the site if the planning commission and board of supervisors actions are taken to modify or waive the provisions, that is, the planning commission recommendation to the board of supervisors and the board of supervisors action to modify and/or waive the development requirements of Resolution 4109 to allow for the proposed redevelopment of the site as a mixed-use community. The proposed project's or project variant's conflicts with provisions of this resolution have been identified in the EIR. In addition, the EIR and initial study discloses the physical environmental effects of the proposed project and variant.

**Development Agreement**

Comments express reservations with the development agreement process and the value of the document to the neighborhood as a disclosure document.

As stated in EIR Chapter 2 on p. 2.26, "…the project sponsor would seek approval of a development agreement between the City and project sponsor (which requires recommendation for approval by the planning commission and approval by the board of supervisors) with respect to, among other community benefits, the project sponsor's commitment to the amount of affordable housing developed as part of the proposed project or project variant and to develop and maintain privately owned, publicly accessible open space, and would vest the proposed project's or project variant's entitlements for a 15-year period." However, as noted on EIR p. 2.10, the development agreement is still under negotiation and community input continues to be sought by the project sponsor. Pursuant to the requirements of Administrative Code Chapter 56, the proposed development agreement will be made available for public review prior to presentation to the planning commission for its consideration and recommendation to the board of supervisors per standard City procedures.

Development agreements are not part of the environmental review process. They are part of the entitlement process for project approval. There are public noticing requirements for a development agreement, and the application, related materials, and the draft development agreement are made available to the City decision-makers and members of the public ahead of any hearing on the approval of the agreement by City decision-makers.

Contrary to the assertion in a comment, mitigation measures to address the significant environmental impacts of the proposed project and project variant were identified in the EIR and in the initial study, and therefore the public has been provided this information for review and comment. The mitigation and improvement measures identified in the EIR and initial study for the proposed project or project variant to avoid or mitigate significant environmental impacts will also be listed in a Mitigation Monitoring and Reporting Program (MMRP) along with information regarding who is responsible for implementation of the measure, the schedule for mitigation, who is responsible for monitoring and reporting, and the schedule of monitoring actions and verification of compliance with the measures. Mitigation measures identified in the initial study and EIR have already been agreed to by the project sponsor in an Agreement to Implement Mitigation Measures dated November 7, 2018. The MMRP for all of the mitigation measures identified in the EIR and initial study must be adopted as a condition of approval as part of the actions on the project and would be enforced by various City agencies. The MMRP will also be a public document.

The comments regarding the development agreement and associated process do not concern the adequacy or accuracy of the environmental impact analysis; thus, no further response is required.

Several comments state a preference for the LHIA Alternative and the amount of housing that would be provided under the LHIA Alternative, asserting that it would be twice as dense as the surrounding area. Residential density in the adjacent neighborhoods varies from low-density, single-family homes on Laurel Street to medium-density, multi-family buildings on California Street and Euclid Avenue. For responses regarding comments related to a preference for this alternative, see Response AL-2: LHIA Alternative, on RTC pp. 5.H.54-5.H.69.

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# 5.D CULTURAL RESOURCES

The comments and corresponding responses in this section relate to the topic of Cultural Resources, including historic architectural resources, subsurface archeological resources including human remains, and tribal cultural resources, all of which were evaluated in EIR Section 4.B or initial study Section E.3 (EIR Appendix B). The comments are further grouped according to the following cultural resources-related issues that the comments raise:

- CR-1, Historic Significance of the Site
- CR-2, Impacts on Historic Architectural Resources
- CR-3, Impacts on Archeological and Tribal Cultural Resources
- CR-4, Mitigation Measures

A corresponding response follows each grouping of comments.

## COMMENT CR-1: HISTORIC SIGNIFICANCE OF THE SITE

"I would say there's two areas, you know, I don't think we've quite looked at or analyzed. One is the level of kind of historic importance that this building is. You know, when we declare something historic, any building now becomes the painted ladies or the most important building down-town.

And although I agree with Commissioner Melgar, I think this building is interesting. It's a D-plus as far as historic goes. I mean, it is not – it's kind of a – I'm sorry to tell you. Go take a look at it. Go take a look at it." *(Commissioner Rich Hillis, President, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 87, December 13, 2018 [A-CPC-Hillis-2])*

"So it's actually a historic example of bad planning. It's like the Sears building on Geary and Masonic. It's like some of the redevelopment projects in the Safeway down the street on Geary. It's actually – it's actually an example of bad planning in the suburbanization of San Francisco that happened in the 50s and 60s. It's not something I would necessarily salute or celebrate as an example of a great urban development. It's exactly the opposite.

The person who spoke about this being like the freeways, it is like that. It's part of our history we should almost forget. And we need housing. So it would be good to analyze kind of how this fits on that spectrum of historic.

I, for one, do not think it's an enormously significant historic resource. I think it's interesting, like the cemetery was that was there, but I'm not saying we should bring back that cemetery. If somebody came in today with a project that proposed this on Laurel Heights, it wouldn't get through the front door of the planning department. So, I encourage us to look at this." *(Commissioner Rich Hillis, President, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 88, December 13, 2018 [A-CPC-Hillis-3])*

"You know, one of the other things for me is where else do we have these kind of office parks out there? So I used to work at HP on Deer Creek Road in Palo Alto –" *(Commissioner Dennis*

*Richards, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 86, December 13, 2018 [A-CPC-Richards-7])*

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"The HPC expressed the importance of the historic resource as an integrated landscape and building." *(Andrew Wolfram, President, San Francisco Historic Preservation Commission, Letter, December 11, 2018 [A-HPC-2] and Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-7])*[1]

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"**4. PHOTOGRAPHS OF THE SITE ARE PROVIDED IN ATTACHMENT D.**

"Photographs of the property that were provided to the State Historic Resources Commission are attached hereto because the DEIR does not appear to contain photographs of the character-defining features, other than the aerial view on the cover. See Attachment D.

**5. THE DEVELOPERS AND USCF CONCEALED THE HISTORIC SIGNIFICANCE OF THE PROPERTY.**

During the meetings UCSF held with community members prior to granting the developer a 99-year lease for the property in 2015, UCSF concealed the historic significance of the property from the community members. The developers also concealed the historic significance of the site from community members during the time they met with community members to discuss their development concepts. The City of San Francisco disclosed the historic significance of the site in the Notice of Preparation of Environmental Impact Report and Notice of Public Scoping Meeting dated September 20, 2017. However, UCSF knew at least six years earlier that the site was a historically significant resource eligible for listing in the National Register and California Register, as shown in the *UCSF HISTORIC RESOURCES SURVEY* prepared on February 8, 2011 by Carey & Co, Inc. See Attachment E, excerpts from Carey & Co, Inc., *UCSF HISTORIC RESOURCES SURVEY*." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-8]) [Attachment D and Attachment E referenced in the comment are presented as Exhibit D and Exhibit E in Comment Letter O-LHIA1in RTC Attachment B.]*

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"I attended all of the public meetings, and UC and the developer concealed the historic significance of the site from the public. Our association nominated it as soon as we learned, and it's now listed on the California Register. Last week the San Francisco Historic Commission expressed strong support for the resource, and also wanted to know more about our alternative.

The Fireman's Fund corporate headquarters and landscaping and building are an integrated composition that was designed to complement each other and promote the seamless integration between indoor and outdoor spaces. No employee was to be more than 40 feet from a window." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript and Handout, pp. 45-46, December 13, 2018 [O-LHIA3-7])*

[1] Comment O-LHIA4-7 includes Comment A-HPC-2 as an attachment to the neighborhood organization's letter (Exhibit 2). These comments are not called out separately; instead, the excerpted comment is attributed to both the agency and the organization to minimize duplication of the same exact comments.

"This memo provides a summary of the reference materials, reviewed as part of the Fireman's Fund National Register Nomination, that provide information on the location of trees at the 3333 California Street property that appear to have been part of the Laurel Hill Cemetery landscape.

In his book Urban Landscape Design, Garrett Eckbo described the design process for the mid-1950s landscape design for the Fireman's Fund site, which had been prepared by Eckbo, Royston, and Williams (ERW). In this description, he noted how some of the trees from the former cemetery were saved and incorporated into the Fireman's Fund landscape design.

> *Considerable care was taken in the arrangement of the building, parking areas, and levels [i.e., grading] to save all the existing trees. Some of the trees were left on mounds of earth where the ground was depressed, and others were contained in wells where the ground was raised. In all cases, special pruning, feeding, aeration, and watering were done during construction to help the trees make the necessary adjustments.*
>
> *The most impressive of the trees saved are the beautiful specimens of Monterey cypress in the parking areas on the California Street side of the building. Here, too, three very large blue gums are retained. In some ways, the most distinctive specimens saved are the large red flowering eucalyptus near the corner of California street and Presidio, and the magnificent native toyon or Christmas berry in the parking area above Presidio. In addition to these six live oaks and a very large redwood and Monterey pine are saved. (Eckbo 1964:47).*

The locations of the cemetery trees that were saved and incorporated into the Fireman's Fund landscape can best be understood through a review of historical aerial photographs that are attached to this memo.

Figure 1 shows the extent of the vegetation at the former Laurel Hill Cemetery in 1948 before any grading or construction work associated with the Fireman's Fund Home Office had occurred.

Figure 2 shows the 3333 California Street property in 1955 after grading for the Fireman's Fund Home Office had begun. The site has been cleared of all traces of the former cemetery except for select trees; these trees are circled on Figure 2.

Figure 3 shows the 3333 California Street property in 1958 after the completion of the initial phase of construction on the Fireman's Fund Home Office. Former cemetery trees that have been incorporated into the design, as described by Eckbo, are circled on Figure 3.

Figure 4 shows the 3333 California Street property in 1969, after the addition of the parking garage, auditorium, and office wing extension, which occurred between 1965 and 1967. This construction required the removal of some of the cemetery trees, and the ones that remained in 1969 are circled on Figure 4.

Figure 5 shows the current configuration of the 3333 California Street property. The trees which appear to have been part of the Laurel Hill cemetery vegetation are circled on Figure 5; these include:

- two Monterey cypress trees (#24 and #25 on the SBCA Tree Location Map)[1] on a low mound in the East Parking Lot,
- a blue gum eucalyptus (#118 on the SBCA Tree Location Map)[2] in the West Parking Lot, and
- several Monterey cypress (# 119, # 120, and # 121 on the SBCA Tree Location Map)[3] in the West Parking Lot.

*(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-11]) (Aerial photographs cited in comment are included in Exhibit 3 in RTC Attachment B)*

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"I am against chopping the building in half. And this building is part of the California historic site. And I am -- the plan was to raise the sections, the other two sections, by two or three stories, so I do not concur with that.

The present plans are ludicrous and, to my mind, will be San Francisco's great urban real estate tragedy of the 21st century." *(M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, p. 51, December 13, 2018 [O-LHIA7-6])*

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"**Could there be something they want to conceal from the public?** Much like they concealed the Historic nature of 3333 for over 4 years?" *(Sal Ahani, Email, January 8, 2019 [I-Ahani-9])*

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"On the overhead is a coalition resolution urging the historic designation of the site." *(Eileen Boken, Draft EIR Hearing Transcript, p. 24, December 13, 2018 [I-Boken-2])*

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"Also, the historically significant architecture of the main building can be seen across the landscaping on the perimeter of the site, and the site was designed so that the building and landscaping would function as an integrated composition." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-3])*

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"…the historically significant landscaping and the historically significant built environment that contributes to a scenic public setting. The proposed project would remove 185 onsite trees, including 19 onsite Significant Trees (i.e. trees within 10 feet of the public right-or-way that meet specific height, trunk, diameter, and canopy width requirements) and 15 protected street trees along California Street. (Initial Study p. 69.) The project would remove significant portions of the landscaping surrounding the main building and all of the Terrace designed by the renowned landscape architecture firm of Eckbo, Royston and Williams. Also, new buildings constructed on presently landscaped areas would obstruct public views of the historically significant main building that contributes to the scenic setting as a significant example of modern architecture in the International Style.

The Mitigation Measure above would avoid or substantially reduce this significant impact on the environment" *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-10])*

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"The EIR identifies the concrete pergola atop a terrace planting feature facing Laurel Street as a character-defining resource -- defining feature of the resource. The EIR explains that it's characteristic of mid-century modern design. The use of patios, pergolas, and interior courtyards created a welcoming transition area where the inside and outside merged." *(Linda S. Glick, Draft EIR Hearing Transcript, p. 56, December 13, 2018 [I-Glick1-3])*

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"The EIR identifies the concrete pergola atop terraced planting feature facing Laurel Street as a character defining feature of the resource. [DEIR p. 4.B.21]

The EIR explains that as a characteristic of Midcentury Modern design, the use of patios, pergolas and interior courtyards created welcoming, transition areas where the inside and outside

merged. [DEIR p. 4.6.12]" *(Linda S. Glick, Draft EIR Hearing Handout, December 5, 2018 [I-Glick1-10]) (See Comment Letter I-Glick1 in RTC Attachment B for the images titled "Character Defining Features" and "Laurel St. Historic Landscaping and Pergola" that accompany this excerpted comment.*)

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"As you know, a small but well connected group of wealthy neighbors are trying to label an office building as historic. No such claim had ever been made about this building until the possibility of new housing came up. Let's call this what it is, a perversion of historic building protections to enrich a few, already very well off, people. It is another example in a shameful history of downzoning and redlining that was used to keep newcomers and diversity out of the northern and western parts of the city. This is NIMBYism at its worst." *(Theo Gordon, Email, December 10, 2018 [I-Gordon-2])*

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*"**HISTORIC RESOURCES*** portion of DEIR:

Page 4.B.40:

The proposed project would also retain ten mature existing trees, if viable: two mature Coast Live Oak trees at the western entrance to the proposed Mayfair Walk; two Cypress trees at the proposed Cypress Square; three mature Coast Redwood trees at the eastern end of the proposed Mayfair Walk; one mature Monterey Pine tree at the west end of the proposed Euclid Green; and two mature Coast Live Oak trees mid-block on Laurel Street between Mayfair Drive and Euclid Avenue.

Page 4.B.42:

Overall, the proposed project or project variant would result in substantial changes to the massing and materiality of the office building such that the project site would no longer convey its historic and architectural significance as a Midcentury Modern corporate campus.

Page 4.B.44:

For these reasons, including the removal of elements that convey the project site's history as a corporate campus, the construction of new buildings on formerly open and/or landscaped space at the project site, and the changes to the massing and materiality of the office building, the proposed project and project variant would not be in conformance with Standards 1, 2, 5, 6, 9, and 10, and would materially alter the physical characteristics of 3333 California Street that convey its historic significance and that justify its inclusion in the California Register. As such, the proposed project or project variant would cause a substantial adverse impact on 3333 California Street, a historical resource, and would be considered a significant impact under CEQA.

Under ***AESTHETICS*** category of CEQA:

From the above "Page 4.B.44" text, it is evident that the proposed project and its variant would be significant impacts to the California historic site. The site has existing mature trees that lend an aesthetic suburban quality to the neighborhood that is a respite from the highly urbanized downtown core. Though the site was built as a form of corporate campus, there is a park-like feel to this location.

Speaking of parks, this is a report from the Department of City Planning by the City Planner in 1950: "In 1939 and 1940, considerable momentum gathered behind the idea of preserving one-tenth of Laurel Hill Cemetery as a Memorial Pioneers Park, as allowed by the removal

ordinances. This was spearheaded by the historical Monuments Committee of the National Recreation Association, and backed by the California Pioneers Society and the Native Sons of the Golden West."

Back in the late 1930s, newspaper articles appeared as to the new "Memorial Park" use of the cemetery lands. Here is one headline:

And the text explaining the idea of using a portion as a memorial park to the pioneers that once were buried there:

While no memorial park was created, the neighborhood residents and visitors today use this area of mature trees and open grassy areas as a park for recreation and to take in the views of the more urbanized downtown area to the east. This publicly used open space contributes to the health and well-being of the neighbors and the visitors in this area and is a healthful retreat from the pressures of urban life without having to trek farther to the Presidio National Recreation area nor to travel much farther to the next available designated park." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-67]) (See Comment Letter I-Hillson2, pp. 31-32 of 37, in RTC Attachment B for the images that accompany this excerpted comment.)*

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"The Firemen's Fund Building is aesthetically pleasing due to its lines that appear to hug the hill. In fact, over four decades ago in The Chronicle, the reason the building is not so jarring on the slope may have to do with its "low lines":" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-71]) (See Comment Letter I-Hillson2, p. 33 of 37, in RTC Attachment B for the excerpt from the Chronicle article that follows this comment.]*

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"I am writing to oppose the historic designation of the current building at 3333 California," *(Ed Munnich, Email, December 13, 2018 [I-Munnich-1])*

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"History is very important. But when the history of a building disrupted the city rather than enhanced it, we must not reflexively sustain the disruption. 3333 California was built at a time when San Francisco was moving towards suburban, car-centered planning, which we subsequently rejected, deeming ourselves a "transit-first city", opposing additional freeway construction, and choosing not to rebuild freeways damaged by the 1989 earthquake. The 3333 California site is historic in the sense that the Central or Embarcadero Freeways were historic--it has history, but its history disrupted the city rather than enhancing it. An absurd but relevant example is that a cloud of tobacco smoke was once part of the historic character of bars, clubs, and, indeed, City Hall; but we would not allow smoking in those locations today, merely to preserve their historic character.

Most importantly, the history of the City is in its people. Every day, my wife and I see neighbors pushed out of our neighborhood by the high cost of housing. We are losing the most vital aspect of our history--the lifelong San Franciscans in rent-controlled housing, the young who come to the City with a dream, immigrants, diverse groups from different parts of the US, and creative people from all over who give the City its unique character. All of these people are our history, and all of them are key to a vibrant future." *(Ed Munnich, Email, December 13, 2018 [I-Munnich-3])*

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"**Also, the developer did not tell the community about the historic significance of the site.** The neighborhood learned last year and had the building and landscaping listed on the California Register of Historical Places because they were designed to complement each other in an

integrated composition. So, the landscaping is also a historical resource on this site and has been used for recreation by the public for many years." *(Anne Neill, Email, December 12, 2018 [I-Neill-7])*

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"As a concerned citizen of San Francisco and a resident of Laurel Heights we are very concerned about the developers totally ignoring the concerns of people who live in the neighborhood and their NON-RECOGNITION OF THE HISTORIC SIGNIFICANCE OF THIS PROPERTY.

**1.** In an earlier public meeting the developers **did not even mention that 3333 California Street, San Francisco, CA, if of Historic Significance.**" *(Zarin E. Randeria, Email, December 3, 2018 [I-Randeria1-1])*

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"**Could there be something they want to conceal from the public?**

Much like they concealed the Historic nature of 3333 for over 4 years?" *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-7])*

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"**Also, the developer did not tell the community about the historic significance of the site.** It was revealed during last week's hearing by UCSF's former architect that they were made aware of this back **in 2010**. The neighborhood learned that last year and had the building and landscaping listed on the **California Register of Historical Places** because they were designed to complement each other in an integrated composition. So, the landscaping is also a historical resource on this site and has been used for recreation by the public since built."
*(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-2])*

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**RESPONSE CR-1: HISTORIC SIGNIFICANCE OF THE SITE**

**Comments about the Historic Significance of the Site**

Comments express opinions as to the historic and architectural significance of the project site. Some comments assert that the project site is significant historically, architecturally, as valued landscaped green space, or because of its former use as Laurel Hill Cemetery. Other comments assert that the project site is not particularly significant or that the site's historic significance is that of an example of automobile-centric urban design principles. Based on these opinions, some comments express support for retention of the on-site resource (in whole or in part), while others express support for redevelopment of the site.

As discussed on EIR p. 4.B.17, in 2010 the University of California, San Francisco (UCSF) commissioned a historic resources consultant (Carey & Co., Inc.) to evaluate the existing on-site structures at the Laurel Heights Campus (the site was owned by the Regents of the University of California at that time) as part of a larger UCSF facility-wide survey of its real estate holdings. The results of the survey are presented in the document titled "*UCSF Historic Resources Survey, San Francisco California,"* dated February 8, 2011. The UCSF survey, including the evaluations of the buildings on the site, was prepared for UCSF's internal facility planning purposes; it was

not submitted to the State Historic Preservation Office, nor was it filed with the California Historical Resources Information System. In 2014 Laurel Heights Partners, LLC (the project sponsor) entered into a 99-year pre-paid ground lease with the Regents of the University of California and subsequently acquired fee title to the site.

On March 29, 2016, the project sponsor submitted their initial environmental evaluation (EE) application and, in response to Question 1 in Section 5 of the EE application, stated that the project would involve the alteration of a structure built 45 years or more ago; in such cases, the planning department must evaluate the property to determine if it is a historic resource under CEQA. The Supplemental Information Form for Historic Resource Determination, filed with the EE Application, included photographs of the property and of adjacent properties, building permit history, historic Sanborn Fire Insurance Maps, ownership and occupant history, photographs and a narrative description of adjacent properties and those properties across streets surrounding the site, historic photographs, and State of California Department of Parks and Recreation (DPR) 523 forms prepared by Carey & Co, Inc. The planning department's preliminary project assessment (or PPA) dated July 14, 2016 determined that one or more buildings or structures on the site were constructed 45 or more years ago and could be a potential historic resource.

Thus, beginning with submission of the EE application, the proposed project was subject to review by the department's historic preservation staff, and a qualified professional chosen from the planning department's Historic Resource Consultant Pool prepared a historic resource evaluation to evaluate the building's eligibility for listing in the California Register of Historical Resources (California Register). The evaluation (see EIR Appendix C-1) concluded that the existing building at the center of the site and the surrounding landscape is a historic resource. Environmental planning and historic preservation staff concurred with the findings in the evaluation, which were summarized in the planning department's historic resource evaluation response (evaluation response).

As discussed on EIR pp. 4.B.18-4.B.20 and EIR pp. 4.B.21-4.B.22, the EIR summarizes the results of the historic resource evaluation and evaluation response that applies the California Register criteria to determine if the project site is a historical resource under CEQA (CEQA Guidelines section 15064.5(a)(3)). The EIR concludes that the project site meets the relevant criteria to be considered a historical resource for the purposes of CEQA based on California Register Criterion 1 (Events) and Criterion 3 (Architecture/Design/Construction). The EIR also determines that the resource retains integrity and identifies the resource's character-defining features (see EIR pp. 4.B.20-4.B.21 and Figure 4.B.1: Character Defining Features of 3333 California Street, on EIR p. 4.B.23). Thus, as determined by the planning department, the site is a historic resource for purposes of CEQA. The EIR concludes and discloses that the proposed project or project variant would have a significant unavoidable impact on the historical resource. As described on EIR pp. 2.86-2.87 in Chapter 2, Project Description, and on EIR p. 4.B.5 the

project sponsor would retain up to 10 mature trees as part of the redevelopment of the site. However, when considered within the context of the overall changes to the site and building, the retention of up to 10 mature trees, some of which are character-defining features of the historic resource, would not alter the EIR conclusion of a significant unavoidable impact on the historical resource.

Statements related to the historic significance of the site that members of the public may have shared in public forums or shared directly with the project sponsor prior to the environmental review process do not alter the approach to the analysis of impacts on historic resources or the significance conclusions in the EIR. As stated on EIR p. 4.B.1,

> "…under the CEQA Guidelines, even if a resource is not included on any local, state, or federal register, or identified in a qualifying historical resources survey, a lead agency may still determine that any resource is a historical resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the California Register of Historical Resources (California Register)."

As noted in a comment, the initial disclosure of the potential historic significance of the site was in the Notice of Preparation of an Environmental Impact Report and Notice of a Public Scoping Meeting, published on September 20, 2017 (see EIR Appendix A, p. 34). This information was reiterated with publication of the initial study on April 25, 2018 (see EIR Appendix B, pp. 123-125), indicating that the issue would be discussed in depth in the EIR.

To the degree that the comments express concern with loss of the Laurel Hill Cemetery, see initial study Section E.3, Cultural Resources, in EIR Appendix C (pp. 125-134), and Response CR-4: Mitigation Measures, below, on RTC pp. 5.D.21-5.D.25.

To the degree that the comments express concern with loss of habitat for nesting and migratory birds, see initial study Section E.12, Biological Resources, in EIR Appendix C (pp. 197-204), and Response BR-1: Loss of Trees , starting on RTC p. 5.J.84 and Response BR-2: Effects on Birds, starting on RTC p. 5.J.91, for a discussion of the effects of tree removal and the mitigation measure to protect nesting birds, and the project sponsor's intent to increase the overall number of trees on the site.

**Photographs of Character-Defining Features**

Comment letters include photographs of the site, including photographs provided to the State Historical Resources Commission as part of the hearing to consider the National Register Nomination Form for the site. The letters, attachments, and photographs are reproduced in RTC Attachment B: Draft EIR Comment Letters and Emails. The submission of the images of the site that are not accompanied by any text are not considered to be a comment on the draft EIR.

Comments assert that the EIR does not include photographs of the site's character-defining features, other than the aerial view on the EIR cover. The EIR does include photographs of character-defining features of the project site in Figure 4.B.1: Character-Defining Features of 3333 California Street, on EIR p. 4.B.23. The EIR also provides photographs of the project site in the supporting documentation cited in Section 4.B, Historic Architectural Resources, on p. 4.B.2; this documentation is included in EIR Appendices C-1, C-2, and C-3. Thus, comments that assert the EIR lacks documentation of the character-defining features of the historic resource at 3333 California Street are not correct. The EIR and its administrative record provide sufficient information for informed decision-making related to the historic architectural significance of the site. As stated on EIR p. 4.B.2:

> The information and analysis in this section are based on Department of Parks and Recreation Primary 523 Forms prepared by Carey & Co., Inc,[2] Historic Resource Evaluation, Part I (HRE) prepared by LSA,[3] the National Register of Historic Places (National Register) nomination prepared by Michael Corbett (Architectural Historian) and Denise Bradley (Landscape Historian),[4] and the Historic Resource Evaluation Response (HRER) prepared by the San Francisco Planning Department (planning department).[5] These reports concluded that the project site meets the eligibility criteria for listing in the California Register.
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> [*Footnotes 2,3,4 and 5 on EIR p. 4.B.2]*
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> [2] Carey & Co., State of California Department of Parks and Recreation Primary Record and Building, Structure and Object Record – 3333 California Street, the Laurel Heights Building, July 31, 2010, and Carey & Co., State of California Department of Parks and Recreation Primary Record and Building, Structure and Object Record – 3333 California Street, the Laurel Heights Annex, July 31, 2010. The evaluation was prepared at the request of UCSF as part of a facility-wide inventory and was not submitted to the State Historic Preservation Office. (See EIR Appendix C-1.)
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> [3] LSA, Historic Resource Evaluation, Part I, 3333 California Street, December 2017. (See EIR Appendix C-2.)
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> [4] Michael Corbett (Architectural Historian) and Denise Bradley (Landscape Historian), National Register of Historic Places Registration Form for Fireman's Fund Insurance Company Office at 3333 California Street, San Francisco, California, submitted to California State Historic Preservation Office, April 19, 2018. (See EIR Appendix C-3.)
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> [5] Justin Greving, Preservation Planner, San Francisco Planning Department, Historic Resource Evaluation Response (Part 1), Case No. 2015-014028ENV, 3333 California Street, May 14, 2018. Minor revisions incorporated after consideration of the expert opinions expressed in the National Register Nomination form. (See EIR Appendix C-4.)

Thus, these comments do not, in and of themselves, raise specific environmental issues or identify issues related to the adequacy or accuracy of the EIR's analysis of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. CEQA directs public agencies to treat EIRs as "full disclosure" documents to ensure that the public is aware that public agencies have considered potential adverse environmental effects in their decision-making processes. The opinions expressed in the

comments will be provided to the decision-makers for their consideration prior to taking any approval actions on the project.

## COMMENT CR-2: IMPACTS ON HISTORIC ARCHITECTURAL RESOURCES

"The HPC found the analysis of historic resources in DEIR to be adequate and accurate. The HPC concurs with the finding that the proposed project would result in a significant, unavoidable impact to the identified historic resource." *(Andrew Wolfram, President, San Francisco Historic Preservation Commission, Letter, December 11, 2018 [A-HPC-1 and Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-6])*

"Now, the EIR admits that the project would have a significant impact on the historical resource by destroying most of the landscaping, half of the building, cutting a hole in it." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript and Handout, p. 45, December 13, 2018 [O-LHIA3-4])*

"The Developers Destructive Proposal first demolishes and destroys the Historic Characteristics and nature of 3333" *(Sal Ahani, Email, January 8, 2019 [I-Ahani-15])*

"The Developer's Proposal destroys the historical characteristics of the site. Sadly, under the Developer's Proposal, much of Laurel Hill will be gone as will most of the mature trees and the very welcoming green space." *(Arlene Filippi, Email, January 7, 2019 [I-Filippi2-2])*

"PSKS has not considered the historical significance of this property" *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-3])*

"The amount of excavation the developers propose is of great concern. It totally destroys this beautiful and historic site." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-5])*

"The Developers Destructive Proposal first demolishes and destroys the Historic Characteristics and nature of 3333." *(Richard Frisbie, Letter, January 7, 2019 [I-FrisbieR1-13] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-19])*[2]

"Under Prop M, Priority Policy #7 (preservation of landmarks and historic buildings) and the DEIR stating various Standards for historic preservation would not be in conformance (Standards 1, 2, 5, 6, 9 & 10) such that the proposed project and variant would materially alter the historical significance of the building and site.

As a reminder, here are the 10 standards with areas of non-conformance bolded:

[2] Comment I-Kwok4 includes Comment I-FrisbieR1 as an attachment to her e-mail. These comments are not called out separately; instead, the excerpted comment is attributed to both persons to minimize duplication of the same exact comments.

**1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**

**2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

**5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.**

**6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

**9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**

**10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.**

It seems that many of the above standards would be violated with the project proposal. Would there be some way this state-registered historic resource not lose its “character-defining” features that made it so? Out of all the changes proposed to the existing buildings, the one that cuts the main building in half is the most egregious in my humble opinion.

The historic use of the property after the cemetery bodies were moved and when Mayfair Heights (old name of Laurel Heights) was proposed was for residential except for commercial on California Street when Mayfair Heights was being built. The commercial was never on the tract where UCSF building is.

There was no commercial on Euclid Avenue historically and it would seem that historic use should be honored and retained to prevent the additional impacts to the neighborhood from putting retail on Euclid which is the residential side of the property. A Chronicle article states that the residential area be “a high class residential district of homes, flats and apartments.” It says a group comprised of “Rusalem, Bennion, Gummere, Goldman and Goldman, Lang Realty

Company, Joseph and Jones" will "develop the business district…along California street." Here is the article:

*(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-51]) [See Comment Letter I-Hillson2, pp. 25-27, in RTC Attachment B for the article mentioned in the comment.]*

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"Some of my concerns, as examples and not comprehensive list, is as follows:…

- Destruction of historical site, virtually with nothing preserved (by cutting through the main building)" *(Tina Kwok, Email, January 8, 2019 [I-Kwok3-5] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-6])*

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"1. The park-like setting, with mature landscaping and a midcentury-modern building with historical significance, would be destroyed were the project to proceed in its current form. This integration of landscaping and buildings is so important to this unique site and the proposed plan would destroy this setting — all for unnecessary retail and office space. The developers have created negative and permanent impacts by destroying part of the physical beauty and historical significance of this site." *(Larry Mathews, Email, December 13, 2018 [I-Mathews1-2])*

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"Secondly, I just wanted to show you some pictures. You've seen some of these already. Not much really needs to be said about them. These pictures and the listing on the California Register of Historical Resources, after the unanimous support of the State Historic Resources Commission at their May hearing, speak for themselves. San Francisco Historic Preservation Commissioner further reinforced these comments at their recent December 5th hearing.

Again, not much needs to be said. The commissioners in Palo Alto spoke more eloquently and with considerably more authority than I can about the master status of the three principals associated with 3333 California Street. The developer proposes the virtual total destruction of this historically listed site.

The black areas indicate the extent to which 50 percent of the historic main building will be demolished. The red indicates the bulldozing and total destruction of more than 80 percent of the historically listed landscaping. It is unimaginable that anyone responsible for San Francisco's future could countenance such a mindless destruction of such an iconic and important part of San Francisco's past.

So what will be the future of 3333? Will we preserve it or destroy it? A great deal of this decision lies in your hands. I will not restate the first five items in red." *(Adam McDonough, Draft EIR Hearing Transcript, pp. 22-23, December 13, 2018 [I-McDonough1-2])*

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"1. It understates the negative impacts of destroying the historical characteristics at the current site;" *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-4])*

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"The developer has not addressed the historic significance of this property." *(Marie McNulty, Letter, December 18, 2018 [I-McNulty-1])*

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"I live in the neighborhood, have for a long time, right across the street. And I understand why it's considered historic, and it would be a shame to destroy it. It was designed a bit like a college campus, even though it was a business. And it was designed so that the people in the building

could enjoy the dramatic outside that was created by some wonderful planners, and it just melds in and doesn't stand out and wave at you and say, "I don't belong here," even though it was commercial establishment.

The developer's proposal would destroy this. The existing buildings and grounds fit so well in the neighborhood now, it just nestles right in." *(Roger Miles, Draft EIR Hearing Transcript, p. 20, December 13, 2018 [I-Miles1-2])*

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"In anticipation of your hearings regarding 3333 California Street, I am writing in support of protecting the well-established historical designation of the property, as evidenced by the August 31, 2018 letter from Julianne Polanco, State Historic Preservation Officer to the principals of the Laurel Heights Improvement Association of San Francisco. You have been provided with a copy of that letter.

Any future development at that site should comply and honor the historic property designation in the following areas:

1. Retain the historic significance of the landscaping of the property, which has 185 mature trees. Such care of natural resources has an added environmental benefit and the greenspace is very important to the surrounding neighborhoods, particularly as San Francisco becomes more urbanized and "Manhattanized." *(Cristina Morris, Email, December 10, 2018 [I-Morris1-1])*

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"The developer proposes to destroy the historically significant characteristics of the site and create a concrete jungle with three underground levels of garages for 896 parking spaces topped with nondescript buildings crowded onto the site." *(Anne Neill, Email, December 12, 2018 [I-Neill-5])*

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"The Developers Destructive Proposal first demolishes and destroys the Historic Characteristics and nature of 3333." *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-12])*

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"The Draft EIR states that the project would have a ***Significant and Unavoidable with Mitigation*** impact on historic architectural resources because the project "would demolish portions of the office building... and remove all of the project site's existing designed landscape elements and features, including, but not limited to, the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features, including planter boxes and seating; brick perimeter walls; and the concrete pergola and terraced planting feature facing Laurel Street. (p. 4.B.41)" *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-3])*

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**RESPONSE CR-2: IMPACTS ON HISTORIC ARCHITECTURAL RESOURCES**

Comments assert that the proposed project or its variant would have an adverse impact on the historical resource within the project site or otherwise express concern for the impact of the project on the historic significance and character of the project site. Such comments express general concurrence with the conclusions of the EIR, which state that the proposed project and its variant would cause a substantial adverse change in the significance of the historical resource

within the project site (see EIR pp. 4.B.41-4.B.47). A comment asserts that the EIR is inadequate because it "understates the negative impacts of destroying the historical characteristics of the site." The EIR found that the proposed project or its variant would have a significant and unavoidable environmental impact with mitigation (see the discussion under Impact CR-1 starting on EIR p. 4.B.41).

Contrary to the comment's assertion that the EIR is inadequate, the EIR thoroughly analyzes and discloses the significant impacts of the proposed project and its variant on the historic resource. The EIR describes the existing conditions at the project site (EIR pp. 4.B.2-4.B.6); reviews the site's historic and architectural context (EIR pp. 4.B.6-4.B.16); identifies and summarizes existing historic resource evaluations of the project site (EIR pp. 4.B.16-4.B.18); evaluates the significance of the project site under California Register of Historical Resources criteria, including identification of differences and similarities between existing resource evaluations of the project site (EIR pp. 4.B.18-4.B.22); identifies character-defining features of the project site (EIR pp. 4.B.20-4.B.21); identifies and summarizes the differences and similarities between the planning department's evaluation response and the National Register nomination (EIR pp. 4.B.22-4.B.25); discusses the proposed project and project variant in relation to Priority Policy 7 (EIR pp. 4.B.34);[3] describes project features that would affect historical resources (EIR pp. 4.B.37-4.B.40); evaluates impacts on the significance of the project site resulting from demolition and new construction within the project site (EIR pp. 4.B.41-4.B.47); analyzes and evaluates the impacts under the *Secretary of the Interior's Standards for Rehabilitation* (EIR pp. 4.B.42-4.B.44); and identifies feasible mitigation measures that would reduce the impact, but not to a less-than-significant level (EIR pp. 4.B.45-4.B.46). Therefore, alternatives that would address significant impacts on historic resources were developed and analyzed in the EIR (see Chapter 6, Alternatives.)

Some comments refer to previous proposals to redevelop the project site for residential and commercial uses, and note that no commercial uses were historically planned on Euclid Avenue, following relocation of the cemetery and before acquisition and development of the existing office building by the Fireman's Fund Insurance Company. Development proposals in the past that were never realized do not constitute character-defining features or historic resources that should be considered in the evaluation of historic resources impact. Reliance on a newspaper article about a potential development project does not provide evidence of any historic resource on the project site.

[3] See also EIR Chapter 3, Plans and Policies, pp. 3.11-3.12, for a discussion of potential conflicts with Priority Policy 7.

To the degree that the comments express concern with the amount of excavation needed to implement the below-grade parking program, see Response GEO-3: Loss of Unique Geological Features/Change to Existing Topography, on RTC pp. 5.J.108-5.J.109.

The comments above do not present evidence that there would be any new significant impacts not identified in the EIR or a substantial increase in the severity of impacts identified in the EIR. As such, the analysis of impacts on the historic resource meets the requirements of CEQA for determining and disclosing the significance of impacts on historical resources specified under CEQA Guidelines section 15064.5.

## COMMENT CR-3: IMPACTS ON ARCHEOLOGICAL AND TRIBAL CULTURAL RESOURCES

"The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the project referenced above. The review included the Executive Summary; the Introduction and Project Description; the Environmental Setting and Impacts; and Appendix B (Initial Study) prepared by Environmental Science Associates for the San Francisco Planning Department. We have the following concerns:

"1. While Tribal Cultural Resources are listed as a subsection under Cultural Resources, the subsection does not adequately address the questions of significance stipulated in the California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf A separate section addressing these questions, and consultation outreach and responses, is preferred."

"2. There is no documentation in the Initial Study or the DEIR of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes.

"The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent "discoveries of Native American human remains and best protect tribal cultural resources." *(Gayle Totten, M.A., Ph.D., Associate Governmental Program Analyst, Native American Heritage Commission, Letter, November 29, 2018 [A-NAHC-1 and A-OPR1-2])*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:

1. Archaeological concerns from the excavation and other site grading activities under the project and their effect on the topography of Laurel Hill" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-2])*

## RESPONSE CR-3: IMPACTS ON ARCHEOLOGICAL AND TRIBAL CULTURAL RESOURCES

### Archeological Resources

These comments express a general concern about the impact of the proposed project on archeological resources and on the topography of the site. The analysis of project-related impacts on archeological resources under Impact CR-2 and Impact CR-3 on initial study pp. 125-134 found a significant impact on archeological resources and human remains and identified mitigation measures to reduce the impacts to a less-than-significant level (see Mitigation Measure M-CR-2a: Archeological Testing, Monitoring, Data Recovery and Reporting and Mitigation Measure M-CR-2b: Interpretation, on initial study pp. 129-133). The comment raises no particular issues with respect to the coverage of these topics in the EIR or initial study. To the extent that the comment expresses opposition to the proposed project based on concerns for its impact on archeological resources and the site's topography, see discussion below under Response CR-4: Mitigation Measures starting on RTC p. 5.D.21, Response GEO-3: Loss of Unique Geological Features/Change to Existing Topography, on RTC pp. 5.J.108-5.J.109, and RTC Section 5.L, Merits of the Proposed Project, on RTC p. 5.L.6.

### Tribal Cultural Resources

A comment asserts that the EIR does not adequately address the significance questions specified by the California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form." The comment suggests that Tribal Cultural Resources should be addressed in a separate environmental topic section in San Francisco's Initial Study Checklist. While not required for this environmental review document, the planning department acknowledges the Native American Heritage Commission's preferred approach and updated its initial study checklist on March 28, 2019, to include a separate topic section for Tribal Cultural Resources.

In the 3333 California Street Mixed-Use Project Initial Study, the topic of Tribal Cultural Resources is addressed in section E.3, Cultural Resources, on p. 123, and under Impact CR-4 on pp. 134-136. Consistent with the direction provided by the Revised AB 52 Technical Advisory (referenced with the link in bullet 1 of the A-NAHC comment letter in RTC Attachment B), initial study Section E.3(d) on p. 123 asks: "would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074?" In San Francisco's Initial Study Checklist, as updated on March 28, 2019, the planning department asks "Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape,

sacred place, or object with cultural value to a California Native American tribe, and that is:

i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Based on planning department discussions with local Native American tribal representatives about San Francisco tribal cultural resources generally, the primary tribal cultural resources expected within city limits are prehistoric archeological resources. As discussed with these representatives, if no consultation is requested, potential prehistoric archeological resources are presumed to be tribal cultural resources. As discussed under Impact CR-4 on initial study p. 135, in response to the required notification sent by the planning department, no consultation was requested and no known tribal cultural resources were identified in the project area; however, the project site was determined to have a moderate potential for prehistoric archeological resources. Based on the procedures developed with local Native American tribal representatives, the planning department assumed that the potential prehistoric archeological resources that may be affected by the proposed project or its variant may also be tribal cultural resources and determined that in the event that construction activities disturb unknown archeological sites that are considered tribal cultural resources, any inadvertent damage would be considered a significant impact (initial study p. 135). In order to reduce this impact to a less-than-significant level, the planning department included Mitigation Measure M-CR-4: Tribal Cultural Resources Interpretative Program (initial study p. 135), which was developed in discussion with local Native American tribal representatives. As such, tribal cultural resources are addressed in the initial study, where a determination of significance is made. Furthermore, to address the definition of tribal cultural resource in Public Resources Code section 21074, although the site is listed in the California Register it is not because of its association with a California Native American tribe; rather, this is due to the historic architectural significance of the Midcentury Modern building and integrated landscape.

The comment further asserts that there is no documentation in the initial study or EIR of the lead agency consultation with Native American tribes (see bullet 2 of the A-NAHC comment letter in RTC Attachment B). Documentation of government-to-government consultation by the lead agency with Native American tribes traditionally and culturally affiliated with the project area is provided on initial study pp. 134-135. As stated in the initial study, in accordance with planning department procedures, the document titled “Tribal Notification Regarding Tribal Cultural Resources and CEQA” was prepared for this project and distributed on September 21, 2017, to

representatives of local Native American tribes who requested notification. No requests for consultation were received. After the initial outreach and the 30-day initial study comment period, the planning department did not receive any requests for additional tribal consultation.

The comments received on the analysis of archeological resources, including site topography, and tribal cultural resources, do not present evidence that there would be any new significant impacts not identified in the initial study or a substantial increase in the severity of impacts identified in the initial study. As such the analysis of impacts on archeological resources and tribal cultural resources meets the requirements of CEQA for determining and disclosing the significance of impacts on such resources specified under CEQA Guidelines section 15064.5.

## COMMENT CR-4: MITIGATION MEASURES

"Page S.6, S.7, S.8: "CR-1: The proposed project or project variant would cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5 of the CEQA Guidelines."

In re the mitigation measures stated – Documentation of Historic Resource; Measured Drawings; Historic American Buildings/Historic American Landscape Survey-Level Photographs; HABS/HALS Historical Report; Video Recordation; Softcover Book; & Interpretation of the Historical Resource: While members of the public may appreciate the above products to document the tangible items on the property, how will this be done if the project is supposedly to take 5-7 years or even up to 15 years ("…the proposed project or project variant may be developed over a 15-year timeframe" <Page 4.C.45>)? When would the historic resource materials be available considering the multiple phasing of the project? How would the public know when these become available? Who will be responsible party to get these products to the public?

As part of the "interpretative program," would there be a new plaque for the listing on the CA Register to be placed on the property? If so where? If not, why not? Would the old plaque that marked Landmark #760 be part of the documentation (even though the landmark standards changed since then & maybe that's why the plaque was removed?)?

For future generations, it would be nice to capture this well-known history of San Francisco's Laurel Hill Cemetery where the city's pioneers were once buried along with being one of the "Big Four" cemeteries with Calvary, Masonic and Odd Fellows cemeteries." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-2])*

"Page S.33-S.34: "CR-2: Construction activities of the proposed project or project variant could cause a substantial adverse change in the significance of an archaeological resource." ("SIGNIFICANT," "Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting")

The Mitigation Measure states:

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one

unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA Department of Parks and Recreation [DPR] 523 series) and/or documentation for nomination to the National Register of Historic Places (National register)/California Register of Historical Resources (California register). In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above." Would the public be able to obtain a copy of the CD or access a link to the FARR, etc. as described above? Please advise.

Page S.34: Mitigation states:

The project sponsor shall implement an approved program for interpretation of significant archaeological resources. The project sponsor shall retain the services of a qualified archaeological consultant from the rotational qualified archaeological consultant list maintained by the Planning Department archaeologist having expertise in California urban historical and prehistoric archaeology. The archaeological consultant shall develop a feasible, resource-specific program for post-recovery interpretation of resources. The particular program for interpretation of artifacts that are encountered within the project site will depend upon the results of the data recovery program and will be the subject of continued discussion between the ERO, consulting archaeologist, and the project sponsor. Such a program may include, but is not limited to, any of the following (as outlined in the Archaeological Research Design and Treatment Plan): lectures, exhibits, websites, video documentaries, and preservation and display of archaeological materials. To the extent feasible, the interpretive program shall be part of a larger, coordinated public interpretation strategy for the project area."

How will the public be informed as to the availability of this program and what would be the timeline?" (*Rose Hillson, Letter, January 8, 2019 [I-Hillson2-32])*

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"Appendix I, Page 658 of 776 says California Historical Landmark plaque on Northeastern Corner Perimeter Wall is missing. It would be part of the history (even if not a "landmark" under present CEQA law) and may be re-created and hung up somewhere where it will not be so easily removed like when it was removed. Images of it are available on the internet." (*Rose Hillson, Letter, January 8, 2019 [I-Hillson2-54])*

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"Being that the site was the former location of the Laurel Hill Cemetery, and not all bodies were moved to Colma, would the discoveries be GPS-tagged and located on a map of the development site so that the person's remains can be identified in case there is a living relative who would like the human remains? This area also has a potential to yield new information depending on what is found so there should be somebody to catalog the findings to match it to the burial maps of the extant cemetery. Even when the bodies were removed the first run through and all were thought to be accounted for, the laborers found 189 more just after combing through the site right after all were accounted for. There are likely more because of the way the bodies were put into some of the plots." (*Rose Hillson, Letter, January 8, 2019 [I-Hillson2-63])*

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"We feel that this site deserves respect and that any decision made on how it's redeveloped is important enough to not rush but get right. With that in mind, I would hope that the historical cemetery plaque be returned to the site and a historical plaque with the designers and historical significance of the building and the landscaping be memorialized on the site as well since the building and landscaping are listed on the **California Register of Historical Places.**"
*(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-9])*

## RESPONSE CR-4: MITIGATION MEASURES

### Documentation of the Historical Resource

A comment enquires about the timing of the availability of the Historic American Buildings/Historic American Landscape Survey (HABS/HALS) and interpretive program. The comment also enquires about the responsible parties and how interested parties would be notified about availability of this survey, and the elements that would make up the interpretive program.

Mitigation Measure M-CR-1a: Documentation of Historical Resource, on EIR p. 4.B.46, states:

> The project sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, San Francisco Architectural Heritage, the Planning Department, and the Northwest Information Center. The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested groups. All documentation will be reviewed and approved by the Planning Department's Preservation staff before any demolition or site permit is granted for the affected historical resource.

The public may contact the planning department to enquire as to the status of documentation and can make an appointment to view the documentation when it becomes available. Such documentation would also be available to the public at the San Francisco Public Library. To clarify the outreach component of Mitigation Measure M-CR-1a, the text of the second sentence in the second full paragraph on EIR p. 4.B.46 has been modified as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double-underline):

> The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested ~~groups~~ repositories.

As stated in the Mitigation Measure M-CR-1a, all documentation will be reviewed and approved by the planning department's preservation staff before *any* demolition or site permit is granted for the affected historical resource (*emphasis added*).

Mitigation Measures M-CR-1b: Interpretation of the Historical Resources, on EIR p. 4.B.46, states that the interpretive program must be approved by the planning department prior to issuance of the architectural addendum to the site permit. The detailed content of the interpretive program must be approved prior to issuance of a temporary certificate of occupancy.

By a signed Agreement to Implement Mitigation Measures (dated November 7, 2018), the project sponsor has agreed to implement these and other mitigation measures.

Comments request that the plaque be replaced on the site to commemorate the former use of the site as Laurel Hill Cemetery. The Laurel Hill Cemetery is not listed in the California Register of

Historical Resources even though it is recognized as California Historical Landmark 760. As indicated in footnote 4 on EIR p. 2.2, which cites Public Resources Code section 5031(a):

> All landmark registrations up to and including Register No. 769, which were approved without the benefit of criteria, shall be approved only if the landmark site conforms to the existing criteria as determined by the California Historical Landmarks Advisory Committee or as to approvals on or after January 1, 1975, by the State Historical Resources Commission.

As further explained in the EIR (see Section 4.B, Historic Architectural Resources, p. 4.B.16):

> …California Registered Historical Landmark Nos. 770 and above are automatically listed in the California Register, and California Registered Historical Landmark Nos. 769 and lower are not automatically listed in the California Register, because they are not presumed to have been evaluated using the evaluative framework currently required for California Register eligibility. Therefore, although the project site and surrounding areas are part of a California Registered Historical Landmark, because the landmark number is below 770 [that is, those up to and including No. 769], the Former Site of the Laurel Hill Cemetery is not listed in the California Register.

To clarify the information in the EIR regarding the fact that the site is not listed on the California Register as part of the larger Laurel Hill Cemetery, the text of the third sentence in the first full paragraph on EIR p. 2.2 has been modified as follows (new text is shown in double-underline):

> Although the Laurel Hill Cemetery is California Historical Landmark 760, it is not listed in the California Register of Historical Resources as California Historical Landmark 760.

Although acknowledged in the EIR as part of the site's history, neither the presence of the plaque commemorating the site as part of the larger Laurel Hill Cemetery nor the fact that it is missing is a factor in the analysis of impacts on cultural resources. The interpretive programs identified in Mitigation Measures M-CR-1b (EIR p. 4.B.46), M-CR-2b (initial study p. 133) and M-CR-4 (initial study p. 135) would neither require, nor preclude, replacement of the plaque. As noted in Mitigation Measure M-CR-1b, "The interpretive program should be developed in coordination with the archeological program, which would likely include interpretation of the subject property's inclusion in the larger site of California Registered Landmark 760, Former Site of Laurel Hill Cemetery." The elements of the interpretive programs to address impacts on archeological resources, historic architectural resources, tribal cultural resources, and human remains are described generally in Mitigation Measure M-CR-1b on EIR p. 4.B.46 and in the initial study (see Mitigation Measure M-CR-2b on p. 133 and Mitigation Measure M-CR-4 on p. 135). The interpretive programs would be developed by qualified architectural historians and archeological consultants, and in the case of tribal cultural resources, in consultation with local Native American representatives, and would be approved by qualified planning department staff with experience in these resource areas.

**Historic Era Human Remains from Laurel Hill Cemetery**

A comment enquires if human remains interred at the former Laurel Hill Cemetery are encountered, whether identification of the remains and notification of surviving descendants would be undertaken. This issue was specifically discussed in the initial study, under Impact CR-3, and Mitigation Measure M-CR-2a: Archeological Testing, Monitoring, Data Recovery and Reporting, on initial study pp. 129-132, would be implemented to ensure that any potential impact would be mitigated to a less-than-significant level.

As discussed on initial study p. 128,

> Based on a review of previously completed projects in former San Francisco cemeteries, there is a high-level of certainty that not all burials from the Laurel Hill Cemetery were successfully removed in the early 1940s. The entire project area has been developed since the removal of the Laurel Hill Cemetery. If burials remained in the former cemetery during prior grading operations, there is the possibility that remnants of burials, including human bone, artifacts, and coffin fragments or hardware, may have become intermixed with the fill and could be located anywhere within the fill stratum blanketing the project area. Therefore, there is a high sensitivity for the entire horizontal extent of the project area to contain buried historical archaeological remains, with the exception of the area of previous deep ground disturbance for existing below-grade parking in the 1950s or 1960s, which would have destroyed any archaeological resources.

Mitigation Measure M-CR-2a, on initial study p. 132, requires that treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity follow protocols laid out in the Archeological Research Design and Treatment Plan (ARDTP), and any agreement established between the project sponsor, Medical Examiner, and the Environmental Review Officer (ERO). Note that the ARDTP, prepared by ESA in 2017, is not a published document and is confidential because such documents may have the potential to reveal the location of archeological resources in violation of state and federal law and policy. The ARDTP establishes the protocols referenced in Mitigation Measure M-CR-2a in the event that historic-period human remains are discovered within the project site (including provisions for the treatment and identification of historic-era human remains, and notification of surviving relatives). The excerpt below from the ARDTP is provided in relevant part, to the extent that it does not reveal the specific location of resources.

> **Historic Burials from Laurel Hill Cemetery**
>
> If human remains associated with historic burials in the Laurel Hill Cemetery are encountered during either the archeological testing or data recovery phases, or during construction-related ground disturbance either with or without an archeological monitor present, work in the immediate area shall be halted, a 100-foot diameter buffer established, and arrangements made to protect the remains in place until their disposition has been arranged according to this section. The treatment of human remains associated with historic burials in the Laurel Hill Cemetery and associated and unassociated funerary objects discovered during any ground-disturbing activity shall comply with

> applicable State laws, including Section 7050.5 of the Health and Safety Code, which shall include immediate notification of the Medical Examiner. Due to the likelihood that human remains associated with the Laurel Hill Cemetery will be encountered, the ERO, Medical Examiner, and Project sponsor shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of the human remains and associated and unassociated funerary objects prior to the finalization of the archeological testing plan. The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated and unassociated funerary objects. Specifically, the agreement should identify notification procedures when human remains are encountered, proposed temporary location of the human remains prior to final disposition, and the proposed final disposition location of all remains following all archeological analyses. This agreement should also include consideration of feasible revisions to the Project design or other avoidance measures should human remains associated with historic burials in the Laurel Hill Cemetery be encountered. If no agreement is reached, the archeological testing plan will discuss appropriate treatment protocols. If human remains associated with historic burials in the Laurel Hill Cemetery are encountered in situ in an undisturbed context, historical research will be undertaken to identify the human remains and, if possible, attempts at contacting family members will be made. Although no additional records are in the California Historical Society collections to accompany the 1910 Laurel Hill Cemetery plot map (see Figure 16), the Cypress Lawn Heritage Foundation collections contain records associated with burial removal from Laurel Hill Cemetery and is a possible avenue of research. Likewise, the Society of California Pioneers holds an extensive collection of burial records for Laurel Hill Cemetery. In addition, Proctor (1950) indicated that San Francisco Department of Public Health forms were completed as burials were removed from Laurel Hill Cemetery, and the Health Department is another possible avenue for future research. Historical research, contacting family members, and reinternment costs will be included in all budgets and are the responsibility of the Project sponsor.

Mitigation Measure M-CR-2b: Interpretation, on initial study p. 133, requires that the project sponsor implement an approved program for interpretation of significant archeological resources that may be discovered within the project site. The interpretive program could include lectures, exhibits, websites video documentaries, and preservation and display of archeological materials. The interpretive program would preserve and realize the information potential about archeological resources that may be encountered within the project site.

**Final Archeological Resource Report**

A comment enquires whether copies of the Final Archeological Resource Report (FARR), when approved by the ERO, would be available to the public. The comment quotes provisions in the mitigation measure regarding the FARR and its disposition.

As with the ARDTP, the FARR would not be a published document as such documents may have the potential to reveal the location of archeological resources in violation of state and federal law and policy. However, Mitigation Measure M-CR-2a on initial study p. 132 states that "in instances of public interest in or the high interpretive value of the resource, the ERO may require

a different or additional final report content, format, and distribution than that presented above." Thus, at the direction of the ERO this could include a public version of the FARR, if deemed appropriate.

Compliance with the mitigation measures including the completion of the FARR, if needed, or a public version of the FARR, if deemed appropriate, would ensure that impacts to archeological resources would be less than significant with mitigation.

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# 5.E TRANSPORTATION AND CIRCULATION

The comments and corresponding responses in this section relate to the topic of Transportation and Circulation evaluated in EIR Section 4.C. The comments are further grouped according to the following transportation-related issues that the comments raise:

- TR-1, Travel Demand Methodology
- TR-2, Transportation Network Companies – SF-CHAMP and Trip Generation
- TR-3, Trip Distribution/Increased Traffic Congestion
- TR-4, Vehicle Miles Traveled Methodology and Findings
- TR-5, Mitigation Measures
- TR-6, Construction Impacts
- TR-7, Traffic Hazards
- TR-8, Pedestrian/Bicycle Hazards
- TR-9, Transit Impacts
- TR-10, Loading
- TR-11, Parking
- TR-12, Cumulative Transportation Impacts
- TR-13, Emergency Access Impacts
- TR-14, Transportation Setting

A corresponding response follows each grouping of comments.

## COMMENT TR-1: TRAVEL DEMAND METHODOLOGY

"We understand that the City Planning Department has recently shifted from a focus on intersection analysis to vehicle miles traveled from potential projects, but that, in conjunction with the SFMTA, it will still consider the projects' impacts to the adjacent transportation network, including existing safety and circulation issues (identified in 1-3 below). We look forward to coordinating with the Department, the SFMTA and the developers to create a safer neighborhood for all users." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 3, 2016 [O-JCCSF4-2])*

"Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading. At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact. The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. Studies also show that TNCs increase passenger trips by almost 10%. There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude. Also,

implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 8,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office +Residential which is an entirely bogus number based on questionable assumptions, such as "The SF Guidelines **do not provide a specific methodology** to assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…." Rather amazing that these "refinements" all work in the Developers favor. Nowhere in these "refinements" have TNCs been taken into account! Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!

Seawall Lot 337 & Pier 48 summary:

Project type Mixed-use, open space, residential, commercial

Project area Approx. 28 acres

Proposed building area 1.3 – 1.7 million sf commercial; 750,000 - 1.5 million sf residential; 150,000 – 200,000 sf retail, 850,000 sf structured parking

Seawall Lot 337 & Pier 48

Pier 70 summary: "The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

**WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable? Simply bogus. The DEIR consistently attempts to misrepresent and mislead the public. It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.**

Under their previous, Level of Service, methodology they would have calculated 8,000 retail trips alone. I think it safe to say that the numbers presented by Planning are simply "Developer friendly!". Their VMT methodology with "refinements" will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 35% less trips! This entire section is suspect and Planning must explain this profound discrepancy. As noted above, nowhere are the TNCs incorporated into the calculations. **All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**"

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.

Planning's mitigation measure is a stone age solution to a digital age problem. How will many people respond to a perceived lack of parking? They'll simply call a TNC and go anyway. **Eliminating parking won't eliminate auto trips it will actually increase auto trips.** A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past –

by any mode of transport. The VMT methodology used by the Planning Department fails to account for the impact of TNCs. *(Sal Ahani, Email, January 8, 2019 [I-Ahani-13])*

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"Retail stores and offices will bring in too much additional traffic and are unnecessary. Existing local stores are more than sufficient for the needs of the neighborhood." *(Barbara and Jim Brenner, Email, January 3, 2019 [I-Brenner-3])*

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**"A. The DEIR Is Inadequate Because It Lacks An Estimate and Discussion of Total Net New Travel Demand (Net New Person Trips) and Understates the Project Impacts by Providing Estimates and Discussion of Net New Person Trips during A.M and P.M. Peak Hours.**

The San Francisco Planning Department *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (San Francisco Guidelines), provide that:

> Travel demand analysis shall include textual information, supported by tables or figures detailing the project's trip generation, trip distribution, trip assignment and modal split characteristics.
>
> Net new travel demand generated by the project is to be estimated, based on the difference between existing and proposed land uses. Person trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C, are to be used for estimating levels of activity for the proposed project...
>
> To "net-out" existing land uses that will be replaced, the existing levels of trip activity should, in most cases, be based on actual observations rather than on estimates based on rates in these Guidelines or other sources.
>
> Each analysis should apply the trip generation rates from the Guidelines individually to the proposed uses, compare the proposed trips to existing levels of trip activity, and show the differences ("net new") by land use and in aggregate. The Travel Demand Analysis is to include the following, unless otherwise directed in the work scope (Note that different or additional analysis periods may be defined in the scope of work process):
>
> - Trip Generation Information: Project trip generation information (total person trips) by land use for existing and proposed uses. The total unadjusted daily and P.M. peak hour trips by mode can be calculated. The number of daily and peak hour vehicles (autos) generated by the project should also be calculated by using the auto occupancy rates noted in the tables in Appendix E.
> - Work and Non-Work Trip Generation Information: Since work and non-work trips have different characteristics in terms of distribution and the mode of travel, the number of work and non-work (visitor) trips should be calculated separately. Appendix C provides the methodology to compute the work and non-work (visitor) trips for a specific land use.
> - Trip Distribution, Assignment and Modal Split Information: Net new person trips distributed to various directions of travel and assigned to the appropriate modes of travel (auto, transit, walk, and other) should be calculated, presented in tables and a graphic diagram (for vehicle and transit trips), and discussed in the text. Modal assignments should also be calculated for daily and the P.M. Peak Hour.
>
> The weekday P.M. Peak Period is generally 4:00-6:00, and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour

> must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. The Planning Department may also request data for other periods to reflect the peak period of trip generation by the land use. (Ex. A, *San Francisco Guidelines* pp. 9-10)

The DEIR failed to estimate the net new travel demand that would be generated by the project, as required by the San Francisco Guidelines, at pages 9-10. (Ex. A, pp. 9-10) EIR Table 4.C.11 at page 4. C.54 estimated the total new travel demand generated by the project (person-trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C) based on the proposed project land uses. However, the DEIR lacks an estimate of the total existing levels of trip activity at the project site, so that the "net-out" of existing land uses that will be replaced can be determined, as required by the San Francisco Guidelines. The DEIR failed to provide estimates of the total existing levels of vehicle trips that currently occur at the project site and merely provided estimates of existing vehicle-trips in the Weekday AM. Peak Hour and Weekday P.M. Peak Hour. DEIR p. 4.C.60. Instead of the total increase, the DEIR only discusses "the anticipated increase in weekday a.m. and p.m. peak hour vehicle trips resulting from the proposed project and project variant, as compared to existing conditions." DEIR p. 4.C.60. The DEIR reports the total net-new external vehicle-trips "during the weekday a.m. peak hour" and the net-new external vehicle-trips "during the weekday p.m. peak hour" for the proposed project and project variant. DEIR p. 4.C.60. The estimated total increase in vehicle-trips is missing. The absence of this information is misleading to the decision maker and the public because the DEIR lacks estimation of the total increase in vehicle-trips that would be caused by the proposed project/variant.

In addition, the DEIR fails to "show the differences ('net new') by land use and in aggregate," as specified in the San Francisco Guidelines, at p. 9. DEIR Table 4.C.15, at page 4.C.601acks information as to net-new vehicle-trips by land use or in the aggregate, and merely presents estimates of net-new external vehicle trips in the "Weekday A.M. Peak Hour" and "Weekday P.M. Peak Hour." The DEIR's focus on peak-hour net-new vehicle trips is more relevant to traffic level of service impacts than to the greenhouse gas emissions that could result from total net-new vehicle trips. However, the lack of the information renders the DEIR inadequate because it lacks estimates of the net-new trips by each proposed land use, depriving decision makers of important information they would use to mitigate effects by tailoring land use.

In addition, the DEIR fails to provide the "total unadjusted daily and P.M. peak hour trips by mode," which is generally required by the San Francisco Guidelines at page 9 unless otherwise directed in the work scope. DEIR Table 4.C.14 provides adjusted daily and A.M. and P.M. peak hour person-trip generation by mode; the estimates in that table had been reduced by the internal trip capture rates set forth in DEIR Table 4.C.12 at page 4.C.55. In that table, the total weekday A.M. peak hour person-trip generation was reduced by 409 alleged internal person-trips and the table reported the net external person-trips as 1,917. The adjusted 1,917 trips figure was carried over and reported as total A.M. Peak Hour person-trips per mode on Table 4.C.14 and those 1,917 person-trips were divided into 1,197 auto trips, 295 transit trips, 376 walk trips and 49 other trips (bicycle, motorcycle, transportation network companies, and other modes). Thus, the DEIR failed to provide unadjusted daily and P.M. peak hour trips by mode as specified in the San Francisco Guidelines.

The DEIR provides no explanation of the manner in which the walk trips in Table 4.C.14 were calculated or the manner in which the alleged internal trip rates set forth in Table 4.C.12 were calculated, and the general source reference to Kittleson & Associates 2018 and the San Francisco Guidelines, 2002 provide no reference to an explanation or calculations supporting those Tables. The total of the alleged external walk trips and internal trips indicates that the walk

trips are inaccurately estimated or the calculations in the tables are inaccurate. Table 4.C.14 reports 376 A.M. Peak Hour walk trips for the proposed project, which is 19.6 percent of the total A.M. Peak Hour person-trips (376/1,917), and 398 P.M. Peak Hour walk trips for the proposed project, which is 19.07 percent of the P.M. Peak Hour total person-trips. (398/2,086). Table 4.C.12 reports 409 internal person-trips of the tota12,326 person-trips for the A.M. Peak Hour, which is 17.6 percent of the total A.M. peak hour internal trips, and 485 internal person-trips of the tota1 2,571 for the P.M. Peak Hour, which is 18.9 percent of the total P.M. Peak Hour internal trips. Adding the percentages of the alleged internal trips to the alleged walk trips reported on these two tables, 37.2 percent of the A.M. Peak Hour Trips would be performed by walking externally or by internal trips (376 plus 409) and 37.97 percent of the P.M. Peak Hour trips would be performed by walking externally or by internal trips (398 plus 485). Since it takes approximately one minute to walk across the site, it is likely that the internal trips consist of walk-trips rather than bicycle trips. The totals of the alleged walk trips and internal trips in perk periods, indicate that the DEIR overstated one or both of these trip rates, and the DEIR lacks substantial evidence that they were correctly stated.

The text at DEIR page 4.C.58 indicates that Table 4.C.14 reports "Overall" person-trips, and if this is the case, walk trips are being double-counted and the total person trips represented as external trips in Table 4.C.14 are inaccurate and were improperly reduced by alleged internal trips before person-trips were reported in Table 4.C.14. That DEIR text reports that "Overall, on a daily basis, various types of land use would result in percentages of person-trips. Overall, residential use would generate 14% of walk trips, office use would generate 3%, general retail would generate 36%, restaurant uses would generate 40% and the day care center would account for 3-6% of trips for each model. These percentages add up to approximately 100 percent, so Table 4.C.141ikely reports total walk trips and total person-trips, rather than external trips only (as indicated by the heading "External Person-Trip Generation by Mode"), and it is likely that such table inaccurately double-counted walk trips, because walk-trips had been subtracted from total person-trips on Table 4.C.12 before the person-trip generation figures were carried over to Table 4.C.14.

The text at DEIR 4.C.57 also indicates that walk trips were double counted. The DEIR states there that "Based on Table 4.C.14, about 61 percent of daily person-trips generated by the proposed project would be auto person-trips, 14 percent would be transit trips, 21 percent would be walk trips, and 4 percent of trips would be taken by other modes, including bicycles, motorcycles, and for-hire vehicles." DEIR p. 4.C.57. These mode shares add up to approximately 100 percent of trips and the 21 percent of walk trips is consistent with the 376 walk trips of the 1,917 total person-trips reported on Table 4.C.14. That DEIR text is not consistent with an additional 17-18 percent of trips being internal trips, as alleged in Table 4.C.12. Since the project site is easily traversed within approximately one minute or less, it is reasonable to assume that internal trips on this site would be walking trips. If there is any evidence contrary to this assumption, please present it." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-2])*

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"The Traffic study in the DEIR states that to estimate the travel demand for the project, the trip generation, mode split and distribution of trips generated by the Project and Variant will be based on data from the SF Guidelines information for Superdistrict 2 and the current U.S. Census American Community Survey Five-Year (2011-2015) Estimates journey-to-work data. DEIR Appendix D, p. 7.

For estimating the trip-making patterns of the proposed project or project variant, the DEIR developed a methodology using the National Cooperative Highway Research Program Report 684 and the 2010 and 2011 Institute of Transportation Engineers Journal which was similar to the

approach used in the analysis of other recently completed EIRs, including the Mission Rock Project at Seawall Lot 337 and Pier 48, and the Pier 70 Mixed Use District Project. DEIR 4.C.56; DEIR Appendix D page 22.

The two studies cited in footnote 2 and 3 on page 22 of Appendix D of the DEIR are the Transportation Research Board, National Cooperative Highway Research Program Report 684, 2011, Enhancing Trip Capture Estimation for Mixed-Use Developments and the ITE Journal, 2010 and 2011, *Improved Estimation of Internal Trip Capture for Mixed-Use Development a*nd Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Projects. These deal with per capita trip capture rates, not total VMT generated. Also, the DEIR fails to provide an explanation of the methodologies discussed in the referenced publications or of the modified trip generation model specific to the 3333 California Street project that the DEIR claims was developed. Thus, the DEIR does not contain substantial evidence that would support the reliability of the modified methodology used to estimate trip-making patterns of the proposed project/variant. An explanation of the modified model and the cited publications are not contained in the DEIR or Appendix D.

However, Appendix D explains that these studies were only the initial point for the analysis because the NCHRP Report 684 and ITE provided information on unconstrained internal trip capture rates for the proposed projects which "represent the highest possible values, resulting from the most favorable balance of land uses." DEIR Appendix D. p. 23. Kittleson then adjusted the initial information to estimate internal trip capture rates used in the analysis that "are contrained by the need for the number of trips generated by the producer uses to match the number of trips received by the attractor uses. Using the unconstrained internal trip capture rates as an initial point of analysis, the project- and scenario-specific internal trip capture rates were identified through an iterative balancing process. DEIR Appendix D, p. 23.

That iterative process was not explained in the DEIR or Appendix D, so the ultimate conclusion reached as to internal trip capture rates was evidently based on interpretation by Kittleson rather than on calculations or fact-based analysis, and the absence of such information renders the DEIR's conclusions as to the internal trip capture rate inadequate under CEQA. Unsupported opinion does of constitute substantial evidence under CEQA. Also, the internal trip capture rates included in Attachment C, and presented in Tables 6 and 7 at DEIR Appendix D pp. 9, lack rates of the internal trip capture rates for the entire day and contain rates for internal trip capture only in the A.M. and P.M. peak hour periods. DEIR Appendix D, Attachment C, p. 131. Kittleson fails to describe any support for its use of only alleged internal trip capture rates for peak periods.

Significantly, the Table 6 shows that the NCHRP and ITE unconstrained trip capture rate of 20% is the same rate as Kittleson estimated for residential uses in the project variants, which are supposed to be determined on the basis of constrained internal trip capture rates. Kittleson estimated that the internal trip capture rate for residential use in the office project variant would be 20% and the internal trip capture rate for residential use in the multi-family variant would be 19.9%. DEIR Appendix D, p. 9. The DEIR contains no support for the conclusion that constrained residential trip capture rates linked with beginning and ending points should be the same as the unconstrained residential trip capture rates that are not linked with a beginning and ending. OPR does not recommend using different methods to estimate VMT reduction. (Ex. I, p. III:16)

The fact that the residential trip capture rates Kittleson calculated for the project variants are the same as the unconstrained rates "which represent the highest possible values, resulting from the most favorable balance of land uses," indicates that Kittleson used a most favorable

interpretation of data rather than conservative estimates to produce a biased and inaccurate conclusion. Also, since Kittleson used data for peak periods to estimate the internal trip capture rates for the project, it would be reasonable to assume that residents of the project site would drive the most at that time traveling to and from work, rather than make the highest possible number of internal trips during peak periods at the site. Since Kittleson provides no calculations to estimate total trip capture rates, and its estimates of peak period residential trip capture rates are suspect, the DEIR lacks substantial evidence to support its estimation of internal trip capture rates of the project/variant which the DEIR used to estimate daily auto trips.

In Table 9 in Appendix D p. 27, Kittleson also projected mode share by trip purpose using P.M. peak hour mode share rather than 24-hour mode share, as provided by the SF Guidelines 2002 in Appendix C-4. Table 9 fails to compare work with non-work trips that total 100% of trips by the land use type. Instead, Table 9 presents comparisons of percentages of trips that occur by auto, transit, walking or other mode, for unspecified amounts of work and nonwork trips so that the percentage of daily work and non-work trips cannot be determined. DEIR Appendix D, p. 27.

Also, the mode shares and average vehicle occupancy rates used in the DEIR were based on the United States Census Bureau five-year estimates of commute trip travel behavior from the 2011-2015 American Community Survey for Census Tract 154, which includes the project site. DEIR p. 4.C.57. As documented herein, TNC use became significant in 2016, so was not accurately taken into account in the mode shares, trip generation and distribution of trips used in the DEIR.

The DEIR estimated travel demand based on information in the 2002 SF Guidelines that predated the astronomical increase in TNA and food delivery trips and failed to provide an estimate of total VMT that would be caused by the project. The DEIR does not claim that its traffic demand analysis included any adjustment to add the traffic demand (and VMT) that would be caused by the current usage of vehicles such as TNCs and food or other delivery vehicles that would be attracted to the five proposed new loading zones surrounding the site. Rather, it claims that some person-trips would be reduced by an unexplained methodology dealing with internal trip capture." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-6]*)

**"5. The DEIR Is Inadequate Because It Lacks the Analyses Set Forth in the *SF Guidelines*.**

The DEIR does not contain the calculations or substantiation for trip distribution, assignment and modal split information required by the 2002 SF Guidelines, which state that ***"person trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C, are to be used for estimating levels of activities for the proposed project."*** (Ex. A, p. 9, emphasis added) Those *SF Guidelines* also state that:

> Trip Distribution, Assignment and Modal Split Information: Net new person trips distributed to various directions of travel and assignment of the appropriate modes of travel (auto, transit, walk, and other) should be calculated, presented in tables and a graphic diagram (for vehicle and transit trips), and discussed in the text. Modal assignments should also be calculate for daily and the P.M. Peak Hour...
>
> The weekday P.M. Peak Period is generally 4:00-6:00, and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. (Ex. A, pp. 9-10)

***The DEIR lacks information on the calculation of total daily trip generation of the project and the calculation of daily modal assignments and net new person-trips. Instead, the DEIR inadequately presents information on peak hour AM and PM trip generation, thus understating the trip generation of the project and the resulting VMT that produces greenhouse gas emissions.*** The mode share presented in Table 9 of Appendix D of the DEIR at p. 27 "reflects the weekday PM peak hour mode share." Table 10 also presents only AM and PM peak hour data and lacks daily modal share information, so total mode share cannot be understood. The DEIR is misleading to decision makers and the public.

The *2002 SF Guidelines* state that since work and on-work trips have different characteristics in terms of distribution and mode of travel, the number of work and non-work (visitor) trips should be calculated separately; Appendix C provides the methodology to compute the work and non-work (visitor) trips for specific land use. (Ex. A, p. 9-10) The DEIR does not calculate the percentage splits between work and non-work trips for specific land uses in the manner specified in Table C-2 based on the trip generation rates in Table C-1 of the 2002 SF Guidelines. For example -for residential use, Table C-2 states that 33% of daily trips are from work trips and 67% are from non-work trips; for office use 36% of daily trips are from work and 64% from non-work use; for retail 4% of daily trips are from work and 96% from non-work use.

However the DEIR lacks the calculation of the daily or PM peak hour percentage splits of work/non-work trips based on the trip generation rates per 1000 square feet of land use or number of residential units presented in Table C-1. The *2002 SF Guidelines* make clear at p. 9 that "Person trip generation rates per unit of square footage for each land use, or other unit shown in Appendix C, are to be used for estimating levels of activity for the proposed project." The DEIR lacks these person trip generation rates per square footage of land use and understates person trips by presenting information on trips during weekday AM and PM peak periods.

Appendix E to the DEIR lacks substantiation or calculation of the total work and nonwork trips for each trip purpose and merely sets forth unsubstantiated claims as to the amount of work and non-work trips divided into auto, transit, walk and other travel, rather than by square footage of land use. Table 9 lacks the total amount or percentage of work and non-work taps for residential, office, retail, restaurant and other use, and merely presents unsubstantiated percentages of work and non-work uses in the various categories of auto, transit, walk and other. Table 9's claim that 54.5% of residential trips are made with autos and 54.8% of residential nonwork trips are made with autos provides no meaningful information to the decision maker as to the total amount of residential trips that are made or the percentage of residential trips made based on the land use devoted to residential use or the split between work and non-work trips attributable to residential uses. That split is the basis for the mode share split calculation required by Table C of the *SF Guidelines*. Table 9 of the DEIR fails to provide information needed to calculate VMT for each mode share. VMT is produced by total trips, not only in the AM and PM.

In addition, the figures set forth in the DEIR also conflict with the vehicle trip distribution information provided in the *SF Guidelines*. Table E-4 of the 2002 *SF Guidelines* provides the daily distribution of work trips to SD-2, but the DEIR lacks information on daily distribution and merely provides data on weekday AM and PM peak hour distribution. Ex. A; DEIR p. 4.C.57. Again, the DEIR Table is not substantiated and is supported only by an unexplained reference to Kittleson &Associates 2017 and *SF Guidelines* 2002. The DEIR did not follow the *SF Guidelines* as to calculation of trip distribution.

The external person-trip generation by mode presented in Table 4.C.14 at page 4.C.58 of the DEIR is unsubstantiated and unsupported by substantial evidence. The support cited for this Table is merely Kittleson &Associates 2018 and *SF Guidelines* 2002. No explanation of the

method or basis of calculation of the modes is provided, and modes are not provided as to trip purpose or type of trip (whether residential, office, retail or daycare). The allegations in the Table constitute unsupported conclusions and do not amount to substantial evidence.

There is also no calculation or substantiation to support the average vehicle occupancy as to mode share set forth in Table 9 of Appendix D page 12. The source cited for the average vehicle occupancy and PM peak hour mode share are merely general references to Kittleson & Associates 2017, the American Community Survey Five-Year (2011-2015) Estimates, and *SF Guidelines*, 2002. While the American survey may provide information as to residential nonwork trips, there is no evidence that it provides information as to work or other trips, such as retail trips.

Also, the mode shares and average vehicle occupancy rates used in the DEIR consist of unsupported conclusions and are not supported by substantial evidence. The mode shares and average vehicle occupancy rates "for residential work trips" were based on the U.S. survey 2011-2015 estimates (DEIR p. 4.C.57), but the DEIR does not provide a supporting reference for the residential non-work trips, office work-trips or non-work trips, retail work trips or non-work trips, restaurant work-trips or non-work trips or daycare work or non-work trips. The DEIR is inadequate for failing to provide an explanation of the manner in which this information was derived. Also, as stated above, in *TNCs &Congestion*, **since TNC use became significant in 2016**, there is not substantial evidence that the increased mode shares by TNCs were taken into account in arriving at the DEIR's conclusions, and the DEIR's transportation analysis is inadequate for failing to take such information into account.

As to Mode Share, the DEIR states at page 4.C.57 that:

> Person-trips generated by the proposed project and project variant were distributed to San Francisco's four Superdistricts and the greater Bay Area and then assigned to travel modes based on mode shares presented in the *SF Guidelines* in order to determine the number of auto, transit, walk and "other" trips. The "other" mode includes trips taken by bicycle, motorcycle, for-hire vehicles such as transportation network companies, taxis, and other modes. The person-trips shown as "auto" person trips reflect the total number of persons traveling by automobile and some automobiles would transport more than one person or multiple people, each of whom is making one person trip. Vehicle trips are calculated as the number of auto person trips divided by the average vehicle occupancy. Mode shares and average vehicle occupancy rates for residential work trips are based on United States Census Bureau five-year estimates of commute trip travel behavior from the 2011-2015 American Community Survey for Census Tract 154, which includes the project site. External person-trip generation estimates by mode and vehicle types are shown in Table 4.C.14: External Person-Trip Generation by Mode.

Thus, the DEIR used inaccurate estimates of mode share that pre-dated the great increase in TNCs that occurred in 2016.

DEIR Appendix D explains at page 27 that mode share by trip purpose (work or non-work) is presented in Table 9. The internal trips presented in Table 7 would be expected to occur for the most part by walking and bicycling. As a result, the preliminary modal split percentages presented in Table 9 would change. Table 10 provides a comparison of modal splits before and after the calculation of internal trips for the Mixed-Use Office Scenario and Mixed-Use Multi-Family Housing Scenario. The resulting person-trips by mode and external person- and vehicle trips are shown in Table 11.

The traffic study in Appendix D of the DEIR admits at page 22 that the SF Guidelines do not provide a specific methodology to assess the amount of trips that could remain within a large

mixed-use project site and claims that refinements were made to the standard travel demand analysis "to account for the size and land use mix of the project." However, the DEIR lacks explanation of the nature of the refinements made and substantiation of the accuracy of the methodology used to estimate the internal trip capture rates. Thus, substantial evidence does not support the DEI's conclusions as to the internal trip capture rates stated in the DEIR.

As explained herein, the internal trip capture rates used in the DEIR for the proposed project are not supported by the referenced studies or other reports. Similarly, the conclusions as to mode share and average vehicle occupancy stated in Appendix D at page 27-29 are also unsupported by explanation or analysis. Again, the source of the conclusions is only Kittleson and an unreferenced page of the 2002 *SF Guidelines.*

The traffic study in DEIR Appendix D also explains at page 22 that:

> To better estimate the trip-making patterns of the proposed project, a modified trip generation model specific to the 3333 California Street project was developed. The methodology was developed using the National Cooperative Highway Research Program Report 684, ITE, and is similar to the approach used in the analysis of the Mission rock Project at Seawall Lot 337 and Pier 48, and the Pier 70 Mixed-Use District Project.

The two studies cited in footnote 2 and 3 on page 22 of Appendix D of the DEIR are the Transportation Research Board, National Cooperative Highway Research Program Report 684, 2011, *Enhancing Trip Capture Estimation for Mixed-Use Developments* and the ITE Journal, 2010 and 2011, *Improved Estimation of Internal Trip Capture for Mixed-Use Development and Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Projects*. However, the DEIR fails to provide any explanation of the methodologies discussed in the referenced publications, which the DEIR cites as support for its estimates of the internal trip capture rate. The cited publications are not contained in the DEIR or Appendix D.

In addition, the DEIR's mode share analysis is inaccurate and inadequate because it fails to take into account the current mode share of vehicle trips currently occurring by transportation network companies such as Uber and Lyft and the 3333 California Street project proposal to add five new loading zones around the perimeter of the site which will attract such transportation network companies and other delivery vehicles. *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-9]*)

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"The 3333 California project site is in Superdistrict 2. (San Francisco Transportation Information Map, accessed December 26, 2018) According to Appendix D of the San Francisco Planning Department Transportation Analysis Impact Guidelines, October 2002, TABLE E-12 VISITOR TRIPS to SD-2 —RETAIL, percentages of automobile trips made to retail locations in SD-2 from residents in the districts described below are made at the rates listed below:

64.3% of visitors from All Origins
78.4% of visitors from Superdistrict 1
56.5% of visitors from Superdistrict 2
60.9% of visitors from Superdistrict 3
81.2% of visitors from Superdistrict 4
65.8% of visitors from the East Bay
81.2% of visitors from the North Bay
95.1% of visitors from the South Bay and
62.5% of visitors from other locations. (Ex. A, excerpts of said Appendix D)

Page C-1 of Appendix C to the San Francisco Planning Department Transportation Impact Analysis Guidelines state that the "essential data necessary for the calculation of trip generation is contained in Tables C-1 and C-2, and in the trip distribution, mode split, and auto occupancy tables contained in Appendix E." (Ex. A, attached) Table C-1 of that Appendix shows that Eating/Drinking uses have higher trip rates that General Retail and all other uses except Supermarket, at the following rates of trips per 1,000 gross square feet of space:

| | |
|---|---|
| General Retail | 150.0 |
| Supermarket | 297.0 |
| Eating/Drinking | |
| Quality Sit-Down | 200.0 |
| Composite Rate | 600.0 |
| Fast Food | 1400.0 |
| Office | |
| General | 18.1 |
| Residential (all types) | |
| 2+ bedrooms | 10.0/unit |
| 1 Bedroom/studio | 7.5/unit |
| Senior Housing | 5.0/unit (Ex.----) |

These rates were used by the City in the EIR for the 901-16th Street and 1200-17th Street project in estimating trip generation for project retail; San Francisco rates were also used for estimating trip generation for project residential uses and calculating Daily Person trips in that Draft EIR for that project. (Ex. U, pp. IV.A.31, 32) The retail mode splits and AVO were based on the *San Francisco Guidelines* Appendix E, and showed that retail work trips accounted for only 4% of the daily auto retail person trips (262/5923) and retail non-work trips accounted for 96% of the daily auto retail person trips (5661/5923). *Ibid.* That EIR also showed, based on the *San Francisco Guidelines* Appendix E, that the Average Vehicle occupancy for retail work trips was 1.23 but the Average Vehicle Occupancy for retail non-work trips was 1.90. *Ibid.* According to Appendix E of the *San Francisco Guidelines*, 64.3 % of all visitor trips to SD-2 were made by automobile, with 1.88 persons per auto. (Ex. A)

Table C-2 of Appendix C of the San Francisco Transportation Impact Analysis Guidelines shows at page C-4 that the percentage splits between work and non-work trips for Retail (including Supermarkets & Eating/Drinking Establishments) is 4% work and 96% nonwork for a daily 24-hour period. (Ex. A) Of the 54,117 gross square feet of total retail uses in the proposed 3333 California Street project, 40,004 gsf would be for general retail, 4,287 gsf for sit-down restaurant and 9,826 gsf for composite restaurant. (DEIR pp. 5-49) According to Table 4.C.11 of the DEIR, of the total 19,644 daily person-trip generation estimated for the proposed project, 12,753 person trips generated by the project would be from total retail uses, or 64.9 % of the daily person trips. Since 96% of the retail trips would be for non-work trips, 96% of the 12,753 retail non-work person trips, or 12,243 daily person trips would be generated by customer, or non-work retail trips.

Thus, the DEIR is inadequate because it failed to include approximately 12,243 daily person trips that would be generated by retail customers of the project, or non-work retail trips. Omission of this information misleads the decision maker and the public as to the true impacts of the project." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-11]*)

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"In addition, different retail uses generate more VMTs than others. Retail and especially ***restaurant type use*** generates ***a lot more traffic*** because they stay open later than another use that

is open only 9AM-5PM. Neighbors in this area drive or call a rideshare to get a cup of coffee even if only 2 blocks away." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-9])*

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"What are the vehicle counts projected for Laurel, Manzanita, Iris, Heather, Spruce, Parker, Commonwealth, Jordan, Palm, Euclid, Geary, and California St. from 2018 each year until the fully built out project? It is hard to say the total number of years the development is projected to take – ranges from 5-7 years (see Table AQ-1 shown later herein & from DEIR) to 15 years so what are the counts based on the time projections?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-12])*

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"Also, the traffic analysis does not take into account the time of day impacts. While most heavy traffic is in AM- and PM-peak commute hours, there are other hours of concern such as when school lets out. These periods have more traffic on the road. Where is the hourly traffic volumes for the nearby streets (Arguello to Presidio/Fillmore between California & Geary)? Using only TAZ 709 from the 2000 Census appears to show rather low VMT numbers. I think since 2000, there is higher VMT with TNCs. I also think more of the nearby TAZs should be included in the analysis to see a more accurate picture of what would impact the "other nearby TAZs" rather than using only TAZ 709 (now called TAZ 100521 (Laurel to Lyon Between California & Sacramento). Traffic flows over a distance and the DEIR admits at least to ¾-mile from the site. There needs to be included the "other nearby TAZs" into the calculations for impacts due to changes since appearance of TNCs, other uses, more people." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-35])*

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"The DEIR estimates that the project would generate 10,057 daily automobile trips (page 4.C.58). This is probably an understatement because another EIR for a mixed use project estimated 13,000 automobile trips generated by the retail square footage alone (approximately 54,000 square feet), and the proposed project also has 558 or 744 residential units and a 49,999 square foot new office building that would generate additional vehicle trips." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-5])*

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**RESPONSE TR-1: TRAVEL DEMAND METHODOLOGY**

The comments state that the planning department has shifted from intersection level of service analysis to vehicle miles traveled and that the City's method for calculating auto trips is not specific, is flawed and misleading, and fails to account for the impact of transportation network company (TNC) vehicles or various time periods (a.m., p.m., after school). The comments state that net new travel demand estimates are not provided and the estimated total increase in vehicle-trips is missing. The comments also state that the mode share and average vehicle occupancy rates do not account for current mode share from transportation network companies; that the internal trip capture methodology and estimates are not explained adequately; and that vehicle trip calculations understate the number of vehicle trips that would be generated by a development of this size. The comments state that trips generated by retail customers of the project, or non-work retail trips, are not included in the analysis. The comments state that the mitigation measure to reduce the number of retail parking spaces would not reduce the significant traffic impact. The comments request

existing vehicle traffic counts and projections of future traffic on nearby roadways with the proposed project or its variant.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Existing Conditions" starting on EIR p. 4.C.4; "Travel Demand Analysis" starting on EIR p. 4.C.53; "Freight Delivery and Service Loading Demand" on EIR p. 4.C.60; "Passenger Loading Demand" on EIR p. 4.C.61; Impact TR-2 starting on EIR p. 4.C.74; Impact TR-9 starting on EIR p. 4.C.96; and Impact TR-10 starting on EIR p. 4.C.98. Detailed supporting information is included in EIR Appendix D, Transportation and Circulation. The EIR concluded that the proposed project or project variant would have a less-than-significant impact on vehicle miles traveled with implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply (EIR p. 4.C.80) and less-than-significant freight loading and passenger loading impacts. The comments received on the draft EIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the EIR or a substantial increase in the severity of impacts identified in the EIR, and no new mitigation measures would be necessary. Since publication of the draft EIR, the proposed project and project variant have been revised to reduce retail square footage as well as the number of parking spaces among other changes. The changes are minor and do not alter the conclusions in the EIR. See RTC Section 2 on pp. 2.2-2.29.

Responses to the issues regarding trip generation, net new trips, and estimated total increase in vehicle trips are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussions in subsection B.3, Trip Generation Estimates (RTC p. 4.4), subsection B.5, Internal Trip Capture in the section entitled "Analysis Time Periods" (RTC p. 4.12), and subsection B.6, Net New Trips, (RTC p. 4.13). Contrary to assertions made in several comments on the EIR, daily and p.m. peak hour trips are provided (see e.g., Table 4.C.11 on EIR p. 4.C.54). Contrary to a comment, the approach used is consistent with the *2002 SF Guidelines* Appendix C, and the analysis presented in the EIR considers both the work and non-work trips generated by retail and other uses. The same comment correctly states that the percentage splits between work and non-work trips for retail is 4 percent work and 96 percent non-work. Therefore, of the total 19,644 daily person-trips generated by the proposed project, 12,753 would be generated by the retail uses (including 12,243 non-work and 510 work trips). Some of these trips would remain internal to the site and some would be external trips, beginning or ending outside the site.

Responses to the issues regarding the impact of TNC vehicles on mode share and average vehicle occupancy rates, along with other TNC issues associated with the proposed project or variant are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussions in subsection B.3, Trip Generation Estimates, under "Trip Generation Comparison – 2002 SF Guidelines and 2019 TIA Guidelines Update," and subsection B.7, Loading Demand, under "Passenger Loading Demand – Transportation Network Company Vehicles" on RTC pp. 4.4-4.8 and RTC pp. 4.15-4.16, respectively). A comment cites "a UC Davis study" regarding information

about TNC vehicles, but fails to provide information such as author or title to identify what UC Davis study is intended. Assuming that the study referenced is one by Regina R. Clewlow and Gour S. Mishra, entitled "Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States," it is discussed, with a full citation, in Response TR-2, Transportation Network Companies – SF CHAMP and Trip Generation, on p. 5.E.26 below.

Responses to the issues regarding internal trip capture rates are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection B.5, Internal Trip Capture, starting on RTC p. 4.9). The methodology for the internal trip capture processing is summarized on EIR pp. 4.C.54-4.C.56 and described in more detail in EIR Appendix D pp. 22-24. Contrary to the comments received, the internal trip capture rates applied do not represent the highest possible values resulting from the most favorable balance of land uses; comments may imply that the planning department selected an internal capture rate that would result in fewer project vehicle trips than other rates. This is incorrect. Mixed-use development creates less demand on the external transportation network than single-use developments because some amount of travel would occur within the development, for example, between the proposed residential units and the office space. The internal trip capture calculation accounts for the portion of the total person-trips generated by the proposed project and project variant that would remain on site and would not use the external transportation network.

Contrary to comments received on internal trip capture, walk trips were not double counted. The walk trips presented in this table are the people who would walk to and from nearby land uses, such as between the proposed residential units and the Laurel Village Shopping Center, or from nearby houses to the proposed retail and office space. As reported in Table 4.C.14, the proposed project would generate 376 walk trips (19.6 percent of total person-trips) during the weekday a.m. peak hour and 398 walk trips (19.1 percent of total person-trips) during the weekday p.m. peak hour. The project variant would generate 359 walk trips (18.3 percent of total person-trips) during the weekday a.m. peak hour and 387 walk trips (17.7 percent of total person-trips) during the weekday p.m. peak hour. The text on EIR p. 4.C.58 supporting the information presented in Table 4.C.14 refers to the proportion of *external* person-trips by mode generated by each land use.

The following documents used as the basis for the approach and cited in the EIR as footnotes 49 and 52 on EIR p. 4.C.59 are included in the project's administrative record:

- Transportation Research Board, National Cooperative Highway Research Program Report 684, 2011, *Enhancing Trip Capture Estimation for Mixed-Use Developments*
- ITE Journal, 2010 and 2011, *Improved Estimation of Internal Trip Capture for Mixed-Use Development and Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Projects*

Responses to the issues regarding trip generation and VMT generated by retail customers are provided in RTC Section 4, Master Response – Transportation and Circulation (see subsections

D.2, Vehicle Miles Traveled (VMT) and Retail Uses, and D.3, Vehicle Miles Traveled (VMT) Calculation" starting on RTC pp. 4.30 and 4.33).

Responses to the issues regarding the adequacy of the proposed mitigation measure are provided in RTC Section 4, Master Response – Transportation and Circulation (see subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking, beginning on RTC p. 4.39).

Existing traffic, transit, pedestrian, bicycle, loading, and emergency access conditions around the project site, including conditions around the Jewish Community Center of San Francisco (JCCSF), are described in Section 4.C, Transportation and Circulation, under the "Existing Conditions" subsection starting on EIR p. 4.C.4. The transportation study area and study intersections are discussed starting on EIR p. 4.C.2. A total of 13 existing intersections within the transportation study area were identified as key locations that are likely to be affected by the proposed project or project variant. These study intersections are identified by number in Table 4.C.1 on EIR p. 4.C.4, and shown on Figure 4.C.1 on EIR p. 4.C.3. These study locations include intersections on Spruce Street, Laurel Street, Euclid Avenue, Geary Boulevard, Sacramento Street, and California Street. Locations on Manzanita, Iris, Heather, Parker, Commonwealth, Jordan, and Palm avenues were not selected because, based on the trip distribution and assignment analysis, these streets do not represent locations likely to be substantially affected by the proposed project or project variant.

Multimodal turning movement counts were collected at the study locations, including existing site driveways, on December 1, 2016. Vehicle counts are included in the Travel Demand Memorandum (see EIR Appendix D, pp. 176-218). Additionally, average daily traffic volumes on roadways surrounding the project were estimated for Existing, Existing plus Project, and Cumulative Conditions. These time periods of analysis are consistent with CEQA and local guidelines. The approach and methodology and estimated current and future volumes are documented in the Average Daily Traffic Volumes – Methodology and Results Memorandum prepared by Kittelson & Associates and included in EIR Appendix F as part of the supporting documentation for the air quality analysis.

## COMMENT TR-2: TRANSPORTATION NETWORK COMPANIES - SF-CHAMP AND TRIP GENERATION

"The Draft EIR does not address the traffic impact of ride share drivers driving around the neighborhood waiting for a fare." *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-3])*

**"4. The DEIR Is Inadequate Because It Used Inaccurate Models to Forecast Vehicle-Trips and the DEIR's Traffic Demand Analysis is Inadequate Because It Omits Substantial Traffic that Would be Attracted to Five New Loading Zones Proposed to Be Installed on the Streets Surrounding the Property, Including VMT from Transportation Network Companies Such as Uber and Lyft.**

The DEIR estimated the Existing Daily Vehicle Miles Traveled per Capita. for the project site, TAZ 709, from data contained in the San Francisco Planning Department Transportation Information Map. (DEIR p. 4C.8 and Table 4.C.3 Existing Daily Vehicle Miles Traveled per Capita. Table 4.C.3 presented an alleged summary of the daily VMT per capita for the region, City and TAZ 709, in which the project site is located. DEIR p. 4.C.8.

Scope of Work for the 3333 California Street transportation demand analysis confirms that the DEIR used the TAZ zone information to estimate VMT:

> **Vehicle Miles Traveled:** KAI will utilize the San Francisco Transportation Information Map to obtain vehicle miles traveled data from the Planning Department data, which includes average daily VMT estimates by us for the region and the project's traffic analysis zone (TAZ 709). DEIR Appendix D, Scope of Work-Final dated July 11, 2017, p. 3.

For purposes of the VMT analysis, KAI assumes the baseline (Year 2020) conditions VMT for the region and the Project's transportation analysis zone for each of the uses proposed by the Project and Variant will be the same as Existing. DEIR Appendix D, Scope of Work-Final dated July 11, 2017, p. 6.

The DEIR explains that the San Francisco Transportation Authority uses a model called SF-CHAMP to estimate VMT by private automobiles and taxis for different land uses within individual TAZs:

> The San Francisco Transportation Authority (transportation authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types within individual TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit hoardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The transportation authority uses a tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. DEIR p. 4.C.7.

As explained herein, the SF-CHAMP model does not include trips made by transportation network companies.

As explained at DEIR p. 4.C.27, the analyses in CEQA documents typically present the existing environmental setting as the baseline conditions against which the project conditions are compared to determine whether an impact is significant. The DEIR used the TAZ data to estimate baseline conditions:

> For purposes of the VMT analysis, the baseline conditions VMT for the region and the project's transportation analysis zone for each of the uses proposed by the project and project variant would be the same as existing. DEIR p. 4.C.30

The DEIR analyzed impacts of the proposed project or project variant by comparing the baseline conditions described in the "Baseline Conditions" discussion (pp. 4.C.27-4.C-31) to conditions under full buildout of the proposed project or project variant. DEIR p. 4.C.46. For the cumulative analysis, future year 2040 cumulative conditions are compared to project buildout conditions for the proposed project and project variant. The year 2040 was selected because it is the latest year that travel demand forecasts are available from the transportation authority's travel demand forecasting model, SF-CHAMP. DEIR p. 4.C.46.

The 3333 California Street proposed project/variant includes significant changes to the transportation network that would attract substantial numbers of automobiles, delivery vehicles, trucks and other vehicles to five new loading zones proposed to be installed on streets surrounding the perimeter of the site. Plan sheet C2.02 shows four new passenger loading zones proposed to be installed on streets surrounding the perimeter of the property and PRELIMINARY DESIGN 08/2018 shows one new 100-foot commercial loading zone proposed on California Street near the northwestern edge of the property. (Ex. L) The DEIR is inadequate because it omitted VMT that could be generated by automobiles, delivery vehicles, trucks and other vehicles attracted to these new loading zones, and such omission is substantial in view of the explosive growth of transportation network companies and food and other delivery vehicles documented herein. DEIR p. 6.86 indicates that commercial loading zones would be used for FedEx and Amazon Fresh, which use delivery vans that are typically about 30 feet long.

The SF-CHAMP model, which was used to estimate project travel in the DEIR, did not include the traffic attracted to these loading zones.

The City is aware that the SF-CHAMP model, used to perform estimates of various transportation issues in the DEIR, is out of date and so inaccurate that it is in the process of being revised. The model used to produce the DEIR's transportation analyses is inadequate and inaccurate because it was based on observed behavior that occurred before the explosion of transportation network companies such as Uber and Lyft, which are causing huge increases in VMT. The DEIR shows that the SF-CHAMP did not take into account the VMT that can be anticipated from transportation network companies attracted to the project/variant site by the five loading zones proposed to be added to the perimeter of the site. The DEIR states at page 4.C.7 that:

> The San Francisco Transportation Authority (transportation authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types within individual TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-5]*)

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"The October 1, 2002 *Executive Summary* of the San Francisco Travel Demand Forecasting Model Development prepared for the San Francisco County Transportation Authority explains that its travel demand model was developed to provide detailed forecasts of travel demand for various planning applications and that its model components were estimates using various data that was in existence before 2002. (Ex. M, SFCTA Executive Summary and November 16, 2018 Wietgrief email stating that SF-CHAMP model is the model the City uses to estimate VMT by transportation analysis zone.) The SFCTA website indicates that SF-CHAMP was last updated in 2014. (Ex. N, excerpts from SFCTA DataMart) If the SF-CHAMP was updated based on any data that came into existence after 2014, please describe in detail the changes in such data that relate to TNC and food delivery traffic, neighborhood parking rates, and VMT (and related issues including mode share, average vehicle occupancy and trip distribution) and provide supporting documentation. Assuming that the last update to SF-CHAMP was in 2014, the date upon which that model was based pre-dated the explosion of transportation network companies such as Uber and Lyft.

Since the 2002 San Francisco Guidelines were adopted, there has been explosive growth in TNC and food and other delivery vehicle trips.

City documents already acknowledge the substantial evidence exists that shows the transportation network companies are generating substantial VMT in the City. Page 1 of the September 28, 2017 San Francisco Planning Department *Transportation Impact Analysis Guidelines -Update* states that the Department's Transportation Impact Analysis Guidelines for assessing project's transportation impacts under CEQA were last updated in 2002. (Ex. O) The update further explains that:

> To assess these impacts, the department estimates how many trips people in newer developments may take, the ways they travel, and their common destinations based on the findings of the Citywide Travel Behavior Survey -Employees and Employers (May, 1993); the Citywide Travel Behavior Survey -Visitor Travel Behavior (August, 1993); revolving five-year estimates from US Census, American Community Survey data; San Francisco County Transportation Authority San Francisco Chained Activity Model, which is based upon, among other sources, observed behavior from California Household Travel Survey (2010-2012), and major San Francisco transportation studies...
>
> Also, since that time, San Francisco has experienced changes in the demographics of the population, the types of new jobs, and the cost of housing, among other variables that affect travel behavior. Some of these changes create greater constraints on our transportation systems, including more competition for curb space. **One of the major changes has been with emerging mobility services and technologies that have changed the way some people travel (using transportation network companies such as Uber and Lyft) and interact with goods (home deliveries). These changes also affect the percentages of how people travel (known as mode splits in the transportation analysis methodology)**. For example, we understand anecdotally that people may be shifting from using their own vehicles or transit to instead use transportation network companies such as Uber and Lyft. (Ex. O, p. 2, emphasis added)

At that time, staff was considering substantive updates to the following topics:

> Process - scoping our topics from transportation review earlier in the process based upon the characteristics of the project, site, and surroundings (e.g., through a checklist)...
>
> Loading -Refine estimates of passenger and commercial loading demand, attempting to account for rise in for-hire vehicles and e-commerce deliveries.
>
> Vehicle Miles Traveled/Induced Auto Travel - Potential quantification of the relationship between parking supply and induced automobile travel.
>
> Traffic Hazards - Update definitions of types of traffic hazards as well and standards that can be implemented to potentially avoid traffic hazards (which may be incorporated into walking/accessibility and bicycling).
>
> Construction - consideration of the effects of excavation on overall project construction and the resulting duration/intensity of construction phases. (Ex. O, p. 3)

Substantial data collection and analysis is currently underway, primarily at newer development sites and will result in the creation of refined estimates of how many trips people in newer developments take, the ways they travel, and their common destinations and updating of the travel demand methodology used in the guidelines. (Ex. O, p. 4) Importantly, data was being collected and analyzed on estimates of passenger and commercial loading demand. *Ibid.* Graphics distributed during the update to the Planning Commission showed that between 1/1/2003 and 1/1/2017 the San Francisco population had increased by 92,000 persons and Bay Area Population by 900,000. (Ex. P, second page)

The October 2018 Draft Report *TNCs &Congestion* by the San Francisco County Transportation Authority states that:

> Congestion in San Francisco worsened between 2010 and 2016...During this period significant changes occurred in San Francisco...San Francisco added 70,000 new residents and over 150,000 new jobs, and these new residents and workers added more trips to the City's transportation network. Finally, new mobility alternatives emerged, most visibly TNCs.... (Ex. Q, p. 3)

> **In recent years, the vehicles of transportation network companies (TNCs) such as Uber and Lyft have become ubiquitous in San Francisco and many other major cities**...In San Francisco, this agency (the San Francisco County Transportation Authority or SFCTA) estimated approximately 62 million TNC trips in late 2016, comprising about 15% of all intra-San Francisco vehicle trips and 9% of all intra-San Francisco person trips that fall (2). [sic] The rapid growth of TNCs is attributable to the numerous advantages and conveniences that TNCs provide over other modes of transportation, including point-to-point service, ease of reserving rides, shorter wait times, lower fares (relative to taxis), ease of payment, and real-time communication with drivers. The availability of this new travel alternative provides improved mobility for some San Francisco residents, workers and visitors, who make over one million TNC trips in San Francisco every week, though these TNC trips may conflict with other City goals and policies...(Ex. Q, p. 3)

> When compared to employment and population growth and network capacity shifts (such as for a bus or bicycle lane), TNCs accounted for approximately 50% of the change in congestion in San Francisco between 2010 and 2016, as indicated by three congestion measures: vehicle hours of delay, vehicle miles travelled, and average speeds. Employment and population growth - encompassing citywide non-TNC driving activity by residents, local and regional workers, and visitors - are primarily responsible for the remainder of the change in congestion...Daily vehicle hours of delay (VHD) on the roadways studied increased by about 40,000 hours during the study period. We estimate TNCs account for 51% of this increase in delay, and for about 25% of the total delay on San Francisco roadways and about 36% of total delay in the downtown core in 2016, with employment and population growth accounting for most of the balance of the increased [sic] in delay...**Daily vehicle miles travelled (VMT) on study roadways increased by over 630,000 miles. We estimate TNCs account for 47% of this increase in VMT, and for about 5% of total VMT on study roadways in 2016**...Average speeds on study roadways declined by about 3.1 miles per hour. We estimate TNCs account for 55% of this decline...(Ex. p. 4, emphasis added)

> Similarly, during the AM peak, midday, and PM peak periods, TNCs cause about 40% of the increased vehicle miles travelled, while employment and population growth combined are responsible for about 60% of the increased VMT. However, in the evening time period, TNCs are responsible for over 61% of the increased VMT and for about 9% of total VMT.... (Ex. Q, p.5)

As the *TNCs &Congestion* report documents, TNCs comprise a significant share of intra-San Francisco travel:

> According to recent studies, between 43% and 61% of TNC trips substitute for transit, walk, or bike travel or would not have been made at all. (Ex. Q, pp. 11-12)

Given the rapid pace of technological change in the transportation sector, other factors may also be contributing to changes in congestion. For example, increased use of online shopping and

delivery services might exacerbate roadway congestion due to an increase in delivery vehicle trips and loading duration. (Ex. Q., p. 12)

**The SFCTA *TNCs &Congestion* report also states that in 2010 TNC use was negligible and in 2016 it was significant, and that SF-CHAMP version 5.2 does not account for TNCs. (Ex. Q, p. 16)**

A 2017 national study of ride-hailing from the University of California, Davis Institute of Transportation Studies, *Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States*, found that 49% to 61% of ride-hailing trips would not have been made at all, or by walking, biking, or transit. (Ex. R, p. 2) After using ride-hailing, the average net change in transit use was a 6% reduction among Americans in major cities, and ride hailing attracts Americans away from bus services (a 6% reduction) and light rail services (a 3% reduction). (Ex. R, p. 2)

The map at page 6 of the *TNCs &Congestion* report shows that TNCs are responsible for approximately 30-60% of vehicle delay on California Street in the project area. (Ex. R) The graphs on page 7 of that report show that TNCs account for 61% of the increase in vehicle miles travelled in Supervisor District 2, with employment change accounting for 21% and population change accounting for 16%. (Ex. R, pp. 6-7)

San Francisco County Transportation Authority's *TNCs Today*, Final Report, June 2017 is consistent with its 2018 *TNCs &Congestion* report. (Ex. S, pp. 1-5, 8) *TNCs Today* reports that on a typical weekday, TNCs make over 170,000 vehicle trips within San Francisco, which is 15% of all intra-San Francisco vehicle trips. Ex. S, p. 1) Infra-SF TNC trips generate approximately 570,000 vehicle miles of travel (VMT) on a typical weekday, comprising as much as 20% of intra-SF-only VMT. (Ex. S, p. 2) Recent SFMTA Travel Decisions Survey results indicate that TNCs are growing in significance as a share of overall San Francisco travel, doubling in mode share served between 2014 and 2015. (Ex. S, p. 3) Approximately 290,000 TNC person trips are estimated to occur within San Francisco during a typical weekday, which represents approximately 9% of all weekday person trips within the City. (Ex. S, p. 9) During weekdays, TNCs have a clear pattern of peak usage that coincides with the existing AM and PM peak periods. (Ex. S, p. 10) The third highest rate of TNC pickups and drop-offs in the City occurs in Supervisorial District 2, in which the 3333 California Street site is located. (Ex. S, p.13) Estimated total VMT produced by TNCs on a typical weekday is approximately 570,000 VMT, and intra-SF TNCs generate as much as 20% of weekday VMT for intra-SF vehicle trips and at least 6.5% of total weekday VMT in San Francisco. (Ex. S, p. 15) Most of the VMT generated by TNCs occurs during the AM and PM peak hours, with significant VMT also occurring during the evening hours, following the PM peak. (Ex. S, p.15-16)

The October 2018 Draft Report *TNCs &Congestion* by the San Francisco County Transportation Authority also states at page 12 that increased use of online shopping and delivery services might exacerbate roadway congestion due to an increase in delivery vehicle trips and loading durations. In addition, the report states that TNC passenger pick up and drop off activity may also result in increased congestion by disturbing the flow in curb lanes or traffic lanes. (Ex. Q, p. 12)

According to the October 2018 Draft Report *TNCs &Congestion* by the San Francisco County Transportation Authority, during most of the day, approximately 40% to 50% of the increase in vehicle hours of delay is attributable to TNCs, but in the evening, almost 70% of the increase in vehicle delay is due to TNCs. (Ex. Q, p. 33)" *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-7]*)

**"The Community Full Preservation Alternative Prevents Excessive Traffic from the Massive ROC Complex, Uber & Lyft. Etc. from Overrunning our Neighborhoods.**

Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading.

At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact.

The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco.

There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.

Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 8,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is an entirely bogus number based on questionable assumptions, such as "The SF Guidelines **do not provide a specific methodology to** assess the number of trips….."

Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…."

Rather amazing that these "refinements" all work in the Developers favor.

Nowhere in these "refinements" have TNCs been taken into account!

Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!

Seawall Lot 337 & Pier 48 summary:

**Project type** Mixed-use, open space, residential, commercial

**Project area** Approx. 28 acres

**Proposed building area** 1.3 – 1.7 million sf commercial; 750,000 - 1.5 million sf residential; 150,000 – 200,000 sf retail, 850,000 sf structured parking

Seawall Lot 337 & Pier 48 *(See Comment Letter I-FrisbieR1, p. 6, in RTC Attachment B for the graphic representing the Seawall Lot 337 & Pier 48 project site that accompanies this excerpted comment.)*

Pier 70 summary: "The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

**WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable? Simply bogus.**

**The DEIR consistently attempts to misrepresent and mislead the public.**

**It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.**

Under their previous, Level of Service, methodology they would have calculated 8,000 retail trips alone.

I think it safe to say that the numbers presented by Planning are simply "Developer friendly!".

Their VMT methodology with "refinements" will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 35% less trips! This entire section is suspect and Planning must explain this profound discrepancy.

As noted above, nowhere are the TNCs incorporated into the calculations.

**All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact.

This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.

Planning's mitigation measure is a stone age solution to a digital age problem.

How will many people respond to a perceived lack of parking?

They'll simply call a TNC and go anyway.

**Eliminating parking won't eliminate auto trips it will actually increase auto trips.**

A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past – by any mode of transport.

The VMT methodology used by the Planning Department fails to account for the impact of TNCs." *(Richard Frisbie, Letter, January 8, 2019 [I-FrisbieR1-10] and Tina Kwok, Letter, January 7, 2019 [I-Kwok4-16])*

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"Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading.

At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact. The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. Studies also show that TNCs increase passenger trips by almost 10%. There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.

Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 13,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." In much the same way as they calculated on the "direct" GHG and totally ignored the "indirect" even though required to do so by their own criteria.

Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is a very suspect

number as it is based on questionable assumptions, such as " The SF Guidelines **do not provide a specific methodology to** assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…." Rather amazing that these "refinements" all work in the Developers favor. Nowhere in these "refinements" have THCs been taken into account! **All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.

Planning's mitigation measure is a stone age solution to a digital age problem. How will many people respond to a perceived lack of parking? They'll simply call a TNC and go anyway. **Eliminating parking won't eliminate auto trips it will actually increase auto trips."** *(Mary Gwynn, Email, January 7, 2019 [I-Gwynn-7])*

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"What formula model does Planning Department use to calculate VMTs? Does it include commercial vehicle miles travelled? What road types are included or excluded from calculations? What about VMTs from carshares? Would one-way carshare trip miles travelled be included in the calculations vs. 2-way carshare trips? Would certain passenger vehicle miles traveled be excluded from calculations? What other models were used besides the one used by Planning? Were the outcomes the same? Was the VMT calculation model used in this DEIR used for all other DEIRs in the last 3 years? If not, why not; and if so, what were the mitigation measures for those DEIRs that could be applied to this site?

The DEIR does *NOT* account for the post-2008/2009 phenomena of TNCs/rideshares causing substantial VMTs in the area. Carshare drivers stop in the middle of the street to load and unload passengers. They drive in from across the bridge to "work" in SF. When they get a customer, they pick up the customer and drive off to another area that could be miles away – especially when the driver drives into the city from outside, the total mileage he has to drive is not included in the VMTs which starts and stops only upon the rider's total ride rather than the miles the TNC driver has racked up. The same customer may want the same driver to drive him/her back so the driver drives back in from miles away potentially to pick up this initial customer at 3333 California who only needs a ride 3 blocks away." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-7])*

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"Also, documentation from University of California, Davis, and other sources, indicate that San Francisco is 92% dependent now on carshare mode (e.g. Uber, Lyft, etc.) as opposed to Muni buses. The documentation states that had these carshare modes not existed, they would walk, bike or take Muni or a taxi. The documentation also shows that there are millions of VMTs travelled by these rideshares in SF based on the total amount of fares collected by these companies. Here is a sample article of the impact from rideshares and VMT count:
https://www.washingtonpost.com/local/trafficandcommuting/as-ride-hailing-booms-in-dc-its-not-justeating-into-the-taxi-market--its-increasing-vehicle-trips/2018/04/23/d1990fde-4707-11e8-827e-190efaf1f1ee_story.html?utm_term=.1f054949bc7e&noredirect=on

Moreover, here is an additional document about the impact of rideshares on VMTs. There is a statement that VMTs would be 83.5% more miles than had rideshares not existed or used. Here is the link to the September 2018 text by Henao and Marshall:

https://link.springer.com/article/10.1007%2Fs11116-018-9923-2

This is the abstract for their work: "Ride-haling such as Uber and Lyft are changing the ways people travel. Despite widespread claims that these services help reduce driving, there is little research on this topic. This research paper uses a quasi-natural experiment in the Denver, Colorado, region to analyze basic impacts of ride-hailing on transportation efficiency in terms of deadheading, vehicle occupancy, mode replacement, and vehicle miles traveled (VMT). Realizing the difficulty in obtaining data directly from Uber and Lyft, we designed a quasi-natural experiment—by one of the authors driving for both companies—to collect primary data. This experiment uses an ethnographic and survey-based approach that allows the authors to gain access to exclusive data and real-time passenger feedback. The dataset includes actual travel attributes from 416 ride-hailing rides—Lyft, UberX, LyftLine, and UberPool—and travel behavior and socio-demographics from 311 passenger surveys. For this study, the conservative (lower end) percentage of deadheading miles from ride-hailing is 40.8%. The average vehicle occupancy is 1.4 passengers per ride, while the distance weighted vehicle occupancy is 1.3 without accounting for deadheading and 0.8 when accounting deadheading. When accounting for mode replacement and issues such as driver deadheading, we estimate that ride-hailing leads to approximately 83.5% more VMT than would have been driven had ride-hailing not existed. Although our data collection focused on the Denver region, these results provide insight into the impacts of ride-hailing."

The rideshares are stated to also impact the ridership of existing Muni buses because they cannot move when the rideshares add to the congestion and automobile delay on the streets. If the retail use was curbed, there would not be as many vehicles in the area to cause the Muni delays as well." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-10])*

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"The DEIR states that the proposed project will be designated as a Special Use District (SUD). As one knows, the City has passed ordinance to have no minimum parking requirements for any units. What people fail to recognize is that parking spaces, while they attract vehicles since that is what parking is for, even if removed, with rideshare vehicles in play today as opposed to 2008/2009 when this project was known and TNCs did not exist, that does not mean that less traffic will be in this area of new retail (over 41,000 sq. ft.) and offices (49,999 sq. ft.) proposed. Retail generates significant vehicle traffic whether for deliveries or for visits. If retail is being proposed, it should all be located on California St. With the advent of the rideshares, people will double-park to drop off the visitors and more and more traffic will go through the area regardless of whether retail parking is there or if removed. The automobile delay in this area and the neighborhoods surrounding it will eventually become worse. People may as well walk, but not everybody is going to. In the areas of greater socio-economic status, most drive. This has been documented in the newspapers." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-49])*

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"Several recent studies have questioned the City's method of calculating auto trips, and the resulting chaos and congestion. Some have suggested the methodology is misleading. The methodology is certainly out of date (last updated in 2014) taking no account of how the Uber/Lyft/Chariot swarm alter the traffic landscape. I can see a lane on either side of California street blocked by Ubers double and triple parked. A disaster for those of us when we need to back out of our garages and a disaster for those who need the emergency vehicles that regularly use California St as a fast way across this part of town. This question is easily answered, provide the raw data and the calculations and the defined procedures that were used so that they can be independently verified. At present, the traffic analysis looks like a favor done for the developers where the neighborhood is expected to accept the high-level results blindly and just live with the results." *(Phillip Paul, Email, January 7, 2019 [I-Paul-6])*

"If Uber or Lyft cars are used, those cars picking up and dropping passengers will simply add to the already intense traffic on Euclid and Presidio Avenues as well as California Street." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-9])*

"Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading.

At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact. The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. Studies also show that TNCs increase passenger trips by almost 10%.

There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.

Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 13,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." In much the same way as they calculated on the "direct" GHG and totally ignored the "indirect" even though required to do so by their own criteria. So, if you don't like the answer, change the question.

Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is an entirely bogus number based on questionable assumptions, such as " The SF Guidelines **do not provide a specific methodology to** assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…." Rather amazing that these "refinements" all work in the Developers favor.

Nowhere in these "refinements" have THCs been taken into account!

Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!

Seawall Lot 337 & Pier 48 summary:

**Project type** Mixed-use, open space, residential, commercial

**Project area** Approx. 28 acres

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Pier 70 summary: " The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

**WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable. Simply bogus.**

**The DEIR consistently attempts to misrepresent and mislead the public. It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.**

Under their previous, Level of Service, methodology they would have calculated 13,000 retail trips alone. Adding Office and Residential would generate a total of approx. 16,000 auto trips. Somehow we have miraculously reduced auto trips by almost 66%!

I think it safe to say that the numbers presented by Planning are simply bogus. VMT will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 66% less trips! This entire section is suspect and Planning must explain this profound discrepancy. As noted above, nowhere are the TNCs incorporated into the calculations.

**All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.

Planning's mitigation measure is a stone age solution to a digital age problem. How will many people respond to a perceived lack of parking? They'll simply call a TNC and go anyway. **Eliminating parking won't eliminate auto trips it will actually increase auto trips.** A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past – by any mode of transport. The VMT methodology used by the Planning Department fails to account for the impact of TNCs.

Not only does Retail, using the LOS methodology, contribute over 80% of the 16,000 total auto trips, all these auto trips generate GHG." *(Laura Rubinstein, Email, January 2, 2019 [I-Rubinstein-9])*

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**RESPONSE TR-2: TRANSPORTATION NETWORK COMPANIES – SF-CHAMP AND TRIP GENERATION**

The comments state that the EIR does not address the impact of circling ride-share drivers. Comments also state that the EIR is inadequate because it bases VMT analysis on the San Francisco Chained Activity Modeling Process (known as SF-CHAMP), which the comment alleges does not account for TNC vehicles, including traffic that would be attracted to the proposed commercial and passenger loading zones. The comments further state that eliminating parking will increase auto trips through increased TNC mode share and that the method of calculating auto trips is misleading and not documented. One comment indicates that the LHIA Alternative would prevent traffic impacts of the project including from TNCs.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Trip Generation" starting on EIR p. 4.C.54; "Freight Delivery and Service Loading Demand" on EIR p. 4.C.60; "Passenger Loading Demand" on EIR p. 4.C.61; Impact TR-2 starting on EIR p. 4.C.74; and Impact TR-10 starting on EIR p. 4.C.98. Detailed supporting information is included in EIR Appendix D, Transportation and Circulation. The EIR concluded that the proposed project or project variant would have a less-than-significant impact on VMT with implementation

of Mitigation Measure M-TR-2: Reduce Retail Parking Supply (EIR p. 4.C.80) and also would have less-than-significant freight and passenger loading impacts. The comments received on the EIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the EIR or a substantial increase in the severity of impacts identified in the EIR, and no new mitigation measures would be necessary.

In addition, the proposed project and project variant have been revised since the publication of the draft EIR. The project revisions include a reduction in retail square footage, a reduction in the number of parking spaces, and reconfiguration of the proposed commercial loading space on California street among other changes. See RTC Section 2 on pp. 2.2-2.13 for a full description. The project changes do not alter the analysis or conclusions of the EIR.

Responses to the issues regarding the impact of TNCs and circling ride-share drivers are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussions in subsection B.3, Trip Generation Estimates, under the subheading "Passenger Loading Demand Comparison" on RTC pp. 4.7-4.8, and subsection B.7, Loading Demand under the subheading "Passenger Loading Demand – Transportation Network Company Vehicles" on RTC pp. 4.15-4.16). In particular, one comment cites a UC-Davis study regarding TNC use in San Francisco. The study presumably cited is Clewlow, Regina R. and Gour S. Mishra (2017), "Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States."[1] The comment states that documentation from that UC-Davis report indicates that "San Francisco is 92% dependent on carshare mode (e.g. Uber, Lyft, etc.) as opposed to Muni buses." The comment is incorrect. It is unclear where the 92 percent value was obtained by the commenter, but according to the SFMTA's 2017 Travel Decisions Survey, the overall auto mode share in 2017 was 47 percent, and TNCs would be 4 percent of that overall mode share.

To the extent that the comments reference the Laurel Heights Improvement Association Alternative, see Response AL-2 in section 5.H Alternatives on RTC pp. 5.H.54.

Responses to the issues regarding the VMT methodology are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussions in subsections D.1, CEQA Section 21099(b)(1) (California Senate Bill 743 and Vehicle Miles Traveled (VMT) beginning on RTC p. 4.19, and D.3, Vehicle Miles Traveled (VMT) Calculation beginning on RTC p. 4.33).

Responses to comments regarding the elimination of parking are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking on RTC pp. 4.39-4.49).

[1] Institute of Transportation Studies, University of California, Davis, Research Report UCD-ITS-RR-17-07. Available online at https://itspubs.ucdavis.edu/wp-content/themes/ucdavis/pubs/download_pdf.php?id=2752.

Responses to the issue regarding travel demand methodology are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussions in subsection B, Travel Demand Methodology, under subheadings "Trip Generation Estimates" on RTC p. 4.4, "Trip Generation Comparison – 2002 SF Guidelines and 2019 TIA Guidelines Update" on RTC pp. 4.4-4.5 and "Internal Trip Capture" on RTC pp. 4.9-4.13). Detailed trip generation calculations are provided in the attachments to the Travel Demand Memorandum in EIR Appendix D on pp. 20-30. Contrary to assertions presented in one comment, the proposed project (including the retail/restaurant, office, daycare, and residential land uses) would generate a total of approximately 16,462 daily external person-trips, including 10,057 daily auto person-trips (equivalent to 5,760 vehicle trips) and not 16,000 vehicle trips as stated in the comment. As presented on EIR pp. 4.C.58-4.C.59, the proposed project's retail use would account for 31 percent and the restaurant uses would account for 35 percent of the total vehicle trips, a combined 66 percent of the 5,760 vehicle trips and not the 80 percent stated in the comments for the combined retail and restaurant uses.

## COMMENT TR-3: TRIP DISTRIBUTION/INCREASED TRAFFIC CONGESTION

"Further, the readily foreseeable traffic snarls will deprive us of access to, and quiet enjoyment of our residences." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-5])*

**"RETAIL**

Our neighborhood will be the only neighborhood (existing or new) facing the Project's proposed retail. In addition to patrons, retail will add traffic to our already congested street, and add turbulence from passenger pick up and drop off. While the Draft EIR acknowledges this, it assesses the impact through a much wider lens than ours; and it does not address the unique and specific localized impact we will experience.

So, even though the Draft EIR acknowledges additional traffic; and the loading and unloading of passengers and freight, it does not recognize the added unspecified activity retail will create across the street from us." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-9])*

"Second, the developer's proposal will result in a massive increase in car traffic in the neighborhood, which we can't handle. Thousands more car trips a day will congest and destroy the historic residential feel of this area." *(Adam Cole, Email, January 6, 2019 [I-Cole-4])*

"The addition of a large retail area will add an immense amount of traffic and congestion. Both California and Pine and Masonic Streets are used to get across the city. The proposed project would put a huge snarl into these thoroughfares." *(Sonya Dolan, Draft EIR Hearing Transcript, p. 52, December 13, 2018 [I-Dolan-4])*

"As you can see from this diagram, you'll see Masonic Avenue here and Pine Street from downtown. Three lanes one way will be heading pretty quickly up that hill towards Euclid

Avenue. There's already a lot of vehicles that go through there, and I don't think this has been adequately studied along what I just said." *(Rose Hillson, Draft EIR Hearing Transcript, p. 48 [I-Hillson1-3])*

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"- The traffic during peak hours from the Inner Richmond to the Financial District and back using California Street as the main route (the Express buses will definitely be affected)" *(Tina Kwok, Email, January 8, 2019 [I-Kwok3-3 and Tina Kwok, Email, January 9, 2019 [I-Kwok4-4])*

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"11. Issues related to traffic circulation impacts from increased congestion on streets adjacent to the project site," *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-12])*

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"This proposal will create major traffic congestion at the enter/exit, parking and loading locations. Presidio and Masonic Avenues are already bumper to bumper car jams and also at Laurel Street near California Street." *(Ann Prato, Email, January 7, 2019[I-Prato-5])*

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"My concern environmentally has been regarding traffic. I would like to ask that retail and the office sections of the plan be eliminated. The traffic estimates by our neighborhood group has said that there will be 12 to 15,000 visits in our neighborhood to use those services a day. And, to me, 12 to 15,000 sounds enormous." *(Debra Seglund, Draft EIR Hearing Transcript, p. 48 [I-Seglund-2])*

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"I live on the southeast corner of Presidio Avenue at California Street which provides me with views from Presidio Avenue and California south to Pine and Masonic Avenue up towards Euclid as well as up California towards Walnut. The traffic in these two intersections on any given day much less any commute is overwhelming NOW. Add tech shuttle buses, express buses on California and Pine and a Fire Department Emergency Response calls from Fire Station 10 and it's over the top."

What the developer has proposed for these two intersections is beyond all comprehension. I was glad when one of your colleague Commissioner, Kathrin Moore, described the run up Pine and on Masonic similar to driving on the freeway and that's NOW. Finally, a reality check from someone other than a resident who lives here who experiences it every day. *(Victoria Underwood, Letter, January 4, 2019 [I-UnderwoodV3-3])*

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"The traffic noise along with blasting music and honking is unbelievably loud now. As I've mentioned in my prior letter addressing the DEIR, I have addressed the issue of the traffic and what affect the developer's project would do to not only the surrounding streets but our entire neighborhood as traffic unloads on to other side streets in order to alleviate their frustration. The westbound traffic on California between Presidio Avenue and Walnut can be a nightmare as cars line up on Walnut Street, around the corner and east on the California and from there all the way down to Presidio Avenue. An example of poor design approval and its effect on daily traffic." *(Victoria Underwood, Letter, January 4, 2019 [I-UnderwoodV3-5])*

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**RESPONSE TR-3: TRIP DISTRIBUTION/INCREASED TRAFFIC CONGESTION**

The comments express concern with the current traffic conditions along California Street, Presidio Avenue, and Masonic Avenue near the project site and the effect of project-generated traffic. Comments state that the proposed project or project variant will create passenger loading and unloading activity along California Street and increase vehicle traffic such that the surrounding street network, including transit vehicles, would be impacted.

Automobile delay (traffic congestion) is not a CEQA issue. Further, CEQA only requires an analysis of a project's physical change to the environment; a project is not expected to mitigate current conditions.

The EIR covered the relevant CEQA issues in Section 4.C, Transportation and Circulation, under the following subsections: "Travel Demand Analysis" starting on EIR p. 4.C.53; "Freight Delivery and Service Loading Demand" on EIR p. 4.C.60; "Passenger Loading Demand" on EIR p. 4.C.61; Impact TR-5 starting on EIR p. 4.C.88; Impact TR-9 starting on p. 4.C.96; and Impact TR-10 starting on EIR p. 4.C.98. Detailed supporting information is included in EIR Appendix D, Transportation and Circulation. The EIR concluded the proposed project or project variant would have a less-than-significant impact on transit delay, freight loading, and passenger loading, and no mitigation measures would be required. The comments received on the EIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the EIR or a substantial increase in the severity of impacts identified in the EIR.

Responses to the issues regarding the impact of increased vehicle traffic and passenger loading/unloading activity are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection C.2, Trip Distribution and Trip Assignment on RTC p. 4.17). In particular, the retail, restaurant, and office uses in the proposed project or project variant, combined, would account for 69 percent of the daily vehicle traffic to/from the site, or approximately 3,974 daily vehicle trips and not the 12,000 to 15,000 daily vehicle trips stated in the comments.

Responses to issues regarding noise increases due to project-generated vehicle traffic are provided in Section 5.F, Noise and Vibration, in Response NO-3: Noise Increases/Operational Impacts on RTC pp. 5.F.10-5.F.12.

## COMMENT TR-4: VEHICLE MILES TRAVELED METHODOLOGY AND FINDINGS

"…and significant traffic impact which they say they'd mitigate by cutting the retail parking. We think that is bogus." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, p. 45, December 13, 2018 [O-LHIA3-6])*

**"1. The DEIR Fails to Adequately Analyze Whether the Proposed Project/Variant Would Cause Substantial Additional VMT and/or Substantially Induce Automobile Travel and/or Have a Cumulative Impact on VMT and/or Substantially Induce Automobile Travel in Combination with Other Reasonably Foreseeable Development and Projects.**

The Draft EIR admits that the proposed project or project variant would cause substantial additional Vehicles Miles Traveled (VMT) and/or substantially induce automobile travel. DEIR p. 4.C.74. The DEIR fails to estimate the total amount of VMT that would result from this significant impact on VMT and claims that the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for the non-residential use. *Ibid*. Similarly, the DEIR admits that the proposed project or project variant's incremental, cumulative effects on regional VMT would be significant, when viewed in combination with past, present and reasonably foreseeable future projects. DEIR p. 4.C. 102. The DEIR claims that both the project and cumulative impact on VMT would be reduced to a less than significant level by reducing retail parking provided by the proposed project/variant. DEIR pp. 4.C. 80 and 103.

In these comments, the term "project" shall include the proposed project and the proposed project variant, unless otherwise indicated.

The DEIR's traffic analysis is inadequate because it fails to state the total Vehicle Miles Traveled (VMT), understates the impact by discussing VMT per person in the AM and PM peak periods, fails to analyze VMT likely to result from special aspects of the project configuration and fails to support its conclusions with substantial evidence. In particular, the DEIR's central claims that the amount of parking included in the proposed project would result in VMT that would be beyond the significance threshold for non-residential use and that merely reducing some of the retail parking spaces would mitigate the impact to a less than significant level, are unsubstantiated and not supported by substantial evidence." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-1])*

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"In addition, the DEIR failed to estimate and state the total daily vehicles miles traveled (VMT) expected from the proposed project and proposed project variant, as required by the City's scope of work:

> KAI will utilize the San Francisco Transportation Information Map to obtain vehicle miles traveled data from the Planning Department data, which includes average daily VMT estimates for use for the region and the project's traffic analysis zone (TAZ 709)...
>
> Using the data collected in Task 2, KAI will document vehicle traffic ....within the study area, which includes the following:
>
> Discussion of vehicle miles traveled for the uses proposed by the project for the region and the Project's traffic analysis zone (TAZ). DEIR Appendix D, pp. 4-5.

The DEIR admits that the proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel but fails to estimate the amount of additional VMT that the project/variant would generate or compare that to a significance standard that states an amount of VMT that would be below the significance threshold. The lack of this information makes it impossible for the decision maker to understand the amount of additional VMT which the project/variant would cause that is above the significance standard."

Instead, at page 4.C.8 the DEIR compares regional average daily miles traveled for residential, office and retail uses with alleged average daily vehicle miles traveled in TAZ 709,

which includes the project site, and with citywide average vehicle miles traveled per capita. Again, total vehicle miles traveled in TAZ 709 are not provided, depriving the decision maker of important information that would be easy to understand. Also, no explanation of the methodology used to achieve the data stated for TAZ 709 is provided, rendering the source of the data used in the DEIR unsupported by substantial evidence.

The DEIR also lacks substantial evidence to show that the significance standard of average regional VMT for residential, office or retail uses is a reasonable baseline against which potentially significant increases in VMT caused by the project should be measured, especially since the project is located in a central city which is targeted for significant population increase and since the proposed project would exceed the citywide average VMT for office and retail uses. The population of the City is projected to grow significantly as a result of ABAG proposals to concentrate population in central cities. (Ex. B) As a result, ABAG estimates that total VMT in the region will increase as a result of population growth even though VMT per capita will decrease. (Ex. B) Thus, use of a regional average VMT standard as the significance standard for the proposed project, omits VMT expected from population and employment growth in the City and fails to evaluate whether project GHG increases could impact communitywide GHG reduction targets. Also, the regional averages include VMT from many existing developments, but if VMT is to be reduced regionally, it is reasonable to expect new developments to produce much less VMT than the average reduction sought by the region of 15%. Thus, the DEIR lacks substantial evidence to support the adequacy of the significance standard used, especially in view of special aspects of the proposed project, including the five loading zones proposed for the perimeter of the site. Substantial evidence does not support the DEIR's conclusion as to the degree of effectiveness of reducing the retail parking spaces to the degree proposed in the DEIR.

Table 4.C. 3 at DEIR page 4.C.8 and 50 shows that TAZ 709 (and the project) would exceed the citywide average VMT by 14.7% for office use and 53.7% for retail uses, although the tables do not compute or substantiate the percentage exceedance to make it easy to understand the information. This data indicates that the proposed retail component of the project/variant could cause substantial additional VMT, because the TAZ 709 VMT from retail uses is in conflict with the goal stated in 2010 of local reduction in "municipal and communitywide GHG reduction targets of 15 percent below then-current levels by 2020." DEIR p. 4.C.50. The DEIR is inadequate because it fails to analyze this potentially significant impact as resulting from retail uses and claims, without substantiation, that "the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for the non-residential use. The DEIR fails to explain this conclusion and there is no evidence in the DEIR or Appendix D that supports it.

The DEIR is also inadequate because its significance analysis fails to discuss the fact that the VMT from TAZ 709 retail uses exceeds the citywide average by 53.7%. DEIR pp. 4.C.74. It discusses only TAZ 709 and regional average daily VMT per capita. Thus, the DEIR is inadequate because its significance discussion failed to inform the decision makers that VMT from retail uses in TAZ 709 (in which the proposed project is located) exceed the citywide average by 53%. This information would be of importance to the decision maker and the public because it shows that reducing the square footage proposed for retail development in the proposed project would be a significant option to consider to reduce VMT.

**2. The DEIR Lacks Substantial Evidence to Support Its Conclusion that Reducing the Project's Retail Parking Supply Would Mitigate the Project's Significant Impact on VMT to a Less Than Significant Level.**

The DEIR contains no evidence that supports the conclusion that "the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for non-residential use. DEIR p. 4.C.74. In fact, the only source that specifically addresses the issue treats the retail or office square footage as the cause of the net new vehicle travel demand generated by the project. Appendix C of the San Francisco Guidelines 2002, estimates travel demand based on square footage of land use, and states that these metrics are to be used to estimate net new travel demand generated by the project. Appendix C of the San Francisco Guidelines 2002 contains trip generation rates for office, retail and other uses based on square footage of space or number of residential units. (Ex. A) These Guidelines indicate that the parking space alone is not the cause of the VMT generated. It is not reasonable to assume that the parking space alone would generate VMT because there would be no reason to travel to the site and park if there were no new retail or new office uses that are the driver's intended destination. The parking space is not the driver's destination. The retail, office, residential or other use would be the driver's destination. Moreover, nothing in the DEIR substantiates the claim that the retail parking spaces are the cause of VMT, rather than the retail restaurants, retail goods and other retail services.

To the contrary, the DEIR inconsistently admits that numerous factors other than the amount of parking included in the proposed project or project variant would influence VMT:

> Factors affecting travel behavior include the presence of parking, development density, the diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. The transportation authority's SF-CHAMP accounts for a variety of factors to estimate VMT throughout San Francisco, but SF-CHAMP is not sensitive to site-level characteristics such as project-specific TDM measures or the amount of parking provided on a site, which itself is considered a TDM measure. DEIR p. 4.C.74.

Thus, diversity of land uses and development density are factors that affect travel behavior. There is no evidence that would support the DEIR's inaccurate conclusion that the amount of parking provided in the project alone would result in significant VMT. DEIR p. 4.C.74.

The DEIR also points to the City's Transportation Demand Management Program (TDM) which seeks to reduce VMT by allowing property owners to select from TDM measures that are under the control of the property owner. The DEIR merely states the '[o]ne of the individual measures in the TDM menu that the City researched was parking supply, as described below.' DEIR p. 4.C.75. The statement that parking is one of the individual TDM measures is vague and does not provide enough relevant information to support the conclusion that the project parking would cause the significant VMT.

Further, the DEIR states that the City's TDM program provides options that depend on the development of a project's parking supply compared to the neighborhood parking rate and that the "neighborhood parking rate is the number of existing parking spaces provided per dwelling unit or per 1,000 square feet of non-residential uses for each TAZ within San Francisco." DEIR p. 4.C.76. At page 33, the *Transportation Demand Management Technical Justification* states that if a Development Project is parked at or below the neighborhood parking rate, the Development project would receive points for this TDM measure. This discussion does not support the DEIR's conclusion that a reduction in retail parking spaces at the rate proposed in the DEIR would reduce the significant VMT impact to insignificance. (Ex. C)

The only evidence that addresses the effect of the amount of retail parking showed the opposite. Attachment 1 to the Apri14, 2016 Wade Wietgrefe Memorandum shows that there is negligible increase in automobile trips per space if a retail establishment has at least 100 retail parking spaces, so reducing the retail spaces provided in excess of 100 spaces would have negligible effect upon VMT. (Ex. D) Given the proposed 54,117 square feet of retail uses, the proposed project parking rate of 3.66 spaces x 54,117/1000 = 198 retail spaces. Given the proposed mitigation of not exceeding the alleged existing neighborhood parking rate of 1.55 spaces per 1000 gross square feet of retail uses by 38% (or providing 2.14 retail spaces per 1000 gross square footage of retail spaces (38% x 1.55 = .589 plus 1.55 = 2.139), the retained retail parking spaces would amount to 115.8 retail parking spaces (2.14 x 54,117/1000 = 115.756 spaces) Thus, the project proposes to reduce retail parking spaces to 115.8 spaces as opposed to the 198 initially proposed retail spaces (the 198 retail parking spaces includes 60 community public parking spaces. DEIR p. 4.C.80. The DEIR counts the 60 commercial public parking spaces as part of the retail spaces that would be provided by the proposed Project/Variant, so the 60 community spaces could be used by retail users of the project. DEIR p. 4.C.77.

The DEIR inaccurately claims that various publications support its conclusions as to the effect of parking spaces on causing VMT.

The DEIR claims that the August 2010 report of California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures* (CAPCOA report) quantifies project-level land use, transportation, energy use, and other measures of effects on GHG emissions. DEIR p. 4.C.75. The DEIR claims that the CAPCOA report identifies a maximum 12.5 percent reduction in VMT related to parking supply (PDT-1), but does not provide a citation to a page in the report that would support this claim. The discussion PDT-1 in the CAPCOA report actually states at page 207 that the range of effectiveness of limiting parking supply is a 5 to 12.5 percent vehicle miles traveled (VMT) reduction and that measure PDT-1 would accomplish a change in parking requirements and types of supply within the project site in a ***multi-faceted strategy*** consisting of elimination (or reduction) of minimum parking requirements, creation of maximum parking requirements and provision of shared parking. (Ex. E)

The DEIR and proposed project/variant do not adopt such mitigation measures, and the project's proposal to provide 896 new parking spaces for various uses (970 for the project variant) is inconsistent with the PDT-1 strategies. DEIR 5.49. More importantly, the CAPCOA report states at page 207 that the reduction can be counted only if spillover parking is controlled (via residential permits and on-street market rate parking (See PPT-5 and PPT-7). The CAPCOA report makes it clear at page 209 that:

> Trip reduction should only be credited if measures are implemented to control for spillover parking in and around the project, such as residential parking permits, metered parking, or time-limited parking. (Ex. E)

The DEIR does not establish that such measures have been implemented, and there are substantial areas in the vicinity of the project (known based on personal information of Kathryn Devincenzi), where parking is not time-limited such as on Mayfair Drive, southern Euclid Avenue west of Collins Street, western Collins Street south of Euclid Avenue, and Heather Street near the project site. (Ex. F, photographs taken on 1-7-19 showing no time limits for parking on said portions of Euclid and Collins streets) Given the lack of controls for spillover parking in the area, the CAPCOA report does not support the DEIR's conclusion that reduction of retail parking

spaces on site would result in mitigation of the significant VMT impact to a less than significant level.

In addition, CAPCOA PDT-4 as to requiring residential area parking permits, specifies at page 217 that:

> This project will require the purchase of residential parking permits (RPPs) for long-term use of on-street parking in residential areas. Permits reduce the impact of spillover parking in residential areas adjacent to commercial areas, transit stations, or other locations where parking may be limited and/or priced. Refer to Parking Supply Limitations (PPT-1), Unbundle Parking Costs from Property Cost (PPT-2), or market Rate Parking Pricing (PPT-3) strategies for the ranges of effectiveness in these categories. The benefits of Residential Area Parking Permits strategy should be combined with any or all of the above mentioned strategies, as providing RPPs are a key complementary strategy to other parking strategies.

Similarly, residential permit parking is required in each of the two combinations of parking strategies that could reduce VMT at page 61 of the CAPCOA report.

Since the proposed project would not implement the key parking control strategy of requiring residents or employees of the project site to purchase residential parking permits, the CAPCOA report does not support credit for trip reduction based on the proposed project's mere reduction in retail on-site parking supply, which the DEIR relies upon. The DEIR's inadequacy is obvious because the project would allow its residents, employees and visitors to park in the surrounding neighborhoods which have some parking spaces that are not time-limited and also to park for free for at least an hour and a half in the adjacent Laurel Village Shopping Center parking lot which has over two hundred fifty-two (252) above-ground parking spaces. (Conversation between Richard Frisbie and Ron Giampaoli, owner of Cal-Mart, December 18, 2018). The Spot Angels website also reports free parking spaces within walking distance of Laurel Village. (Ex. G)

Further the CAPCOA report at page 40 states that it "does not provide, or in any way alter, guidance on the level of detail required for the review or approval of any project. For the purposes of CEQA documents, the current CEQA guidelines address the information that is needed," and refers to footnote 2 which states: "See: California Natural Resources Agency: 2007 CEQA Guidelines -Title 14 California Code of Regulations, Sections 15125, 15126.2, 15144, and 15146."

In addition, as to limiting parking supply, the CAPCOA report provides that factors other than limiting parking supply must be considered and states at page 208:

> Though not specifically documented in the literature, the degree of effectiveness of this measure will vary based on the level of urbanization of the project and surrounding areas, level of existing transit service, level of existing pedestrian and bicycle networks and other factors which would complement the shift away from single-occupant vehicle travel.

As discussed herein, the proposed addition of five loading zones around the site would attract additional vehicle trips but the EIR failed to take into account the VMT that would result from these new trips and failed to provide substantial evidence to support its conclusion that reducing retail parking supply in the manner stated in the DEIR would mitigate project VMT to a less than significant level.

The DEIR is also inadequate in that it relies upon the generalization that recent research indicates that an area with more parking influences higher demand for more automobile use without taking into account the large number of parking spaces proposed for the project. The DEIR relies upon a study by Rachael Weinberger that is cited in footnote 73, but the cited pages

are not provided in the DEIR or Appendix D. However, the study deals only with the effects of residential parking spaces at home and does not predict the effect of retail parking spaces. (Ex. H, abstracts of Weinberger study)

The DEIR also relies upon a study of *Residential Street Parking and Car Ownership* that is also not provided in the DEIR or Appendix D, but cited in footnote 74. Again, the DEIR merely claims that the Zhan study deals the "the number of cars per household" and does not claim that the study says anything about the effect of retail parking supply. DEIR p. 4.C.75. Similarly, the DEIR relies on a study of households in New Jersey cited in footnote 75 that is not contained in the DEIR or Appendix D. Again, the DEIR does not claim that this study considers retail parking supply.

The DEIR also relied on the generalization that a study of nine cities across the United States concluded that "parking provision in cities is a likely cause of increased driving among residents and employees in those places." DEIR p. 4.C.76. Again, this study is not contained in the DEIR or Appendix D and says nothing about the effectiveness of reducing retail parking supply alone to the degree described in the DEIR, while still providing over 100 retail parking spaces and abundant parking for residential and office uses. The quoted portion of the study said nothing about the effectiveness of reducing the retail parking alone or the degree of increased driving associated with the provision of parking, so is too vague to support the conclusion set forth in the DEIR that reducing the retail parking to the degree proposed in the DEIR would mitigate the VMT impact to insignificance.

The DEIR also refers at page 4.C.76 to Fehr and Peers research that allegedly claims that reductions in off-street vehicular parking for office, residential and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar contexts that provide more off-street vehicular parking. The conclusion which the DEIR draws from this research indicates that it has no relation to retail parking spaces: "In other words, more off-street vehicular parking is linked to more driving, indicating that people without dedicated parking spaces are less likely to drive." DEIR p. 4.C.76. In the context of the proposed mitigation for the proposed 3333 California Street project, which would reduce retail parking spaces from 198 to 116 (which would include 60 commercial parking spaces for the community), the generalization set forth in the Fehr and Peers research does not constitute substantial evidence that the reduction in retail parking to the degree proposed in the DEIR would reduce the significant VMT impact to insignificance. Again, the Fehr and Peers research cited in footnote 77 is not in the DEIR or Appendix D.

In addition, the DEIR is legally inadequate in failing to present information on the number of retail parking spaces that the mitigation measure M-TR-2 proposes to eliminate, and requires the reader to perform a calculation to arrive at number of retail parking spaces proposed to be eliminated. DEIR p. 4.C.80. This type of obtuse discussion in an EIR is unlawful under CEQA. CEQA requires that information be presented in manner that is understandable to the decision maker and the public, but the transportation analysis in this DEIR is characterized by a hide-the-ball approach, replete with unexplained conclusions and unsubstantiated allegations. Under CEQA, conclusions that require blind trust in the decision maker are inadequate. The calculations of the amount of retail parking proposed to be reduced stated in this comment letter were performed by the author of this comment statement and are not set forth in the DEIR. Demand is made that the DEIR state the number of retail parking spaces that Mitigation Measure M-TR-2 on page 4.C.80 of the DEIR proposes to eliminate to mitigate the significant VMT impact and set forth the manner of calculating the number of retail spaces to be eliminated. After this information is provided in a revised EIR, please circulate it for public comment.

**3. The DEIR Lacks Any Substantiation or Explanation of the Alleged Neighborhood Parking Rate, and Substantial Evidence Does Not Support Its Conclusions as to the Accuracy of the Alleged Rate and TAZ 709 Data.**

Importantly, the alleged neighborhood parking rate is not substantiated or supported by substantial evidence in the DEIR or Appendix D. The DEIR lacks a description of the methodology used to calculate, and times of collecting data related to, the alleged existing neighborhood parking rates for residential, retail or other non-residential uses set forth in Table 4.C.19 of the DEIR on page 4.C.77-79 or the daily existing VMT per capita for Households (Residential), Employment (Office) and Visitors (Retail) in TAZ 709 at page 4.C.50 of the DEIR. Table 4.C.10 at page 4.C.50 of the DEIR cites the San Francisco Planning Department Information Map, accessed May 25, 2018, as the source of the data as to the existing average daily vehicle miles traveled in TAZ Zone 709. However, that map provides only conclusions and the DEIR does not contain a summary of the data used to produce the alleged average daily vehicle miles traveled or explain the methodology used to collect or produce the data or the dates on which the data was collected or estimates made. Due to the lack of sufficient substantiation or description of a reputable methodology, substantial evidence does not support the allegations in the DEIR that the data in Table 4.C.10 of the DEIR accurately represents the existing average daily vehicle miles traveled.

The data in the DEIR concerning the existing neighborhood parking rate is also unsubstantiated and fails to constitute substantial evidence that such data accurately represents the existing neighborhood parking rates for the uses claimed, including for residential, retail and other (office and daycare). The DEIR is inadequate because it fails to provide substantiation of the methodology for collecting data as to the alleged existing neighborhood parking rates or the times of collection of the data or the estimations made. As the Source of the data contained in Table 4.C.19 of the DEIR, the DEIR cites "Kittleson and Associates, Inc. 2018; San Francisco Planning Department, 2018." These citations merely identify the alleged source of the conclusions and the date.

Footnote 80 of the DEIR states that Planning department staff reviewed assessor and planning department records and street view/serial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site to derive the appropriate neighborhood parking rate for this analysis. No summary or description of such information is provided in the DEIR or Appendix D. Although footnote 80 does not refer to any review related to office or childcare uses, the DEIR cites footnote 80 as support for the claim that the analysis splits non-residential into retail and other non-residential (office and daycare) uses and compares those to the neighborhood parking rate, which accounts for parking associated with retail and other non-residential uses along California Street and Sacramento Street near the project site. DEIR p. 4.D.77. The methodology used in such analysis is not discussed in the DEIR or Appendix D. There is no substantiation for the parking rates for office and childcare uses.

Also, the note to Table 4.C.19 states that the existing parking rate for residential uses reflects data for TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance. The DEIR lacks any explanation of the type of data for TAZ 709 that was used to estimate the existing parking rate for residential use in the area described or substantiate the reliability of the methodology used to arrive at the existing parking rate for residential uses set forth in the DEIR. It is unclear whether the residential parking rate was estimated in some manner based on VMT, surveys of vehicle ownership or some other means and whether the dates on which the base data was collected, if any, was representative of existing conditions in the project area. The DEIR is inadequate because it lacks substantial evidence indicating that the methodology for collecting or analyzing the data was reliable, a sufficient explanation of the

nature of the data collected for the identified land uses and the times at which the data was collected, and explanation of why the data gathered was representative of conditions in the project area. Surely, there should be memoranda explaining or analyzing any data collected, but none are discussed or cited in the DEIR or Appendix D. In essence, the TAZ data and the existing neighborhood parking rate data stated in the DEIR are lacking in the factual support needed to constitute substantial evidence under CEQA. Unsupported conclusions do not constitute substantial evidence under CEQA. The DEIR's alleged TAZ data and alleged existing neighborhood parking rates are unsubstantiated black holes that lack the transparency required to constitute substantial evidence supported by fact under CEQA.

Similarly, the DEIR admits that parking supply is not an input into SF-CHAMP, but claims that "based on recent research, the existing parking supply within a TAZ has a relationship with VMT for that TAZ." DEIR p. 4.C.76. The "recent research" is not described or substantiated with a citation to a document, and the claim that the existing parking supply within a TAZ is related to the VMT for that TAZ is too general to support the conclusion as to the effectiveness of the proposed mitigation drawn in the DEIR. The degree or nature of the alleged relationship is not explained or substantiated as providing a reasonable basis for calculating the existing neighborhood parking rate or the effectiveness of mitigation provided by reducing retail parking supply.

The DEIR also inadequately relies upon the ambiguous claim that even "though parking is not specifically an input in SF-CHAMP, the amount of existing parking is captured in the estimates of VMT outputs from SF-CHAMP because it is an existing condition on the ground. Therefore, it is likely that a new development that does not propose parking at or below the neighborhood parking rate would not reduce VMT below the existing VMT per capita rate for that TAZ." DEIR p. 4.C.76. The DEIR cites nothing as substantiation for this vague claim, rendering it suspect and lacking in substantial evidence. The claim that the existing neighborhood parking rate is likely captured in the estimates of VMT outputs from SF-CHAMP is so vague as to be unusable and does not provide a basis for calculating the alleged neighborhood parking rates from VMT attributable to the area or some amount of it. The claim that there is some relationship between VMT and the neighborhood parking rate fails to provide enough relevant information from which a conclusion can reasonably be drawn that a mere relationship provides a basis for calculating the existing neighborhood parking rate from VMT outputs or the effectiveness of reducing retail parking supply as a mitigation measure.

Also, the DEIR does not claim that the Planning Department or Kittleson and Associates estimated or calculated the existing neighborhood parking rates using VMT outputs. The DEIR's allegations as to the existing neighborhood parking rate and the VMT for TAZ 709 fail to qualify as substantial evidence, as they do not supply enough relevant information and reasonable inferences from this information that a fair argument can be made to support the conclusions made in the DEIR. 14 California Code of Regulations section 15384(a). The DEIR's claims as to the existing neighborhood parking rate for the project area and the VMT for TAZ 709 are unsupported allegations. Substantial evidence under CEQA does not include unsubstantiated opinion or narrative, evidence that is not credible, argument, or speculation. Public Resources Code sections 21080(e), 21082.2( c); 14 California Code of Regulations sections 15064 (f)(5)-(6), 15384.

In calculating the alleged existing parking rate for retail and other nonresidential uses on "California and Sacramento streets, as provided by the planning department," the DEIR ignored the existing retail uses on Presidio Avenue, which are adjacent to the project site and included in TAZ 709. Also, the DEIR fails to describe the areas on California and Sacramento streets that were included in the alleged measurement, so fails to demonstrate that they were reasonable

estimates of the area from which the neighborhood parking rate should be determined. DEIR p. 4.C. 77. Demand is made that the City provide detailed explanation of the method of calculating the existing neighborhood parking rates used in the DEIR, the method and nature of collecting the data underlying the rates, the dates on which data was collected and the basis for determining that the data accurately reflects the existing neighborhood parking rate for the project area.

Importantly, the January 20, 2016 Governor's Office of Planning &Research *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* does not recommend basing the evaluation on estimates of neighborhood parking rates. (Ex. I) Rather, OPR recommended that:

> Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e. the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts. (Ex. I, p. III:23.)

Moreover, there is not substantial evidence in the record that the project's proposed retail would be local-serving. The proposed 198 retail parking spaces indicates that the retail would not be local serving and the plans do not specify the square footage of the retail spaces. August 17, 2017 plan sheet A4.03 shows a very large retail space whose square footage is not specified. (Ex. J, compare sheet A4.03 with sheet A4.02) Thus, there is a fair argument that the project would have a large anchor tenant which would draw non-local-serving retail. Demand is made that the DEIR calculate the estimated total daily VMT that the project would generate, including the total VMT for each land use type. Also, the five proposed loading zones proposed to be installed in streets surrounding the site further support a fair argument that the retail uses would attract non-local customers. (Ex. L)

Agencies do not have unlimited discretion to adopt their own thresholds for significance of impacts, including impacts on VMT. Agencies may adopt their own thresholds or rely upon thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." CEQA Guidelines section 15064.7(c).

Thresholds of significance are not a safe harbor under CEQA; rather, they are a starting point for analysis:

> [T]hresholds cannot be used to determine automatically whether a given effect will or will not be significant. Instead, thresholds of significance can be used only as a measure of whether a certain environmental effect "will normally be determined to be significant" or "normally will be determined to be less than significant" by the agency....In each instance, notwithstanding compliance with a pertinent threshold of significance, the agency must still consider any fair argument that a certain environmental effect may be significant. (Ex. I, OPR proposed transportation impact analysis guidelines, p. III:17-18, citing *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Ca1.App.4th 1099, 1108)

Substantial evidence does not support the City' decision to adopt the thresholds for estimating VMT increase used in the DEIR or the rate of mitigation adopted in the DEIR. Thus, the EIR must consider the fair argument presented above that reducing the retail parking spaces in the manner described in Mitigation Measure M-TR-2, with reference to a percentage of the existing neighborhood parking rates, will not reduce the Significant VMT impact of the proposed project/variant to a less than significant level.

Also, the DEIR's claim that the existing neighborhood parking rate for retail uses is 1.55 conflicts with information on retail parking rates applicable to the project area. The Note in Table

4.C.19 at DEIR page 4.c.77 claims that the existing parking rate for retail and other nonresidential uses reflects data from California Street and Sacramento streets, as provided by the Planning Department," but fails to describe a specific document produced by either Kittleson and Associates, Inc. or the San Francisco Planning Department that contains such data. Thus, the record does not contain substantial evidence to support the DEIR's claim that reducing retail parking to the extent proposed would mitigate the significant impact to insignificance. Similarly, footnote 80 on DEIR p. 4.C.77 claims that Planning Department staff reviewed assessor and planning department records and street view/aerial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site to derive the appropriate neighborhood parking rate for this analysis, but fails to provide such data or a description of a specific document that would support the analysis described. For these reasons, the DEIR lacks substantial evidence to support its conclusion that the existing neighborhood parking rate is 1.55 parking spaces per gsf of retail uses.

Resolution 4109, which applies to the 3333 California Street site, requires 1 automobile parking space for each 500 square feet of gross floor area on the property, which is 2 parking spaces for each 1,000 square feet of commercial building floor area. (Ex. K) Under the NC-S, Neighborhood Commercial Shopping Center zoning applicable to the Laurel Village Shopping Center, Planning Code section 151 requires for retail sales and services, one off-street parking space for each 500 square feet of Occupied Floor Area up to 20,000 where the Occupied Floor Area exceeds 5,000 square feet, plus one for each 250 square feet of Occupied Floor Area in excess of 20,000. Thus, the general standard applicable to Laurel Village is 2 parking spaces for each 1,000 square feet of Occupied Floor Area up to 20,000 square feet. Based on this information, there is a reasonable possibility that the existing neighborhood parking rate in the project area is greater than 1.55 parking spaces per gsf of retail uses, and the DEIR's claims as to the existing neighborhood parking rate are inaccurate or unsubstantiated.

The DEIR is also deficient because it used different thresholds for assessing VMT significance (exceeding regional VMT per employee minus 15 percent) and whether mitigation measures would reduce the significant VMT impact to less than significant, which is based on whether the retail parking exceeds the existing neighborhood rate of 1.55 spaces per 1,000 gross square feet. DEIR p. 4.C.80. This comparison of apples and oranges makes the analysis in the DEIR inadequate and confusing to the decision maker and the public. The deficient comparison is also contrary to the OPR proposes transportation impact guidelines, which state at p. III:16 that:

> Models and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due. to mitigation should be comparable. (Ex. I, p. III:16)" *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-4])*

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"Although the DEIR does not explain the data used to derive the neighborhood parking rates used in Table 4.C.19, SFCTA documents show that the data included only off-street parking spaces, so did not include parking in loading zones or other on-street areas by transportation network companies. The Apri16, 2016 Memorandum from Wade Wietgrefe concerning *General Non-Residential Off-Street Parking Rate Estimation for San Francisco* states at page 2 that the "Transportation Authority estimated a general non-residential off-street parking rate as the number of public and private off-street parking spaces per 1000 square feet of non-residential land use. Summaries of non-residential square footage and off-street parking supply for the TAZ and other nearby TAZs within .75 miles of network-based walking distance were made to derive a parking rate that is representative of the neighborhood and is not artificially truncated at arbitrary TAZ boundaries. Off-street, publicly available parking data were available through SFPark and off-street, private parking estimates were taken from the Transportation Authority's

Parking Supply and Utilization Study. (Ex. T, pp. 1-2) The map following that page entitled *Non-Residential Parking Supply Estimated from SF Park Data* shows TAZ level estimates of parking supply rates for San Francisco, based on off-street parking supply from SFPark and scaled up by 35 to match citywide totals to match the estimated supply from the PSUS parking estimation model. (Ex. T) The source of the estimates on the map are cited as "2013 Parcel Land Use and Zoning District Methodology, San Francisco Planning Department." (Ex. T, map following p. 2)" *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-8])*

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"Also, the DEIR fails to estimate the amount of VMT which the proposed non-residential use (54,117 gsf feet of retail and 49,999 gsf of new office use - DEIR p. 2.8) of the project/variant would cause substantially induce. Simply admitting that the project would cause substantial VMT would be caused is inadequate under CEQA because it fails to supply information to decisionmakers and the public as to the degree of the significant impact and nature of the cause(s).

**6. The EIR's Traffic Analysis Fails to Adequately Analyze VMT Generated by Customers of the Proposed New Retail Uses.**

The DEIR claims that the following thresholds of significance and screening criteria used to determine if a land use project would result in significant impacts under CEQA are consistent with CEQA section 21099 and the thresholds of significance for other land uses recommended in OPR's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (OPR proposed transportation impact guidelines):

> For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent. This metric is consistent with OPR's proposed transportation impact guidelines stating that a project would cause substantial additional VMT if it exceeds both the existing city household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent.
>
> For office projects, a project would generate substantial additional VMT if it exceeds the regional VMT per employee minus 15 percent.
>
> For retail projects, the planning department uses a VMT efficiency metric approach for retail projects; a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent.
>
> For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above. DEIR p. 4.C.49.

For mixed-use projects or retail land use, the threshold of significance used in the DEIR is not consistent with the OPR proposed transportation impact guidelines). Those OPR proposed transportation impact guidelines actually state at page III:16 that:

> **Retail Projects**. Lead agencies should usually analyze the effects of a retail project by assessing the change in total VMT, because a [sic] retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.
>
> Page III:23 of those OPR Guidelines state that:
>
> Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e. the difference in total VMT in the area

affected with and without the project) is the best way to analyze a retail project's transportation impacts.

The DEIR failed to analyze adequately the project's potential change in total VMT because it only analyzed VMT caused by employees of the new retail uses. THE DEIR is inadequate because if failed to analyze VMT caused by customers of the proposed new retail uses. Also, as previously stated, the DEIR is inadequate because it determined whether increased VMT was significant based on a comparison with VMT per capita for various land use, rather than based on a comparison with total VMT. Given the increase in employment and population in the City and the rapid growth in TNCs, substantial evidence does not support the DEIR's use of significance standards for the proposed project/variant based on VMT per capita." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-10])*

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"The DEIR failed to analyze whether a likely increase in VMT per retail customer, or nonwork trips, could cause substantial additional VMT. DEIR p. 4.C.80. The DEIR only analyzed whether the likely increase in VMT per employee associated with provision of retail parking spaces may increase VMT per employee enough to exceed the threshold of 15 percent below the regional average for retail uses. DEIR p. 4.C.80. Based on the information set forth herein showing that 12,243 daily person trips would be generated by retail customers, the DEIR lacks substantial evidence to show that the significance standard used in the DEIR was a reasonable measure of VMT increase for the proposed project/variant, especially since the standard considered retail work-trips and not retail customer-trips. For these reasons, including the fact that the DEIR failed to analyze 64.9% of the daily person trips from total proposed retail uses, the DEIR also lacks substantial evidence to support its conclusion that reducing the retail parking supply in the manner stated in Mitigation Measure M-TR-2 would reduce the significant impact of the proposed project and variant on VMT to a less than significant level. DEIR 4.C.80.

Vehicle miles traveled (VMT) measures the amount and distance vehicles would travel on the roadway as a result of a project or plan. (Ex. C, TDM Technical Justification, p. 6) That justification confirms that transportation demand management programs are "designed to reduce Vehicle Miles Traveled by residents, tenants, employees, and visitors." Thus, the DEIR is inadequate for failing to analyze potentially significant increase in visitor travel.

The DEIR also lacks a coherent and complete explanation of which retail uses would use the parking spaces being provided for retail uses. The DEIR contains numerical estimates of "Long-Term" and "Short-Term" proposed parking space supply for Retail, Sit-down and Composite retail uses. DEIR p. 4.C.118. Is the proposed Long-Term supply intended for employees of the retail uses and the proposed Short-Term supply intended for customers of the retail uses? Since it is a reasonable assumption that the proposed Short-Term supply is intended for customers of the retail uses, customers of the retail uses are expected to drive to the site, but the EIR inadequately lacks any estimate of the impact of that driving by retail customers on increased VMT, or the cumulative impact of retail customer driving with driving by customers of the adjacent Laurel Village Shopping Center. With respect to the mitigation measures proposed to reduce retail parking spaces, would those measures reduce long-term or short-term retail parking spaces?

The DEIR's analysis of the cumulative impact on VMT was also deficient for the reasons stated above.

The EIR also fails to analyze the combined or cumulative effect on VMT caused by the proposal to construct new project retail uses along two blocks of California Street that are immediately adjacent to the existing two-block long retail neighborhood shopping center of Laurel Village. The combination of the two adjacent shopping areas would likely attract more

retail customers to the project area due to the potentially increased variety of retail uses and availability of a wider range of retail services including substantial amounts of new restaurant uses (both composite and sit-down) proposed for the project site. Due to the amount of potential added retail options that the proposed project would add to the area (54,117 gsf, the project area including the Laurel Village Shopping Center would likely become a shopping destination which would attract more customer traffic in combination than would occur with either component of the retail uses alone. Due to the increased attraction of retail customers to a retail shopping destination, the DEIR is seriously inadequate for failing to have analyzed the VMT likely caused by retail customers of the proposed project/variant as a project impact, and also as a cumulative impact on the VMT likely generated by the project retail uses in combination with the VMT generated by existing retail uses in the Laurel Village Shopping Center. The proposed addition of Whole Foods market at the City Center on Geary Boulevard at Masonic, which is two blocks from the project site, together with the VMT caused by visitors to the Target store currently located at that site, and the visitors to the Trader Joe's market located on Masonic one block away from the project site, should also have been included in a cumulative impact analysis. In sum, based on my experience in shopping at Laurel Village, the proposed project could cause significantly increased VMT in the area of the proposed project because the area would become more of a shopping destination than it is presently. Thus, the EIR is inadequate for failure to estimate VMT from retail customers as an impact of the project and as a cumulative impact with VMT from existing customers of Laurel Village Shopping Center and other nearby commercial uses." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-12])*

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"Page 4.C.7: "The project site comprises most of the area in TAZ 709, which is the area generally between Laurel/California streets, Presidio Avenue/California Street, Presidio/Euclid avenues and Laurel Street/Euclid Avenue. The project site is located close to major transit services and facilities, bicycle and pedestrian networks and facilities, and a diversity and density of land uses. A project located in TAZ 709 would have substantially reduced vehicle trips and shorter vehicle distance, and thus reduced VMT, compared to other areas of the region."

While the Transportation Analysis Zone (TAZ) 709 is based on census data, it *ignores the other nearby TAZs* which are not functioning in a vacuum. There should be impacts that go at least ¾- to 1-mile away based on the ***land use types*** being proposed at the site for potential workers count & resident counts. The larger TAZ 709 area being compared to a larger geographic area for VMT does not make sense except to make it so that the TAZ 709 is going to be smaller than the larger "Bay Area VMT" and make the result *not* be impactful to a significant level. Where in the DEIR does it state the margin of error for these counts? What is it? If the margin of error were incorporated, how would the results change?

Page 4.C.77: With the conclusion from Page 4.C.7 that the project will not affect TAZ 709 in any way, it is illogical to throw in Table 4.C.19 that takes into account "other nearby TAZs (within three-quarters of a mile based on walking distance)" for the analysis when in all the other tables, *NO* "other nearby TAZs" are reflected in that data. How can one way of analysis be applied to one but not in other categories of impact?

The proposed ***parking rate for the Retail Use to increase to 136%*** or **150%** depending on which alternative is chosen compared to the existing parking rate is severely out of character for this area. It is the RETAIL USE that will drive all the vehicles into the area (pun intended). When the parking rate increases by these percentages and there is no parking on the street nor the lots, people will crowd the vehicular lanes to entangle the neighborhood with delayed traffic to push more GHGs in the neighborhood. Also, as more people cannot park, those spaces become more expensive due to "demand" parking pricing. The winners will be the SFMTA (parking

meters/parking stickers revenue) and the garage owners to increase their pricing. This will lead to unaffordable pricing in this area except for the well-heeled. Having a 136% - 150% increase in parking rate would almost keep traffic going to and from this area all day. This cannot be truly environmentally sound and sustainable but with all the parking demand, the price of parking would soar and there could be socio-economic redlining of the area such that only the well-to-do would be able to park or the TNC count would explode in this area.

**Table 4.C.19: Parking Rate Summary**

| Scenario/Land Use | Size | Vehicle Parking Spaces | Existing Neighborhood Parking Rate | Proposed Parking Rate | Change from Existing |
|---|---|---|---|---|---|
| **Proposed Project** | | | | | |
| Residential | 558 units | 558 | 0.9 | 1 | 11% |
| Retail | 54,117 gsf | 198 | 1.55 | 3.66 | 136% |
| Other Non-residential (Office & Daycare) | 64,689 gsf | 129 | 1.44 | 1.99 | 38% |
| **Project Variant** | | | | | |
| Residential | 744 units | 744 | 0.9 | 1 | 11% |
| Retail | 48,593 gsf | 188 | 1.55 | 3.87 | 150% |
| Other Non-residential (Daycare) | 14,650 gsf | 29 | 1.44 | 1.98 | 37% |

*Note:* The existing parking rate for residential uses reflects data for TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance). The existing parking rate for retail and other non-residential uses reflects data from California and Sacramento streets, as provided by the planning department. The retail land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation as these would be publicly accessible spaces and would not be dedicated to residents or tenants of the proposed project or project variant.

*Source:* Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018

As none of the “other nearby TAZs” is enumerated, ***there needs to be an accurate count of all traffic on all streets*** -- within at least 1-mile of this project -- as more units and various uses get settled in the area during the development phase. What are the traffic counts for all the streets between California and Geary from Arguello Blvd on the west to Fillmore on the east side? All of these streets are part of the “other nearby TAZs” not incorporated into the study. If nothing else, there should be counts for Palm to Presidio between and including Geary and California and none of this appears in the DEIR to come to the conclusion that there’s little impact to the Laurel Heights, Jordan Park, Presidio Heights areas. Without study of the “other nearby TAZs” to see the impact on each TAZ, one particular area could be overwhelmed with more VMTs and vehicle trips. Perhaps if the data for the other streets were presented, this project would reveal an immense impact beyond “significant”? The Final EIR should provide all this data that is missing from the “other nearby TAZs” and all streets in each TAZ. It is missing and thus the DEIR is not complete nor the analysis conclusion accurate without this data. Will it be provided?

Page 4.C.102: The DEIR then decides not to mention the “other nearby TAZs” in Table 4.C.32 below and decides to show only *regional* VMTs for certain uses. What this means is that in future, TAZ 709 will start to creep to the “Bay Area VMT” of double digits (12.4-17.1) because there is no chaining of miles in the analysis nor a separate “other TAZs” analysis done. Here is the table:

**Table 4.C.23: Projected 2040 Average Daily Vehicle Miles Traveled – Cumulative Conditions**

| Land Use | Bay Area VMT | | TAZ 709 |
|---|---|---|---|
| | Regional Average | Regional Average minus 15% | |
| Households (Residential) | 16.1 | 13.7 | 6.6 |
| Employment (Office) | 17.1 | 14.5 | 8.9 |
| Visitors (Retail) | 14.6 | 12.4 | 7.8 |

*Source:* San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Under other DEIR transportation or traffic analysis, the city used *NOT* the "Bay Area VMT." Why in this one? Why not do an analysis of the TAZs (I suspect about a dozen of them being impacted by this project) to see in greater detail impacts to those TAZs and calculation of VMTs. Would this be provided?

A major flaw in the DEIR for VMTs and traffic counts and parking needs is the separate unbundling of any data in regards to workers who get to the project site who live outside of San Francisco. It is not only the residents of this city who may be visiting this site. Perhaps an analysis of VMTs, parking, and other analysis to nearby TAZs should be included (only TAZ 709 analyzed in this DEIR)." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-34])*

"Is the TAZ "bar" set to "Bay Area VMT" such that the REGIONAL bar is now the metric rather than anything at the neighborhood level? If so, would that not create a situation such that any and almost all development in future will not have and "Significant" level impacts, especially in the low-density neighborhoods?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-37])*

"Take a look at the below 2 tables – one for 3333 California & the other for 1 South Van Ness: Table 4.C.23 shows the Average Daily VMTs for *ONLY* TAZ 709 (3333 California site & very close streets):

**Table 4.C.23: Projected 2040 Average Daily Vehicle Miles Traveled – Cumulative Conditions**

| Land Use | Bay Area VMT | | TAZ 709 |
|---|---|---|---|
| | Regional Average | Regional Average minus 15% | |
| Households (Residential) | 16.1 | 13.7 | 6.6 |
| Employment (Office) | 17.1 | 14.5 | 8.9 |
| Visitors (Retail) | 14.6 | 12.4 | 7.8 |

*Source:* San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Table 4.2.10 shows the Average Daily VMTs for *ONLY* TAZ 578 (10 S. Van Ness Project & close streets):

**Table 4.2.10: Average Daily Vehicle Miles Traveled per Capita—2040 Cumulative Conditions**

| | Average Daily VMT per Capita | | |
|---|---|---|---|
| | San Francisco Bay Area | | |
| Land Use | Regional Average | Regional Average minus 15% | TAZ 578 |
| Residential (per resident) | 16.1 | 13.7 | 3.1 |
| Retail (per employee) | 14.6 | 12.4 | 9.0 |

Notes: TAZ = transportation analysis zone; VMT = vehicle miles traveled
Source: CHS Consulting Group, *10 South Van Ness Avenue Mixed-Use Residential Project Final Transportation Impact Study*, Case No. 2015-004568ENV, December 2017.

Comparing these 2 tables, it shows that SF has, in these last couple of *recent* DEIRs, decided to use a *REGIONAL* number rather than do street-level or neighborhood district level analyses for CEQA traffic analysis to determine level of impact. Would not using a *REGIONAL* figure in most all cases result in minor or no impacts in less populated (whether residents or visitors (retail) or employee counts) areas? What the above 2 tables compared indicates is that the 3333 California Project and the 10 South Van Ness Project would have the same resulting impact to the neighbors because they *BOTH* fall under the *REGIONAL" average. Is this what this means? Please clarify.

Now, let us consider the 3333 California Project "VMT per capita" in Table 4.C.3 below:

**Table 4.C.3: Existing Daily Vehicle Miles Traveled per Capita**

| Land Use | Bay Area Regional Average | Citywide Average | TAZ 709 |
|---|---|---|---|
| Households (Residential) | 17.2 | 7.9 | 7.3 |
| Employment (Office) | 19.1 | 8.8 | 10.1 |
| Visitors (Retail) | 14.9 | 5.4 | 8.3 |

*Source:* San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Compare Table 4.C.3 to the 10 South Van Ness Project "VMT per capita" in Table 4.2.7 below:

**Table 4.2.7: Average Daily Vehicle Miles Traveled per Capita—Existing Conditions**

| | Average Daily VMT per Capita | | |
|---|---|---|---|
| | San Francisco Bay Area | | |
| Land Use | Regional Average | Regional Average minus 15% | TAZ 578 |
| Residential (per resident) | 17.2 | 14.6 | 3.7 |
| Retail (per employee) | 14.9 | 12.6 | 8.9 |

Notes: TAZ = transportation analysis zone; VMT = vehicle miles traveled

Source: CHS Consulting Group, *10 South Van Ness Avenue Mixed-Use Residential Project Final Transportation Impact Study*, December 2017, Case No 2015-004568ENV.

While 10 South Van Ness is in a highly dense and commercialized area unlike 3333 California, it appears from the counts shown in their respective TAZs (709 for 3333 California & 578 for 10 S. Van Ness), that *BOTH* projects have no impact since their numbers are below the *REGIONAL* numbers. Using TAZ would take projects and their VMTs to be analyzed on a *REGIONAL* level rather than a local neighborhood level as it was done in the past for many other DEIRs. Who decides which method to use? Why? In what cases? Are the decisions of whether Planning applies TAZ to determine VMTs arbitrary? What would the results for the VMTs be under the older traffic analysis without using TAZ? Would the impact conclusions be different? If so, in what way? If not, why not? Please clarify.

I think using TAZs and saying any particular one TAZ as being less than the "REGIONAL" number is only going to allow for future DEIRs to have "NO IMPACT" in terms of VMTs; but the evidence on the street is that there are many more vehicles milling about and the numbers appear to be lowballed. The additional VMTs not captured outside of any one TAZ could impact "other nearby streets" in every neighborhood district with potentially bad consequences for its residents in terms of AIR QUALITY (more people, more garbage truck trips, more GHGs, more NOISE & VIBRATIONS, and SAFETY.

Now, let us look at another DEIR that was released not too long ago, ***Case No. 2013.1543E (State Clearinghouse No. 2015012059), 1979 Mission Street Mixed-Use Project, published May 4, 2016***: In this 1979 Mission DEIR, there is ****NOT**** ONE MENTION OF TAZ.

Although the DEIRs for 1979 Mission, 3333 California, 10 South Van Ness cover varied site particulars, the conclusion of all three is that they are ***identical*** as to having no VMT impact because of the application of a "REGIONAL" threshold. Doing so skews the impact at the neighborhood level.

The city may want to take into account again the "Precautionary Principle" that while one can create a situation that would pass muster due to having to meet a high "REGIONAL" number for VMTs before a project would be deemed having a "SIGNIFICANT" impact in re VMTs. Each project may well be contributing a lot more impacts to the environment in some or all of the CEQA categories than meets the eye. If the city continues on this path, it may be found out by 2040 that there is much more impact than what was written in these DEIRs today. Not only the community near the developments would be negatively impacted, but so might the entire city.

TAZs have been used for some decades already. If some DEIRs use TAZs but others do not, the process of choosing which to use is not transparent to the public nor would the results necessarily to come to some of the conclusions in the DEIRs.

Had the 1979 Mission Street Project DEIR (Sarah Jones, ERO) used TAZ, would the VMT numbers have changed? If so, to what? If they do change, how much of an impact would they be?

The greater number of vehicles and with TNCs coming in from *OUTSIDE* the city, along with other building uses and more units having been completed in the area, there are more vehicles and people than what is being used in this DEIR for TAZ 709 from the 2000 Census as things change over 18-19 years. Why would the other TAZs not be included for each DEIR alternative and perhaps for the neighborhood community alternative in order to have an accurate, thorough and complete DEIR?

Even with TAZs, why has Planning not used in in recent past DEIRs? Seems like not using the same method for all projects so the impacts can be manipulated. For instance, there exists DEIR Case No. 2013.1543E published on May 4, 2016 for 1979 Mission Street. It does not use TAZ. New metrics for TAZs are not going to be in place until later in 2019 wherein larger zones will be created to minimize concentration of VMT issues in a smaller area not disaggregated from the TAZ being analyzed. Why did Planning decide to use TAZ for the last couple DEIRs and not prior DEIRs? Why is there not a consistent basis of analysis for all projects?

There is also **DEIR Case No. 2015-004568ENV (State Clearinghouse No. 2017072018) published October 17, 2018 for 10 South Van Ness**. The DEIR for this project uses TAZ. It gives a "2040 Average Daily Household VMT per Capita" calculation." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-39])*

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"Volume 2A:

(See also under Volume 2C.)

➔ ***DEIR LIST OF OTHER FORESEEABLE PROJECTS** (Pages 94-99)***:

3700 California Street (2017-003559ENV)

726 Presidio Avenue (2014-001576ENV) – add 4 units, remove 1 on-street parking

2670 Geary Blvd. (2014-002181ENV)

2675 Geary Blvd. (2015-007917ENV)

California Laurel Village Improvement Project

Laurel Heights/Jordan Park Traffic Calming Project

Masonic Ave. Streetscape Project

Geary Bus Rapid Transit Project

With the above cumulative projects listed in this Volume 2A of this DEIR -- of which more than one is now complete -- and with Planning Code allowing new buildings and alterations to occur with no minimum parking requirements especially along California St. and Geary Blvd. and other streets where transit or bike lanes exist, the residents in these newer buildings with more units and fewer or no parking, may be forced to add to VMTs to park their vehicles farther out into neighboring areas and add to VMT calculations. Also, they may resort to ride-sharing. These ride-share drivers are also increasing the VMT calculations as they are often trolling the neighborhoods with no passengers waiting for a call on their app for their next customer or taking up residents' on-street parking. Without on-street parking for residents currently existing in their units, how are they to get to work or take care of personal business especially when the affordability factor gets thrown into the equation? Retail and office components trigger the most traffic as seen in many DEIRs. It might be best to leave the retail out of this residential area on the Euclid side. Retail is already on California, Sacramento and at the Target City Center at Geary and Masonic only a couple of blocks away. This only adds to VMTs." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-47])*

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"The Kittelson & Associates (KIA)'s letter on Page 6 under "Task 4" says the VMT for the project will be the same as what exists today:

**"Vehicle Miles Traveled**: For purposes of the VMT analysis, KIA assumes the baseline (Year 2020)" conditions VMT for the region and the Project's transportation analysis zone for each of the uses proposed by the Project and Variant will be the same as Existing."

Do not believe a true impact can be told "assuming" the baseline year of 2020. I think it skews the impact as less impactful because rideshares and *alternative modes such as rideshares were not present in 2008/9 and earlier years vs. 2020*. The years prior to rideshares is not included in the DEIR so it skews the data and conclusions. Please provide data for vehicles in the area from earlier years starting at 2008 to present in this project area streets. It will likely show that compared to today, there are many more vehicles in this area (Arguello to Laurel, between Geary & California).

Rideshare is everywhere today so it is not like cars have disappeared just because the parking is minimized or removed. It is the type of uses for a project that attract certain number of cars. Again, not clear why the baseline year of 2020 – the year the development is supposedly to start -- is being used as the starting year for the analysis. Why is that?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-55])*

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"In the November 15, 2018 article at the link below, it states that vehicle mode is still prevalent at over 50%, especially for those in the higher income brackets. The area of the proposed project has a large population of higher income residents and visitors and thus one would reasonably expect more cars in the area.

http://www.sfexaminer.com/survey-private-auto-use-sf-lower-except-among-wealthier-residents/

The SF Examiner article references the SFMTA's "Travel Decision Survey" of 2017. This is anecdotal evidence that wealthier areas drive or take rideshare more so the mitigation measure to remove some parking spaces will not necessarily negate the traffic, automobile delay or VMTs

and increased GHGs. There must be other mitigation measures, and that may be reduction or removal of non-residential use especially on the residential side of the parcel.

The DEIR states that the VMT will be no different at complete build-out compared to 2009 or any year through 2018. Since 2009, there were new transportation alternatives – e.g. rideshare, shared scooters (Bird, Lime, etc.) and other modes. The analyses in the DEIR is *incomplete* without this new data incorporated. The new rideshares impact all streets in the neighborhood in all directions and are mostly used in retail trips besides commuting to offices/work places. Many of my neighbors use them for these purposes but then hop into their personal automobiles for longer out-of-city trips.

On Page 21 of their letter, it states the vehicle trips estimates for the 3 different scenarios and all three are over 2,236 person-trips per day. If the restaurants were only on the California street side where there are already commercial businesses, there should be less disruption of cars in the residential areas as they can take the Muni bus or alternative modes." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-57])*

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"Anecdotally, below are a couple of links to tell you about jammed SF streets and traffic increase - many due to people deciding to use vehicles not available before since the introduction of "Transportation Network Companies (TNCs), aka "rideshares".

Article re jamming SF's streets:

https://sf.streetsblog.org/2018/10/17/data-confirms-uber-and-lyft-jam-up-san-francisco/

Article re traffic increase:

https://sf.curbed.com/2018/10/16/17984366/tnc-ride-hailing-uber-lyft-sfcta-report

On Page 27 of the "KIA Letter", in Table 10, it shows clearly that people in the area are at 60%+ using automobile mode. I do not see this changing any time soon so the VMTs should be more especially with the retail restaurant sit-downs at 63.9%. For whatever reason, there is still a high percentage of automobile use – whether rideshares or privately-owned vehicles. With on-street parking diminishing and off-street parking being eliminated in many zoning districts, vehicles will still be around to circle the area to add to pollution, wear and tear on the roads, need to fix or re-pave roads and features. Even if in Volume 1 above, a new Muni line is proposed for relief of "congestion" in the area or of a bus line, there are still many who continue to drive. Even with "self-driving" cars, the VMTs do not go away." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-61])*

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"Also, the Draft EIR states that the proposed project would generate 10,057 auto trips per day and would cause substantial additional Vehicle Miles Traveled and/or substantially induce automobile travel. DEIR p. 4.C.74. The DEIR claims that reducing the retail on-site parking supply would mitigate this impact to less than significant. DEIR p. 4.C.80. We think this analysis is bogus." *(Anne Neill, Email, December 12, 2018[I-Neill-11])*

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"The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This does not make sense. Are there published studies that support this idea and if so can we have the references? If the business served are to survive, eliminating parking does not eliminate auto trips it will actually increase driving time as cars cruse for a spot and it will push parking into the surrounding neighborhoods, or it will fill the streets with Ubers. All to the detriment of those that live in the neighbor. Whereas if parking is so

bad as to drive away shoppers, we get the failure of the businesses." *(Phillip Paul, Email, January 7, 2019 [I-Paul-7])*

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"The DEIR admits that the project would be expected to generate higher Vehicle Miles Traveled than retail, office or residential average projects in the area. The DEIR compares the project with city average data but not with actually measured traffic conditions in the project area. However, the DEIR concludes that the project would have an impact on traffic that would be ***Less Than Significant with Mitigation.*** (page 4.C.74) ***The DEIR claims that reducing the retail parking supply would mitigate the Vehicle Miles Traveled impacts of the project.*** (page 4.C.80)" *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-4])*

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**RESPONSE TR-4: VEHICLE MILES TRAVELED METHODOLOGY AND FINDINGS**

The comments claim that the EIR concludes that the proposed project would cause substantial additional VMT, that the proposed mitigation measure to reduce the amount of retail parking is not adequate and that the EIR does not provide evidence to support the adequacy of the significance standard used to determine the VMT finding, the VMT impact finding, or the degree of effectiveness of the proposed mitigation measure. The comments state that the traffic analysis does not present the total VMT associated with the proposed project or project variant, and does not estimate the amount of additional VMT that the project would generate and that the EIR does not explain the methodology used to estimate the project level and cumulative VMT for the project's transportation analysis zone. The comments state that the EIR inaccurately claims various publications support the EIR conclusions as to the effect of parking on VMT and that the EIR does not present the methodology or data used to calculate the neighborhood parking rates for retail or non-retail uses or explain which retail uses would use the long-term and short-term parking. The comments state that the EIR fails to analyze VMT resulting from retail customers or VMT generated by the project retail uses in combination with other nearby retail.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Background Vehicle Miles Traveled in San Francisco and Bay Area" on EIR p.4.C.6; "Vehicle Miles Traveled Baseline" on EIR p.4.C.30; "Vehicle Miles Traveled Analysis" starting on EIR p. 4.C.48; Impact TR-2 starting on EIR p. 4.C.74; and Impact C-TR-2 starting on EIR p. 4.C.102. Detailed supporting information is included in EIR Appendix D, Transportation and Circulation. The EIR concludes that the proposed project or project variant would have a significant impact on vehicle miles traveled related to the retail use and that implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply (EIR p. 4.C.80) would reduce the impact to a less-than-significant level. The EIR also concludes that the proposed project's and project variant's streetscape modifications would not substantially induce automobile travel and therefore the VMT impact would be less than significant, contrary to a statement made in the comments. The comments received on the EIR do not present evidence that the transportation analysis was inadequate, that

there would be any new significant impacts not addressed in the EIR, or that there would be a substantial increase in the severity of impacts identified in the EIR.

The proposed project and project variant have been revised since publication of the draft EIR. The project revisions include a reduction in retail square footage, a reduction in the number of parking spaces, and reconfiguration of the proposed commercial loading space on California street among other changes. See RTC Section 2 on pp. 2.2-2.13 for a full description. The project changes do not alter the analysis or conclusions of the EIR. Mitigation Measure M-TR-2: Reduce Retail Parking Supply, would continue to be applicable, and would be satisfied by the reduced parking program in both the revised project and revised variant, as discussed on RTC pp. 2.33-2.34. Compliance would be verified through the building permit review process.

Responses to the issues regarding trip generation are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection B, Travel Demand Methodology under the subheading "Trip Generation Estimates" on RTC p. 4.4).

Responses to the issues regarding the adequacy of the proposed VMT mitigation measure are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking under the subheading "Neighborhood Parking Rate" starting on RTC p. 4.45).

Responses to the issues regarding the VMT methodology and VMT estimates are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussions in subsections D.1 CEQA Section 21099(d)(1) (California Senate Bill 743) and Vehicle Miles Traveled (VMT), under the subheading "Vehicle Miles Traveled Efficiency Metrics and Thresholds of Significance," and D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking starting on RTC pp. 4.19, 4.22, and 4.39, respectively). In addition to the information included in RTC Section 4, Master Response – Transportation and Circulation, the following addresses comments related to information presented in Table 4.C.3 on EIR p. 4.C.8 and Table 4.C.10 on EIR p. 4.C.50. As noted in the comments, Tables 4.C.3 and 4.C.10 show that the project transportation analysis zone (TAZ 709) would have a VMT per capita of 7.3 for the residential use, 10.1 for the retail use, and 8.3 for the retail use. For informational purposes, Table 4.C.3 also presents the citywide average VMT per capita. Contrary to the comments, Table 4.C.10 presents a comparison of the VMT significance standards (regional VMT minus 15 percent) to VMT data for TAZ 709, the TAZ in which the project site is located. As shown in Table 4.C.10, TAZ 709 (and the project) would meet the VMT significance standards and have VMT per capita that is more than 15 percent below the regional average While the fact that the project TAZ has lower VMT per capita than the established threshold (i.e., regional average daily VMT minus 15 percent) is clearly shown in the table, for informational purposes, the comparison of project TAZ VMT per capita to the regional average VMT per capita can be calculated as follows for each land use category:

(Project TAZ VMT per capita – Regional Average VMT per capita) / Regional Average VMT per Capita

Based on this calculation, the project TAZ's residential, retail, and office VMT would be 58 percent, 44 percent, and 47 percent lower than the regional average VMT per capita, respectively.

Responses to the issues regarding the literature review are provided in Section 4, Master Response – Transportation and Circulation (see the discussion in subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking, under the subheading "Literature Review" starting on RTC p. 4.41).

Responses to the issues regarding the neighborhood parking rate are provided in RTC Section 4, Master Response – Transportation and Circulation (see subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking, "Neighborhood Parking Rate", and "Neighborhood Parking Rate Analysis" starting on RTC pp. 4.39, 4.45, and 4.47, respectively). To the extent any previously applicable minimum parking code requirements[2] affected the actual supply in the existing neighborhood, the neighborhood parking supply and associated rate accounted for this.

Responses to the issues regarding the VMT generated by the retail customers are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection D.2, Vehicle Miles Traveled (VMT) and Retail Use starting on RTC p. 4.30).

For a response to concerns regarding size and type (e.g., local-serving) of the proposed retail use, see Response PD-3: Project Characteristics – Open Space, Unit Size and Parking Program in Section 5.B, Project Description (RTC pp. 5.B.19-5.B.24).

For a response to comments that express opinions on the merits of the project's retail program, see Response ME-1: Merits of the Proposed Project in Section 5.L, Merits of the Proposed Project (RTC p. 5.L.6).

Parking demand calculations are presented for informational purposes; as explained on EIR p. 4.C.1, the proposed project is a residential infill project in a transit priority area and parking is no longer considered in determining a project's environmental impacts (see also EIR pp. 4.C.31-32 and 4.C.46). Parking information for the proposed project and project variant is presented on EIR pp. 4.C.116- 4.C.120. The parking demand (long-term or employee demand and short-term or visitor demand) generated by the proposed project and project variant and proposed parking supply for each proposed land use is presented in Table 4.C.28 on EIR p. 4.C.118. The parking demand generated by the proposed project was estimated using the methodology described in the *2002 SF Guidelines*. As shown in Table 4.C.28, the proposed project would generate a long-term demand

[2] In October 2018, the City's Planning Commission unanimously recommended removing citywide parking requirements. On December 21, 2018, the Mayor signed the ordinance eliminating minimum parking requirements. The ordinance went into effect on January 20, 2019.

for 949 parking spaces and a short-term demand for 116 parking spaces, including 81 long-term and 42 short-term parking spaces for the retail uses. The project variant would generate a long-term demand for 1,092 parking spaces and a short-term demand for 108 parking spaces, including 73 long-term and 40 short-term parking spaces for the retail uses. The supply of parking is not separated or dedicated into long-term or short-term use and the 138 retail parking spaces (proposed project) and 128 retail parking spaces (project variant) would be available for use by employees and visitors to all retail uses. With respect to demand for on-street parking, results from SFMTA's SF*Park* Pilot Project Evaluation[3] found that the SF*park* pilot program reduced traffic congestion, vehicle miles traveled, and greenhouse gas emissions generated by drivers circling for parking. The SF*Park* pilot project reduced VMT in pilot areas by 30 percent, compared to a 6 percent decrease in control areas. Therefore, there is no evidence that SF*park*'s parking demand pricing program would increase the use of TNCs as stated in comments.

As explained on EIR p. 4.C.6 and in RTC Section 4, Master Response – Transportation and Circulation (see Subsection D.3,"Vehicle Miles Traveled (VMT) Calculation, starting on RTC p. 4.33), the San Francisco Transportation Authority (transportation authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types within individual TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. Year 2000 Census data was not used in the VMT analysis. Furthermore, 2000 Census data are not used in the travel demand calculations. As noted on EIR p. 4.C.57, mode shares and average vehicle occupancy rates for residential work trips are based on United States Census Bureau five-year estimates of commute trip travel behavior from the 2011–2015 American Community Survey for Census Tract 154, which includes the project site.

The comments about VMT methodology and conclusions in the EIR do not identify any new significant impacts not already addressed in the EIR or any substantial increases in severity of significant impacts identified in the EIR, and no new mitigation measures are required.

## COMMENT TR-5: MITIGATION MEASURES

"The Draft EIR states that the "proposed project or project variant would cause substantial additional Vehicles Miles Traveled and/or substantially induce automobile travel" but claims that reducing the retail parking would mitigate the impact to less than significant. DEIR pp. 4.C.68 and 80. We will submit comments on these and other matters. 74" *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-1])*

[3] SFMTA, SF*Park* Pilot Project Evaluation, June 2014, *http://sfpark.org/wp-content/uploads/2014/06/SFpark_Pilot_Project_Evaluation.pdf*, accessed July 31, 2019.

**"7. Feasible Mitigation Should Be Adopted to Reduce the Project's Significant Impact on VMT and its Incremental Cumulative Effects on Regional VMT.**

The following Mitigation Measure should be adopted as a condition of approval of the proposed project/variant.

**MITIGATION MEASURE - NO RESIDENTIAL PARKING PERMITS FOR RESIDENTS OF, OR PERSONS WORKING AT, THE PROJECT.**

In order to reduce VMT from project residents or workers parking in the areas surrounding the project site, as a condition of approval, the project sponsor shall be required to agree to a deed restriction recorded against the property providing that persons living at 3333 California Street and workers employed at 3333 California Street shall not be entitled to apply for a residential parking permit in the residential parking permit area that includes the 3333 California Street site, and the project sponsor shall be required to fund development of a program at the City agency that governs issuance of residential parking permits (currently believed to be MTA) in an amount not to exceed $2 million (two million dollars) to be used to enable that agency to modify and screen applications for residential parking permits and identify persons residing or working at 3333 California Street who would not be eligible to apply for residential parking permits and to implement amendments to application procedures for residential parking permits sufficient to enable the agency to identify persons residing or working at 3333 California Street. This condition sha11 be incorporated into any approval of the project, including without limitation into any approval rendered by the Board of Supervisors or the Planning Commission." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-13])*

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"Page S.10: "TR-2: The proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel." ("SIGNIFICANT")

While it is appreciated that Mitigation Measure M-TR-2 proposes to *REDUCE* the retail parking supply as though that would reduce the number of VMTs, any added retail generally, and restaurants in particular, according to prior DEIRs for other development sites, show that retail attracts vehicles to the site such that elimination of a handful of parking spaces will not solve the inundation of vehicles – whether personally owned or for hire (car sharing) – in this area for at least ¾-mile in all directions. The retail use attracts vehicle trips. And with rideshares, there does not have to be parking to have them add to the vehicle trip count." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-6])*

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"The mitigation measure to reduce the VMTs generated by this project would be to eliminate all or much of the *retail* use which in many Planning Department DEIRs show is what generates the most VMTs." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-8])*

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"Part of the mitigation measure should be to curb increased vehicle counts on the residential arterial (side) streets within ½-mile of the project that are already taking on the bulk of the traffic." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-11])*

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"Page S.16 (C-TR-2): "The proposed project's or project variant's incremental effects on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects. / S"

The "Mitigation Measure M-TR-2: Reduce Retail Parking Supply" will make things worse and more impactful because as stated earlier, even if there is *no* parking anywhere, more rideshares, etc. will use the streets and bicycle lanes to clog up the street so that the automobile delay will be greatly increased up to at least ¾-mile of the area in all directions." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-27])*

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**RESPONSE TR-5: MITIGATION MEASURES**

The comments recommend that a new mitigation measure restricting residential parking permits for future residents of the site, or people working at the site, be incorporated as a condition of approval. The comments recommend augmenting the mitigation measure to limit vehicle counts on residential streets within 0.5-mile of the project site. The comments state that reducing parking will increase auto trips through increased TNC mode share.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: Impact TR-2 starting on EIR p. 4.C.74 and Impact C-TR-2 starting on EIR p. 4.C.102. Detailed supporting information is included in EIR Appendix D, Transportation and Circulation. The EIR concluded the proposed project or project variant would have a significant impact on VMT related to the retail use, and implementation of Mitigation Measure M-TR-2: Reduce Retail Parking Supply (EIR p. 4.C.80) would reduce the impact to a less-than-significant level. Mitigation Measure M-TR-2 would continue to be applicable to the revised project or revised variant and would be satisfied by the reduced retail parking program in both the revised project and revised variant. Compliance would be verified through the building permit review process. The comments received on the EIR do not present evidence that the transportation analysis was inadequate, or that there would be any new significant impacts not addressed in the EIR or any increases in the severity of impacts identified in the EIR.

In addition, since publication of the draft EIR, the proposed project and project variant have been revised to reduce retail square footage as well as the number of parking spaces among other changes. The changes are minor and do not result in additional or more severe significant impacts than discussed in the EIR. See RTC Section 2 on pp. 2.2-2.29.

Responses to the issues regarding the adequacy of the proposed mitigation measure and feasibility of suggested additional/supplemental measures are provided in RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection D.4, Vehicle Miles Traveled (VMT) and Vehicular Parking on RTC pp. 4.39-4.49.

## COMMENT TR-6: CONSTRUCTION IMPACTS

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"For years, during this construction, the Developer seeks closure of an eastbound/parking lane of the street for its benefit. The loss of parking is a taking from our community. It means that there

will a drastic reduction in available parking places for families, caregivers, etc., which will radically affect our chosen neighborhood." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-4])*

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"The proposed intrusion of a lane for construction purposes on California between Laurel and Walnut will constitute a taking of available parking currently, which would last for years." *(Joseph J. Catalano, California Street Homeowners Group, Draft EIR Hearing Transcript, p. 62, December 13, 2018 [O-CSHG2-3])*

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"We believe that the EIR should contain specific construction mitigations designed to consider the following construction-related concerns, which we have developed in conjunction with Cahill Contractors, the contractor which built the JCCSF building:

1. Construction Traffic, Staging and Safety - We have 4500 daily users ranging from newborns in strollers to school children to frail older adults. Our only access point for pedestrians and cars is from California Street (except for preschool pick-up and drop-off which enters off Walnut Street but exits onto California Street.) Many of our users and employees routinely cross the California/Presidio and California/Walnut intersections to enter or exit our building. As a result, we are concerned about disruption to our facility caused by construction traffic on California Street and by California Street southside parking lane closures (IS pg.77) during the construction period. We request that the EIR study these considerations in an effort to minimize these impacts. *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 8, 2018 [O-JCCSF2-1])*

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"The truck traffic and other construction traffic is a threat to pedestrian safety. The congestion will force cars onto nearby side streets, affecting the whole area." *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-5])*

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"…the idea of seven to 15 years of construction at this intersection that we rely on constantly to get where we're going. We rely on the 1 Bus on the 43 Bus, driving past there, and the thoughts of construction, dumpsters, and board walls and backhoes backing up, and trucks beeping for seven to 15 years is just really kind of soul-crushing." *(David Goldbrenner, Draft EIR Hearing Transcript, p. 32, December 13, 2018 [I-Goldbrenner1-2])*

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"As this project does not seem to be in a hurry to build out fully for possibly as long as 15 years, the construction traffic should be limited during AM and PM rush hours." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-75])*

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"The construction period also brings congestion and chaos to the major commute route which is California Street, Pine Street, Bush, Euclid, to and from the Richmond area, not just for the Laurel Heights, Jordan Park, Presidio Heights area." *(Tina Kwok, Draft EIR Hearing Transcript, p. 54, December 13, 2018 [I-Kwok2-6])*

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"7. Construction truck traffic and safety concerns, as well as cumulative construction transportation impacts" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-8])*

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"Removal of the demolition debris and the excavated soils will require approx. 32,000 dump truck loads, all of which have to pass though and pollute our neighborhoods. By contrast, the Community Full Preservation Alternative generates approx.. 9,000 dump truck loads, one quarter as many! After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings. How many large truck loads, concrete truck loads, etc. will this require? The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads." *(Laura Rubinstein, Email, January 2, 2019 [I-Rubinstein-13])*

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**RESPONSE TR-6: CONSTRUCTION IMPACTS**

The comments state that the project will remove one parking lane on California Street between Laurel and Walnut streets during construction, and that the EIR should study implications of construction traffic and parking lane closures on Jewish Community Center of San Francisco (JCCSF) operations. The comments ask about the number of dump truck loads, large truck loads, and concrete truck loads required during construction and state that construction truck traffic should be limited during weekday a.m. and weekday p.m. peak hours. The comments state that construction traffic poses a threat to pedestrian safety and will result in diversions of existing traffic to side streets.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under Impact TR-1 starting on EIR p. 4.C.68, and concluded the proposed project or project variant would have a less-than-significant impact on transportation-related construction impacts and no mitigation measures would be required. The comments received on the Draft EIR do not present evidence that the analysis of construction impacts was inadequate, that there would be any new significant impacts, or that there would be a substantial increase in the severity of impacts identified in the EIR.

The project's preliminary construction schedule and phasing is described in EIR Chapter 2, Project Description, starting on EIR p. 2.91, and is based on information provided by Webcor Builders, a construction contractor for the project sponsors. Based on the preliminary construction information presented and analyzed in the EIR, temporary parking lane and sidewalk closures would be required along California and Laurel streets (see EIR p. 4.C.70). Additionally, the parking lane on Masonic Avenue between Presidio and Euclid avenues would be used intermittently, as needed, for concrete truck staging subject to the conditions of a special traffic permit. The closures would be required to comply with the City's blue book regulations, would be subject to review by the SFMTA, and would be coordinated with City staff to minimize effects on people walking or taking transit, transit operations, local traffic, and circulation.

As discussed on EIR p. 4.C.72, the number of construction-related truck trips would range from 10 to 80 per day for material removal and soil hauling during demolition and excavation for each phase of the construction program. Based on information provided by Webcor Builders, removal of the

demolition debris and excavated soils would require about 18,000 truck trips (not 32,000 as asserted in the comments). Based on preliminary construction information, there would be approximately 4,650 material and vendor delivery truck trips and 6,900 concrete truck trips over the construction period.

The impact of construction truck traffic and parking lane closures on the surrounding street network could result in a slight temporary lessening of its capacity because of slower-moving vehicles but would not substantially affect weekday a.m. and weekday p.m. peak period conditions because construction work would typically be scheduled to avoid peak commute periods (see EIR p.4.C.73). Given that construction traffic would occur primarily during off-peak periods and local circulation would be limited to the designated haul routes, it would not have a substantial effect on travel times through the area or result in diverted or cut-through traffic on minor streets. In addition, construction traffic volumes would be less than operational traffic volumes. Construction would be conducted in compliance with City requirements such that they would not result in substantial interference with pedestrian, bicycle, transit, or vehicle circulation or result in potentially hazardous conditions for pedestrians, bicycles, transit, or vehicles. Therefore, no new significant impacts not already identified in the EIR would result, and no new mitigation measures are necessary.

See Section 5.B, Project Description, Response PD-1, Construction Duration, Phasing and Staging, and Development Agreement (RTC pp. 5.B.9-5.B.15) for a response to issues raised regarding the construction time frame and additional information about construction staging.

See Section 5.H, Alternatives, Response AL-2: Laurel Heights Improvement Association's Proposed Alternative (RTC pp. 5.H.54-5.H.69) for a discussion of issues related to that alternative.

## COMMENT TR-7: TRAFFIC HAZARDS

"California Street, between Laurel and Walnut, is 4 lanes plus parallel parking lanes, or two lanes with opposing bus stops (at Laurel). Along with the garages of our 40 families, the garages for an additional 11families open to this block of California Street, and require (sometimes blind) backing onto the already congested street for exit." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-1])*

**"INCREASED TRAFFIC HAZARDS**

Garages for more than 50 residences exit in reverse onto this block of California Street. Currently this is challenging and sometimes hazardous. When it is manageable, it is so because the Walnut Street traffic coming on to California St when the California light is red is very light. Increased traffic coming from both directions on Walnut may make it impossible at times for the California Street neighbors to exit our buildings.

The Project's inevitable additional congestion from long term construction; followed by retail traffic, perhaps with commercial loading, will significantly and adversely impact this already difficult circumstance.

The Draft EIR is fundamentally deficient in its failure to address this unique and significant environmental impact on our neighborhood, and of course, it necessarily fails to identify or require any mitigation of it by the Developer or the City's traffic authorities." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-13])*

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"We are 40 residents. In addition, there are 11 other neighborhood occupants whose garages enter by backing into California Street between Laurel and Walnut. Right now, that's a hazardous proposition with the construction proposed, with the development proposed. It will be become basically untenable. The Draft EIR does not address this. It obviously, then, can't mitigate something it hasn't addressed." *(Joseph J. Catalano, California Street Homeowners Group, Draft EIR Hearing Transcript, pp. 61-62, December 13, 2018 [O-CSHG2-2])*

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"A. **Traffic/Safety**: The TIS should evaluate:

1. Impacts of Project traffic on: the white zone in front of 3200 California; the Muni bus stops on Presidio and California Streets; traffic flow on California Street; and the ability of JCCSF users to safely cross California Street, as detailed in the attached 6/3/16 letter to you. All the issues in that letter continue to be relevant, except that we are pleased to note that the developer has eliminated the midblock entrance on California Street directly across from the JCCSF. We request that the TIS address the other issues in the attached letter.
2. Conflicts between the Walnut Street entrance to the Project (location of its passenger loading and retail parking entrances) and the JCCSF Walnut Street drive-through for preschool pick-up/drop-off and the Jackson Muni line, detailed in the attached letter." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017 [O-JCCSF3-2])*

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"**1. The white zone in front of 3200 California**.

This zone extends the full length of the building on California. This space is used as a drop off/pick up point for participants, including parents, transportation services and school buses dropping off and picking up children. It is also the holding zone where cars wait to enter the garage when it is full. Unfortunately, the increase in westward flow traffic along California since the JCCSF opened 12 years ago contributes to a bottlenecking of vehicles entering/leaving our garage/white zone/drive through areas, particularly in the afternoons and evenings, creating congestion and safety concerns. We hope that the city's traffic analysis for the proposed new projects addresses mitigations for any increase in this bottlenecking linked to any potential increase in westbound traffic from the proposed projects. We are particularly concerned about the impact of cars headed westbound on California that may queue as they wait to turn south onto Walnut into the primary entrance to the 3333 project. We look forward to conversations with the developers and SFMTA about potential management, parking and intersection design solutions to mitigate this concern that could be implemented by some combination of the developers, the JCCSF and SFMTA." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 3, 2016 [O-JCCSF4-3])*

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"…and carving under much of the hill for a three to four-story garage with exits onto Presidio and California, which is already a 3-ring circus, or out towards -- on Laurel, which is opposite one of

two exits of the Laurel Village parking lot." *(M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript p. 51, December 13, 2018 [O-LHIA7-5])*

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"A quick look at the turning radii of the trucks, i.e. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution. In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-18])*

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"The garages for our homes back out onto California Street and there was no mention in the Draft EIR of the hazards that will be created as a result of the Project during construction, and particularly with the added traffic that will be created by its proposed retail." *(David Bercovich, Email, January 7, 2019 [I-Bercovich-6])*

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"The Draft EIR does not mention, much less include mitigation requirements for the additional hazards the Project's foreseeable congestion will create for exiting garages on California Street." *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-6])*

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**"8. The DEIR Inadequately Analyzes Whether the Proposed Project/Variant Would Cause Major Traffic Hazards.**

**A. The Project Would Cause Significant Hazards of Collision with Oncoming Vehicles.**

Plan sheet C.4.03 shows that trucks with a 50-foot wheelbase would turn into the oncoming traffic lane/area when turning right from Euclid Avenue to onto Laurel Street, when travelling right at the curve of Laurel Street where it intersects Mayfair Drive, and when turning right from Laurel Street onto California Street. (Ex. V) At each of these locations, trucks with a 50-foot wheelbase would turn into the oncoming traffic lane/area. (Ex. V) At the curve of Laurel Street where it intersects Mayfair Drive, traffic often backs up onto northbound Laurel Street in peak hours and after school hours due to vehicles stopping on northerly bound Laurel Street while they are waiting to turn left into the Laurel Village Shopping Center. I have also seen vehicles traveling southbound on Laurel Street adjacent to the Laurel Village Shopping Center backup as they approach the entrance to the Laurel Village Shopping Center to the right, due to vehicle back-ups at the entrance to the Shopping Center. According to plan sheet C.403, a truck traveling northbound on the curve of Laurel Street which has a 50-foot wheelbase would turn into the oncoming traffic lane where vehicles southbound on Laurel Street back up, thereby creating a risk of collision. Such trucks turning right at the corner of Laurel Street eastbound onto California Street would also turn into the oncoming westbound traffic lane on California Street as they approach the 100-foot commercial loading zone proposed to be installed next to the bus stop on eastbound California Street. Such truck turns would also cause a collision hazard, because vehicles often back up in the eastbound lanes on California Street at the intersection of Laurel Street in the peak afternoon traffic periods. Plan Sheet C.4.06 shows that buses with a 40-foot wheelbase turning right in these areas would also turn into oncoming traffic lanes and have the same risk of collision. (Ex. V) The DEIR is inadequate because it failed to analyze adequately this traffic hazard impact and analyze and adopt mitigation measures that could reduce the

significant impact from causing major traffic hazards." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-14])*

**"C. The Proposed Project/Variant Would Cause a Major Hazard From Vehicle Speed Reductions On Pine Street Approaching the Proposed Bulb-Out on Presidio Avenue at Pine Street Such that There Would be Increased Risk of Rear-End Collisions or Other Hazards.**

Sheet C2.02 shows a new proposed bulb-out would be installed adjacent to the right westbound traffic lane on Pine Street at the corner of Presidio Avenue and Pine Street. (Ex. L) Pine Street is a Major Arterial containing three one-way lanes of westbound travel. DEIR 4.C.5. During commute hours, traffic is very heavy on Pine Street westbound, with substantial vehicles traveling from downtown work locations. The proposed bulb-out at this location would cause traffic to slow down at the intersection of Pine Street and Presidio Avenue where visibility is already impaired due to the upward slope. Due to vehicles slowing down near this bulb-out, the proposed project would have increased risk of rear-end crashes or other hazards to vehicles traveling on this major artery and also could cause potential traffic back-ups which would also cause increased risk of collisions. The DEIR is inadequate for failing to analyze this potentially significant impact and mitigation measures that could reduce the impact to insignificance. The DEIR's claim that the project's proposed streetscape changes, including bulbouts, would not increase the risk of rear-end crashes or other hazards is conclusory and not supported by substantial evidence. The following mitigation measure would mitigate this impact to insignificance:

**MITIGATION MEASURE:** Eliminate the proposed bulb-out at the intersection of Pine Street and Presidio Avenue as shown in plan sheet C2.02.

**D. The DEIR Is Inadequate in Failing to Analyze the Potentially Significant Hazards From TNC and Delivery Vehicles Double-Parking Near Proposed Loading Zones.**

The five proposed new loading zones proposed to be installed on streets surrounding the project would attract TNCs and other delivery vehicles. Such vehicles are known to stop in the street when there is not an easily accessible or available turn-in area, such as when a loading zone is occupied. Literature previously discussed herein documents this hazard from TNCs. The DEIR fails to analyze adequately the traffic hazards caused by such vehicles potentially stopping in the street near the proposed project loading zones, including without limitation the increased hazards from the risk of collisions.

**E. The DEIR Fails to Analyze Potentially Significant Traffic Hazards From Vehicles Queueing at Project Site Driveways.**

The DEIR acknowledges that based on a review of existing. conditions, the addition of project-generated traffic could result in queues and potential conflicts with existing traffic operations in the vicinity of the proposed Laurel Street driveway between California Street and Mayfair Drive with potential conflicts being between vehicles entering/exiting the Laurel Village Shopping Center surface parking lot and vehicles accessing the proposed project's below-grade parking garage from the Laurel Street northernmost driveway. DEIR p. 4.C.81. During times of peak demand, queues can spill back across the sidewalk and onto Laurel Street and affect operations of the adjacent, closely spaced intersections at California Street and at Mayfair Drive. *Ibid.* The DEIR included an improvement measure which is not binding for this impact. The DEIR is inadequate in failing to include as a binding mitigation measure the proposed queue

abatement measures stated in Improvement Measure I-TR-3 and the following measure, which should be adopted as conditions of approval of the proposed project:

> **MITIGATION MEASURE:** If significant queues develop on Laurel Street near the intersections of Mayfair Drive or California Street, entrance to the project garages on Laurel Street will be limited to residential occupants of the buildings along California Street. If such queues are reported to the Planning Director, the Planning Department will propose and support modifications to project approvals that will be sufficient to abate such queues to be approved by the Board of Supervisors, Planning Commission or other applicable authority.
>
> **MITIGATION MEASURE:** The terms of Improvement Measure I-TR-3: Driveway Queue Abatement at DEIR p. 4.C.82 are incorporated herein by reference as Mitigation Measures required as a condition of approval of the proposed project/variant." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-16])*

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"…and it is difficult at rush hour getting out of my garage." *(Sharon Esker, Email, January 5, 2019 [I-Esker-7])*

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"A quick look at the turning radii of the trucks, i.e. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution.

In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate." *(Richard Frisbie, Letter, January 8, 2019 [I-FrisbieR1-17] and Tina Kwok, Letter, January 7, 2019 [I-Kwok4-23])*

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"Page S.10: "TR-3: The proposed project or project variant would not cause major traffic hazards."

("LESS THAN SIGNIFICANT" (LTS))

Improvement Measure I-TR-3 says there will be parking garage attendants or other queue abatement actions but there will be bad actors who will "only for a minute" park in neighbors' driveways as they wait for parking in the garage. These queued up drivers will compete now with the rideshares that generally are in the neighborhood parked and waiting or sleeping in their vehicles for their next client. Neighbors will no longer have any street space to park because all the "temporary" parkers are taking up practically every foot of curb space." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-13])*

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"Page S.11: TR-3 (continued) Why would the owner/operator of the garage be held accountable for a situation caused by the developer's design of the project? If the project is going to attract that much vehicular traffic and problems for the garage, then the uses that attract the most vehicles that would use the garage would need to be eliminated from the project." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-16])*

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"In regards to traffic queues that arise from the garage use, why would the onus be put on the operator of the garage when in other DEIRs such as for 1979 Mission, it "shall be the

responsibility of the Project Sponsor/property owner to ensure that recurring vehicle queues do not occur…"? The vehicles would be considered to be making a queue if more than one vehicle were lined up to enter the garage or exist the garage in a traffic jam. The queue should also not occur in the public right of way whether private vehicles or carshares for any longer than 3 minutes or the time it takes for the passenger to enter and exit the vehicle, whichever is less. Where the garage becomes full, there should be active management with "Lot Full" signs installed with parking occupancy sensors that show how many spaces are still left. If any queuing occurs, neighbors should contact the Planning Department to notify the property owner of the queuing issues to be abated through support from the developer's agreement to annually contribute to queue abatement costs as this will impact the neighborhood. If this is not done, the supervisor of the district will have a long line of complainers at her or his door due to the foreseeable situation that would arise with a development built to attract people in vehicles and not accommodating them so as not to jam up the streets or create queuing." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-74])*

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"In re the light and glare from the proposed windows and their impact to vehicles going and coming to the area would be a safety issue, I have not heard anything as to the remedy." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-76])*

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"Traffic: Those of us who live on Presidio Avenue sometimes have to wait up to 5 minutes during morning peak periods before someone is kind enough to allow us to pull out of our garages, and the rush of cars from Pine Street onto Presidio Avenue is dangerous as it presently stands, as cars careen without regard to safety." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-2])*

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"A quick look at the turning radii of the trucks, i.e. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution. In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate." *(Laura Rubinstein, Email, January 2, 2019 [I-Rubinstein-14])*

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"I saw the proposed changes for Presidio/Pine/Masonic. I think removing the right turn lane is smart and will slow down traffic in a good way. However, Pine's traffic itself is still incredibly dangerous. The garage egress directly onto Masonic and Presidio will be incredibly dangerous given how traffic flows currently in this area." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-5])*

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"And, as I've stated now in at least five letters, adding ingress and egress driveways, deletion of the right most lane on to Masonic from Presidio and adding loading zones and driveways on Masonic and Euclid, a crosswalk on Presidio Avenue and bicycles and you have not only a huge traffic mess but an impasse zone and parking lot and a dangerous mess. None of this was addressed in the DEIR." *(Victoria Underwood, Letter, January 4, 2019 [I-UnderwoodV3-4])*

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**RESPONSE TR-7: TRAFFIC HAZARDS**

The comments state that the project-related traffic along California Street will impact access to/from garages on the north side of California Street and that that proposed curb cuts and streetscape modifications would create hazards along Presidio Avenue and Masonic Avenue. The comments state that the EIR should incorporate the terms of Improvement Measure I-TR-3 as a mitigation measure to minimize the potential for driveway queues to block adjacent street traffic and affect operations of adjacent intersections. The comments state that the EIR does not analyze potentially significant hazards from TNC and delivery vehicles double-parking near loading zones and suggest that the EIR should evaluate the impact of the project on the JCCSF passenger loading (white curb) zone located at 3200 California Street, the ability of JCCSF users to safely cross California Street, and conflicts between the Walnut Street entrance to the project and the JCCSF Walnut Street drive-through and the Muni 3 Jackson line. The comments state that based on truck turn diagrams, WB-40 vehicles[4] and larger vehicles would not be able to navigate five of the six intersections surrounding the site and would present hazards to vehicles, pedestrians, and bicyclists. The comments state that the light and glare from the proposed windows in the buildings would be a safety issue for vehicles traveling on the surrounding roadway network.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: Impact TR-3 starting on EIR p. 4.C.81; Impact TR-5 on EIR p. 4.C.88; Impact TR-7 starting on EIR p. 4.C.92; Impact TR-9 starting on EIR p. 4.C.96; and Impact TR-10 starting on EIR p. 4.C.98. The EIR concluded the proposed project or project variant would have a less-than-significant impact related to traffic hazards, pedestrian accessibility, freight loading, and passenger loading. The comments received on the EIR do not present evidence that there would be any new significant impacts not identified in the EIR or a substantial increase in the severity of impacts identified in the EIR.

The project's potential traffic hazard impacts, including potential hazards related to increased traffic volume, are addressed under Impact TR-3 starting on EIR p. 4.C.81. The proposed project features are discussed starting on EIR p. 4.C.40. Based on field observations of existing conditions on the surrounding streets and on review of the proposed land use program, site layout and design, and transportation network modifications, the proposed project or project variant would not create a traffic hazard related to light and glare from the proposed windows in the buildings.

The project's and project variant's vehicle trip generation are discussed in RTC Section 4, Master Response – Transportation and Circulation, Subsection B, Travel Demand Methodology under subsection B.3, Trip Generation Estimates, starting on RTC p. 4.4, and Subsection C, Trip Distribution/Increased Traffic Generation, under subsection C.2, Trip Distribution and Trip

[4] A WB-40 is an intermediate semitrailer with an approximately 33-foot trailer and a 40-foot minimum design turning radius.

Assignment, on RTC p. 4.17. As discussed in the Master Response, vehicle trips generated by the proposed project and project variant were assigned to project driveways based on the land use/building generating the trip and the associated garage access. Project-generated vehicle trips were then distributed and assigned to travel routes and study intersections based on the vehicle trip distribution shown in Table 8 on EIR Appendix D p. 25. During the weekday a.m. peak hour, the project variant would add 117 vehicle trips to the 1,219 vehicle trips on California Street west of Presidio Avenue (9.6 percent), and during the weekday p.m. peak hour, the project variant would add 176 vehicle trips to the 1,511 vehicle trips on California Street west of Presidio Avenue (11.6 percent). The project-added vehicle traffic is shown on Figure 4, on EIR Appendix D p. 34 and the existing traffic volumes are included in EIR Appendix D beginning on p. 176. Due to the expected increase in vehicle traffic along California Street, localized impacts were evaluated at the California Street/Presidio Avenue, California Street/Walnut Street, and California Street/Laurel Street intersections. The analysis is summarized in the Travel Demand Memorandum (see EIR Appendix D starting on p. 15).

The project-related vehicle traffic would be expected to use the inside lane in the westbound direction and the curbside lane in the eastbound direction, given these lanes are more convenient to access the project site. Therefore, the project-related traffic would not be expected to directly conflict with vehicles entering/existing residential garages on the north side of California Street. Additionally, based on the findings of the intersection level of service analysis, the project-related increase in traffic volumes would result in less than a two-second increase in intersection average delay[5] and an increase of less than five seconds on any approach. Given the location of the project site between two signalized intersections, it is likely that vehicles accessing the residential garages on the north side of California Street could continue to find a gap in traffic when the adjacent signals are in the red phase. In addition, multiple residential driveways along a single block of a street with four travel lanes is not a unique condition in urban San Francisco. As such, the proposed project would not create hazards to/from garages on the north side of California Street.

The project's potential traffic hazard impacts, including the impact of curb cut modifications and streetscape changes, are addressed under Impact TR-3 starting on EIR p. 4.C.81. An evaluation of traffic operations was conducted to assess potential hazards related to vehicle access and circulation and queueing at the project site driveways. The driveway operations analysis and queue evaluation reports are included in EIR Appendix D (see Attachment F starting on p. 144). The proposed driveway on Laurel Street would be located directly across the street from the existing driveway to the Laurel Village surface parking lot about 120 feet south of the signalized California Street/Laurel Street intersection. Based on the initial trip distribution and assignment analysis, assuming an all-movement driveway, a share of the project-generated vehicle trips would be expected to enter

[5] Intersection average delay is computed as a weighted average of the average control delay for all lane groups based on the number of vehicles in each lane group and represents the average delay per vehicle at the intersection.

the project site at this location from the north and exit the project site to the south via southbound Laurel Street. Based on the operational analysis, the queue at this location would not spill back into the adjacent intersection at California Street/Laurel Street. However, as a result of the potential for the addition of project-generated traffic and the introduction of new turning movements at this location to result in conflicts between vehicles entering/exiting the Laurel Village driveway and vehicles entering/exiting the project site, there would be a potential for queues to extend into the adjacent California Street/Laurel Street intersection and impede transit, pedestrians, and bicycles on the project frontage and along California Street. Based on this analysis, the project was redesigned during environmental review to implement left-turn restrictions and provide a right-in/right-out driveway on Laurel Street south of California Street. Right-in/right-out operations at this location would minimize the potential for queues to develop and resolve potential hazards at this location. The driveway queue abatement improvement measure would not be required and was identified to further reduce the proposed project's or project variant's less-than-significant traffic hazard impacts and help ensure that recurring vehicle queues do not occur at the project driveways.

Vehicle parking spaces for the various land uses would be provided as shown in Table 2.3: Parking Summary in Chapter 2, Project Description on EIR p. 2.73, with proposed access as shown on Figure 2.22: Proposed Site Access on EIR p. 2.62. Most of the parking spaces (over half) would be individually assigned to residents who choose to pay for them or would be designated car share spaces. A "lot full" sign would only apply to the non-residential parking spaces. The proposed project and project variant have been revised since the publication of the draft EIR (see RTC Section 2, Revisions and Clarifications to the Proposed Project). The project revisions include reductions in retail square footage and a reduction in the number of parking spaces. These project changes do not alter the analysis or conclusions in the EIR related to traffic hazards or the impact of streetscape modifications included in the proposed project and project variant.

Proposed streetscape modifications are detailed on EIR pp. 4.C.39-4.C.41 and illustrated in Figure 2.28a and 2.28b on EIR pp. 2.80-2.82. Discussion of the proposed streetscape modifications is included in RTC Section 4, Master Response – Transportation and Circulation, subsection C.3, Intersection Operations Analysis, under "Streetscape Modifications," starting on RTC p. 4.18. The intersection operations analysis conducted at locations where streetscape modifications are proposed (i.e., the Presidio Avenue/Pine Street/Masonic Avenue, Masonic Avenue/Euclid Avenue, and Mayfair Drive/Laurel Street intersections) is documented in the Streetscape Changes Operations Analysis Memorandum, included in the project's AB900 Record of Proceedings.

The operations analysis shows that the project variant would not result in substantial delays or queue lengths as a result of the project-related increase in vehicle traffic and proposed removal of the channelized right turns (Presidio Avenue/Pine Street/Masonic Avenue and Masonic Avenue/Euclid Avenue) or installation of bulb-outs (Mayfair Drive/Laurel Street). As

demonstrated by the analysis, the transportation network would accommodate the increase in traffic volumes generated by the proposed project or project variant with minimal increases in intersection delay and queue lengths. Therefore, no significant impact was identified in the operations analysis, the comments do not present new evidence that there would be a significant impact, and mitigation measures would not be necessary.

The project's potential passenger loading impacts, including impacts to JCCSF operations, are addressed under Impact TR-10 starting on EIR p. 4.C.98. The project's potential pedestrian impacts are discussed under Impact TR-7 starting on EIR p. 4.C.92. The project does not propose any changes to drop-off and pick-up for the JCCSF and passenger loading/unloading for that use will continue to occur along California Street across from the project site and via the one-way internal private driveway off Walnut Street. Vehicle trips generated by the proposed project would not impact existing drop-off and pick-up operations for the JCCSF, as vehicles accessing the site and traveling westbound on California Street would be in the leftmost travel lane to make a left turn at the Walnut Street entrance. Furthermore, the intersection operations analysis conducted at intersections along California Street/Walnut Street and documented in the Travel Demand Memorandum on pp. 25-29 in EIR Appendix D show that the proposed project would result in minimal increases to intersection delay and queue lengths during the weekday a.m. and p.m. peak hour.

Passenger loading for the proposed project and project variant would not occur on California Street and would not impact existing queues at the JCCSF, as project-related loading activities would be accommodated on street on Masonic Avenue, Euclid Avenue, and Laurel Street, as well as at the Walnut Street roundabout within the project site. Furthermore, the pedestrian-related features of the proposed project and project variant would represent an improvement over existing conditions with respect to accessibility, as both would include connections across the project site for pedestrians, which do not exist under baseline conditions, as well as streetscape modifications including sidewalk widening, installation of corner bulb-outs and crosswalks, and removal of channelized right-turn lanes. The possibility of removing the channelized right-turn lane at California/Presidio was explored to help increase pedestrian visibility and slow vehicular movements for vehicles turning from California Street to southbound Presidio Avenue; however, the presence of Muni overhead wires and the use of the turn by buses rendered that option infeasible.

The project's potential freight loading and emergency access impacts, including a discussion of truck turning movements, are addressed under Impact TR-9, starting on EIR p. 4.C.96, and Impact TR-11, starting on EIR p.4.C.99. Truck turning diagrams are included in EIR Appendix D starting on p. 254. Truck turn diagrams were reviewed by SFMTA and designs were updated based on SFMTA feedback during preparation of the draft EIR.

The proposed supply of on-street and off-street loading spaces would meet the overall freight loading demand generated by the proposed project or project variant in terms of number, size, and location of loading spaces. Delivery vehicles would vary in size but based on information in the SF Guidelines, the majority (95 percent) would be two-axle trucks that do not have a 50-foot wheel base. As shown in EIR Appendix D, the SFMTA's standard design vehicle, the SU-30, can complete all turn maneuvers in the project area while maintaining position within the appropriate travel lane. During the limited, rare occurrences that a truck with a 50-foot wheel base would access the project site or adjacent streets, no potentially hazardous condition would occur. The small number of trucks would require a slower turning movement to access the travel lane. Based on existing or existing plus project counts, none of the streets include such substantial amounts of traffic that there would not be opportunities for the truck to safely maneuver away from the oncoming traffic into its lane.

During the construction period, larger haul trucks would be expected to access the site. As shown in Table 4.C.18, on EIR p. 4.C.70, the number of construction-related truck trips would range from 10 to 80 per day for material removal and soil hauling during demolition and excavation for each phase of the construction program. It is anticipated that primary access to and from the project site for construction truck traffic would be provided from California Street and Presidio and Masonic avenues, with few construction-related vehicles entering the project site from Euclid Avenue and Laurel Street, where the turn maneuvers are tighter. While these vehicles may need to turn into the opposing lane to complete the turning maneuver, no potentially hazardous condition would occur as construction work would typically be scheduled to avoid peak commute periods. Construction would be conducted in compliance with City requirements (e.g., SFMTA's *Regulations for Working in San Francisco Streets* [Blue Book], the Public Works Code and other public works orders) such that they would not result in substantial interference with pedestrian, bicycle, transit, or vehicle circulation or result in potentially hazardous conditions for pedestrians, bicycles, transit, or vehicles.

As discussed under Impact TR-10 on EIR pp. 4.C.98-4.C.99, an evaluation of passenger loading demand and supply was conducted to assess potential impacts with on-street queues and traffic hazards at the proposed passenger loading zones. On-street passenger loading zones are proposed on the west side of Masonic Avenue near Presidio Avenue and Pine Street, on the north side of Euclid Avenue near Masonic Avenue, and on the east side of Laurel Street near Mayfair Drive as part of the proposed project and project variant (see Figure 2.22, EIR p. 2.62). These three on-street zones would each be about 60 feet in length and could accommodate up to three passenger vehicles each. Passenger loading would also occur on site at the proposed roundabout at the terminus of the Walnut Street extension into the project site. This proposed circulation feature would allow residents and guests to be picked up or dropped off at a central location without interfering with traffic on the surrounding street network.

The proposed supply of on-street passenger loading spaces (three 60-foot-long zones that could support a total of three vehicles in each zone, for a total of nine vehicles), and the passenger loading space available at the Walnut Street roundabout, would exceed the projected passenger loading demand of four vehicles. The passenger loading demand estimates presented on EIR p. 4.C.61 include demand for for-hire vehicles, e.g., transportation network companies, taxis. The provision of an adequate supply of on-street and off-street passenger loading would have multiple benefits, including a reduction in potential conflicts associated with double-parked vehicles. The design and placement of proposed color curb modifications has been reviewed by SFMTA and their input has been incorporated into the proposed project and its variant. As such, the proposed project or project variant would meet the demand for passenger loading and the project would not create localized loading impacts.

The comments do not identify any new significant impacts not already presented in the EIR, do not show that any significant impacts in the EIR would be substantially more severe, and no new mitigation measures would be needed.

## COMMENT TR-8: PEDESTRIAN/BICYCLE HAZARDS

"1. **Traffic /Pedestrian Safety Concerns.** Pages 4.C. 68-71. As previously noted in our other letters, we have 4500 daily users ranging from newborns in strollers to school children to frail older adults. Our only access point for pedestrians and cars is from California Street (except for preschool pick-up and drop-off which enters off Walnut Street but exits onto California Street.) Many of our users and employees routinely cross the California/Presidio and California/Walnut intersections to enter or exit our building. We do not believe that the DEIR has fully described the existing traffic patterns around the JCCSF and, therefore, has not adequately analyzed the potential negative impact of the 7-15 years of Project construction traffic in the vicinity of our building on traffic and pedestrian safety in the vicinity of the JCCSF building. In particular, the DEIR's description of the existing traffic patterns around the JCCSF should acknowledge the existing traffic issues and (resulting impact on pedestrian safety) in the vicinity of the JCCSF caused by afternoon westbound traffic (much higher than morning westbound traffic) intermingling with: (a) cars picking up and dropping JCCSF users in the JCCSF California Street white zone; (b) cars entering the JCCSF garage snaking back in a waiting pattern along California; (c) cars leaving the JCCSF garage weaving into westbound traffic on California Street; and (d) cars leaving the preschool drive-through weaving into westbound traffic on California Street. All these factors are also affected by the slowdown in westbound traffic that occurs due to the dramatic decrease in visibility experienced by late afternoon westbound drivers as the sun hits their windshields causing glare. Additionally, the DEIR needs to account for the morning traffic patterns as preschool cars drop off children at the Walnut Street entrance with the line of waiting cars snaking back onto California Street in front of the JCCSF garage. We already have implemented many measures ourselves to address these issues including: (i) assignment of additional staff during peak times to manage loading zone backups; (ii) increased signage for parents re loading/ unloading; (iii) provision of a white zone on Walnut (east-side close to California) to allow the line of cars waiting to go through the drive- through to have a place to queue without blocking traffic; (iv) during camp season (which is a peak period of usage), staggering programs to shift pick up and drop off and adding cones to direct traffic; and (v) working with MTA to move the bus stop on Presidio back 20 feet from the California/Presidio

intersection to improve visibility of pedestrians for other southbound vehicles. Nonetheless, we are very concerned that current situation could be made much worse by 7-15 years of construction traffic. As a result, while acknowledging that we are not traffic experts, we would request that the DEIR analyze potential mitigations such as: limiting construction traffic entering into the Walnut Street entrance to the Project site; installing longer lights for pedestrian crossings at California/Walnut and/or California/Presidio; constructing sidewalk bulb outs in the vicinity of the JCCSF; installing flashing pedestrian crossing signals, etc.; directing blue book regulations to be applied in a manner that limits the exacerbation of these problems. Even if the City believes that the construction traffic will not cause significant impacts pursuant to the DEIR standards of significance, we believe that it is in everyone's best interests to implement every advance preventative action possible to enhance the safety of the thousands of young children and older adults who use this community center on a daily basis." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, January 8, 2019 [O-JCCSF1-1])*

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"b. Traffic Circulation and Pedestrian Safety

i. California Street: The TIS should evaluate sidewalk capacity on both sides of California Street with respect to Project-related pedestrian trips, particularly at bus shelter pinch points.

ii. California/Walnut Intersection: The TIS should evaluate left turn restrictions as a means of mitigating the pedestrian safety effects of unprotected left turns across California Street by Project-related traffic.

iii. California/Presidio Avenue intersection: The TIS should assess the removal of the right-tum (slip) lane on California Street as a means of mitigating the pedestrian safety effects of free right turns by Project- related traffic." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017 [O-JCCSF3-6])*

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"**3. <u>MUNI bus stops on Presidio Street and California Street</u>.**

MUNI buses staging on Presidio directly adjacent to the east side of the JCCSF block the views of cars heading south on Presidio and turning west on California. Importantly, pedestrians in the California/Presidio intersection crosswalks can be obscured by the waiting MUNI buses. We are already in conversation with SFMTA about the impact of this conflict on the safety of pedestrians in these crosswalks (particularly older adults who walk more slowly and young children who can be hard to see). We want to make sure that the potential increase in California Street traffic (whether east- or westbound) does not further exacerbate the safety issues at this intersection. We are hopeful that your analysis might look at different intersection design configurations at California/Presidio that would reduce these safety impacts." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 3, 2016 [O-JCCSF4-5])*

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**"B. The Project Would Cause a Potentially Significant Hazard to Pedestrians.**

The DEIR failed to analyze adequately the significant hazard to pedestrians that would result from unloading operations conducted at the proposed 100-foot long commercial loading zone proposed to be installed on California Street adjacent to the project site. Preliminary Design 08/2018 and plan sheets C2.02 and L1.01 show that this 100-foot commercial loading zone would be adjacent to a "PEDESTRIAN ACCESS POINT" and the pedestrian sidewalk on California Street. (Ex. L) Trucks off-loading freight from this loading zone would likely cross the sidewalk to deliver freight to the site, and some such crossings would likely traverse that pedestrian access

point. The proposed 100-foot commercial loading zone is adjacent to a major pedestrian access point in the proposed project. The off-loading of freight in this area could cause major hazards to pedestrians using the sidewalk in this area. The DEIR is inadequate because it failed to analyze this potentially significant impact and provide mitigation measures to avoid or substantially reduce this impact.

The following mitigation measure is feasible and would mitigate this hazard to a less than significant level:

> **MITIGATION MEASURE.** All freight loading or unloading will be conducted in the underground garages provided in the proposed project/variant." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-15])*

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"In addition, increasing the traffic will make it more hazardous for a large number of seniors using walkers, as well as endanger mothers with baby carriages trying to cross these already very busy intersections." *(Judy Doane, Draft EIR Hearing Transcript, p. 30, December 13, 2018 [I-Doane-5])*

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"While there are many impact areas of the Draft Environmental Impact Report that should be challenged as the assumptions used are suspect, I will focus on one:

- **Cumulative Pedestrian Conditions (4.c.112)**

As an avid walker in San Francisco, I appreciate the effort to improve sidewalks and intersections. However improvements that are proposed will do nothing to enhance the pedestrian environment. For example the addition of a crosswalk at the eastern Mayfair/Laurel intersection will not fix today's problem that will only be worsened with the post project increased traffic. Today the crosswalk that runs north /south across the west side of Mayfair at Laurel is a death trap as people using Collins as a pass through routinely fail to stop at the intersection. Increased traffic volume will result in more injuries. The only reason that this crosswalk did not come up as dangerous is that today's residents know to pay attention. Who will warn the new residents of 3333 California?

Also the Euclid Avenue traffic circles have made pedestrian life a nightmare. Drivers cannot see across the traffic circle and are so busy trying to figure out how to navigate that pedestrians are ignored. Again, the assumption that the traffic calming will help with the increased traffic volume is fallacious.

The new bulb out on the NE corner of Euclid and Laurel has not made the intersection any safer. Drivers routinely turn right onto Laurel without coming to a full stop. The addition of one on the NW corner will not change the driving behavior. Again the increased traffic will not be mitigated by these bulb-outs." *(Linda S. Glick, Letter, January 6, 2019 [I-Glick2-4])*

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"The truck traffic and other construction traffic is a threat to pedestrian safety. The congestion will force cars onto nearby side streets, affecting the whole area." *(David Goldbrenner and Zhenya Fridlyand, Email, January 4, 2019 [I-Goldbrenner3-4])*

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"If double-parkers occurred at the intersection of Euclid and Laurel or farther east, there could be major collisions from being not only blinded by the sun but due to the trifurcation of Pine into Euclid, Presidio, and Masonic. This area is like an accident waiting to happen. I cross there as a pedestrian on the tiny little refuge islands and can get the breeze from cars "flying" by. The time

for the signal for pedestrians to cross on a fresh green is very short there. Vehicles do not see the signals well so they continue on their turns even on a red.

There could be major traffic hazards with a new retail on the Euclid corner which may take out people on the pedestrian islands or on the sidewalk. The retail on Euclid side should be taken out because people will spill out onto the dangerous part of the parcel putting them at risk for their safety. Rideshares will be taking up road space and on-street parking for pick-ups and drop-offs so there will be a lot of automobile delay especially with the heavy traffic from Pine (one-way westbound, Masonic (left turn westbound onto Euclid & right turn onto Euclid) and Euclid (from other cross-streets) are combined." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-14])*

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"Putting retail in the Euclid building and at the corner plaza where the Muni Express buses and commuters travel at a good clip around the Euclid-Masonic intersection at all hours but especially during the AM and PM peak hours with 3-lanes of one-way traffic from Pine heading westbound is compromising safety for everybody. I do not think this should be considered "LTS" if any sort of use allows people to linger about this area and on the corner of this steep hill area." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-23])*

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"This also applies to S.13 ***TR-7 & TR-8*** -- bike lane on Euclid at Masonic heading westbound & to downtown. This is not safe due to slope with multiple vehicular feeders in the area." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-25])*

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"NOTE: In Table 4.C.1 above, Number 10 states that the "Existing Traffic Control" is only a "Signal." This is *NOT* true. There is also an uncontrolled traffic lane going eastbound on Euclid to southbound on Masonic. Pedestrians can get killed here as many vehicles turn that corner near the traffic islands." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-38])*

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"Having more cars circulating in the area would also increase the chances also for pedestrian safety to be compromised. All of the traffic does not necessarily have to be directed into and around this project site if certain uses are curtailed." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-59])*

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"8. Pedestrian safety due to increased traffic" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-9])*

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"I had written Julie last summer with feedback/concerns about pedestrian safety near 3333 California project. I'm writing again because I'm concerned that I haven't heard our comments addressed -- at least not from what I've read in the report. It's possible I've missed it, as it's a long report! So apologies if so. But I didn't see pedestrian safety in the nearby streets as a known area of concern that was addressed, and what I did see mentioned that there was no impact." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-1])*

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"We specifically are worried about pedestrian safety in the area. We believe the conditions for pedestrian in this area to already be hazardous. It's important to note that this is NOT the fault of the developer or their proposal! But, given that improvements are to be made, and the project will increase the number of pedestrians, we think it's wrong that the following conclusion was drawn:

> "TR-7: The proposed project or project variant would not result in substantial overcrowding on public sidewalks, **create potentially hazardous conditions for pedestrians**, or otherwise interfere with pedestrian accessibility to the site and adjoining areas."

The project won't create worse conditions for pedestrians. However, the conditions *today* are hazardous, specifically at the top of Pine street at Presidio, the intersection of California and Presidio, and the intersection of Euclid/Masonic/Pine alongside the new development. I am regularly almost hit by cars flying through these intersections. Often with a stroller or dogs with me.

Some more specifics:

- (Study area 8) The intersection of Pine and Presidio is one of the most dangerous in the city for cars alone -- but even worse for pedestrians, who try to avoid it right now, as drivers coming up the hill cannot see before turning left. There is no cross walk on the other side, because it is dangerous, but no barriers and pedestrians regularly cross here still at risk of their lives. This project WILL increase the frequency of pedestrians crossing this intersection and something should be done to improve it. Study area 11 (Bush st) has similar problems but slightly different.

- (Study area 10) The intersection of Euclid/Pine/Masonic is equally hazardous for those crossing in various ways; pedestrians crossing from the complex are blocked from view by parked cars for cars coming up the hill at high speed -- who don't slow down, as the corner is today a yield. Will the project address safety there? This is a KEY walking route to Trader Joes, which the proposed project makes into an even bigger walking path. I've nearly been hit twice in the past two months. For example, the parking should be removed well back from the cross walk so cars have visibility, and it should have speed bumps at a minimum before the yield.

- (Study area 6) The intersection of California and Presidio is WAY too short of a light & cross-walk for pedestrians, and because of the three-way nature of the light is almost impossible to get across safely, as drivers who are not used to the three-way system regularly assume it is a normal 2-way, and turn when pedestrians have a cross walk (because the light is red). The traffic that doesn't stop turning right in front of the credit union through the turn lane is even more dangerous. This should be stop sign, if it isn't removed altogether (Julie Moore told me that the muni buses need it for turning radius). Or implement a 4-way walk with no cars, like exists downtown at very busy intersections. Notably, our son attends school at the JCC, so we along with many families are regularly crossing these intersections with small children. Elderly adults are in the facility next door, and I frequently have to help elderly individuals across the street; it's impossible to get across in time.

These study areas and the pedestrian characteristics were discussed in 4.C.21, but I explicitly do NOT feel like the concerns have been mitigated/addressed. It may not be the developers responsibility to fix them, but someone needs before for the project to make them substantially worse and someone dies!

The Vision Zero studied the areas that *currently* have high risk data for pedestrian injuries. I'm asserting that the pedestrian behavior will SHIFT because of the project, because there will be people living or walking to the new retail locations and pathways, and the intersections they will use are hugely dangerous. So even though they don't have a lot of traffic now, they WILL and it will be dangerous.

* I'll add that one of the high risk areas in Vision Zero is California St between Lyon and Scott; it's high risk because all of the mapping software now routes drivers this way to avoid California and Presidio. And so they come flying through a very residential neighborhood trying to get to

Bush or Pine. :( Wasn't a problem a decade ago." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-3])*

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"Additionally, I think ignoring California and Presidio because they're not part of the direct development is very naive if that's the city's perspective. These new residents will impact ALL nearby intersections with both cars and pedestrian volume, and these are some of the most dangerous intersections in San Francisco. So just because the fire union is it's own building, does not mean the impact should not be considered. I feel similarly about the intersection of Bush and Presidio, which also has incredibly high accident and pedestrian risk today.

I'd like to see the city take STRONG action in these neighboring streets & intersections to assure us as residents that our lives will not be put in danger by the increase in traffic, congestion, and pedestrians. Our families are at stake; we're not safe today, and this project WILL make our lives more at risk." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-7])*

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"My wife and I live at the top of Pine street with our two children, and we've been watching the proposed project at 3333 California with interest -- general support -- but concerns about pedestrian safety with the likely increase in traffic.

I know we missed the May 25th deadline for formal comments, but I'd like to understand what the project's sponsors and the city intends to do about our already very dangerous intersections at Pine & Presidio, California & Presidio, and California & Walnut. I've been nearly hit multiple times in each intersection, and witness near monthly crashes on Pine and Presidio, where the steep hill and timed fast lights prevent cars from fully seeing pedestrians and other traffic while gunning for the light or to turn into the cross walk. There is also no cross walk at present across Presidio to the proposed development." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-8])*

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"But. The current situation is already dangerous, and with the new garages, cars, and residents and businesses, the situation is poised to be disastrous.

Please please please tell me the city has plans to improve pedestrian safety in enormous ways. I'd love to review any such plans, or provide some constructive input as a local resident." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-10])*

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**RESPONSE TR-8: PEDESTRIAN/BICYCLE HAZARDS**

The comments state the following concerns: that the EIR has not fully described the existing conditions around JCCSF or adequately analyzed the negative impact of construction traffic on JCCSF operations; that the EIR analysis should evaluate sidewalk capacity, left-turn restrictions at the California Street/Walnut Street intersection, and the removal of the right-turn slip lane at the California Street/Presidio Avenue intersection; that conditions for pedestrians are already hazardous, particularly at the Pine Street/Presidio Avenue, California Street/Presidio Avenue, Bush Street/Presidio Avenue, and Euclid Avenue/Pine Street/Masonic Avenue intersections, and that the EIR should evaluate additional mitigation measures related to hazardous transportation conditions; and that the planned improvements – installation of a new crosswalk at the Mayfair Drive/Laurel

Street intersection and bulbouts at the Euclid Avenue/Laurel Street intersection – will not increase safety for people walking or mitigate effects of increased vehicle traffic at these locations.

Comments also state that the EIR did not adequately analyze the effect of loading/unloading activity in the proposed curbside loading zone on California Street and state that this would result in significant pedestrian impact. As a result, the comment proposes a mitigation measure to conduct all freight loading/unloading on site. Other concerns expressed are that provision of retail in the Euclid Building near the Euclid Avenue/Masonic Avenue intersection would create hazards for pedestrians, and that the westbound bike lane on Euclid Avenue is not safe. The comments state that study intersection 10 shown in Table 4.C.1 on EIR p. 4.C.4 is partially signal-controlled with an uncontrolled lane on Euclid Avenue to southbound Masonic Avenue.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Existing Conditions" starting on EIR p. 4.C.4; "Pedestrian Facilities and Circulation" starting on EIR p. 4.C.20; "Bicycle Facilities and Circulation" starting on EIR p. 4.C.22; "Passenger Loading starting on EIR p. 4.C.25; Impact TR-1 starting on EIR p. 4.C.68; Impact TR-7 starting on EIR p. 4.C.92; and Impact TR-8 starting on p. 4.C.94. The EIR concluded the proposed project or project variant would have less-than-significant construction-related impacts and less-than-significant impacts on pedestrian and bicycle safety and no mitigation measures would be required. CEQA does not require that a project mitigate existing conditions. The comments received on the draft EIR do not present evidence that the transportation analysis in the EIR was inadequate, that there would be any new significant impacts not identified in the EIR, or that there would be substantial increases in the severity of impacts identified in the EIR.

The existing traffic, transit, pedestrian, bicycle, loading and emergency access conditions on and around the project site, including conditions around the JCCSF, are described in Section 4.C, Transportation and Circulation, under the "Existing Conditions" subsection starting on EIR p. 4.C.4. This section describes the local roadway and transit facilities, pedestrian facilities and circulation, bicycle facilities and circulation, and freight and passenger loading conditions. The existing and baseline conditions analysis incorporates traffic counts collected at intersections within the study area that capture existing circulation patterns and account for current trip-making characteristics, such as use of side streets to avoid congestion, or adherence to software routing suggestions from mapping application such as Google Maps, Apple Maps, and Waze.

A detailed discussion of passenger loading activity observed at the JCCSF is provided in the passenger loading section beginning on EIR p. 4.C.25-4.C.26 and data are included in EIR Appendix D (starting on p. 219).

The project's potential construction-related transportation impacts are addressed under Impact TR-1 starting on EIR p. 4.C.68. A response to comments related to construction impacts is also provided in Response TR-6: Construction Impacts, on RTC p. 5.E.56. Comments regarding

identification of mitigation measures for hazardous transportation conditions are noted. However, the proposed project or project variant would have a less-than-significant impact on transportation as a result of construction and no mitigation measures would be required. Construction would be conducted in compliance with City requirements, as noted on EIR p. 4.C.71, such that they would not result in substantial interference with pedestrian, bicycle, transit, or vehicle circulation or result in potentially hazardous conditions for pedestrians, bicycles, transit, or vehicles. Construction-related activities for the proposed project or variant would have a less-than-significant impact on transportation and no mitigation measures would be required. However, Improvement Measure I-TR-1: Project Construction Updates (EIR p. 4.C.74) was identified to further reduce less-than-significant construction impacts to nearby residents, institutions, and businesses. This improvement measure could become a condition of approval and/or be included in the development agreement.

The project's potential pedestrian impacts are addressed under Impact TR-7 starting on EIR p. 4.C.92. The analysis of pedestrian impacts considers whether the addition of project-generated vehicle and pedestrian trips would have an impact on the pedestrian network proposed for the project site and whether the proposed project or project variant would create potentially hazardous conditions for pedestrians. The proposed project and project variant would generate walk trips directly to and from destinations and walk trips to and from transit stops. Weekday a.m. and p.m. peak hour walk trips for the proposed project and project variant are presented in Table 4.C.14 on EIR p. 4.C.58. California Street and Presidio and Masonic avenues would be the primary routes for pedestrians traveling from off-site locations to and from the project site.

As discussed on EIR p. 4.C.22, three street segments near the project site are identified as part of the City's Vision Zero High Injury Network: California Street between Lyon and Scott streets, Post Street between Lyon and Steiner streets, and Geary Boulevard between 31st Avenue and Steiner Street. Streetscape changes proposed by the project include proposed sidewalk widening along Masonic Avenue (from 10 to 15 feet), along Euclid Avenue (from 10.5 to 12 feet), and along Laurel Street (from 10 to 12 feet); and installation of corner bulb-outs at the southwest corner of the California Street/Laurel Street intersection, at the southwest and southeast corners of the California Street/Walnut Street intersection, and at the northeast corner of the Laurel Street/Euclid Avenue intersection. These modifications would increase the amount of sidewalk space available for people walking and waiting for transit.

While the proposed project and variant would increase the number of vehicle trips and pedestrian trips in the study area, the proposed project and variant would also improve conditions in areas that currently exhibit challenges for pedestrians (e.g., removal of channelized right turn lanes at the intersections of Presidio and Masonic avenues and at Masonic and Euclid avenues, which would slow vehicular traffic). As a result, the proposed project or variant would not create potentially hazardous conditions for pedestrians. As defined in the San Francisco Planning Department's *2019 TIA Guidelines*, for purposes of CEQA, hazards refer to traffic engineering aspects of a project

(e.g., speed, turning movements, complex designs, substantial distance between street crossings, sight lines) that may cause a greater risk of collisions that result in serious or fatal physical injury than a typical project. This analysis focuses on hazards that could reasonably stem from the project itself, beyond collisions that may result from non-engineering aspects or the transportation system as a whole.

Existing challenges for pedestrians, including the right-turn slip lane at California Street/Presidio Avenue, are discussed in the "Pedestrian Facilities and Circulation" subsection of EIR Section 4, Transportation and Circulation (EIR pp. 4.C.20-4.C.22). The possibility of removing the channelized right-turn lane at California Street/Presidio Avenue was explored; however, the presence of Muni overhead wires and the use of the turn by buses rendered that option infeasible. An existing pedestrian issue is not a significant environmental impact of the proposed project. The proposed project or variant would not decrease pedestrian visibility or increase the speed of vehicular movements for vehicles turning from California Street to southbound Presidio Avenue. Furthermore, the proposed project would not increase the number of pedestrian crossings or vehicle movements at this location such that a potentially hazardous condition would result. Therefore, the proposed project or project variant would not result in a significant impact to pedestrians.

As shown in Table 4.C.16, on EIR p. 4.C.61, the proposed project and project variant are estimated to result in a demand for about five freight loading spaces during the average hour and about six freight loading spaces during the peak hour of loading activity. The proposed commercial loading program is discussed on EIR pp. 4.C.42-4.C.44, and the freight loading impact analysis is presented under Impact TR-9 on EIR pp. 4.C.96-4.C.98. As stated, all freight loading activity from the proposed project or project variant could be accommodated on site through provision of six off-street commercial loading spaces. Upon review of the site plan and location of proposed freight loading docks, SFMTA requested the addition of one on-street commercial loading zone on California Street to meet localized demand for deliveries generated by the retail uses concentrated along this frontage and minimize potential for delivery vehicles to double-park. As a result, in addition to the six off-street commercial loading spaces, the proposed project and variant would provide one 100-foot-long on-street commercial (yellow curb) loading zone on the south side of California Street east of Laurel Street.

Deliveries would occur throughout the day and would not be concentrated during peak hours of activity, thereby minimizing the potential for loading conflicts with traffic, transit, bicyclists, and pedestrians on the surrounding street network. There would be adequate space for circulation on the California Street sidewalk and within the California Street plaza at the corner of Laurel and California streets in the ground-floor setback associated with the proposed retail in the Plaza A Building for people walking to/from the site and people loading/unloading goods. People walking would have access to the site and its open space via the proposed Cypress Stairs between the Plaza A and B buildings on the south side of California Street adjacent to the proposed loading zone via

entrances to the Plaza A and B buildings themselves. As such, the loading/unloading of goods from the on-street commercial loading zone would not cause potentially hazardous conditions to pedestrians using the sidewalk in this area. The provision of an adequate supply of on-street commercial loading spaces, in addition to the six off-street commercial loading, would minimize conflicts associated with double-parked vehicles when commercial loading zones are located relatively close to the businesses receiving deliveries. The design and placement of color curb modifications has been reviewed by SFMTA and their input has been incorporated into the proposed project. The proposed project or project variant would not result in a pedestrian impact and no mitigation measures related to the location of freight loading are warranted, unlike as proposed by the commenters.

Proposed streetscape modifications are detailed on EIR pp. 4.C.39-4.C.41 and illustrated in Figures 2.28a and 2.28b in Chapter 2, Project Description on EIR pp. 2.80-2.82. The intersection operations analysis conducted at locations where streetscape modifications were proposed is documented in the Streetscape Changes Operations Analysis Memorandum. As demonstrated by the analysis, the transportation network would accommodate the increase in traffic volumes generated by the proposed project and project variant with minimal increases in intersection delay and queue lengths. As documented on EIR p. 4.C.83, the addition of the corner bulbout at Euclid Avenue/Laurel Street and installation of corner bulbout and eastside crosswalk at Mayfair Drive/Laurel Street would increase pedestrian visibility, shorten the crossing distance and exposure to traffic for people walking, slow vehicle traffic, and improve sight distance for drivers.

As described on EIR p. 2.7, the Euclid Building would have limited ground-floor retail space fronting the south end of the proposed Walnut Walk near the intersection of Masonic and Euclid avenues and would not attract a substantial number of pedestrians who would use nearby sidewalks and crosswalks. Pedestrian access to the site in this location would be provided at the intersection of Masonic and Euclid avenues at the southern terminus of Walnut Walk (the proposed Corner Plaza). As described on EIR p. 2.80 and above, the proposed project would reconfigure the west curb line on Masonic Avenue at its intersection with Euclid Avenue (see Figure 2.28b: Existing Streetscape and Proposed Streetscape Changes – Masonic Avenue on EIR p. 2.82) to remove the right-most travel lane for southbound traffic on Masonic Avenue merging onto Euclid Avenue to regularize the intersection of Masonic and Euclid avenues by eliminating the slip lane. The existing triangular-shaped pedestrian island would be incorporated into an approximately 4,000-square-foot open space (Corner Plaza) that would be integrated with the southern end of the proposed Walnut Walk. The proposed streetscape changes would not create potentially hazardous conditions for people walking.

The existing bicycle conditions around the project site, including the existing bike lanes on Euclid Avenue, are described in the “Bicycle Facilities and Circulation” subsection of EIR Section 4, Transportation and Circulation (EIR pp. 4.C.22-4.C.24). As described in this subsection, a class II

facility (bike lanes) exists on Euclid Avenue from Arguello Boulevard to Masonic Avenue. The facility continues as a class III bike route for one block to connect with Presidio Avenue. As noted in the "Bicycle Network Baseline" subsection on EIR p. 4.C.30, the Laurel Heights/Jordan Park Traffic Calming Project was completed in March 2018 and included restriping Euclid Avenue between Arguello Boulevard and Masonic Avenue and installing a two-foot buffer for the existing bike lane. The proposed project would reconfigure the west curb lane on Masonic Avenue at its intersection with Euclid Avenue (see Figure 2.28b: Existing Streetscape and Proposed Streetscape Changes – Masonic Avenue) to remove the right-most travel lane for southbound traffic on Masonic Avenue merging onto Euclid Avenue. This proposed modification would slow right-turning vehicles and eliminate the existing bike-vehicle conflict zone west of the Euclid/Masonic avenues intersection, creating safer conditions for people biking in the westbound bicycle lane on Euclid Avenue.

As shown in Table 4.C.1 (EIR p. 4.C.4), study intersection number 10 (Euclid/Masonic) is signal controlled. However, as the comment noted, the intersection also has channelized free right-turn lanes. The existing condition was accounted for in the transportation analysis. Existing challenges for pedestrians, including the right-turn slip lane at Euclid/Masonic avenues, are discussed in the "Pedestrian Facilities and Circulation" subsection of EIR Section 4, Transportation and Circulation (EIR pp. 4.C.20-4.C.22). An existing pedestrian issue is not a significant environmental impact of the proposed project. The proposed project or variant would not decrease pedestrian visibility or increase the speed of vehicular movements for vehicles using this channelized free right-turn lane, turning from southbound Masonic Avenue to westbound Euclid Avenue. Furthermore, the project variant, with its 109 net new a.m. peak hour and 37 net new p.m. peak hour vehicle trips (including TNCs) turning from southbound Masonic Avenue to westbound Euclid Avenue, would not substantially increase the number of vehicle movements at this location such that a potentially hazardous condition would result. The proposed project would generate fewer vehicle trips than the project variant. Therefore, the proposed project or project variant would not result in a significant impact to pedestrians and no mitigation measure would be required.

The comments do not present evidence of new significant environmental impacts related to pedestrian or bicycle hazards that are not identified in the EIR, and no new mitigation measures would be necessary.

In addition, the proposed project and project variant have been revised since the publication of the EIR. The retail program has been amended (see RTC Section 2, Revisions and Clarifications to the Proposed Project) and retail is no longer proposed as part of the Euclid Building program. In addition, the project revisions include reductions in retail square footage in other buildings along California Street, a reduction in the number of parking spaces, and reconfiguration of the proposed commercial loading space on California street, as well as changes to the size of open spaces among other changes. Instead of the 100-foot long commercial loading space on the south side of

California street west of Walnut Street, a 60-foot long loading space would be implemented on the south side of California Street west of Walnut Street and a 40-foot loading space would be provided on the south side of California Street east of Walnut Street. These project changes do not alter the analysis or conclusions of the EIR.

## COMMENT TR-9: TRANSIT IMPACTS

"c. Transit - The TIS should consider the need for bus bulbs to handle Project-related transit ridership." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017 [O-JCCSF3-7])*

"**2. Walnut Street Drive-Through Conflict with the Jackson MUNI line**

The JCCSF has a parent drive-through area that enters the JCCSF property on Walnut Street and exits onto California Street (just west of the JCCSF garage entrance}. This drive-through is used by parents to drop off their preschoolers in the morning and pick them up in the afternoon. At peak times (i.e., weekday mornings and late afternoons} the line of cars waiting to enter this area will back up and wrap around onto California Street, blocking the drive-through exit. Space is at a premium at this Walnut/California intersection, given that MUNI's Jackson line heads west on California and then turns north onto Walnut (the buses have little room to maneuver around the cars, as they run on overhead electric lines, and the lines of cars and buses then interfere with each other). Recently, we contacted SFMTA to start to find solutions to this problem. We would like to make sure that the traffic studies for the proposed projects take this concern into account and closely examine the space premium issues at the Walnut/California intersection in order to devise appropriate mitigations in light of the likely increase in traffic at this intersection from cars entering and exiting the 3333 project on Walnut Street." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 3, 2016 [O-JCCSF4-4])*

"This is kind of nestled between Sacramento and California, but we're also a couple blocks away from Geary Boulevard. For people like me who are going to continuously advocate for a Muni expansion, either below ground – I'm a big fan of the 15 feet above ground. It's a much easier and less expensive way to do light rail service across San Francisco. I realize we're not there yet, and it's really tough for a lot of people to kind of envision what that would look like. I plan on riding that subway, that Muni line at some point in my life right now on Geary Boulevard. And this will literally be about a block and-a-half away, and folks will be able to get downtown, and it's all kind of part of the longer vision of everything that we're going for." *(Cory Smith, San Francisco Housing Action Coalition, Draft EIR Hearing Transcript, p. 68, December 13, 2018 [O-SFHAC-2])*

"Page S.12: Unsure that a new Muni line would mitigate much of the traffic or loading demand on buses when many use the rideshares. Muni ridership has declined. Perhaps more people in this area take rideshare. This means more VMTs in the area than other areas where more ridership exists on Muni. There are many lines that go by the 3333 California site but do not stop there (e.g. 38BX, 38AX, NX, etc.). These existing lines use Masonic to get to Bush to get downtown. Again, with other transportation modes available such as scooters, bikes, rideshares such as Uber, Lyft, Chariot, not sure how this will mitigate the impact of ridership on Muni. Will there be a 43-

Masonic line ridership survey to see where they are all going first? Also, if there is less ridership on Muni overall, why not find out where the ride-hailing companies are taking their passengers and from what point to what point before putting in things that may not make any difference? Will such data be analyzed and shared with the public?

This S.12 mitigation proposal appears to be conflict with C-TR-10 on Page S.17 that says the "project will not contribute…passenger loading impact." If there is no loading impact, again, it does not make sense to run more buses or run a new Muni line. Also, without knowing if all the future residents and users of the site will be taking Muni or using alternate forms of transportation which are now in use since 2009 when the study was done, not clear why this is also labeled "Not required" and "N/A" just like C-CR-1 (above). And if all the future visitors and residents to the site will be taking rideshare or driving – as the statistics for automobile use in the city is still fairly high with Muni ridership declining, it makes less sense to add to the 43-Masonic line or increase the frequency. Just because there are more buses being run on a line does not mean that is the basis to say the demand is there. There is already the 2-Clement line, the 1-California line and the 43-Masonic at the location. The 38-Geary is only up to 2 blocks away. Anybody west of these locations generally takes the 33-Stanyan, 44-O'shaugnessy, 28-19th Avenue or 29-Sunset lines to go in the north-south direction.

Page S.12 (***see also TR-4*** comments): The "fair share" contribution is listed not to exceed these amounts:

Proposed Project – $182,227

Project Variant – $218,390"

However, due to the project taking at minimum 5-7 years to be completely built out or as described from the DEIR up to 15 years, these figures would be too low as the cost in future of the Muni operation and purchases increase. There should be a clause in the developer agreement to ensure that the project pays for *future increases in cost* to mitigate the traffic impacts to the value of the cost of the bus with projected cost of a bus in the future. The *$182,000-$218,000 is low to mitigate impacts* of the transit ridership by full development of this project.

TR-4 (***see also S-12*** comments): "The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a.m. peak hour under baseline conditions."

"Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity Based on an evaluation of the transit ridership generated by the proposed project or project variant, monitoring of transit capacity utilization for the 43 Masonic line shall be initiated when the first phase of development has been completed and occupied."

Where are the extra 3 people mentioned in the DEIR triggering the need to purchase another bus at today's cost of $940,000+ coming and going to? Why not find out where most of the 43-Masonic line riders are going to and from? Why is there not an estimation of the need for any 43 Masonic buses for the entire development completion with the purchase price of the bus being paid for those as well including estimated bus purchase cost at end of the development? Otherwise, the taxpayers end up paying for supporting Muni via more ridership fare increases and such. A developer who works in partnership with the city should pay for the additional infrastructure costs into the future if his/her development is going to be delayed for many years. Otherwise, it's cheaper to put the entire development in at the current costs of infrastructure or it will cost a lot more to the taxpayers and Muni riders in the form of fare increases. If the Muni fare increases are equivalent to the rideshare modes, there will be even more VMTs as San Francisco is more and more dependent on rideshares especially as fares increase for the municipal

bus system (Muni) and travel times increase as more vehicles clog the streets to increase travel time causing major delays so all modes get bogged down and people sit in vehicles and pollute at lower RPMs." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-17])*

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"There's a comment (Page 523) that states in ***today's*** dollar value:

"Cost of a 40-foot electric bus is $967,132"

The fair-share contribution to even add one bus is not going to be covered per the amounts shown on Page S.12 above because in the future, the bus would cost more. How was this figure calculated? If the project takes years to complete, there should be a figure that would purchase however number of buses to mitigate the impact of not having sufficient number of buses as a result of this project due to the impact to the community in the surrounding area, no?

The trigger for the needed 43-Masonic line is explained as being due to the 3 additional riders on that line. Where are these people on this line going to that it is so heavily skewed to the *northbound* 43-Masonic trips in the AM Peak Hour?

Page 248 shows 43-Masonic ridership NORTHbound & Southbound as below:

*(See Comment Letter I-Hillson2, p. 9, in RTC Attachment B for the Directional Muni Line Analysis table for existing and existing plus project conditions that accompanies this excerpted comment.)*

Is the same model used for transportation VMTs used for calculating impact or needs for Muni? What is the margin of error to calculate the need for Muni considering the focus is on the 43-Masonic line which is at the boundary of the Census Block or Transportation Analysis Zone (TAZ)? Has any analysis been made as to whether the riders using the 43-Masonic are going across town or milling about just to travel a few blocks to the City Center on Masonic for a cup of coffee? Would it not be more accurate to find out where the riders are going? What about the impacts to the 1-California or the 2-Clement?

Page S.13: "TR-6: The proposed project or project variant would not cause significant impacts on regional transit." ("LTS" & the mitigation = "None required")

When the streets in the area get jammed with more vehicles in the area along with potential new bus line or more Muni buses as stated in this DEIR, more road space is taken up and everybody will be waiting, including the Golden Gate Transit buses on Geary that go to Marin County. How is this analyzed in the DEIR?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-20])*

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"Based on the 12,000+ VMT for the project and with all the retail and office space being proposed, there is likely to be delays for transit as more conflicts at the intersections would arise by cutting new streets through the historic property site. There will be automobile delay to the point of gridlock in some areas." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-22])*

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"9. Effects of projected growth on transit infrastructure" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-10])*

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"MUNI is not able at this time to guarantee that enough buses will be supplied to take the load of 1,000 residents suddenly appearing in the Laurel Heights area." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-8])*

"The EIR Intersection Operations Analysis (Page 9,Task 7.2) has focused on transit timing on California Street. To say that Applicant's Proposed Project will have little or no impact on transit and traffic flow on all surrounding streets, simply is NOT true. As it is currently during the commute, Masonic Avenue is solid cars between Presidio and Euclid during evening commute hours and that is with the right most lane on Presidio with the additional lane to Euclid; both of which are to be removed as part of Applicant's Proposed Project. As it is currently, for every southbound vehicle that stops on Presidio at the Presidio/Pine/Masonic light, three now utilize the right most lane up to Masonic or Euclid. That means that if 3 to 5 cars stop for the traffic light, 9 have driven up Masonic and no are longer sitting waiting to turn right at the light. But, if you eliminate that right most lane, those cars will have to wait for the light to change and back up to the SFFD Credit Union Building at Presidio and California. Additionally, Muni buses have a shift change and buses are coming off California onto Presidio Avenue; add one or two buses and traffic on Presidio will back up to California. The impact for anyone familiar with these intersections is clear. I just have to look out the window. The idea that you can add three total ingress/egress active driveways on Presidio next to the SFFD Credit Union ingress/egress garage driveway and then do the same on Masonic and, not overload all the surrounding streets as the Applicant's Proposed Project does by using criteria from other sites without understanding these major thoroughfares, will be disastrous. You could end up backing traffic all the way down to the financial district." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-6])*

**RESPONSE TR-9: TRANSIT IMPACTS**

The comments state that the residents and visitors of the proposed project would use transit service along Geary Boulevard and that the EIR analysis should consider the need for bus bulbs to handle the addition of project-related ridership to project-corridor transit lines and evaluate different intersection design configurations at the California Street/Presidio Avenue intersection to increase visibility of pedestrians when buses are stopped curbside. The comments state that the EIR analysis should evaluate TNC impacts on Muni ridership and consider transit surveys to understand passenger origin-destination patterns. The comments seek clarification on how the regional transit analysis was conducted for the EIR. The comments state that the transit service frequency does not correctly reflect demand for transit and the fair share contribution identified in the transit impact mitigation (Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity, EIR pp. 4.C.87-4.C.88) should take into account future increases in the cost of improving the capacity of the 43 Masonic route. The comments state that the proposed streetscape modifications – removal of the right turn slip lane at the Presidio Avenue/Pine Street/Masonic Avenue intersection – would create queue spillback onto California Street potentially causing delay for the transit service on Masonic Avenue.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Transit Facilities" starting on EIR p. 4.C.8; "Transit Network Baseline" starting on EIR p. 4.C.28; Impact TR-4 starting on EIR p. 4.C.83; and EIR Appendix D, Transportation and Circulation. The EIR concluded that the proposed project or project variant would have a less-than-significant impact on transit delay, but a significant and unavoidable impact on transit capacity on

the 43 Masonic line even with mitigation. The comments received on the EIR do not present evidence that the transportation analysis in the Draft EIR was inadequate, that there would be any new significant impacts related to transit not identified in the EIR, or that a substantial increase in the severity of impacts identified in the EIR would occur.

The proposed project's or project variant's potential transit impacts, including transit trip distribution, transit ridership and capacity, and transit delay, are addressed under Impact TR-4 starting on EIR p. 4.C.83. Per the *2002 SF Guidelines* methodology, the project-generated transit trips would follow the geographic trip distribution patterns throughout San Francisco and the region (see Table 4.C.13 on EIR p. 4.C.57). Transit trips generated by the project were assigned to individual transit routes, including routes along Geary Boulevard, based on the likely origins and destinations of the trips and the headways and available capacity on each route. The service frequency, or headway, is taken into account for transit route assignment because people are known to value reduction in wait time higher than shorter travel time. Therefore, because buses that arrive more frequently would reduce passenger wait times and have increased ridership capacity, they are more likely to pick up passengers with a destination along that route.

The ridership analysis is based on the travel demand estimates which consider mode split, including TNC mode share. As discussed in RTC Section 4, Master Response – Transportation and Circulation, in subsection B.3, Trip Generation Estimates, under the subheading "Trip Generation Comparison – 2002 SF Guidelines and 2019 TIA Guidelines Update" on RTC pp. 4.4-4.8 the planning department was in the process of updating the *2002 SF Guidelines* while the transportation analysis was being conducted for the draft EIR. The update to the *2002 SF Guidelines* – the "Transportation Impact Analysis Guidelines" – was published on February 14, 2019. The updated methodology applies person trip rates, accounting for size and type of land use, to estimate the number of project-generated person trips. The trip generation rates and mode splits in the updated methodology were developed based on data collected in spring 2017 at 65 typical office, retail, residential, and hotel sites throughout San Francisco. Travel demand estimates were developed using the updated methodology and a trip generation comparison was prepared for the proposed project and project variant. As shown in RTC Table 4.1, Weekday P.M. Peak Hour Person-Trip Generation Comparison on RTC p. 4.6 of the RTC Section 4, Master Response – Transportation and Circulation, in subsection B.3, Trip Generation Estimates, and discussed under the subheading "Trip Generation Comparison – 2002 SF Guidelines and 2019 TIA Guidelines Update,", while the TNC mode share would be about 1 or 2 percentage points higher at 5 percent, the transit mode share would be about the same at 13 percent or 14 percent.

As presented in the subsection "Significance Thresholds" on EIR p. 4.C.37, a project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant

adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour. For screenlines that already operate above the utilization standard during the peak hour, a project would have a significant effect on the transit provider if project-related transit trips were more than 5 percent of total transit trips during the peak hour.

The proposed project or variant would not generate 12,000+ VMT (assumed to mean vehicle trips rather than vehicle miles traveled) as claimed in the comments. The proposed project would generate 6,656 daily vehicle trips and the project variant would generate 6,752 daily vehicle trips. As described below, the project-related and variant-related vehicle trips were assigned to the transportation network in the project vicinity as part of the analysis to determine transit delay as well as traffic hazards. The daily vehicle trips calculations are publicly available as part of the AB 900 application for transportation efficiency and are posted on the website for the Governor's Office of Planning and Research: http://opr.ca.gov/docs/20190204-AB900_3333_California_Street_Transportation_Assessment_Final.pdf.

The local and regional transit analysis in the EIR does consider whether the addition of vehicle trips generated by the proposed project or project variant would have an impact on the transit system. The assessment of potential impacts on transit operations focuses on whether vehicles entering/exiting the project site and queues from the project driveways would affect operations of Muni lines on the surrounding street network. The transit delay assessment addresses whether added project traffic could affect transit routes such as the 1 California, 2 Clement, and 3 Jackson on California Street and the 43 Masonic on Presidio Avenue by causing transit delays due to intersection congestion or due to queues of vehicle traffic at intersections and/or at entrances to the proposed garages. The transit delay assessment utilizes the a.m. and p.m. peak hour vehicle trip generation shown in Table 4.C.14 on EIR p. 4.C.58. As shown in Table 4.C.14, the proposed project would generate 691 and 752 vehicle trips during the weekday a.m. and p.m. peak hours, respectively. The project variant would generate 726 and 804 vehicle trips during the weekday a.m. and p.m. peak hours, respectively.

Due to the expected increase in vehicle traffic along Presidio Avenue and California Street, as well as proposed streetscape modifications, potential impacts on Presidio Bus Yard operations were analyzed and localized transit impacts were evaluated at California Street/Presidio Avenue, California Street/Walnut Street, and California Street/Laurel Street (intersections for streets with transit service). The Presidio Bus Yard occupies the block bounded by Geary Boulevard, Masonic, Euclid, and Presidio avenues with several bus entrances on Presidio Avenue. The analysis is summarized in the Travel Demand Memorandum (see EIR Appendix D, pp. 39-44). Based on the findings of the analysis, the project-related increase in traffic volumes would result in less than a

two-second increase in intersection average delay[6] and an increase of less than five seconds on any intersection approach. Additional discussion of the potential for project-generated traffic to result in queues and conflicts with existing traffic and transit operations is provided under Impact TR-3 starting on EIR p. 4.C.81. Based on the analyses, the proposed project and project variant would not result in substantial transit delays, and the proposed project or project variant would result in a less-than-significant transit impact related to transit delay. The analysis and these findings were reviewed by SFMTA staff.

Initial streetscape modifications considered for the project by the project sponsor included the removal of the free right turn at California Street/Presidio Avenue (also known as a slip lane). This geometric modification, if implemented, would slow turning vehicles and increased space and visibility for pedestrians at the southwest corner of the intersection of California Street/Presidio Avenue. However, the streetscape modification was determined to be infeasible due to the presence of overhead wires and heavy turning movements from in-service Muni vehicles as well as buses heading to the Presidio Bus Yard. The project would not result in a significant impact related to pedestrian safety or traffic hazards at this location. The limitations to pedestrian visibility when buses are stopped curbside is an existing condition, and, as such, evaluation of other intersection design configurations at the California Street/Presidio Avenue intersection to mitigate this condition is not required under CEQA.

The transit analysis also considers the impact of additional transit riders generated by the proposed project or project variant using local and regional screenlines and directional Muni line analysis. As discussed in Section 4.C, Transportation and Circulation, in the "Existing Conditions" subsection under "Transit Facilities," on EIR pp. 4.C.8-4.C.20, the impacts on local and regional transit service were assessed by comparing the projected ridership from the proposed project or project variant with the available transit capacity at the maximum load point of various transit corridors. Capacity utilization for the weekday a.m. and weekday p.m. peak periods was determined at the maximum load point for each route serving the study area. Capacity utilization relates the number of passengers per transit vehicle to the design capacity of the vehicle. For the local screenline analysis, Muni has established a capacity utilization standard of 85 percent, and for the regional screenline analysis, regional operators have established a capacity utilization standard of 100 percent. These capacity utilization standards were applied to the weekday a.m. and weekday p.m. weekday conditions analyzed.

Contrary to the comment that the Mitigation Measure M-TR-4 conflicts with Impact TR-10 on EIR p. S.17, the project's passenger loading demand is not related to the transit impact. As shown in Table 4.C.20 on EIR p. 4.C.85-4.C.86, with the addition of transit trips generated by the proposed

[6] Intersection average delay is computed as a weighted average of the average control delay for all lane groups based on the amount of volume within each lane group and represents the average delay per vehicle at the intersection.

project or project variant, the 43 Masonic would exceed Muni's capacity utilization standard of 85 percent during the weekday a.m. peak hour. Thus, the proposed project or the project variant would result in a significant impact. The addition of three riders would cause the 43 Masonic to exceed Muni's capacity utilization standard and the proposed project or project variant would add 13 riders or 15 riders to the line during the weekday a.m. peak hour. This increase in transit demand could not be accommodated by adjacent transit capacity, given the 43 Masonic is the only transit line within one half of a mile that serves the northbound destinations for the assumed distribution of project trips. Per the 2002 *SF Guidelines* methodology, the project-generated transit trips would follow the geographic trip distribution patterns throughout San Francisco and the region (see Table 4.C.13 on EIR p. 4.C.57). Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity (EIR pp. 4.C.87-4.C.88) was identified as a mechanism to monitor project-related impacts on the 43 Masonic route and to develop transit route improvements that would reduce impacts, as feasible, to the 43 Masonic transit headways. The fair share contribution calculation is presented in EIR Appendix D (see p. 253) and assumes rolling stock cost provided by SFMTA. As noted on EIR pp. 4.C.87-4.C.88, SFMTA would determine whether adding buses or other measures, including installing bus bulbs, would be more desirable to increase capacity along the route and would use the funds to implement the most desirable measure.

To clarify the fair share contribution information in Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity, a new sentence has been added after the two bullets in the third paragraph of the mitigation measure on EIR p. 4.C.87 (new text is shown in <u>double-underline</u>):

> The fair share contribution as documented in EIR Appendix D shall not exceed the following amounts across all phases. Payment of the following fair share contribution levels would mitigate the impacts of the estimated transit ridership added by full development of the proposed project or project variant.
>
> - Proposed Project – $182,227
> - Project Variant – $218,390
>
> <u>These amounts shall be increased by consumer price index per year plus a one-time escalation of 0.5 percent.</u>

The project sponsor has agreed to implement the mitigation measure as revised. The comments about transit impacts do not present evidence that there would be any new significant impacts not already identified in the EIR, that there would be a substantial increase in the severity of any significant impacts identified in the EIR, or that new mitigation measures are necessary, and the clarification to the text of the mitigation measure does not constitute a considerable change.

## COMMENT TR-10: LOADING

**"CALIFORNIA STREET COMMERCIAL LOADING ZONE**

There is no more enduring or objectionable environmental impact from this Project than the creation of a commercial loading zone outside our doors.

The City (or the Developer) has proposed a 100-foot commercial loading zone instead of passenger loading or car parking on most of the parking lane on the eastbound side of our block.

In every meeting with the Developer over the past several years, the Developer asserted that the Project would require that all commercial loading would be underground, and advised that subterranean facilities for these purposes would be part of their Project. That assurance from the Developer relieved our concerns about the potential for commercial loading in front of our homes, so we were frankly shocked when the proposed Project description provided for commercial loading directly across the street from us.

There was originally no need to find measures to mitigate the significant and adverse environmental impact of commercial loading in front of our homes. The Developer has already proposed that all commercial loading would be underground. If the City has some rationale for a commercial loading zone on California Street, it should at least mitigate its impact by creating it across from the existing commercial uses between Walnut and Presidio, away from existing residences and the already problematic intersection of Laurel and California." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-12])*

"The proposed imposition of a commercial loading zone on the street side of California Street, rather than putting construction staging and construction loading and commercial loading within the confines of the project is unacceptable, an intrusion, and taking of existing property interests." *(Joseph J. Catalano, California Street Homeowners Group, Draft EIR Hearing Transcript, p. 62, December 13, 2018 [O-CSHG2-4])*

"3. Project traffic impacts on the JCCSF accounting for the fact that many of the core JCCSF users are families with small children who require safety restraints in their cars, and consequently require extra timing loading and unloading children from cars in the JCCSF loading zone and in the preschool pick-up and drop-off zone. It is the JCCSF's observation that families with young children have been slow to adapt to ride share or public transit.

4. Impacts on California Street and Walnut Street traffic from the Project's proposed: commercial loading spaces; residential move-in and move-out use of on street parking spaces; two bus stops on California; Walnut street bulb-out." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017 [O-JCCSF3-3])*

"a. Passenger Loading - The TIS should evaluate passenger loading needs on California Street to minimize potential effects on JCCSF passenger loading and Muni service. The site plan includes mixed use office, retail, and childcare facilities along California Street east of Walnut Street. These uses are likely to generate demand for passenger loading and commercial loading activities. However, the NOP states that the Project will include three

passenger loading zones (Masonic Avenue, Euclid Avenue, and Laurel Street) and two commercial zones (both near the Laurel/California intersection) but does not include (or mention) any spaces on California Street near the JCCSF. The TIS should quantify passenger loading (including Transportation Network Companies) and commercial loading demand, and identify an appropriate amount of curb space on California Street to ensure minimization of spillover that could affect JCCSF operations." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017 [O-JCCSF3-5])*

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"The Developers Destructive Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-20])*

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"There is a commercial loading zone being proposed directly across the street from our neighborhood which will create noise and disruption. The Draft EIR's mitigation is to restrict loading to before 7AM and after 7PM, which is even more disruptive to the quiet enjoyment of our homes. Since the Developers have included provisions for all commercial loading to take place underground, there is no justification for the significant adverse impact street side commercial loading would create." *(David Bercovich, Email, January 7, 2019 [I-Bercovich-5])*

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"The Draft EIR fails to address the deleterious effect of freight loading on a currently entirely residential street." (California between Laurel and Walnut)" *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-4])*

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"The DEIR indicates that the Transportation Demand Program measures supplied for the proposed project/variant, subject to refinement during the planning review process for project entitlements, would include delivery supportive amenities. TDM Measure Delivery-1 states that an area for the receipt and temporary storage of package deliveries would be provided in the offstreet loading areas or other locations on the project site. DEIR p. 2.79. Please describe in detail the potential other locations on the project site that could be provided for these delivery supportive amenities and how they would operate." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-23])*

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"I am opposed to the increased delivery traffic on Presidio ave." *(Sharon Esker, Email, January 5, 2019 [I-Esker-5])*

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**"The Community Full Preservation Alternative Keeps the Loading and Unloading Traffic Within the Site as Opposed to External to the Site**

The Developers Destructive Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that

occurs for deliveries and drop-offs. A perfect storm!" *(Richard Frisbie, Letter, January 8, 2019 [I-FrisbieR1-19] and Tina Kwok, Letter, January 7, 2019 [I-Kwok4-25])*

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"The Developers Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs." *(Mary Gwynn, Email, January 7, 2019 [I-Gwynn-8])*

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"S.14: "TR-9: The proposed project's or project variant's freight loading demand would be met during the peak loading hour." ("LTS")

One of the mitigation measures states:

"Requiring deliveries to the retail and restaurant components of the proposed project or project variant to occur during early morning or late evening hours."

If any more trucks are going to weave through the Laurel Heights & Jordan Park neighborhoods during the wee morning hours or late evening, the community will not be able to get quiet enjoyment of their properties.

"Delivery to the retail and restaurant components" of the project is unclear as to when these would occur. Please clarify. Restaurants usually are open late. They would already have deliveries late. Most deliveries should be done on OFF-PEAK, *NON*-WEE-HOURS to not create a nuisance to the neighborhoods.

The DEIR mentions:

"Installing delivery supportive amenities such as lock boxes and unassisted delivery systems to allow delivery personnel access and enable off-peak hour deliveries"

If this is going to create *"Amazon-like" lockers* (package delivery lockers for mail orders) to be accessed 24/7, there will be a huge impact to more VMTs and other CEQA impacts to the neighborhood that would not ordinarily exist if restricted to when any retail is open for business. Also, should such locations ("Delivery Supportive Amenities," Page 246, "TDM") be identified on the site, they should be kept on the commercial corridor rather than on the Euclid side which is residential in nature." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-21])*

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"The statements in this part seem as if they should be in the freight-loading section of the study -- C-TR-9, Page S.17 – as well. If one looks at it, it also says, "Not required" and "N/A."" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-28])*

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"The Developers Proposal surrounds 3333 California with five major Loading/unloading zones for personnel pick-ups and loading. The Developers started by promising that all commercial loading would be done underground or on-site. Now the site is ringed with loading zones. These zones eliminate many parking spaces and create additional traffic congestion and pollution. Simply put, the traffic flow and the parking impacts do not seem to have been considered in a systematic fashion." *(Phillip Paul, Email, January 7, 2019 [I-Paul-8])*

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"The Developers Destructive Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs." *(Laura Rubinstein, Email, January 2, 2019 [I-Rubinstein-16])*

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"The other two things that are unique to our concerns that were not addressed in the EIR is the fact that the developers are proposing a commercial loading directly across the street from where these hundred people live and, all along, again, in discussions with the developer, they asserted that all commercial loading would be underground. Again, when we read the draft EIR, we were shocked to find that. And that loading zone would be there after the project is over. So this is not a temporary thing. There was a mitigation suggested in the EIR which we think is not viable. They suggested, because of the traffic impact of commercial loading, that the loading happen before 7:00 a.m. and after 7:00 p.m. Well, if you're one of the hundred people that live across the street, that makes absolutely no sense. And I think what was ignored were the hundred-plus people across the street when you're considering a commercial loading zone." *(Joan Varrone, Draft EIR Hearing Transcript, pp. 71-72, December 13, 2018 [I-Varrone-3])*

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**RESPONSE TR-10: LOADING**

The comments state that the provision of a commercial loading zone and temporary provision of construction staging along the south side of California Street is unacceptable and would adversely affect residents in the neighborhood. The comments state that loading for the project was initially proposed to occur on site and provision of on-street commercial and passenger loading would create additional traffic congestion and disruption. The comments state that passenger loading/unloading at the JCCSF could be impacted by project traffic and the EIR should evaluate passenger loading needs on California Street to minimize potential effects on JCCSF passenger loading and transit operations. The comments request a detailed description of provision of delivery supportive amenities[7] and how they would operate.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Transportation Demand Management" starting on EIR p. 4.C.44; Impact TR-1 starting on EIR p. 4.C.68; Impact TR-3 starting on EIR p. 4.C.81; and Impact TR-9 starting on EIR p. 4.C.96. The EIR concluded the proposed project or project variant would have a less-than-significant impact on vehicle miles traveled with mitigation, and a less-than-significant impact on freight loading and passenger loading. The comments received on the EIR do not present evidence

[7] As described under Improvement Measure I-TR-9b, delivery supportive amenities could include lock boxes (i.e., a lockable container for storing goods) and unassisted delivery systems (i.e., a range of delivery systems that eliminate the need for human intervention at the receiving end) that would allow delivery personnel access to a single delivery site rather than delivery to multiple individual residential units, and enable off-peak hour deliveries. These delivery supportive amenities would serve future residents of the site and would not be intended for use by other neighborhood businesses or residents.

that the transportation analysis in the Draft EIR was inadequate, that there would be any new significant transportation (VMT or loading-related) impacts not identified in the EIR, or that a substantial increase in the severity of impacts identified in the EIR would occur.

The project's potential construction-related transportation impacts are addressed under Impact TR-1 starting on EIR p. 4.C.68. In addition, please see Response TR-6, Construction Impacts above. As stated in the EIR on pp. 4.C.70-71, there could be construction staging on the sidewalks and parking lanes along California and Laurel streets and along Masonic Avenue during later phases of construction. Construction would be conducted in compliance with City requirements such that construction activities would not result in substantial interference with pedestrian, bicycle, transit, or vehicle circulation or result in potentially hazardous conditions for pedestrians, bicycles, transit, or vehicles. Therefore, as described in the EIR no significant impacts would occur and no mitigation measures are necessary.

As discussed under Impact TR-10 on EIR pp. 4.C.98-4.C.99, an evaluation of passenger loading demand and supply was conducted to assess the potential for on-street queues and traffic hazards at the proposed passenger loading zones. The proposed project or project variant would meet the demand for passenger loading and the project would not create significant localized loading impacts. On-street passenger loading zones are proposed on the west side of Masonic Avenue near Presidio Avenue and Pine Street, on the north side of Euclid Avenue near Masonic Avenue, and on the east side of Laurel Street near Mayfair Drive (see Figure 2.22: Proposed Site Access, EIR p. 2.62) as part of the proposed project and project variant. These on-street zones would each be about 60 feet in length and could accommodate up to three passenger vehicles each. Contrary to the comments, the proposed project and project variant would convert a total of 36 on-street parking spaces (not 40) to commercial and passenger loading. Passenger loading would also occur on site at the proposed roundabout at the terminus of the Walnut Street extension into the project site. This proposed circulation feature would allow residents and guests to be picked up or dropped off at a central location without interfering with traffic on the surrounding street network.

The proposed supply of on-street passenger loading spaces (three 60-foot-long zones which could support a total of three vehicles in each zone, for a total of nine vehicles), and the passenger loading space available at the Walnut Street roundabout would exceed the projected passenger loading demand of four vehicles. The passenger loading demand estimates include demand for for-hire vehicles, e.g., TNCs and taxis (see EIR pp. 4.C.61-4.C.62 and subsection B.3, Trip Generation Estimates, in "Trip Generation Comparison – *2002 SF Guidelines* and *2019 TIA Guidelines* Update Comparison" subsection in RTC Section 4, Master Response – Transportation and Circulation, on RTC pp. 4.4-4.5). As such, the proposed project or project variant would meet the demand for passenger loading, and the project would not create localized loading impacts. The provision of on-street passenger and commercial loading zones would not result in potential traffic hazards or substantially disrupt transit or passenger loading operations at the JCCSF. The provision of an

adequate supply of on-street commercial and passenger loading spaces would reduce the conflicts associated with double-parked vehicles.

As discussed on EIR pp. 4.C.25-4.C.26, on-street passenger loading activity data were collected along California Street at the JCCSF on July 6, 2017, during the weekday a.m. and weekday p.m. peak periods (7 to 9 a.m. and 4 to 6 p.m.). Data are included in EIR Appendix D on pp. 219-226. On-street passenger drop-off and pick-up for the JCCSF occurs within the approximately 280-foot-long passenger loading zone on the north side of California Street between Presidio Avenue and Walnut Street, directly across from the project site. The passenger loading zone can accommodate about 14 vehicles (one passenger car per 20 feet). During field observations, JCCSF staff were observed to assist with and monitor drop-off and pick-up activities.

During the peak hour of on-street passenger loading activity (4 to 5 p.m.), approximately 40 vehicles used the curbside loading zone on California Street with a typical dwell time of around 40 seconds. On five occasions over the two-hour evening observation period, when the passenger loading zone was fully occupied, drivers were observed to pick up their passenger while stopped in the travel lane. On three occasions during the morning observation period and one occasion during the evening observation period, drivers were observed stopping in the bus zone to load/unload passengers. No buses arrived when people were stopped in the bus zone. However, drivers in the rightmost travel lane attempting to access the passenger loading zone were observed to bypass and delay buses attempting to re-enter the travel lane. Passenger loading activity associated with the JCCSF was observed to result in re-entry delay (less than 30 seconds) for two buses traveling westbound along California Street during the weekday p.m. peak hour of passenger loading activity.

The proposed project and project variant do not propose any changes to drop-off and pick-up for the JCCSF, and the analysis for the 3333 California Street Mixed-Use Project assumes that on-street passenger loading/unloading for the JCCSF will continue to occur along California Street across from the project site and via the one-way internal private driveway off Walnut Street for preschool pick-up/drop-off. Vehicle trips generated by the proposed project or project variant would not affect existing drop-off and pick-up operations for the JCCSF, as vehicles accessing the project site and traveling westbound on California Street would be in the leftmost travel lane to make a left turn into the project site via the Walnut Street entrance. Furthermore, the intersection operations analysis conducted at intersections along California Street, as documented in the Travel Demand Memorandum in EIR Appendix D on pp. 40-44, shows that the proposed project and project variant would result in minimal increases to intersection delay and queue lengths during the weekday a.m. and p.m. peak hours. The results of the analysis are summarized in the EIR under Impact TR-5 on EIR p. 4.C.88. Passenger loading for the proposed project and project variant would not occur on California Street and would not impact existing queues at the JCCSF, as project-related passenger loading activities would be accommodated on street within passenger loading

zones proposed along Masonic Avenue, Euclid Avenue, and Laurel Street, as well as at the Walnut Street roundabout within the project site (see EIR p. 4.C.99). As discussed on EIR p. 2.14, while existing land uses along California Street between Laurel and Walnut streets are primarily residential, land uses near the project site along the California Street corridor include a mix of residential, financial, institutional, and retail uses. The proposed uses on the project site would be integrated with the surrounding land uses and circulation network. The provision of on-street commercial loading under the proposed project or its variant along this corridor would support existing and proposed land uses.

The proposed commercial loading program is discussed on EIR pp. 4.C.42-4.C.44, and the freight loading impact analysis is presented under Impact TR-9 starting on EIR pp. 4.C.96. As shown in Table 4.C.16, on EIR p. 4.C.61, the proposed project and project variant are estimated to result in an average demand for about five freight loading spaces during the typical hour and about six freight loading spaces during the peak hour, which occurs between 10 a.m. and 1 p.m., of freight loading activity. As discussed under Impact TR-9 on EIR p. 4.C.96, the proposed project and project variant would meet the estimated commercial loading demand through provision of six off-street commercial loading spaces. Three of the loading spaces would be located in the off-street freight loading area in the proposed California Street Garage, accessed from Presidio Avenue, and three would be located in the off-street freight loading area in the proposed Masonic Garage under the Masonic and Euclid buildings. The proposed off-street loading area in the California Street Garage would accommodate 40-foot-long Recology garbage trucks, 30-foot-long single unit trucks, and 55-foot-long intermediate semitrailer trucks. The proposed off-street loading area in the Masonic Garage, accessed from Masonic Avenue, would accommodate 40-foot-long Recology garbage trucks and 30-foot-long single unit trucks. Vertical clearance for the proposed California Street and Masonic garage entrances from Presidio Avenue and Masonic Avenue would be 15 feet.

Upon review of the site plan and location of proposed commercial freight loading docks, SFMTA requested the addition of one on-street commercial loading zone on California Street to meet localized demand for deliveries generated by the retail uses concentrated along the proposed project's or project variant's frontage along California Street, and to minimize potential for delivery vehicles to double-park and create traffic hazards or transit delay. As a result, in addition to the off-street commercial loading spaces, the proposed project or project variant would provide one 100-foot-long on-street commercial (yellow curb) loading zone on the south side of California Street east of Laurel Street. The proposed loading supply would meet estimated demand for loading generated by the proposed project and variant and the proposed 100-foot-long commercial loading space located along California Street (near the Plaza A and B buildings) would meet the estimated loading demand generated by the nearby retail uses. The provision of an adequate supply of on-street commercial loading spaces, in addition to the off-street commercial loading, is proposed to provide convenient on-street locations for commercial loading in order to reduce the potential for vehicles to double-park and block adjacent travel lanes. The provision of the commercial loading

spaces would not induce demand for deliveries but would accommodate delivery vehicles loading/unloading at the project site. The revisions to the proposed project and project variant described in RTC Section 2, including replacing the proposed 100-foot-long on-street commercial loading zone with two commercial loading zones (a 60-foot-long zone immediately west of the California Street/Walnut Street intersection and a 40-foot-long zone immediately to the east of the intersection), would not change the analysis and conclusions in the EIR.

As discussed under Impact TR-10 on EIR pp. 4.C.97-4.C.98, although loading impacts would be less than significant and no mitigation measures would be required, Improvement Measures I-TR-9a: Schedule and Coordinate Deliveries and I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies are identified to further reduce the less-than-significant freight loading impacts. If the planning commission adopts these improvement measures, they consist of strategies that could be implemented and do not include the complete range of possible measures that could be implemented. While not required as mitigation, implementation of Improvement Measure I-TR-9a would coordinate deliveries such that loading activity would be distributed across the site, and that peak-period demand would be reduced with deliveries to occur during off-peak hours. While not required as mitigation, implementation of Improvement Measure I-TR-9b would require ongoing monitoring, which would allow for adaptive management to ensure loading activities to further reduce less-than-significant impacts. The EIR does not include a mitigation or improvement measure that would limit hours of commercial loading to occur before 7:00 a.m. and after 7:00 p.m. because the proposed project or its variant would result in a less-than-significant impact with respect to commercial loading activity. The SFMTA's color curb program manager will determine the specifics of the hours of operation for the loading zones depending on the occupied land uses at the time they are operational. It may be possible that space is available for public parking at other times (e.g., overnight). For a response to concerns related to noise increases due to project operations, see Response NO-3: Noise Increases/Operational Impacts in Section 5.F, Noise and Vibration starting on RTC p. 5.F.10.

As part of the project sponsor's Transportation Demand Management Program, described in Chapter 2, Project Description, on EIR pp. 2.78-2.79, and in Section 4.C, Transportation and Circulation, on EIR pp. 4.C.44-4.C.45, the project sponsor would install delivery supportive amenities at the proposed off-street loading docks and/or within the adaptively reused building and newly constructed buildings in ground-floor locations currently identified as residential lobbies or back-of-house areas. As described under Improvement Measure I-TR-9b, delivery supportive amenities could include lock boxes (i.e., a lockable container for storing goods) and unassisted delivery systems (i.e., a range of delivery systems that eliminate the need for human intervention at the receiving end) that would allow delivery personnel access to a single delivery site rather than delivery to multiple individual residential units, and enable off-peak hour deliveries. These delivery supportive amenities would serve future residents of the site and would not be intended for use by other neighborhood businesses or residents.

Seattle Department of Transportation in partnership with the Urban Freight Lab conducted an assessment of private truck freight bays and loading docks, and delivery policies and operations within buildings located in Center City, Seattle.[8,9] Data showed that a lock box system would reduce the time delivery people spend in the building by up to 73 percent and would almost eliminate failed first deliveries and dramatically cut the mean truck dwell time in parking/loading spaces. The research documented that of the 20 total minutes delivery drivers spent on average in the Seattle Municipal Tower, 12.2 of those minutes were spent going floor-to-floor in freight elevators and door-to-door to tenants on multiple floors. Provision of lock boxes and unassisted delivery systems allow customers to pick up their packages when it is convenient for them to do so while providing secure deliveries. These systems provide convenient access for both delivery workers and building tenants.

The details of the TDM Plan would be finalized during the planning department's review process for project entitlements including those related to TDM Measure Delivery-1. These improvements and TDM measures would be a condition of approval or incorporated into the development agreement.

In summary, the comments do not present evidence of any significant loading impacts or increase in the severity of the proposed project's or project variant's impacts that are identified in the EIR and no mitigation measures would be needed. The proposed project and project variant have been revised since the publication of the draft EIR. The project revisions include a reduction in retail square footage, a reduction in the number of parking spaces, and reconfiguration of the proposed commercial loading space on California street among other changes. See RTC Section 2, Revisions and Clarifications to the Project Description, on pp. 2.2-2.29 for a full description. The project changes do not alter the analysis or conclusions of the EIR.

## COMMENT TR-11: PARKING

"Additionally, please note that we continue to strongly support the inclusion of 60 on-site public parking spaces on the Project site given that the Project is causing not only the loss of current public parking on the site but also the loss of significant neighborhood street parking (i.e. conversion of 15 on-street parking spaces to loading zones and the loss of 36 on street parking spaces.)" *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 8, 2018 [O-JCCSF2-6])*

[8] Seattle Department of Transportation and University of Washington Supply Chain Transportation and Logistics Center Urban Freight Lab, *The Final 50 Feet Urban Goods Delivery System*, January 19, 2018, https://depts.washington.edu/sctlctr/sites/default/files/SCTL_Final_50_full_report.pdf, accessed May 9, 2019.

[9] Seattle Department of Transportation and University of Washington Supply Chain Transportation and Logistics Center Urban Freight Lab, *The Final 50 Feet Urban Goods Delivery System: Common Carrier Locker Pilot Test at the Seattle Municipal Tower, October 2018*, https://depts.washington.edu/sctlctr/sites/default/files/SCTL_Muni_Tower_Test_Report_V4.pdf, accessed May 9, 2019.

"5. JCCSF desire for continued availability of publicly available spaces at the Project, especially given the Project's elimination of 33 on-street parking spaces." *(Craig Salgado, JCCSF Chief Operating Officer, JCCSF, Letter, October 20, 2017 [O-JCCSF3-4])*

**"4. <u>UCSF Parking</u>**

We understand that the developers of the 3333 project are proposing around 60 public spaces as part of their facility. We are very supportive of the proposal for additional public parking, given that a number of JCCSF employees and users have been using the UCSF lot for many years during peak parking periods at the JCCSF." *(Craig Salgado, JCCSF Chief Operating Officer, JCCSF, Letter, June 3, 2016 [O-JCCSF4-6])*

"Parking is currently extremely difficult. The developer originally stated loading zones would be onsite or underground however that plan was scrapped. On-street loading zones would eliminate 40 additional street parking spaces." *(Barbara and Jim Brenner, Email, January 3, 2019 [I-Brenner-4])*

"…and contribute to the loss of parking, in a neighborhood where it's already almost impossible to find adequate street parking, even for residents with G-Stickers. It's important to realize that not only will the construction of the Prado project permanently eliminate 40 currently available non-metered parking spaces to accommodate five loading/unloading zones for TNCs (Uber, Lyft, Chariot) and freight traffic, but it will also take away another 200 non-metered parking spaces, which surround the 10 acre site on Euclid and Laurel Streets for the entire 15 years of construction. That is parking that residents, as well as businesses in Laurel Village Shopping Center need desperately, and that severe impact on our community is not addressed anywhere in the DEIR. Essentially, Prado's current DEIR changes what should be a residential development into a full scale retail destination." *(Bill Cutler and Judy Doane, Email, January 5, 2019 [I-Cutler2-4])*

"…for the following reasons: One, we do not need more retail in this area. We have plenty of shops serving the neighborhood now. Adding more will make 3333 California not just a residence, but also a retail destination, guaranteeing an unacceptable amount of extra traffic and exacerbating an already stressed on-street parking problem. *(Judy Doane, Draft EIR Hearing Transcript, p. 30, December 13, 2018 [I-Doane-4])*

"The influx of hundreds of new residents and the proposed retail will greatly reduce the amount of street parking in the neighborhood (which hurts people such as us who have no garage) and create horrible traffic." *(Zhubin Fardis, Email, January 8, 2019 [I-Fardis-2])*

"One of our main concerns is the increase of traffic and the impact on parking and the length of time that the project will take. Since we don't have a parking spot, we rely on being able to park on the street. The influx of hundreds of new residents and the proposed retail will greatly reduce the amount of street parking in the neighborhood." *(Shannon Fong, Email, January 8, 2019 [I-Fong-2])*

"Excessive parking in unnecessary at this location. Many people would be happy to live in such a community and use public transit, bicycles, ride share and their own feet to get around our great city. We have no need to preserve 300 parking spaces and the existing building." *(William Holleran, Email, December 10, 2018 [I-Holleran1-2])*

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"10. Loss of on-street parking spaces" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-11])*

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"…but mostly I want to address parking and the parking deficit and traffic congestion we already have in the neighborhood. Having lived in the neighborhood for 46 years, we've seen increasing congestion, even those of us with residential parking permits. Many of these homes were built before any parking requirements were made by the city, so many of them don't have garages or garages large enough, so most of us are looking for parking all the time on the street. And it requires -- over all these years, it requires many trips around many blocks. And often times we end up parking, even at night, three or four blocks away and then walking home from there. If you go through the neighborhood, you see many people and homeowners and renters illegally parking across the sidewalk, for which we often are ticketed, and that's simply because we can't find parking. So we already have a significant parking problem. And the EIR has a section which talks about a study in New York and New Jersey that proposes the premise that if you have fewer parking spaces and fewer garages, than people will have fewer cars and drive less. In the development of the neighborhood, the neighborhood has been built out over the last several years. There used to be lots of vacant lots. There's been significant additional buildings on California Street across from the proposed site. That did not, in my experience, reduce the number of cars; it's only increased the congestion. So I would ask you to consider, in the EIR, looking more closely at the number of parking spaces proposed. If there are that many housing units, we need more parking. I don't think it really bears out that there have been fewer cars, because we have fewer garages. And, you know, with all due respect, we choose to live in San Francisco, not in New York City. Thank you." *(Maryann Massenberg, Draft EIR Hearing Transcript, pp. 66-67, December 13, 2018 [I-Massenburg-5])*

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"2. There is insufficient transportation and parking to support this project, and the developers have transferred the burden to the neighborhood and neighboring streets." *(Larry Mathews, Email, December 13, 2018 [I-Mathews1-3])*

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"**Transportation:**

There are not enough parking spaces for the proposed number of units provided in the plan. As it now stands, street parking is impossible." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-7])*

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**RESPONSE TR-11: PARKING**

The comments state that the use of the eastbound parking lane on California Street during construction will adversely affect parking conditions in the area. Some comments opine that there are not enough parking spaces for the project and the conversion of 40 non-metered parking spaces to commercial and passenger loading zones and the removal of an additional 200 non-metered

parking spaces surrounding the site will increase the parking deficit in the neighborhood and impact the community. Another comment opines the project has too much parking given its location.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under Parking Information starting on EIR p. 4.C.115. The proposed project and project variant meet the Public Resources Code section 21099(d) criteria as a residential, mixed-use infill project in a transit priority area and therefore parking is not an environmental impact for the purposes of CEQA. The comments received on the EIR do not present evidence that the transportation analysis in the Draft EIR was inadequate, that there would be any new significant impacts not identified in the EIR, or that a substantial increase in the severity of impacts identified in the EIR would occur.

The project's potential construction-related transportation impacts, including parking lane removal and construction worker parking, are addressed under Impact TR-1 starting on EIR p. 4.C.68. Temporary parking lane and sidewalk closures would be required during Phase 3 and Phase 4 of construction. Phase 3 and Phase 4 would require some staging on the sidewalk and parking lane along California and Laurel streets. Additionally, the parking lane on Masonic Avenue between Presidio and Euclid avenues would be used intermittently, as needed, for concrete truck staging subject to the conditions of a special traffic permit. The closures would be required to comply with the blue book regulations, would be subject to review by the SFMTA, and would be coordinated with City staff to minimize effects on people walking or taking transit, transit operations, local traffic, and circulation.

As noted above, parking related to the proposed project or its variant is not an environmental impact for the purposes of CEQA. As such, parking information is presented for informational purposes in the "Parking Information" subsection starting on EIR p. 4.C.115. Given the project's location in proximity to high-quality local transit services with connections to regional transit, the implementation of transportation demand management measures, and the availability of on- and off-street public parking facilities, the proposed project and project variant would not create a substantial parking deficit that could result in secondary environmental impacts; this conclusion also applies to the revised project and revised variant, described in RTC Section 2, Revisions and Clarifications to the Project Description.

## COMMENT TR-12: CUMULATIVE TRANSPORTATION IMPACTS

"c. Cumulative - The TIS should consider the cumulative effects of the Project in relation to other nearby projects that are currently in the planning stages." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017 [O-JCCSF3-8])*

"Although the report shows the impact at "LESS THAN SIGNIFICANT" ("LTS"), the cumulative traffic issue with Trader Joe's traffic already bogging down Masonic southbound should not overburden the adjacent neighborhoods with cut-through traffic through Laurel

Heights and Jordan Park. In addition, the delivery trucks travel within ½-mile of Laurel Heights to the Laurel Village Shopping Center, to the existing CPMC cafeteria and hospital to add to the overburdening of the street.

When new businesses get to inhabit the City Center at Masonic and Geary, those traffic counts and VMTs will add to the area VMTs which should be much more than it is today. If a grocery store or another restaurant or more is inserted in the City Center, how will the traffic from that impact the Laurel Heights/Jordan Park, Geary and California St. areas? Has this been studied in the DEIR?

This point cannot possibly be considered "LTS". See **C-TR-1** (Pages S.15-S.16) "Construction of the proposed project or project variant, in combination with reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to cumulative construction-related transportation impacts." ("LTS," "None required" for mitigation)

A number of projects including the Lucky Penny, CPMC rebuild into new housing, a Presidio Avenue project, the Geary BRT closing off lanes for construction that will be coming during the same time span as 3333 California Project, the introduction of a potential Whole Foods at City Center at Masonic, the 3300-mid-block demolition-to-housing project on Geary, the new builds and other increases of unit counts on surrounding "nearby streets" are not taken into account." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-15])*

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"Here are the "other nearby TAZs" located from 3333 California. All the streets in these TAZs are not studied for impacts alone with only 3333 California Project *NOR* with the "reasonably foreseeable"**projects the DEIR lists. See also the map below of the TAZs (corresponding TAZ numbers differ but area of TAZs are same):

**TAZ 100524 = Parker to Laurel between California & Euclid *(*NOT* included in the DEIR)***

**TAZ 100521 = Laurel to Baker between California & Euclid/Bush *(TAZ 709 in the DEIR)***

**TAZ 100513 = Laurel to Lyon between California & Sacramento *(*NOT* included in the DEIR)***

**TAZ 100523 = Parker to Presidio between Euclid/Bush to Geary *(*NOT* included in the DEIR)***

**TAZ 100517 = Maple to Laurel between California & Sacramento *(*NOT* included in the DEIR)***

**TAZ 100525 = Arguello to Parker between California & Geary *(*NOT* included in the DEIR)***

The above TAZs include projects that are reasonably known to happen, has happened or has projects that will happen (e.g. new uses at Target City Center, new buildings on Geary, Presidio Ave, **surrounding "nearby" streets that are *NOT* analyzed for traffic impacts**. ***CEQA categories such as AIR QUALITY, VIBRATIONS, NOISE are also not analyzed for these other "nearby" streets with known projects, upcoming projects as additive to 3333 California. The data does not exist in the DEIR. It is missing***.

Why was only TAZ 709 used and none of the "other nearby TAZs" analyzed for impacts from the proposed project? Look below at *** for the list of ***"Projects for cumulative analysis"*** & there are many projects that can have impact with this development in "other nearby TAZs" than only TAZ 709. This is not accounted for in this DEIR.

Again, refer to the map of TAZs below that shows ***at least 12-13 TAZs that are within ¾-mile*** from the proposed development. The streets should all be analyzed for CEQA impacts including traffic or VMTs on these streets. If the **DEIR mentions the known other projects in the area**, every one of those will produce some impact, especially in regards to vehicle travel why are not the streets around them studied in relation to this project?

Not ***all counts of vehicles and VMTs be done to the above TAZs listed*** are included in the DEIR.

Why?

*(See Comment Letter I-Hillson2, p. 18, in RTC Attachment B for the map of TAZs in the vicinity of the project site and a brief description of a TAZ that accompany this excerpted comment.)*

Do the developers of these other up-and-coming nearby projects want their locations to be impacted by any oversights from the 3333 California Project? Streets nearby known and upcoming projects need to be studied for cumulative impacts and it is missing from this DEIR.

Look below at Table 4.C.1 which lists *ONLY* the closest streets in the analysis. When one has a 10+ acre project, the impact with vehicles goes up along with the other projects and the streets surrounding them. NO ANALYSES has been done on the other streets.

The DEIR fails to take into consideration that the listed and other recent foreseeable projects** (and those now completed) and new projects such as that at 2675 Geary or the 3300-block of Geary Project, the new uses going into Masonic City Center, all of which can impact the residential streets "nearby" in the Laurel Heights, Jordan Park and Presidio Heights areas. Only intersections for one "Transportation Analysis Zone" (TAZ) -- No. 709 – has a vehicle count. Traffic flows to and from "other nearby TAZ" streets listed due to the "reasonably foreseeable" projects the DEIR lists and without the analysis for these other streets in the Laurel Heights, Jordan Park & Presidio Heights neighborhoods, this DEIR is not complete and thorough nor does it give an accurate VMT picture by 2040."

**Table 4.C.1: Study Intersections**

| Number | Intersection | Existing Traffic Control |
|---|---|---|
| 1 | Sacramento Street / Walnut Street | All Way Stop Control |
| 2 | Sacramento Street / Presidio Avenue | Signal |
| 3 | California Street / Spruce Street | Signal |
| 4 | California Street / Laurel Street | Signal |
| 5 | California Street / Walnut Street | Signal |
| 6 | California Street / Presidio Avenue | Signal |
| 7 | Mayfair Drive / Laurel Street | All Way Stop Control |
| 8 | Presidio Avenue / Masonic Avenue / Pine Street | Signal |
| 9 | Euclid Avenue / Laurel Street | All Way Stop Control |
| 10 | Masonic Avenue / Euclid Avenue | Signal |
| 11 | Presidio Avenue / Euclid Avenue / Bush Street | Signal |
| 12 | Geary Boulevard / Masonic Avenue | Signal |
| 13 | Geary Boulevard / Presidio Avenue | Signal |

*Source:* Kittelson & Associates, Inc. 2017

*(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-36])*

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"With 13,500+ additional vehicle trips from the retail and offices (and some from the residential) use of the proposed project, the increase in automobile delay in the area would be a major impact not only adjacent to the site but even 6 blocks away into Presidio Heights, Jordan Park, Lone Mountain areas. Traffic will eventually reach gridlock as was written in the Geary BRT EIR –

and *that* EIR did *not* even have this project in its write-up so any additional heavy traffic such as in the proposal is just going to be BEYOND GRIDLOCK and it is not safe for people to not be able to get to emergencies." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-48])*

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"How much analysis has been done to see how this project be impacted by the cumulative trips from the new project at CPMC, from the new uses to come to the City Center at Masonic, from increases in TNC (rideshares) in the area as new uses and buildings and more units are created in this ½-mile area near this 3333 California site? Where is this data?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-60])*

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**RESPONSE TR-12: CUMULATIVE TRANSPORTATION IMPACTS**

The comments state that the EIR should consider the cumulative transportation effects of the project in relation to other nearby projects that are currently in the planning stages and ask how the traffic from the nearby retail developments has been studied in the EIR. The comments question the validity of the less-than-significant impact conclusion for cumulative construction impacts under Impact C-TR-1 (see EIR pp. 4.C.101-4.C.102). The comments also state that transportation analysis zones (TAZs) surrounding the project site should be considered in the cumulative analysis.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Future 2040 Cumulative Transportation Methodology" starting on EIR p. 4.C.62 and "Cumulative Impacts" starting on EIR p. 4.C.101. The EIR concluded that the proposed project or project variant would have a less-than-significant impact on cumulative construction, cumulative traffic hazards, cumulative transit, cumulative pedestrian conditions, cumulative bicycle conditions, cumulative freight and passenger loading, and cumulative emergency access and would have a less-than-significant impact with mitigation on vehicle miles traveled. The comments received on the EIR do not present evidence that the analysis was inadequate, or that there would be any new significant impacts not addressed in the EIR or any increases in the severity of impacts identified in the EIR.

The 2040 Cumulative Transportation Methodology, including transportation network changes and land use development assumed to be in place as part of the 2040 cumulative conditions, is discussed in the EIR starting on p. 4.C. 62. A discussion of cumulative impacts is provided in Section 4.C, Transportation and Circulation, starting on EIR p. 4.C.101. Per CEQA Guidelines section 15125(a)(1), the physical conditions existing when the notice of preparation is published were used to establish the baseline for the project-level analysis. Per CEQA Guidelines section 15130(b) and section 15355, the identification of past, present and reasonably foreseeable future projects is considered the first step in the cumulative analysis. The cumulative impact analysis takes into account reasonably foreseeable future development projects in the study area identified by the planning department. The 2040 future cumulative scenario was established based on a review of reasonably foreseeable future development projects and transportation network improvements, and

SF-CHAMP travel demand model forecasts. The model includes a comprehensive projection of growth that is reasonably foreseeable in 2040, based on known and forecast development within the city, including growth under adopted area plans, and TAZs surrounding the project site, that could affect San Francisco's transportation network. These projections include trips from nearby approved developments.

The City has discretion to determine a reasonable date as a cutoff for which projects to include in the cumulative impacts analysis (see *South of Market Community Action Network v. City and County of San Francisco (2019) 33 Cal.App.5th 321*[10] and *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099[11] [county had discretion to set date of application for current project as cutoff date for deciding which projects to include in cumulative impacts analysis]), and the comments have not shown that the City's decision to use the project list was unsupported by substantial evidence. The cumulative analyses include reasonably foreseeable projects; the analyses included several new additions and buildings at the City Center Shopping Mall at Masonic Avenue and Geary Boulevard (2675 Geary Boulevard), as described on EIR p. 4.A.8, but appropriately do not include speculative uses such as a potential grocery or another restaurant at City Center that were not formally known to the planning department until after the publication of the EIR through submittal of an application and plans. A planning application for a conditional use authorization to convert the Best Buy location to a Whole Foods grocery store was submitted on March 21, 2019. The planning application is under review and was submitted after publication of the draft EIR (November 7, 2018). Therefore, this specific planning application was appropriately not included in the cumulative impact analyses. See the discussion in subsection D.2, Vehicle Miles Traveled (VMT) and Retail Use, in RTC Section 4, Master Response – Transportation and Circulation, p. 4.30, for more information regarding the cumulative VMT analysis.[12]

Vehicle traffic and commercial deliveries to existing land uses, including Trader Joe's on Masonic Avenue, Laurel Village Shopping Center, and California Pacific Medical Center (CPMC) located at 3700 California Street, are included under existing and baseline conditions. CPMC will relocate to new facilities outside the project vicinity by 2020 (the baseline year); however, for a more conservative analysis in terms of vehicle traffic and transportation, the existing traffic to/from that site is considered under baseline conditions. As discussed on EIR p. 4.C.2, the transportation study area for the proposed project and project variant consists of the area bounded by Geary Boulevard, Presidio Avenue, Sacramento Street, and Spruce Street. The transportation study area includes all aspects of the transportation network within generally two blocks of the project site that may be substantially affected by trips generated by the proposed project or project variant. The

[10] Available online at: https://www.courts.ca.gov/opinions/documents/A151521.PDF, accessed May 13, 2019.
[11] Available online at: https://casetext.com/case/gray-v-county-of-madera, accessed May 13, 2019.
[12] See also Response CU-1, Cumulative Setting/Project List in Subsection 5.I,Cumulative Impacts, in this RTC document for a general discussion of the approach used to establish the cumulative setting for the cumulative impacts analyses in the EIR.

transportation study area consists of travel corridors and facilities such as transit routes and stations, bicycle routes and amenities, pedestrian sidewalks and crossings, and the overall vehicular roadway network that residents, employees, and visitors would use in traveling to and from the project site. Intersections and roadways farther away were not analyzed as part of the study because project-generated travel remaining on local streets would be dispersed, and, consequently, the proposed project or project variant contributions would be relatively small. A total of 13 existing intersections within the transportation study area were identified as key locations that would be likely to be affected by the proposed project or project variant.

The cumulative construction impacts are discussed under Impact C-TR-1 starting on EIR p. 4.C.101. The construction of the proposed project or project variant may overlap with construction of other reasonably foreseeable future development and transportation infrastructure projects, including the 2670 Geary Boulevard project, the 3700 California Street project, and Geary Bus Rapid Transit (Geary BRT) project, all of which are within a radius of approximately a quarter-mile of the 3333 California Street project site.

Construction of 2670 Geary Boulevard (to the south of the project site) is anticipated to begin within the next year and would likely be near completion during the demolition and excavation construction activities for the proposed project's or its variant's Phase 1 (Masonic and Euclid buildings) construction program. Sutter Health is expected to vacate the CPMC campus located at 3700 California Street (to the west of the project site) and move to a new location by 2020. Construction of the proposed 3700 California Street project is anticipated to run concurrently with construction of portions of 3333 California Street and would commence around the same time. The 3700 California Street[13] project would develop up to 273 dwelling units; given the smaller scale of the 3700 California Street project and its distance from the proposed project, including likely truck travel patterns, contribution to cumulative construction activities would be minimal. The 3333 California Street Mixed-Use Project EIR assumed construction of 250 units at the 3700 California Street site (23 fewer units than were identified at the time of the Notice of Preparation). This minor change in the unit count would not affect the construction phasing or duration, or number of construction truck trips that would occur and would not affect or alter the conclusions reached in the EIR's cumulative analysis.

Comments express concern with the potential for traffic gridlock under cumulative conditions, citing the transportation analysis in the Geary BRT Draft EIS/EIR, and correctly state that the 3333 California Street Mixed-Use Project was not part of the cumulative analysis for the Geary BRT.

[13] 3700 California Street Draft Environmental Impact Report (Case No: 2017-003559ENV), June 12, 2019, https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=4595d1d5d3a94c1007295e922610d9afeeb2a48a415e46e91107c6d30938d458&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0, accessed June 17, 2019.

Comments also express concern with the addition of project-generated traffic (specifically that generated by the proposed retail uses) to the transportation network under cumulative conditions.

The Geary BRT Draft EIS/EIR examined potential effects on automobile delay (intersection level of service) in the weekday p.m. peak hour for a number of build alternatives as well as a no build alternative, pursuant to the methodology in use for traffic impact analyses at the time that EIS/EIR was prepared. The results of this analysis showed that while there would be significant traffic impacts at four of the 78 study intersections, mainly along the Geary corridor (none near the 3333 California Street project site) in 2020, and at eight of the study intersections in 2035 (the closest to the 3333 California Street site are at California Street/Presidio Avenue and Geary Boulevard/Parker Street), there would be an overall reduction in traffic on Geary Boulevard. This was found to be due in part to the reduction in traffic capacity with the exclusive transit lane, but also in part due to expected shifts from auto to transit use with the improved transit service.

While the planning department and the state no longer use automobile delay, measured as level of service (LOS), to determine whether a project would result in significant traffic impacts based on changes in CEQA, LOS is used to determine whether some projects would result in transit delays. The single intersection analyzed for the 3333 California Street Mixed-Use Project to determine whether transit delay would occur as a result of project-generated traffic that was also analyzed in the Geary BRT Draft EIS/EIR is California Street/Presidio Avenue. Project-generated traffic would increase existing (2017) traffic volumes at that intersection by about five percent overall in the weekday p.m. peak hour, and would result in an overall increase in delay of about three seconds (see pp. 43-44 in the Travel Demand Memorandum in EIR Appendix D). This additional project-related traffic would not be sufficient to substantially change the conclusions in the Geary BRT Draft EIS/EIR and does not support a conclusion that there would be traffic "gridlock" in the vicinity of the 3333 California Street project site in combination with implementation of the Geary bus rapid transit project.

Construction of the 2670 Geary Boulevard, 3700 California Street, and Geary BRT projects would not combine to result in significant cumulative construction-related transportation impacts due to limited construction overlaps and to the distances between these projects. There are no other planned development projects nearby, other than the proposed project or project variant, that would contribute to cumulative construction-related transportation impacts. For information about the effects of project-generated and cumulative traffic on emergency access see the discussion in Impact TR-11 on EIR pp. 4.C.99-4.C.101 and Impact C-TR-11 on EIR pp. 4.C.114-4.C.115. For a response to other comments regarding emergency access see Response TR-13: Emergency Access, below, on RTC p. 5.E.106.

It is anticipated that construction of the proposed project or project variant would occur over a time period of 7 to 15 years. Construction of the reasonably foreseeable future projects in the vicinity of the project site could temporarily generate increased traffic at the same time and on the same roads

as the proposed project or project variant. As part of the construction permitting process and similar to the requirements for the proposed project or project variant, each development project would be required to work with the various City departments to develop detailed and coordinated construction logistics and contractor parking plans, as applicable, that would address construction vehicle routing, traffic control, transit movement, pedestrian movement, and bicycle movement adjacent to the construction area. Overall, because the proposed construction activities of the cumulative projects would, to the maximum extent feasible, accommodate construction and staging activities on their respective project sites, and must also conduct construction in accordance with City requirements, the proposed project or project variant in combination with past, present and reasonably foreseeable developments in San Francisco would result in less-than-significant cumulative construction-related transportation impacts. As noted under Impact TR-1 (EIR p4.C.68-4.C.74), the proposed project or project variant would implement Improvement Measure I-TR-1: Project Construction Updates to further reduce the less-than-significant contribution to cumulative construction-related impacts.

Based on the above discussion, the comments do not present evidence that there would be any new significant cumulative transportation impacts not already identified in the EIR or that significant impacts would be substantially more severe than identified in the EIR; no new mitigation measures would be needed.

## COMMENT TR-13: EMERGENCY ACCESS IMPACTS

"Also, as more projects will not have parking allowed with units on Presidio Avenue and practically every other street in the city, the rideshares will, along with all the road-dieting, bulb-outs for pedestrian safety, lane marking changes and traffic control devices cause a lot of automobile delay and could be dangerous to get *emergency access and support* into and out of the area for not only this site but for the rest of the nearby community inhabitants.

Related to this above matter about emergency access, see Page S.15, ***TR-11*****:** "The proposed project or project variant would not result in significant impacts on emergency access to the project site or adjacent locations." ("LTS," "None required" for mitigation measures)" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-24])*

"With streets clogged with more vehicles, with more pedestrians in the area, the delays can start to impact emergency services. How has the emergency response times changed? Where is the analysis for safety personnel (e.g. ambulance, fire trucks) for the development per phase and at the end of completion?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-41])*

### RESPONSE TR-13: EMERGENCY ACCESS IMPACTS

The comments state that the combination of project-related vehicle traffic and proposed streetscape modifications will result in automobile delay that could impact emergency access and response times to the area and the project site.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under Impact TR-11 starting on EIR p. 4.C.99. The EIR concluded the proposed project or project variant would have a less-than-significant impact on emergency access and no mitigation measures would be required. The comments received on the EIR do not present evidence that the analysis in the EIR is inadequate or that there would be any new significant impacts not addressed in the EIR or that impacts would be substantially more severe than those identified in the EIR.

The project's potential emergency access impacts are discussed in Section 4.C, Transportation and Circulation, under Impact TR-11 starting on EIR p. 4.C.99. Emergency vehicles would access the site from the north via the Walnut Street/California Street intersection, from the west via Mayfair Drive, and from the south at the intersection of Masonic and Euclid avenues. The Walnut Street roundabout and Mayfair and Walnut walks would be designed to accommodate the truck turning movements of a San Francisco Fire Department articulated fire truck and a ladder truck.

Intersection operations analyses were conducted at locations along California Street and at locations where streetscape modifications were proposed to evaluate the effect of project-related vehicle traffic and proposed streetscape modifications on vehicle delay and queue lengths. The intersection analysis is included in the Travel Demand Memorandum in EIR Appendix D and is documented in the Streetscape Changes Operations Analysis Memorandum. The operations analysis shows that the proposed project or project variant would not result in substantial delays or queue lengths at the study intersections as a result of the project-related increase in vehicle traffic or proposed streetscape modifications. Accordingly, there would not be significant impacts on emergency access or response times.

The project sponsor would continue to coordinate the design details with the police and fire departments for final review and approval, as required, to minimize the potential for impacts on emergency vehicle access to the project site or adjacent locations. For these reasons, the proposed project or project variant would result in a less-than-significant impact on emergency access. No new information has been presented that identifies any significant impacts on emergency access, and no mitigation measures are needed.

## COMMENT TR-14: TRANSPORTATION SETTING

"Our rebuilt facility located at 3200 California Street opened in January 2004 and serves users of all ages ranging from newborns in strollers to the frail elderly. Because we serve so many children and older adults, we are very focused on safety concerns around traffic/circulation. In the 12 years since it has opened, the JCCSF has observed an increasing number of traffic/circulation problems in the vicinity of 3200 California, primarily attributable to conflicts with MUNI and increasing amounts of westbound and eastbound traffic on California. Given that the surrounding neighborhood is currently in the beginning phases of a number of significant development projects which would likely increase traffic in the neighborhood, the JCCSF would like to make sure that the following background conditions and safety issues are taken into account in the

city's analysis of the proposed projects and in the development of mitigations to address the issues." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 3, 2016 [O-JCCSF4-1])*

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"The DEIR also lacks the actual site traffic counts for the P.M. peak period which the *San Francisco Guidelines* require:

> The weekday P.M. Peak Period is generally 4:00-6:00, and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. *San Francisco Guidelines*, 2002, p. 10.

Instead of actual P.M. peak period counts, the DEIR only collected vehicle counts at 13 intersections within the transportation study area, existing site driveways, and nearby sidewalks. DEIR p. 4.C.2." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi2-3])*

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"The traffic and congestion are already huge problems on Presidio Ave. The intersections are already crowded with pedestrians, bicyclists, buses, vans, and delivery trucks." *(Sharon Esker, Email, January 5, 2019 [I-Esker-4])*

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"The comparative data should be in this DEIR from 2009-2017 but the DEIR seems to put the base line for analysis at 2020 – possibly because the project is not expected to start until then. Doing so does not make a comparable to what existed from earlier years when the higher number of vehicles did not exist. Using the figures based on the vehicles today when their numbers have *already* increased makes the results of the additional vehicles negligible because the factors for comparison is based on a false comparison of what existed before (no rideshares, e.g.). If the date for the modeling does not use data from when no alternative transportation modes like rideshare existed, then one cannot make an accurate comparison as to the impact of traffic volume on the neighborhood. If one compared the 2009 and earlier years when rideshares (TNCs) did not exist to what is projected for this development, it may indeed become not an insignificant impact but a SIGNIFICANT impact. Why not use the prior years?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-50])*

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"Already the traffic in this area is heavy, and parking has become a major issue. We do not welcome more development without careful review of the impact on the existing neighborhood quality of life." *(Abe Lee, Email, December 13, 2018 [I-Lee-2])*

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"3. Consider the environmental impact of increased traffic, parking issues and the overall impact on the quality of life for the existing neighborhood as well as for those people who will eventually occupy any new units at 3333 California Street." *(Cristina Morris, Email, December 10, 2018 [I-Morris1-3])*

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**RESPONSE TR-14: TRANSPORTATION SETTING**

The comments state that the background conditions and safety concerns near the JCCSF should be taken into account in the analysis of the proposed project and development of mitigation measures. The comments state that the use of a 2020 baseline year reduces the project-related contribution to vehicle traffic relative to use of an earlier, 2009 baseline, when rideshare/TNCs did not exist. The comments ask for the vehicle counts and projected vehicle traffic on surrounding streets from 2018 until project build-out.

The EIR covered these issues in Section 4.C, Transportation and Circulation, under the following subsections: "Existing Conditions" starting on EIR p. 4.C.4 and "Baseline Conditions" starting on EIR p. 4.C.27. The comments received on the EIR do not present evidence that the analysis is inadequate, that there would be any new significant impacts not addressed in the EIR, or that impacts would be substantially more severe than those identified in the EIR.

Existing traffic, transit, pedestrian, bicycle, loading, and emergency access conditions around the project site, including conditions around JCCSF, are described in Section 4.C, Transportation and Circulation, under the "Existing Conditions" subsection starting on EIR p. 4.C.4. These conditions have been taken into account in the analysis of the proposed project and project variant and in the development of mitigation measures. For existing parking conditions, see the informational discussion starting on EIR p. 4.C.115. For further response to comments related to parking, see Response TR-11: Parking on RTC pp. 5.E.98-5.E.99.

The "Baseline Conditions" are described in the EIR starting on p. 4.C.27. As noted in this subsection, analyses in CEQA documents typically present the existing environmental setting as the baseline conditions against which the project conditions are compared to determine whether an impact is significant. However, in the study area, some land use development projects are either recently occupied or under construction, and some transportation infrastructure projects are approved/funded. Because these projects will be completed by the time the proposed project or project variant is operational, the transportation analyses provide baseline conditions that take these conditions into account. Using an existing plus project transportation analysis would not accurately reflect the conditions that will exist at the time the proposed project's or project variant's impacts would actually occur; therefore, a baseline plus project conditions transportation analysis was used to provide a more accurate and conservative analysis.

The transportation study area and study intersections are discussed in Section 4.C, Transportation and Circulation, starting on EIR p. 4.C.2. A total of 13 existing intersections within the transportation study area were identified as key locations that are likely to be affected by the proposed project or project variant. These study intersections are identified by number in Table 4.C.1 on EIR p. 4.C.4, and shown on Figure 4.C.1 on EIR p. 4.C.3. Multimodal turning movement counts were collected at the study locations, including existing site driveways, on

December 1, 2016. Vehicle counts are included in the Travel Demand Memorandum (see EIR Appendix D, pp. 176-218). Additionally, average daily traffic volumes on roadways surrounding the project were estimated for Existing, Existing plus Project, Cumulative, and Cumulative plus Project Conditions. The approach and methodology and estimated volumes are documented in the Average Daily Traffic Volumes – Methodology and Results Memorandum prepared by Kittelson & Associates and included in EIR Appendix F as part of the supporting documentation for the air quality analysis.

# 5.F NOISE AND VIBRATION

The comments and corresponding responses in this section relate to the topic of noise and vibration evaluated in the EIR Section 4.D. The comments are further grouped according to the following noise- and vibration-related issues that the comments raise:

- NO-1, Construction Noise Impacts
- NO-2, Construction Vibration (Off-Site Structures)
- NO-3, Noise Increases/Operational Impacts
- NO-4, Mitigation Measures
- NO-5, Methodology

A corresponding response follows each grouping of comments.

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## COMMENT NO-1: CONSTRUCTION NOISE IMPACTS

"2. **Sensitive Receptor.** Page 4.D.12. We appreciate the fact that the DEIR identifies the JCCSF site as a sensitive receptor (in fact, the JCCSF is identified as the closest sensitive receptor to the Project site). As a result of this designation, we believe it imperative that the City, through DEIR mitigations and application of blue book regulations, implement all feasible measures to decrease construction noise and dust on our users. In light of the potentially negative effect on our preschool and other programs of the 7-15 year construction period (e.g. page 4.D. 40 indicates a maximum increase of 9dBA over existing 67dBA for 82 months), we would hope that the City would design a mitigation measure that creates a collaborative process enabling the City, Developer and JCCSF to monitor the impact of the construction noise, dust and traffic on the JCCSF with the City retaining the ability to impose enhanced mitigation measures throughout the construction period, if warranted, depending on the actual on-the-ground experience of the JCCSF, as a sensitive receptor." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, January 8, 2019 [O-JCCSF1-2])*

"Additionally, in light of the fact that we have approximately 170 preschoolers who use our outdoor play yard every day from 8:00 am-3:00 pm, we would like to make sure that the Impact NO-2 analysis considers construction noise impacts on these sensitive receptors." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 8, 2018 [O-JCCSF2-4])*

"It would also have a significant construction noise impact that's unmitigable…" *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript and Handout, p. 45, December 13, 2018 [O-LHIA3-5])*

"And I understand the environmental impacts of the noise, and we're all going to have to do that, because I'm committed to the people of San Francisco." *(Ed Munnich, SF YIMBY Action, Draft EIR Hearing Transcript, December 13, 2018 [O-YIMBY2-3])*

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"That's not to mention noise, light, and air pollution it will add to the very lengthy construction period and after." *(Sonya Dolan, Draft EIR Hearing Transcript, December 13, 2018 (I-Dolan-5])*

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"The Noise Control Plan should be reviewed and approved by BOTH Planning Department *and* the Department of Building Inspection (DBI) before permit issuance that will show that the daytime and nighttime noise from the project or any variant will not be greater than 10dBALeq.

This 3333 California DEIR does not have specifics as to how or where the construction-related equipment and vehicles will be handled in the neighborhood. Noise should be attenuated at the closest receptor as part of the mitigation of this "S" Significant Impact category. Developer and contractor may use field-erected temporary noise barriers. Other mitigation measures to employ might be noise control blankets on the buildings as they are worked on, wall off stationary equipment that are noise-makers such as compressors, generators, concrete pumps.

Not only to mitigate noise but also to reduce GHGs in the area, turn off idling vehicles such as dump trucks, delivery trucks, etc.

Staging of concrete pump trucks (they have their concrete spinning while waiting for their turn and thus have a continuous noise) should be determined as to what street and how that will work with the TR (transportation and traffic) category of impact. Who might be responsible would likely be the developer and the construction contractor(s) with notice to Planning and DBI.

Concrete pumping trucks used at night should not increase interior noise levels to surrounding sensitive receptor sites above 45 dBA from 7PM-7AM. Shift noise-making activities to daytime prior to 7PM whenever possible." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-29])*

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"The noise-monitoring report should be made available online with a link for the public to access the data to be done daily (every 15 min. or what the neighbors request) rather than on a "weekly basis" (Page S.20).

The hotline number should be posted on a publicly accessible webpage specifically for this construction project as contractors change quickly depending on the phase and change of plans. The hotline number complaints should be handled within 24 hours. Investigational steps should be taken to determine the source of the noise, reduce or abate the noise due to the sound path. Block significant noise makers with non-noise-producing vehicles and equipment so long as they do not create additional hazards for pedestrians, bicyclists and other traffic in the area.

The routes taken (under TR), causes more noise on these residential streets. The routes should be only where large trucks not over 3 tons are allowed. Many streets in the Laurel Heights/Jordan Park area are off-limits for trucks over 3 tons and have many speed humps that would create more vibrations and banging noises when larger vehicles use them. The construction vehicles should not take the restricted streets and stick to commercial streets.

Also, shifting all the noise makers to the early morning or late evening hours will make the noise more discernable since even 70db is heard better during these hours than during the day when other noise is present to "mask" it somewhat.

See also S.15 comments and other areas where noise was brought up as an issue in this document." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-31])*

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"The mitigation measures suggested for construction noise, which will be at unacceptable levels, is inadequate." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-6])*

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"Construction period noises will be unacceptable. In many construction projects, dump trucks and other big trucks travel at night, rumbling loudly when ambient noise levels finally are low, adding to the discomfort of residents." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-8])*

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"The Draft EIR states that the project would have a Significant and Unavoidable with Mitigation impact on noise because it would "expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels." (page 4.D.36) The estimated construction period is 7 to 15 years." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-2])*

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**RESPONSE NO-1: CONSTRUCTION NOISE IMPACTS**

The comments present concern for potential construction noise impacts on the users of the Jewish Community Center of San Francisco (JCCSF) and other sensitive receptors near the project site during construction activities, and the timing of these impacts. Comments assert that the mitigation measures are not adequate and suggest changes to the mitigation measures to reduce construction noise. Comments also express concern about the length of construction, the noise impacts of construction staging, and the noise impacts of construction truck traffic on receptors along the haul routes. Comments also request that the noise mitigation program (assumed to mean the Noise Control Plan identified in Mitigation Measure M-NO-1: Construction Noise Control Measures, on EIR pp. 4.D.42-4.D.43) include the ability for the City to enhance and augment the measures based on monitoring results during the construction period.

Existing long-term and short-term sound level measurements were collected as part of the noise impact analysis for the proposed project or project variant. Five long-term measurements and seven short-term measurements were taken. Figure 4.D.1: Sound Level Measurement Locations, on EIR p. 4.D.8 in Section 4.D, Noise and Vibration, shows each long- and short-term location. Table 4.D.2: Summary of Long-Term (LT) Noise Monitoring Results in the Project Vicinity and Table 4.D.3: Summary of Short-Term (ST) Noise Monitoring Results in the Project Vicinity, on EIR pp. 4.D.9 and 4.D.10, respectively, summarize the collected noise data. The existing noise-sensitive land uses are described on EIR pp. 4.D.10-4.D.11 and the closest sensitive receptors are listed in Table 4.D.4: Sensitive Receptors in the Project Vicinity, on EIR p. 4.D.12.

The potential for noise impacts at the JCCSF was evaluated through modeling noise levels at sensitive receptor locations positioned at the north side of California Street, including at the JCCSF (Receptor R6). As explained in the discussion of the approach to the noise analysis under

"Federal Transit Administration General Assessment Guidance" on EIR p. 4.D.25, and as stated on EIR p. 4.D.38, the EIR assessment of potential increases in the ambient noise environment due to construction activity was based on the "two loudest pieces of equipment [that] would operate simultaneously for one hour at the approximate center of the closest activity," and is considered a worst-case construction noise scenario. As stated in the title of Table 4.D.13: Highest Noise Increases over Ambient Levels During Construction, on EIR p. 4.D.40, the potential increases over ambient noise due to construction are provided as the "highest increases," that is, maximum increases. This is the highest potential increase over ambient noise conditions anticipated during construction activities. The analysis and disclosure of maximum potential project-specific increases over existing ambient environments (i.e., a "worst case" assessment) follows standard methodology for the evaluation of noise impacts. However, it can be anticipated that during most of the construction period, when "worst case" construction noise conditions are not occurring, construction noise would be less than the maximum noise levels conservatively presented in the EIR analysis and would not greatly exceed the ambient noise environment at most sensitive receptor locations, including those north of California Street. For example, the discussion of noise impacts at the sensitive receptors located across Laurel Street, on EIR pp. 4.D.44-4.D.45, states that increases of 10 dBA or more would not be expected to occur at all times during any of the construction phases, and, at many times, the construction noise levels would be below those maximum noise levels. Noise sensitive receptors located across California Street (Receptor R5, located approximately 80 feet from the project site) would experience significant construction-related noise levels during excavation for the Plaza A and Plaza B buildings under Phase 3, but levels would fall below the 10 dBA impact standard during other portions of the excavation period. Regardless, mitigation measures, including continuous noise monitoring along the north side of California Street as well as along Laurel Street and Euclid Avenue during the excavation component of construction, are identified in Mitigation Measure M-NO-1: Construction Noise Control Measures (EIR pp. 4.D.42-4.D.43) to help reduce the potential for off-site construction noise impacts. Appropriate actions are identified for instances where monitoring reports indicate an exceedance. Note that increases in ambient noise from construction that are less than 10 dBA, such as the maximum increase anticipated at the JCCSF, while noticeable, would be less-than-significant impacts. See EIR pp. 4.D.46-4.D.47 regarding less-than-significant construction noise impacts along California Street (closer to Presidio Avenue) and along Presidio Avenue.

Other measures identified in Mitigation Measure M-NO-1, in addition to continuous monitoring along Euclid Avenue, Laurel Street and the north side of California Street, include the preparation of a Noise Control Plan, which would precisely define noise monitoring requirements and would identify specific noise-control measures that would be implemented as part of the Noise Control Plan from the list of measures identified in the EIR on pp. 4.D.42-4.D.43. These noise control features could include some of the items identified in comments, such as prohibiting unnecessary idling and installing temporary barriers around stationary equipment. The noise control features in Mitigation Measure M-NO-1 (EIR pp. 4.D.42-4.D.43) account for corrective actions. As stated

there, "…corrective action shall be taken, such as halting or moving specific construction activities, fixing faulty or poorly operating equipment, and installing portable barriers." Both of these representative measures listed in the mitigation measure could include noise blankets mentioned in one comment, under "temporary barriers" or under "portable barriers." A draft of the Noise Control Plan would be submitted to the planning department and the department of public health for review and approval prior to implementation. To clarify the requirement for review and approval of the Noise Control Plan by the Department of Public Health – Environmental Health Division, the first sentence of the first paragraph under "Plan Review, Implementation and Reporting" in Mitigation Measure M-NO-1 on EIR p. 4.D.43 has been modified as follows (new text is shown in double-underline):

> The Noise Control Plan shall be reviewed and approved by the San Francisco Department of Public Health and Planning Department prior to implementation. Noise monitoring shall be completed by a qualified noise consultant.

Additionally, as stated in the mitigation measure on EIR p. 4.D.43, weekly noise monitoring logs must be made available to the planning department when requested.

Noise monitoring details are presented in the EIR under Mitigation Measure M-NO-1 (p. 4.D.43) and would include alert notifications to the Construction Manager or other designated person(s) when noise levels exceed allowable limits (10 dBA above established ambient levels) so that corrective actions may be taken. Noise monitoring logs would be available at the planning department for public review upon request. Construction activities would not be limited to quieter or noisier times of the day, but are anticipated to occur during daytime hours of 7 a.m. to 7 p.m. on weekdays with some work anticipated to occur on Saturdays between 7 a.m. and 3 p.m., as described on EIR p. 4.D.35, when typical activities at nearby noise sensitive receptor locations would be less likely to be disturbed by construction noise and when construction activities would be less likely to disturb sleep. Therefore, noise from construction-related activities is not anticipated to occur on the project site between the hours of 7:00 p.m. at night to 7:00 a.m. in the morning as noted in one comment, except in certain circumstances for discrete events such as continuous concrete pours for some foundations. As explained on EIR p. 4.D.35, if a few specific construction activities necessitated nighttime work, a special work permit would be required from the Director of Public Works or the Director of Building Inspection. Nighttime construction activities, if any, would not involve activities or equipment that could produce substantial noise and vibration, such as controlled rock fragmentation, impact or vibratory pile drivers, jackhammers, impact hammers, or rock drills. There is no plan to shift noisy activities to early morning (before 7:00 a.m.) and late evening (after 7:00 a.m.) hours, as suggested in one comment.

The noise analysis in the EIR calculated construction noise levels for nearby sensitive receptors, including Receptor R6 located at the exterior of the JCCSF building, as noted above. The analysis in the EIR shows that the maximum noise level at Receptor R6 would be 9 decibels over the

existing ambient level and therefore, while noticeable, would be a less-than-significant impact (see EIR pp. 4.D.40 and 4.D.46). Additionally, the JCCSF preschool yard is located in an interior courtyard shielded from traffic on California Street by the JCCSF building itself, and is expected to be exposed to much lower levels of construction noise than reported in the EIR for Receptor R6. This is because the interior courtyard would be further from the construction noise sources than Receptor R6 located at the California Street edge, which would attenuate the calculated noise level at the interior courtyard somewhat. The building walls around the courtyard would further attenuate construction noise. Therefore, the JCCSF building is expected to effectively shield noise from construction activity as received at the pre-school yard. In addition, implementation of Mitigation Measure M-NO-1, described above in relation to reducing noise levels at Receptor R5, would reduce construction noise levels at all locations, including locations with less-than-significant impacts such as the JCCSF pre-school. Thus, the mitigation measures suggested in the comment are not necessary.

Construction truck hauling hours are defined specifically on EIR p. 4.D.50 as 7 a.m. to 3:30 p.m.; however, pursuant to the San Francisco Noise Ordinance, construction activities within the city may occur on the site between 7 a.m. and 8 p.m. Noise monitoring during construction hours would be continuous, and therefore would capture all noise emitted during daytime construction operations. At this time, no regular nighttime construction is anticipated by the developer. Accordingly, no hauling of materials, equipment warm-up, or any other activity is anticipated during nighttime hours except in unusual circumstances such as concrete trucks providing a continuous concrete pour, if needed, for some foundations or construction equipment for utility work, as explained on EIR p. 4.D.35. If nighttime work after 8 p.m. were needed, a special nighttime construction permit would be needed, as noted above.

For purposes of the noise impact analysis, the construction truck haul routes were determined based on the identified truck routes in the San Francisco Planning Department's Transportation Information Map and information provided by the project sponsor's general contractor (see EIR pp. 4.D.50-4.D-51 and Section 4.C, Transportation and Circulation, EIR p. 4.C.72). Considerations for weight restrictions on roadways are made in coordination with the San Francisco Municipal Transportation Agency (SFMTA), which publishes readily available online resources that identify weight and vehicle size/type restrictions throughout the City.[1] San Francisco Transportation Code article 500, section 501, lists the streets where operation of a vehicle with a gross weight over 3 tons is prohibited in subsection (b).[2] That list includes Laurel

[1] SFMTA, San Francisco Street Restrictions Effective December 2017, https://www.sfmta.com/sites/default/files/pdf_map/2017/12/streetrestrictions.pdf and https://www.sfmta.com/getting-around/drive-park/commercial-vehicles/tour-bus-information, accessed June 18, 2019.

[2] San Francisco Transportation Code article 500, section 501, Vehicle Weight Restrictions, http://library.amlegal.com/nxt/gateway.dll/California/transportation/transportationcode?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$sync=1, accessed June 18, 2019.

Street between Mayfair Drive and Euclid Avenue as well as several streets in the Jordan Park area near the project site such as Jordan Avenue between Geary Boulevard and California Street, Spruce Street between Geary Boulevard and Euclid Avenue, and Mayfair Drive between Spruce and Laurel streets. Subsection (d)(2) provides for exemptions to the weight limitation for a commercial vehicle coming from an unrestricted street to one of the restricted streets when necessary for the purpose of delivering materials or equipment to be used in construction of a building on the restricted street when a building permit has previously been issued. The construction logistics plan identified under Impact TR-1 on EIR pp. 4.C.68-4.C.74 would take that information into consideration. As explained on EIR pp. 4.D.50-4.D.51, construction trucks would access the site from California Street and from Masonic and Presidio avenues (with limited access from Laurel Street and Mayfair Drive based on the exception noted), citing the Truck Routes section of the SF Transportation Information Map (see note 39 on EIR p. 4.D.51) and/or Transportation Code section 501.[3] That construction truck traffic would add 2 dBA or less to the expected haul routes (see EIR p. 4.D.50). A 2 dBA change is not typically noticeable to most people outside of laboratory conditions, although some residents may notice when some trucks pass nearby.

Construction occurs throughout San Francisco and is common and expected in a dense urban environment. The SFMTA, planning department, and other City agencies have established protocols for addressing a variety of concerns throughout the construction process, e.g., noise complaints, dust control, and traffic hazards. For a response to comments regarding the construction duration, phasing and temporary staging see Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement, on RTC pp. 5.B.9-5.B.15.

## COMMENT NO-2: CONSTRUCTION VIBRATION (OFF-SITE STRUCTURES)

"3. **Construction Vibration.** Pages 4.D.54-56. The DEIR concludes that the JCCSF is located too far from the Project construction site to experience construction vibration impacts to the JCCSF structure. We acknowledge that the San Francisco Fire Credit Union building is closer and is more at risk from vibrations from construction activities; however, we continue to be extremely worried about this issue especially given the presence of the underground garage and pool at the JCCSF. As a result, we request that the City amend the last sentence of the fourth bullet of Mitigation M-NO-2 to add the JCCSF to the list of entities which is alerted when vibration levels exceed the allowable threshold at the San Francisco Fire Credit Union building. In other words, if the San Francisco Fire Credit Union is the canary in the coal mine, then the JCCSF will want to know when something happens to the canary. Additionally, if damage is observed at the JCCSF, then similarly to the San Francisco Credit Union Building, we believe that excavation should cease and vibration control measures should be implemented. Thus, we would request that the phrase in the fifth bullet of Mitigation M-No-2 be amended to add the

[3] Violations of the street weight restrictions, without a special exception as noted in Transportation Code section 501(d), is an infraction under Transportation Code sections 7.2 and 7.2.77, enforced by police officers, parking control officers or others designated by the Chief of Police under Transportation Code section 3.1.

bolded language: i.e. "if damage to the SF Fire Credit Union building or the JCCSF building is observed..." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, January 8, 2019 [O-JCCSF1-3])*

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"3. Construction Vibration and Noise -The IS notes (pg. 142, Impact N0-3) that vibration is a potential issue for the SF Fire Credit Union. We are similarly concerned by construction related activity and request that the EIR consider potential impact to the JCCSF building - including our underground pool, parking and overall structure." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 8, 2018 [O-JCCSF2-3])*

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"What is the impact on 560 Presidio Building's structure vibrations…" *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-4])*

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**RESPONSE NO-2: CONSTRUCTION VIBRATION (OFF-SITE STRUCTURES)**

One comment expresses concern about potential construction vibration impacts at the JCCSF because it is across the street from the SF Fire Credit Union building, which was evaluated in the EIR for its potential to be affected by construction-related vibration as it is near the northeast side of the construction area. The comment also requests that Mitigation Measure M-NO-2 be revised so that the JCCSF would be notified when vibration levels exceed the thresholds for potential damage at the SF Fire Credit Union building. Another comment requests information on the vibration impacts at 560 Presidio Avenue.

Groundborne vibration impacts are discussed in Section 4.D, Noise and Vibration, under Impact NO-2, starting on EIR p. 4.D.51. The methodology for the vibration impact analysis is provided on EIR pp. 4.D.30-4.D.32 and is based on Federal Transit Administration guidance. Table 4.D.6: Vibration Guidelines for Potential Damage to Structures, on EIR p. 4.D.17, identifies the vibration level at which different structure types (i.e., from "extremely fragile historic buildings, ruins, ancient monuments" to "modern industrial/commercial buildings") would be subject to potential damage. Table 4.D.10: Vibration Source Levels for Construction Equipment, on EIR p. 4.D.31, provides the vibration source levels for typical construction equipment.

As noted on EIR pp. 4.D.54-4.D.55, vibration impacts on the SF Fire Credit Union building could occur with the operation of excavators or similar earth-moving equipment within less than 8 feet of this building (see Table 4.D.17: Maximum Anticipated Construction Groundborne Vibration Levels at SF Fire Credit Union Building on EIR p. 4.D.55). The JCCSF is located approximately 60 feet from the nearest portion of the project site, and would be at a greater distance from the nearest use of an excavator than the SF Fire Credit Union building. Thus, the JCCSF is located substantially further away than the minimum distance of 8 feet that is identified in the EIR as the distance beyond which structural damage would not be expected to occur from continuous use of an excavator (see Table 4.D.17, Note D, on EIR p. 4.D.55). The JCCSF, constructed in 2001-

2004, is a newer "modern commercial" building that is anticipated to be able to withstand levels of vibration similar to the SF Fire Credit Union building. As shown in Table 4.D.16: Maximum Anticipated Construction Groundborne Vibration Levels at Offsite Structures, on EIR p. 4.D.54, at a distance of 60 feet, vibration levels at the JCCSF would be expected to be 0.06 in/sec peak particle velocity (PPV) or less when using vibration-intensive equipment such as vibratory rollers, substantially below the 0.5 in/sec PPV threshold for structural damage applicable to modern buildings such as the JCCSF building. As shown in Table 4.D.17, use of excavators during the excavation component of Phase 3 at a distance greater than 25 feet away from the JCCSF would be expected to generate vibration levels of less than 0.089 in/sec PPV, which is below the 0.5 in/sec PPV threshold for structural damage. Thus, the JCCSF at a distance of approximately 60 feet from the proposed excavation activities would experience less-than-significant vibration levels.

Although vibration levels within this range may be perceptible by some people, they are substantially below the Caltrans criterion for vibration impacts for a typical "modern commercial" building (per Table 4.D.6 on p. 4.D.17, 0.5 in/sec PPV for continuous/frequent intermittent sources). Based on the distance of the JCCSF building from vibration-inducing equipment, groundborne vibration effects on the underground garage and pool would not be expected to occur. Therefore, the vibration levels would be below the vibration criteria requiring mitigation and do not provide a basis to include the JCCSF on the list of persons to be notified when vibration levels exceed allowable thresholds. Based on the same Caltrans criteria that have been applied to this analysis (see Table 4.D.6, EIR p. 4.D.17), at all other nearby off-site buildings, including those on the east side of Presidio Avenue such as 560 Presidio Avenue, those south of Euclid Avenue, or those west of Laurel Street, vibration from construction activities is expected to be well below the threshold for vibration criteria requiring mitigation.

## COMMENT NO-3: NOISE INCREASES/OPERATIONAL IMPACTS

"The DEIR states that centralized trash rooms "with combined chutes or bins for recyclable, compostable and trash would be located within each residential building on every floor. The combined chutes would terminate into separate recyclable, compostable, and trash bins using tri-waste sorters and would be held within trash collection rooms." DEIR p. 2.78. Please state the amount of noise expected to be generated by the tri-waste sorters, the times of day during which such noise would be generated; also, please state whether such noise was included in the DEIR's analysis of operational noise and describe the details of the analysis that took into account such noise. Please also describe in detail the amount of space that would be occupied by the proposed tri-waste sorters and the trash collection rooms in each proposed location in the proposed project." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-22])*

"Page S.15: The mitigation measure to initiate early morning and late evening deliveries would seem like they would increase noise levels during these hours which are very low per your data (in the 40dBAs). When one adds large commercial truck deliveries during these very early or

very late hours, the impact would be greater even if at 75db because everything else around it is so quiet." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-26])*

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"If HVAC equipment mitigation is not reached, the Certificate of Occupancy should not be issued for parts of the development where any part of the Noise Ordinance is not met." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-30])*

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"Today, the 3333 California site is offices with no residential units so there is hardly any use of the site beyond UCSF's use after 5PM. As more projects surrounding the building are built with uses that go beyond 5PM or early evening, there will be increased base level noise on all the streets in the neighborhood where it has not existed before or to a greater extent than it will once such uses get put on the site." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-56])*

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"3. The increase in noise and pollution caused by the increased density and changed use of the site would adversely impact the neighborhood. This is a residential neighborhood and the site cannot support the increase in noise or traffic — either during an extended construction period or with the existence of an unnecessary mixed-use project." *(Larry Mathews, Email, December 13, 2018 [I-Mathews1-5])*

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**RESPONSE NO-3: NOISE INCREASES/OPERATIONAL IMPACTS**

The comments suggest that noise from operation of the proposed project or project variant, specifically from garbage sorting, truck deliveries, and HVAC equipment, was either not adequately evaluated in the EIR or requires additional assessment.

The EIR addresses waste sorting on p. 4.D.61, under the subheading "Additional Equipment":

> "Trash compactors and loading docks would be located below grade within Basement Level B3 of the California Street Garage and Basement Level B1 of the Masonic Garage and would be shielded from exposure to nearby onsite and offsite uses. Noise from such equipment and activities would be expected to be either minimally audible or not audible."

The waste would be sorted in the buildings' basements, and sorting activities would not be audible outside of the basements. As explained on EIR p. 2.78, solid waste bins would be transported within the buildings by an automated tow tractor system to off-street staging areas adjacent to off-street freight loading docks in the California Street and Masonic Building garages. Pickup would occur inside the buildings at the loading docks for all buildings except the Laurel Duplexes and the Mayfair Building. Noise from solid waste handling and pickup would be shielded by the building structure. Solid waste bins from the Laurel Duplexes and the Mayfair Building would be placed at the curb on Laurel Street on pickup days, similar to the process for existing residential buildings across Laurel Street and at other locations in the neighborhood and would not result in noise levels different from existing solid waste pickup activities occurring on surrounding neighborhood streets. No additional analysis is necessary.

Regarding truck deliveries, EIR p. 4.D.67 states:

> "…generators and loading docks would be located underground and shielded from onsite receptors, and their use would be temporary and infrequent (i.e., delivery vehicles, including backup alarms) and generally would be consistent with the character of an urban environment within which the project site is located. The impacts of operational noise on onsite receptors would be less than significant."

As noted on EIR p. 4.D.60, noise from delivery vehicles accessing the proposed off-street loading docks within the proposed California Street and Masonic garages from outdoors also would be of short duration and consistent with the character of the urban environment around the project site. Noise generated by loading activities would occur within the building and noise would be effectively shielded from on- and off-site sensitive receptors by the intervening building walls and by distance from the noise sources. Similarly, noise from delivery vehicles using the proposed curbside loading area along California Street to serve the retail and office uses would be typical of the urban environment along neighborhood commercial corridors. While loading impacts were found to be less than significant and no mitigation measures were required, Improvement Measure I-TR-9b: Monitor Loading Activity and Implement Loading Management Strategies was identified to improve loading conditions if occupancy of the on-site loading docks and the on-street loading spaces were to approach capacity (see discussion of freight loading transportation impacts in Impact TR-9 on EIR pp. 4.C.96-4.C.98). This improvement measure could be adopted by the planning commission as a condition of approval or incorporated into the development agreement.

Improvement Measure I-TR-9b provides a list of management strategies that could be employed.[4] One of the several strategies identified would be to require that deliveries to the retail and restaurant components of the proposed project or project variant occur during early morning or late evening hours. If this strategy were to be implemented, the operational noise from these deliveries would be similar to early and late deliveries that already occur along neighborhood commercial streets throughout the city that also have residential uses and would not result in substantial increases in ambient noise levels in the vicinity.

Regarding the operation of HVAC equipment, EIR p. 4.D.64 states:

> "[The] design and operation [of HVAC] in accordance with the noise ordinance and implementation of performance standards for cooling equipment and garbage trucks, as summarized above under Impact NO-3 (pp. 4.D.58-4.D.62), and identified under Mitigation Measure M-NO-3 (p. 4.D.60), would ensure that the proposed project or project variant would not substantially alter ambient noise levels such that future occupants would be located within a noise environment that would be incompatible with the proposed uses."

[4] The mitigation and improvement measures are reproduced in the EIR Summary Chapter in Table S-1, with this transportation loading Improvement Measure presented on pp. S-14 to S-15.

Specifically, Mitigation Measure M-NO-3 (EIR p. 4.D.60) states:

> "Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code."

To clarify the requirements for implementation of Mitigation Measure M-NO-3, at the top of EIR p. 4.D.60, a new second paragraph has been added to the measure as follows (new text is shown in double-underline):

> Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered vent openings, and location of vent openings away from adjacent residential uses.
>
> After completing installation of the HVAC equipment but before receipt of the Final Certificate of Occupancy for each building, the project sponsor shall conduct noise measurements to ensure that the noise generated by stationary equipment complies with section 2909 (a) and (d) of the San Francisco Noise Ordinance. No Final Certificate of Occupancy shall be issued for any building until the standards in the Noise Ordinance are shown to be met for that building.

Regarding operational traffic, the EIR analyzes traffic-generated noise in Impacts NO-4 and NO-5 on EIR pp. 4.D.62-4.D.67. The analysis shows that the increase in vicinity noise levels from operational traffic generated by the proposed project or project variant is predicted to be between 0 and 2 dBA (Ldn) at all existing residences and at new project residential properties adjacent to area roadways (see Table 4.D.19: Project-Related Traffic Noise Levels Near Area Roadways and Table 4.D.20: Estimated Future Traffic Noise Levels at New Occupied Buildings, EIR pp. 4.D.63 and 4.D.66, respectively). Therefore, no significant traffic-generated noise impacts would occur.

See also Response NO-1: Construction Noise Impacts, RTC pp. 5.F.3-5.F.7, regarding construction noise.

## COMMENT NO-4: MITIGATION MEASURES

"**1. The DEIR Fails to Adopt Feasible Mitigation Measures for the Significant Impact From Construction Noise.**

The Draft EIR (DEIR) admits that construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels. DEIR p. 4.D.36. Despite this significant impact, the DEIR fails to adopt feasible mitigation measures required by the California Environmental Quality Act (CEQA). The DEIR is inadequate because it proposes only that the project sponsor prepare a noise control plan at a later time that would be approved by the

Planning Department, and the DEIR does not specify the required contents of the plan and does not adopt a specific performance standard for mitigation of the significant noise impact.

The following mitigation measures are feasible and must be adopted to substantially reduce the significant impact from construction noise:

**MITIGATION MEASURE - NOISE-1: COMPLIANCE WITH SAN FRANCISCO NOISE ORDINANCE**

1. As a condition of approval of the project, contractors or representatives of the project sponsor shall comply with the provisions of Article 29 of the San Francisco Police Code as to Regulation of Noise, except as indicated herein.

**MITIGATION MEASURE - NOISE-2: SPECIFIC NOISE CONTROL MEASURES**

2. As a condition of approval of the project, the noise control plan for the proposed project shall include all of the construction noise control measures described in Mitigation Measure M-NO-1: Construction Control Measures set forth at DEIR pp. 4.D.42-51. Notwithstanding the foregoing, the monitoring noise stations shall be required to provide continuous noise monitoring at the nearest potentially impacted receptors whenever construction activities are being conducted and not merely from 7 am to 3 pm on Saturdays.

Also notwithstanding the foregoing, night noise permits shall not be sought except in an emergency and at the time that any night noise permits are requested, the Construction Manager shall also provide written copies of the application for a night noise permit and all accompanying writings to the Laurel Heights Improvement Association by email to KRDevincenzi@gmail.com and frfbeagle@gmail.com or such other email address as LHIA may provide for notice.

**MITIGATION MEASURE -NOISE-3: PROHIBITION ON NIGHT CONSTRUCTION WORK EXCEPT IN EMERGENCY**

3. At the 3333 California Street site, construction work shall not be performed at night during the hours of 8:00 pm of any day and 7:00 am of the following day except in an emergency.

**MITIGATION MEASURE -NOISE-4: PROCEDURES FOR NOTICE TO RESIDENT ASSOCIATION OF APPLICATION FOR A PERMIT TO PERFORM CONSTRUCTION WORK AT NIGHT**

4. A complete copy of any application for a special permit to perform construction work at night pursuant to section 2908 of the San Francisco Police Code or any other law or regulation must be provided by contractors or representatives of the project sponsor to the Laurel Heights Improvement Association (LHIA) at the same time as it is submitted to the Department of Public Works (DPW) or the Department of Building Inspection (DBI) or any other government agency, and DPW, DBI and any other government agency shall consider comments and/or objections made by LHIA as to any such application. Representatives of the project sponsor shall provide complete copies of any such application to LHIA by email to KRDevincenzi@gmail.com and to frfbeagle@gmail.com or to such other email addresses as LHIA may provide for notice.

**MITIGATION MEASURE -NOISE-5: PROVISIONS' FOR NOISE MEASUREMENTS**

5. As a condition of approval of the project, the Department of Public Health Noise Prevention and Control Officer shall arrange for a qualified noise measurement professionals)

to be on call to travel to 3333 California Street and take noise measurements upon complaint about the level of noise by any resident of the area. The qualified noise professional shall arrive at the 3333 California Street site and commence the noise measurements within 15 minutes of receipt by the City of any complaint about the level of noise emanating from the project.

The cost of such noise measurement and all related work and travel shall be assessed against the project sponsor as a condition of approval of this project. Receipt of a noise complaint by the City shall include without limitation initial receipt of a noise complaint by DBI, DPW, the Department of Public Health, the Police Department, 311, or any other government agency to which a noise complaint may be made. Copies of all writings regarding noise measurements made by such qualified noise measurement professionals) and remedial action required or recommended shall be provided immediately to the Laurel Heights Improvement Association at the email addresses described above.

In the event the qualified noise measurement professional retained by the Department of Public Health fails to arrive at the 3333 California Street site and take noise measurements in accordance with this provision, the project sponsor shall deposit the sum of $20,000.00 (twenty thousand dollars) with the Laurel Heights Improvement Association, and that Association shall be entitled to use these funds to retain a qualified noise professional to perform all the measurements and activities described in this provision. As said sums are drawn down to $2,000, the project sponsor shall deposit additional $10,000 payments with said Association for ongoing noise measurements and mitigation in accordance with this provision. The project sponsor hereby grants permission for any qualified noise professional described in this provision to enter onto the 3333 California Street site and take noise measurements and monitor noise conditions and mitigation measures.

**MITIGATION MEASURE -NOISE-6: PROHIBITION ON VARIANCES TO NOISE REGULATIONS**

6. In relation to construction or operational noise that occurs at 3333 California Street, the Directors of Public Health, Public Works, Building Inspection, or the Entertainment Commission, or the Chief of Police or any other government representative, may not grant variances to noise regulations, over which they have jurisdiction pursuant to Section 2916 of the SF Police Code. The variance procedure provided by section 2910 of the SF Police Code shall not apply to construction or operational noise that occurs at 3333 California Street.

**MITIGATION MEASURE -NOISE-7: STORAGE AND IGNITION OF CONSTRUCTION EQUIPMENT IN UNDERGROUND GARAGE**

7. To the greatest extent feasible, project sponsor shall store all construction equipment in the existing underground garage located on the project site at all times when such equipment is not in use, and all construction workers shall start up, turn on or perform ignition of all construction equipment in that underground garage.

**MITIGATION MEASURE -NOISE-8: PROOF OF USE OF MUFFLERS AND SOUND ATTENUATING DEVICES**

8. Project sponsor shall provide to the Laurel Heights Improvement Association (LHIA) written evidence that impact tools and equipment shall have intake and exhaust mufflers recommended by the manufacturers thereof and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation, and written evidence that pavement breakers and jackhammers shall also be equipped with acoustically attenuating shields or shrouds recommended by the manufacturers thereof and

approved by the Director or Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation, as described in section 2907 of the SF Police Code. Project sponsor shall provide such written evidence to LHIA by email to the addresses described above for each impact tool or equipment to be used at the 3333 California site at least 48 hours prior to use of any such impact tools) and equipment on the site.

**MITIGATION MEASURE -NOISE-9: NOTICE TO RESIDENTS' ASSOCIATION OF NOISE COMPLAINTS AND REPORTS**

9. The Construction Manager or other designated person will provide copies of the noise monitoring log on a weekly basis to the Laurel Heights Improvement Association at the email addresses herein. The log shall include any complaints received, whether in connection with an exceedance or not, as well as any complaints received through calls to 311, DBI, or any other government agency if the contractor is made aware of them (for example, via a DBI notice, inspection, or investigation). The Construction Manager or other designated person shall also contemporaneously submit to the Laurel Heights Improvement Association copies of all reports submitted to the Planning Department Development Performance Coordinator." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-1])*

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**RESPONSE NO-4: MITIGATION MEASURES**

The comment states that the EIR does not include feasible mitigation measures for construction noise required by CEQA. It also states that the draft EIR is inadequate because it proposes only that the project sponsor prepare a noise control plan at a later time that would be approved by the Planning Department, and because it does not specify the required contents of the plan nor adopt a specific performance standard for mitigation of the significant noise impact. The comment proposes several measures intended to provide additional noise controls beyond those discussed in the EIR.

Mitigation Measure M-NO-1: Construction Noise Control Measures, on EIR pp. 4.D.42-4.D.43, summarizes a series of measures that would ensure that noise levels during construction would be minimized, monitored, and corrected when necessary. The measures are designed to ensure that noise from construction meets the requirements of the San Francisco Noise Ordinance (article 29 of the police code, sections 2900-2926), as well as the Federal Transit Administration (FTA) impact criterion of 10 dBA above ambient, as summarized on EIR p. 4.D.29. Note that meeting the provisions of article 29 of the police code related to construction noise is not identified in the EIR as a mitigation measure because it is an ordinance, and therefore compliance is required by law. Specific construction noise limits set by article 29 of the police code are described on EIR pp. 4.D.17-4.D.18.

The Noise Control Plan detailed under Mitigation Measure M-NO-1 is comprehensive and includes measures that address many of the concerns raised in comment. The draft Noise Control Plan would be prepared by a qualified acoustical consultant and submitted to the planning department and the department of public health – environmental health division for review and

approval prior to implementation. As noted above on RTC p. 5.F.5, a text change to Mitigation Measure M-NO-1 has been introduced that clarifies the role of the public health department in the review and approval of the Noise Control Plan. Because technologies change over time, the list of measures that could be included in the plan was not made mandatory but inclusive. The qualified acoustical consultant may choose additional measures to be included in the Noise Control Plan that would be more effective and/or efficient than some of those listed in the mitigation measure. Thus, with review and approval of a draft Noise Control Plan by the planning department and the department of public health, the noise control measures listed in the EIR mitigation measure could be updated to included additional effective measures. None of the currently listed measures in Mitigation Measure M-NO-1 would be removed; instead, they could be updated or augmented to enhance their effectiveness.

As described in Mitigation Measure M-NO-1, construction noise would be monitored by a series of monitoring stations that would record construction noise levels at the surrounding sensitive receptors. The locations of the stations would be selected in coordination between the planning department, construction contractor, and the affected residential property owners on whose properties the stations would be placed, as discussed in the mitigation measure. Monitoring stations would operate continuously during all excavation and during exterior building construction of the Euclid, Masonic, and Mayfair buildings and the Laurel Duplexes, during all hours of daytime construction, identified in the mitigation measure and in Chapter 2, Project Description, on EIR p. 2.93, as typically Monday through Friday 7 a.m. to 7 p.m. with some work anticipated to occur on Saturdays between 7 a.m. and 3 p.m. Thus, continuous noise monitoring at the nearest potentially impacted receptors would cover all periods of time when construction activities are being conducted, not only between 7 a.m. to 3 p.m. on Saturdays as incorrectly stated in the comment. If construction were to occur outside the listed hours, noise monitoring would continue during those hours. To clarify this last point, the text in the seventh bullet in Mitigation Measure M-NO-1, at the end of EIR p. 4.D.42 and continuing on EIR p. 4.D.43, has been modified as follows (deleted text is shown in ~~strikethrough~~ and new text is shown in double-underline):

- ...During the excavation component of all construction phases and during building construction (framing of structure and major exterior work) of the Euclid and Masonic buildings, the Laurel Duplexes, and the Mayfair Building, prepare and implement a ~~daytime~~ construction-noise monitoring program (e.g., 7 a.m. to 7 p.m. during weekdays, and 7 a.m. to 3 p.m. on Saturdays and all other times that excavation or major exterior construction of the identified buildings occurs).

As stated on EIR p. 4.D.35, "…if nighttime construction work is necessary for discrete events such as concrete pours or utility work, a special work permit granted by the Director of Public Works or the Director of Building Inspection…would be required." As noted on EIR p. 4.D.18, under section 2908 of the police code, if noise from construction activities between the hours of 8 p.m. and 7 a.m. (including erecting, constructing, demolishing, excavating for, altering or

repairing) would exceed 5 dBA over ambient levels at the nearest property plane, a work permit must be applied for and granted by the Director of Public Works or the Director of Building Inspection. Night noise permit applications records are available at the building department's website (https://sfdbi.org/night-noise-permits). Sending copies of night noise permit applications and supporting materials to interested individuals and/or neighborhood organizations by e-mail, as requested in a comment, is not a standard planning department practice and would not enhance the effectiveness of the mitigation. Nighttime work permits specify when and where the activity is to occur. If the nighttime work consists of excavation or major exterior construction of the buildings identified in Mitigation Measure M-NO-1, noise monitoring would also be conducted for such work and noise logs would be available to the public as previously noted. The requirements for issuance of a night noise permit include the following: all area residents within a 300-foot radius of where work is to be performed should be given notice at least 10 business days in advance; nighttime work should be scheduled from 8 p.m. to midnight and work between midnight and 6 a.m. should be avoided where possible to minimize effects on sleep; construction equipment must be equipped with muffler and acoustical shrouds; and use of jackhammers is prohibited from midnight to 7 a.m.[5]

As described in Mitigation Measure M-NO-1 (EIR p. 4.D.43), complaints about construction noise would be addressed by the Construction Manager. The Construction Manager, or a designated person, would be alerted when construction noise levels exceed ambient conditions by more than 10 dBA and would be the primary contact person addressing noise complaints. The Construction Manager, or designated person, would be required to identify remedial measures and take corrective action should such events occur. A noise monitoring log would be prepared on a weekly basis and made available to the planning department upon request. The log would include any noise complaints received by the Construction Manager and 311 telephone system operators. Thus, adequate and comprehensive processes for receipt and resolution of noise complaints are already detailed in the EIR mitigation measure.

Regarding the issue of response times to address noise complaints raised in the comment, it would not be reasonable to assume that a third-party acoustical consultant could reach the project site to respond to noise complaints during daytime hours within 15 minutes of the complaint being made, as requested by the comment. Complaints are logged and the measures to address the complaint are identified and implemented in a reasonable amount of time.

All records related to compliance with mitigation and improvement measures imposed as conditions of approval, including noise complaint logs, would be made available for public review at the planning department upon request by any member of the public who files a request.

[5] City and County of San Francisco Department of Building Inspection, Night Noise Permit Issuance and Policy and Procedure, effective May 2015, https://sfdbi.org/sites/default/files/Night%20Noise%20OPP%20-%20May%202015%20FINAL.pdf , accessed June 18, 2019.

However, the commenters request to distribute the weekly noise monitoring reports to the list of persons cited in the comment is not a standard planning department practice and would not be necessary to mitigate or reduce the identified noise impacts.

Because the Construction Manager would already be responsible for ensuring that construction noise is maintained within acceptable levels through contracting with a qualified noise consultant, requiring payment for an additional third-party noise consultant would be a duplicated effort. As indicated, results of noise monitoring, including complaints, would be documented on a weekly basis by the qualified noise consultant, would be made available to the planning department upon its request, and would be available for public review at the planning department.[6]

The Noise Control Plan identified in Mitigation Measure M-NO-1 includes measures intended to minimize noise generated by construction equipment and construction trucks such as muffling and maintaining all equipment and prohibiting unnecessary idling of internal combustion engines. Regarding storage and start-up of construction equipment, the Construction Manager would be responsible for seeing that all equipment is operated within the allowed construction hours and meets the applicable noise limits. Moving equipment to a garage at the end of the shift, or from a garage at the beginning of a shift, would add additional noise from movement of equipment on city streets and throughout the site that otherwise would not occur, and may prolong the duration of construction noise emissions during a typical day. Typically, diesel-powered equipment that requires engine warm-up prior to use is too large to be located within an underground parking garage (e.g., excavators, dozers, etc.). Due to the size of the site and location of each phase of construction, heavy equipment is most efficiently stored at the location where the pieces are planned for use.

As stated on EIR p. 4.D.36, impact-type equipment, such as jackhammers or hoe rams, are not subject to the sound level limits identified under section 2907(a) of the police code, i.e., sound levels in excess of 80 dBA at a distance of 100 feet from the source. Section 2907(b) of the police code states that section 2907(a) is not applicable to impact tools and equipment, provided that such impact tools and equipment have intake and exhaust mufflers recommended by the manufacturer, and that pavement breakers and jackhammers are equipped with acoustically attenuating shields or shrouds recommended by the manufacturer; all of which would need to be approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation. However, the assessment of noise emissions in exceedance of existing sound levels, prepared for the EIR and summarized in Table 4.D.13: Highest Noise Increases over Ambient Levels During Construction, p. 4.D.40, included both non-impact and impact-type equipment. As stated in Mitigation Measure M-NO-1, the Construction Manager would be required to take corrective action, such as halting or moving specific

[6] The project sponsor would enter into a development agreement with the City. The planning department's development performance coordinator would monitor and report on compliance with the mitigation monitoring and reporting program.

construction activities, fixing faulty or poorly operating equipment, and installing portable barriers, when notified that noise levels exceed 10 dBA over ambient conditions during all permitted construction hours.

Mitigation Measure M-NO-1 (EIR p. 4.D.42) would also require the general contractor to use impact tools (e.g., jack hammers, pavement breakers, rock drills) for project construction that are "quiet" gasoline-powered compressors or electrically powered compressors, as well as electric rather than gasoline- or diesel-powered engines to avoid noise associated with compressed air exhaust from pneumatically powered tools. The mitigation measure also states: "However, where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used, which could achieve a reduction of 5 dBA. Quieter equipment shall be used when feasible, such as drills rather than impact equipment." The construction equipment requirements for impact tools would therefore result in the reduction of construction noise. Requiring additional mitigation measures for impact-type equipment (e.g., hoe rams) such as shrouds or portable barriers is not recommended. Such equipment often moves through a construction area working at various locations within a short time, resulting in relatively short periods of noise impact and making the placement of shrouds or portable barriers impractical. Further, shrouds or portable barriers could block the line of sight from the operator to the impact equipment itself, and possibly endanger the safety of other nearby workers.

As described in Mitigation Measure M-NO-1 (EIR p. 4.D.43), the Construction Manager would be responsible for notifying area residents of construction activities, the construction schedule, and impacts. Notifications would include descriptions of the type of work that is anticipated, including whether impact-type equipment may be utilized. Providing written evidence of implementation of manufacturer-recommended exhaust mufflers is unnecessary as the Construction Manager is required, as stated in Mitigation Measure M-NO-1 (EIR p. 4.D.42), to ensure all equipment is fitted with mufflers that are in good working conditions. Information on the muffling of construction equipment to meet Noise Ordinance requirements would be available to the public upon request. Thus, the measure suggested by the comment is similar to those already identified in the EIR and would not lessen the identified significant construction noise impact.

As discussed on EIR pp. 4.C.68-4.C.74 in Section 4.C, Transportation and Circulation, area residents and businesses would also be informed of construction activities as part of the required adherence to blue book regulations, which call for the development of a traffic control plan and construction management plan. Furthermore, Improvement Measure I-TR-1: Project Construction Updates (EIR p. 4.C.74) would provide area residents and businesses with detailed construction updates in a mailer or on a dedicated website.

## COMMENT NO-5: METHODOLOGY

"B. Noise. Already street noise is loud and annoying enough to reduce a sense of wellbeing. For Project operations, the methodology of adding noise estimates to current average noise figures is flawed and does not account for unacceptable levels or types of noise throughout the day." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-5])*

It is deceptive to look at average noise levels, and then conclude that the additional noise will not be perceptible. Added noises from construction or operation of the Project may occur when ambient noise is low (early morning truck delivery), or the noise may occur when noise levels already are unacceptable (during rush hour.) Noise may be combined with vibration (heavy truck) which calls attention to the noise. Noise may be rhythmic (motor or fan) or unpleasant (car alarm, dog barking) which causes annoyance. Noise at street level may be different than 3-4 stories up, where noise reverberates from buildings across the street and is amplified. On my block the clanging of delivery truck doors and banging of pallets wakes me up at 5:30 am; a pulsating motor (HVAC system?) somewhere that is imperceptible during the day keeps me awake at night.

Any rise in average noise levels may be too much. Average means there are times when the noise level is already much higher. We sense the need to talk louder, to strain to hear others. In the 8 years at my present address, I have never used the roof deck due to traffic noise. I do not invite people over open during peak hours due to the noise from California Street and Presidio Avenue, and cannot leave my windows open, even on hot days. The chart on Page D.4.20 says that adding to noise—which this Project will do—when the ambient noise in residential areas is 65bBA or higher should be discouraged. Noise measurements (Table 4.D.2) show that LT noise on California Street (R5) already is over 65dBA on average, and so are higher many time of the day.

The EIR concludes that noise from increased traffic from Project operations will not be significant, and may in fact non-existent. How can adding 10,000 vehicle trips per day not significantly increase noise levels? Ride share vehicles, the ever present UPS and FedEx trucks, and pizza and home delivery services for the new residents will add to the noise, not just through higher traffic levels, but by causing more starting-stopping sounds, doors opening and closing, horns as irritated drivers try to pass them, etc." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-7])*

## RESPONSE NO-5: METHODOLOGY

The comments state that the methodology for using average noise levels, such as the hourly Leq or the 24-hour Ldn, is deceptive. The EIR noise analysis presented in Section 4.D was prepared in accordance with the methods established by the Federal Highway Administration and the Federal Transit Administration for the assessment of construction and operational noise impacts. The proposed project or project variant was also reviewed for compliance with the San Francisco Noise Ordinance. Methods established by the California Department of Transportation for the assessment of operational noise were also used in the noise analysis. Key concepts and terms are described under the subheading "Sound Fundamentals" on EIR pp. 4.D.2-4.D.4, and the approach to the noise analysis is detailed on EIR pp. 4.D.23-4.D.30.

The potential for construction noise impacts is based on increases over existing ambient average daytime sound levels using the hourly Leq, which is the average sound energy level over the period of one hour. As summarized in Mitigation Measure M-NO-1 (EIR p. 4.D.43), the Construction Manager would be required to monitor noise emissions and take corrective action, such as halting or moving specific construction activities, fixing faulty or poorly operating equipment, and installing portable barriers, when notified that noise levels exceed10 dBA over ambient conditions during all permitted construction hours. In accordance with the Noise Control Plan, also required under Mitigation Measure M-NO-1, ambient levels would be established for each monitoring location, and typically would be based on measurements at these locations prior to the start of construction activities. The perceived impact of an increase over ambient conditions of up to 10 dBA varies by time of day and according to the sensitivities of the receiver.

During project operation, the prediction of sound levels is based on a 24-hour Ldn. The Ldn is considered to be representative of the average community response to a given noise environment and is commonly applied for long-term sources of noise such as traffic from vehicles, aircraft, and trains. Therefore, the use of the Ldn for the assessment of long-term exposure to increases in noise due to project operation is a reasonable application of this noise metric in the EIR. A comment suggests that exposure to street-level noise would be greater at the upper levels of a building due to reverberation and/or amplification effects of the built environment. As stated on EIR Section 4.D, Noise and Vibration, p. 4.D.2:

> For any noise source, several factors affect the efficiency of noise transmission traveling from the source, which in turn affects the potential noise impact at offsite locations. Important factors include distance from the source, frequency of the noise, absorbency and roughness of the intervening ground (or water) surface, the presence or absence of obstructions and their absorbency or reflectivity, and the duration of the noise.

Sound would not be amplified as a result of reflecting off other nearby surfaces. A receptor's distance from a noise source affects how noise levels attenuate (decrease), and noise exposure at the upper levels of buildings would decrease slightly compared to the exposure at street level, in accordance with the increased distance from the noise source. If sound were reflected off another surface, it would travel a greater distance between the source and the receptor and therefore would attenuate somewhat more and would not be louder at an upper level of a building than at the ground level. If there were intervening features such as trees between the reflecting surface and the receptor, that would further slightly reduce the noise at upper levels.

The comment questions how 10,000 vehicle trips per day, when added to the existing environment, would not "significantly increase" noise levels in the project vicinity. As summarized in Table NO-4 of EIR Appendix E, project-related traffic is expected to be distributed among various roadways in the project vicinity. That is, all project-related traffic would not be expected to be focused at one location (or on one road segment). As noted on EIR p. 4.D.2, a doubling of traffic volumes along a road segment would result in a 3-dBA increase in

noise emission on the same road segment. Therefore, because the increase in traffic levels due to the proposed project or project variant, along all area roadways, would be much less than a doubling of traffic along each roadway, the expected increase in traffic-related noise along each roadway is expected to be between 0 dBA and 2 dBA (see Table 4.D.19: Project-Related Traffic Noise Levels Near Area Roadways and Table 4.D.20: Estimated Future Traffic Noise Levels at New Occupied Buildings, EIR pp. 4.D.63 and 4.D.66, respectively). As stated on EIR p. 4.D.2, people generally cannot detect differences of 1 to 2 dB in a complex acoustical environment. In addition, the increases in traffic volumes and associated ambient noise levels would occur gradually over time as new and rehabilitated buildings were occupied, further reducing the noticeability of the changes in both traffic volumes and noise levels.

# 5.G. AIR QUALITY

The comments and corresponding responses in this section relate to the topic of Air Quality evaluated in EIR Section 4.E. The comments are further grouped according to the following air quality issues that the comments raise:

- AQ-1, Construction Impacts
- AQ-2, Health Risk Impacts
- AQ-3, General Automobile Air Pollution
- AQ-4, Air Quality Setting

A corresponding response follows each grouping of comments.

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## COMMENT AQ-1: CONSTRUCTION IMPACTS

"2. Construction Dust and Hazardous Materials - We are concerned about safety to our users and employees from exposure to dust and potentially hazardous materials during the construction process, especially given that many of them are sensitive receptors - e.g. young children and older adults (pgs. 144-145, Impacts AQ-2 and AQ-3). It is important that Best Management Practices are employed to minimize these potential hazards (especially given that winds pick up in the afternoon with fog)." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 8, 2018 [O-JCCSF2-2])*

"Removal of the demolition debris and the excavated soils will require approx. 32,000 dump truck loads, all of which have to pass though and pollute our neighborhoods. By contrast, the Community Full Preservation Alternative generates approx. 9,000 dump truck loads, one quarter as many! After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings. How many large truck loads, concrete truck loads, etc. will this require? The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-17])*

"That's not to mention noise, light, and air pollution it will add to the very lengthy construction period and after." *(Sonya Dolan, Draft EIR Hearing Transcript, p. 52, December 13, 2018 (I-Dolan-6])*

"Removal of the demolition debris and the excavated soils will require approx. 28,000 dump truck loads, all of which have to pass though and pollute our neighborhoods." *(Richard Frisbie, Letter, January 7, 2019 [I-FrisbieR1-15])*

"Ramboll Environ's pollution counts show emissions based on what kind of equipment? Would not the equipment being used dictate how much pollution is put out? Are all the measurements based on equipment from the 1960s? To be more environmentally friendly, why would not other forms of construction equipment be used to mitigate the emissions? Sadly, the document states that the cancer risks will be essentially the same without and with all the construction equipment emissions coming from this project. It does not make sense as even the fire pollution wafting in from Butte County (the November 2018 "Camp Fire") incident urges everybody including non-sensitive groups to wear N-95 or better rated masks. Laurel Heights and surrounding area is one with a large population of families with small children in the neighborhood. They will be affected the most. It may be important as this cancer risk has to be mitigated." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-62])*

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"While the DEIR states that since any burials were done years ago, there would not be any concern over communicable diseases. However, the DEIR does *not* mention the potential of noxious odors under CULTURAL RESOURCES nor under AIR QUALITY (odors). No mention of mitigation measure to deal with such odors in the DEIR.

Although the bodies were dead for a long time under the ground, the odors were still present even up to 70 years later when exhumed around 1937+, according to the 1950 City Planner's Report at this website http://www.sfgenealogy.org/sf/history/hcmcpr.htm :

> "Condition of remains disinterred varied from "dust" to almost perfectly embalmed bodies, the latter resulting from filling of cast-iron caskets with groundwater acting as a preservative. The superintendent of the disinterment proceedings told the author that his was an interesting job, but that in some cases it was not "pretty". The smell of death was often present, even though the remains had been laid to rest from thirty to seventy years previously."

The DEIR needs a mitigation measure for this because strong winds in this area may carry the unpleasant odors to affect a substantial number of people in the area." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-64])*

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"12. Length of the construction period and overlapping construction phases and the resulting air quality impacts on nearby residents" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-13])*

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"Mitigation measures described for construction dust are inadequate." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-10])*

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"The report recognizes construction dust as a problem, but the proposed mitigation measures will not solve it. Even with dampened dirt, dust will penetrate the neighborhood. It will be blown onto the streets and stirred up again by vehicle traffic; it will be blown off construction trucks leaving the Project and permeate the neighborhood; it will be tracked off the site and into the air on worker's shoes and clothes. A short road repair project in the neighborhood blackened my windows almost immediately, with the rainy season five months away. It will be extremely unpleasant to see and breathe construction grime and dust for seven or more years." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-13])*

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## RESPONSE AQ-1: CONSTRUCTION IMPACTS

The comments relate to concerns about construction impacts from construction equipment, haul trucks, and construction dust. Specifically, comments express concern about impacts on sensitive receptors, including young children and elderly adults. Comments also state that mitigation measures identified to control the construction dust are inadequate. Other comments express concern about the potential odors from unearthing graves from the site's former cemetery. Additionally, some comments express general concern about the length of construction and the air quality impacts of overlapping construction phases. Another comment asserts that an alternative developed by a local neighborhood association (Laurel Heights Improvement Association of San Francisco, Inc.) would generate less haul truck traffic during construction than the proposed project or its variant. Another comment suggests that the November 2018 wildfire in Butte County, California, and the public safety measure recommending use of a N-95 rated breathing mask during those poor air quality days are indicators of potential air quality impacts from construction of the proposed project or project variant.

### Sensitive Receptors

Sensitive receptors are individuals who may be more sensitive to toxic exposures than the general public, such as young children and the chronically ill.[1] Health risks were calculated for all sensitive receptors shown in Figure 4.E.7: Modeled Off-Site Sensitive Receptor Locations, EIR p. 4.E.57, including all residences and sensitive land uses specifically identified in Figure 4.E.2: Sensitive Receptor Parcels in the Immediate Vicinity of the Project Site, EIR p. 4.E.30.

Non-residential sensitive receptors such as daycare centers and schools are typically analyzed differently from residential receptors because of the shorter exposure durations and generally older children (relative to the analysis of impacts on residential receptors, which assumes exposure that begins with fetuses at the third trimester) that results in a lower Age Sensitivity Factor, among other factors. As discussed on EIR pp. 4.E.17-4.E.18, non-residential sensitive receptors such as the preschool at the JCCSF or the in-patient facility at the California Pacific Medical Center were not evaluated separately from residential receptors. All off-site receptor locations within the study area were analyzed as residential receptors to be consistent with the City's Community Risk Reduction Plan-Health Risk Assessment, which characterized all receptors as residents to be conservative. This is a conservative analysis approach because residential receptors would have longer exposure durations and are therefore expected to have the highest health impacts. Stated another way, effects on sensitive receptors decrease based on distance from the source and the type of sensitive receptor, i.e., residential or non-residential, with impacts on residential receptors typically being greater due to daily breathing rate, exposure time, frequency, and duration, among other factors. Thus, pollutant

[1] Cal EPA, OEHHA, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, accessed March 28, 2019.

concentrations, including $PM_{2.5}$ and other toxic air contaminants, would be higher at individual sensitive receptor locations closer to the project site and health impacts would be greater at the closest residential receptor location rather than the closest non-residential receptor location. By assuming all sensitive receptors, even those identified as non-residential receptors in Figure 4.E.2, are residential receptors, the analysis is conservative.

For purposes of the health risk impact analysis, which considers impacts from construction and operation on both off-site and on-site receptors (see EIR pp. 4.E.52-4.E.56), impacts were assessed at all off-site receptor locations but only reported for the maximally exposed individual receptor (see Figure 4.E.8: Maximally Exposed Individual Sensitive Receptors Locations, EIR p. 4.E.57). Based on the air dispersion modeling results, the maximally exposed off-site receptor would be a residence located immediately west of the site. As discussed on EIR p. 4.E.55, the health risk impact analysis assumed that residents at each off-site receptor location would be exposed for 30 years at the same location, starting with an unborn child in the third trimester of pregnancy when construction starts and exposed to all construction emissions followed by operational emissions until that child is 30 years old. The residential receptor exposure is assumed to begin from a third trimester fetus and includes exposure parameters specific to infants and children for the first 16 years of life such as breathing rates, as recommended by the California Environmental Protection Agency's Office of Health Hazard Assessment (OEHHA) Air Toxics Hot Spots Program Risk Assessment Guidelines.[2] The overall exposure is 30 years, as recommended in the OEHHA guidelines.

OEHHA guidelines do not recommend any heightened sensitivity factors for the elderly as they do for infants and children. However, the EIR identified the sensitive receptors in the senior care facilities and conservatively evaluated them under the default 30-year residential assumptions in the health risk calculations. These assumptions are very conservative and health protective even for the most sensitive populations (i.e., infants and children). According to the OEHHA guidelines, the assumptions recommended are "designed to err on the side of health protection in order to avoid underestimation of risk to the public." Additionally, the guidelines state that "OEHHA uses health-protective exposure assumptions to avoid underestimating risk. For example, the risk estimate for airborne exposure to chemical emissions uses the health protective assumption that the individual has a high breathing rate and exposure began early in life when cancer risk is highest.[3]"

As discussed under Impact AQ-3 on EIR pp. 4.E.52-4.E.60, the analysis results using these parameters show that the construction and operational air quality impacts at the on- and off-site sensitive receptors would be less than significant.

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[2] Cal EPA, OEHHA, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, http://www.oehha.ca.gov/air/hot_spots/pdf/HRAguidefinal.pdf and https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, accessed March 28, 2019.

[3] Ibid.

**Odors and Hazards**

Odors from project operations are discussed in the initial study (see initial study Section E.6, Air Quality, pp. 145-146). Odors from temporary activities associated with construction (e.g., diesel exhaust fumes) are also discussed but are not analyzed in depth as they would be temporary. The same would be true for any odors associated with the uncovering of human remains.

A discussion of the Laurel Hill Cemetery, human remains, and their handling, if uncovered during any ground disturbance activities on the project site, is provided in the initial study (see initial study Section E.3, Cultural Resources, pp. 133-134). As discussed in the initial study under Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting (p. 132), all applicable federal and state laws would be complied with as would any protocols identified in the archeological research design and treatment plan (ARDTP)[4] regarding the treatment of human remains discovered during any soils-disturbing activity. As noted under Impact CR-3 in initial study Section E.3, Cultural Resources, p. 134, if human remains are encountered during construction-related ground disturbance "work in the immediate area shall be halted, a 100-foot-diameter buffer established, and arrangements made to protect the remains in place. The treatment of human remains associated with historic burials in the Laurel Hill Cemetery … shall comply with applicable state laws …, including section 7050.5 of the health and safety code, …". Archeological investigation of human remains generally involves recovery of skeletal remains, which are not expected to have any noticeable odor. As discussed in the ARDTP, any remains that would be recovered from the project site were interred during the 19th century and therefore only skeletal remains are anticipated. Hazards associated with uncovered bodies as expressed in the comment are discussed in the initial study (see initial study Section E.15, Hazards and Hazardous, p. 236). As stated, there would be a less-than-significant impact related to this issue and mitigation is not needed.

As discussed under Impact AQ-4 in initial study Section E.6, Air Quality, pp. 145-146, construction or operation of the proposed project or variant would not generate emissions that create objectionable odors. Construction-related odors, such as diesel exhaust from construction equipment, would be temporary and would not persist upon completion of the proposed project's or project variant's construction activity. Operation of the proposed project or its variant is not anticipated to create significant sources of new odors. Therefore, such impacts would be less than significant.

For information related to the presence of hazardous materials in the underlying soils such as naturally occurring asbestos and materials identified in the state Cortese List, see initial study Section E.15, Hazards and Hazardous Materials (EIR Appendix B) as well as EIR Section 4.F,

[4] Note that the ARDTP, prepared by ESA in 2017, is not a published document and is confidential because such documents may have the potential to reveal the location of archeological resources in violation of state and federal law and policy.

Initial Study Supplement. For a response to comments that express concern about health and air quality effects from disturbance of hazardous materials in soils during proposed excavation activities, see Response HZ-1 on RTC pp. 5.J.120-5.J.125.

**Construction**

Construction Schedule

One comment expresses concern over the length of the construction period and overlapping construction phases and the resulting air quality impacts on nearby residents. As discussed in Section 4.E, Air Quality, EIR p. 4.E.1, the air quality impact methodologies and approaches to the analysis are based on an approximately seven-year construction duration with four overlapping construction phases that would constitute maximum development on the site, with construction estimated to start in 2020 and continue through 2027 (see EIR Chapter 2, Project Description, pp. 2.91-2.96, for a detailed discussion of the preliminary construction phasing). The project sponsor may choose to develop the proposed project or project variant over a longer, up to 15-year timeframe and may also develop the phases in a different order. For more information about the construction schedule as it relates to the air quality analysis, see EIR pp. 4.E.26-4.E.32 and Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement, on RTC pp. 5.B.9-5.B.15.

Construction fugitive dust and criteria air pollutant emissions from the proposed project and project variant were found to be below significance thresholds adopted by the Bay Area Air Quality Management District (air district) and used by San Francisco, and less than significant for all years of the construction period (see Impact AQ-1, EIR pp. 4.E.38-4.E.49). This analysis accounted for the emissions from overlapping construction phases. Further, as discussed in Impact AQ-3 (EIR pp. 4.E.52-4.E.60), health impacts from construction and operational activities were found to be below the significance thresholds and therefore less than significant. This analysis also accounted for the overlapping construction phases and all years of construction (plus subsequent project operations).

Construction Equipment Emissions

One comment asks about the type of construction equipment assumed in the analysis. Construction equipment expected to be used at the project site would include excavators, bulldozers, jackhammers, loaders, backhoes, and cranes. The type and usage characteristics of construction equipment that form the basis for the construction-related air quality and noise analyses were provided by the project sponsor and are available for review at the planning department offices as part of Case File No. 2015-014028ENV. Construction off-road equipment assumed for emissions calculations in this analysis is listed in Table AQ-2 in EIR Appendix F. Emission factors for off-road equipment were taken from the California Air Resources Board's online tool for off-road

diesel vehicles, OFFROAD, for each year of construction. Therefore, it was assumed that each year of construction would use the fleet average equipment (in terms of engine model and emissions tier level from OFFROAD) for the year of construction analyzed. Emissions were calculated using CalEEMod® equivalent methods, as well as default horsepower and load factors built into the model.

As discussed in Impact AQ-1 (EIR pp. 4.E.38-4.E.49), construction fugitive dust and criteria air pollutant emissions were found to be below thresholds adopted by the air district and used by San Francisco, and therefore would be less than significant. Further, as discussed in Impact AQ-3 (EIR pp. 4.E.52-4.E.60), health impacts from the proposed project's or project variant's construction and operational activities were found to be below the air district's thresholds and therefore less than significant. The comment that "the document states that the cancer risks will be essentially the same without and with all the construction equipment emissions coming from this project" is incorrect. As shown in Table 4.E.10: Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project and Project Variant at Maximally Exposed Off-Site Receptors, EIR p. 4.E.58, the cancer risk calculated from construction equipment (off-road emissions) was found to be 24 in one million at the maximally exposed individual sensitive receptor (MEISR), making the total cancer risk at the MEISR approximately 36 in one million for off-site receptors. Without the construction equipment emissions, the excess cancer risk would consist of the risk from background existing sources, from the construction on-road vehicles, and from operational traffic, for a total cancer risk of approximately 12.1 in a million. Thus, cancer risks would not be the same with and without the proposed project or project variant's construction activities. However, the excess cancer risk from construction equipment emissions, in combination with other cumulative sources, at 36 in 1 million, would still be below the applicable project-level and cumulative cancer risk significance threshold. The applicable project-level and cumulative health risk threshold for excess cancer risk from the contribution of emissions from all modeled sources (both project-generated and background concentrations) is greater than 100 per 1 million persons exposed, the level that would cause a new location to meet the Air Pollutant Exposure Zone excess cancer risk criterion.

Construction Truck Trips

Construction truck trips are discussed on EIR p. 4.E.41. The quantities of construction haul truck trips mentioned in the comments – 28,000 and 32,000 – are not accurate; the actual number of total construction haul trips would be just over 18,000. Construction truck trip rates were provided by the project sponsor, as shown in Table AQ-3 in EIR Appendix F.

Total haul trips are determined by adding hazardous waste haul trips and non-hazardous waste haul trips for all construction phases. EIR p. 4.E.41 presents the maximum number of off-haul and demolition trips of 80 round trips per day (160 one-way trips); however, this is a maximum number of trips per day and not the average trip number over the entire construction period. Comments estimated 9,000 construction haul trips for the LHIA Alternative, but did not provide any detail of

estimation for haul, delivery and concrete truck trips. The estimate appears to be based on a more limited demolition and excavation program and a reduction in the number of buildings to be built for the LHIA Alternative.

None of the EIR alternatives were developed to reduce a significant air quality impact because all project-related air quality impacts were identified as less than significant without mitigation; however, as a comparison, the EIR alternatives analysis, presented in Chapter 6, Alternatives, included Alternative C: Full Preservation – Residential Alternative, which is similar to the LHIA Alternative. As discussed on EIR p. 6.75, Alternative C has a reduced construction program and a slightly reduced land use program compared to the proposed project and project variant (fewer residential units and less retail space). Thus, under the more limited construction program of Alternative C, construction-related air quality impacts would be below the thresholds and less than significant, similar to but less than the proposed project or project variant.

Construction Dust

The EIR analysis determined that the impacts from construction activities, including the generation of fugitive dust and criteria air pollutants (Impact AQ-1, EIR pp. 4.E.38-4.E.49) as well as toxic air contaminants contributing to health effects (Impact AQ-3, EIR pp. 4.E.52-4.E.60), would be less than significant. Therefore, no construction mitigation measures were required, and none were included in this EIR. The "mitigation measures" referenced by comments are not project-specific mitigation measures; rather, they are measures required for compliance with the local San Francisco Construction Dust Control Ordinance (San Francisco Health Code article 22B and San Francisco Building Code section 106A.3.2.6), described in detail on EIR pp. 4.E.25 and 4.E.39-4.E.40.

The City adopted the ordinance to reduce the quantity of dust generated during site preparation, demolition, and overall construction work in order to protect the health of the general public and on-site workers, to minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (building department). The ordinance represents a regulation of general applicability, adopted for the purpose of environmental protection, that is not peculiar to the parcel or to the project. Thus, the requirements in the ordinance are not "mitigation measures" under CEQA but must be complied with, as explained below.

As shown in Table 4.E.5: Criteria Air Pollutant Thresholds, on EIR p. 4.E.33, the threshold of significance for fugitive dust is not a specific value but compliance with "construction dust ordinance or other best management practices to control fugitive dust emissions." This significance criterion is consistent with air district's recommended significance threshold. The City and County of San Francisco has discretion to rely on air district's recommended thresholds of significance and the use of those thresholds is supported by substantial evidence as discussed below.

San Francisco's Dust Control Ordinance is very similar to the Best Management Practices (BMPs) approach for controlling fugitive dust required by the air district. The Bay Area Air Quality Management District's CEQA Air Quality Guidelines[5] Appendix D: Thresholds of Significance Justification, provides the basis for their reliance upon the BMPs to control fugitive dust.[6] The CEQA Air Quality Guidelines Appendix D states, on p. D-47:

> "For fugitive dust emissions, staff recommends following the current best management practices approach which has been a pragmatic and effective approach to the control of fugitive dust emissions. Studies have demonstrated (Western Regional Air Partnership, U.S.EPA) that the application of best management practices at construction sites have significantly controlled fugitive dust emissions. Individual measures have been shown to reduce fugitive dust by anywhere from 30 percent to more than 90 percent. In the aggregate best management practices will substantially reduce fugitive dust emissions from construction sites. These studies support staff's recommendation that projects implementing construction best management practices will reduce fugitive dust emissions to a less than significant level."

The project sponsor would be required to comply with the San Francisco Construction Dust Control Ordinance (see EIR p. 4.E.25) for the proposed project or its variant. The Construction Dust Control Ordinance requires the project sponsor to submit a Dust Control Plan for approval by the San Francisco Department of Public Health (health department) prior to issuance of a building permit by the building department. This is required because the site is over one-half acre. The goal of the Dust Control Plan is to minimize visible dust and includes a mechanism to temporarily stop work and apply more aggressive dust control measures until there are no visible dust clouds migrating off site. Building permits will not be issued without written notification from the Director of Public Health that the applicant has an approved site-specific Dust Control Plan in place. The Construction Dust Control Ordinance requires project sponsors and contractors responsible for construction activities to control construction dust on the site or implement other practices that result in equivalent dust control that are acceptable to the Director of Public Health. For further details about dust control measures, see EIR pp. 4.E.38-4.E.40. As discussed above, the City and County of San Francisco has a robust dust control ordinance which would apply to the project.

**Effect of Wildfires**

Comments also discuss the impacts from Northern California fires on the Laurel Heights neighborhood air quality, asserting that air quality effects of wildfire would be similar to those from construction of the proposed project and would require public safety measures such as use of N-95 breathing masks. The effects of the 2013 and 2017 wildfires on San Francisco air quality are discussed on EIR pp. 4.E.6 and 4.E.10 and are part of the existing conditions. Verified monitoring

[5] Bay Area Air Quality Management District (BAAQMD), CEQA Air Quality Guidelines, updated May 2017, available online at: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed April 2, 2019.

[6] Ibid., Appendix D: Thresholds of Significance Justification, June 2, 2010.

data are not yet available for 2018, but similar air quality patterns due to wildfires occurred in November 2018 (after the draft EIR was published). Based on preliminary data from the air district, the 24-hour $PM_{2.5}$ standard was exceeded 16 times in the Bay Area in 2018.[7] During the November 2018 wildfire period, the Bay Area experienced unhealthy air quality for nearly two weeks.[8] While final 2018 air quality monitoring data have not yet been released, it is likely that some of these 16 exceedances occurred as a result of the wildfires.

Levels above 300 on the Air Quality Index (AQI) scale, described on EIR pp. 4.E.10 and 4.E.11, rarely occur in the United States, and readings above 200 have not occurred in the Bay Area in decades, with the exception of October 2017, when wildfires occurred north of San Francisco, and November 2018, when wildfires occurred in Butte County.[9] As a result of both wildfires, the AQI in several neighboring counties reached the "very unhealthy" designation, ranging from 201 to 300.[10] During these periods, the Air District issued "Spare the Air" alerts and recommended that individuals stay inside with the windows closed and refrain from any outdoor activity. Although these conditions occurred two years in a row, they are not typical and were due to the wildfires, which affected the San Francisco Bay Area Air Basin.

The levels of emissions from construction of the proposed project or project variant would be substantially less than emissions generated due to wildfires; thus, the comment asserting that the effects of wildfires are analogous to those of the proposed project's or project variant's construction is not accurate.

**Conclusion**

The hazards analysis in initial study Section E.15, Hazards and Hazardous Materials, p. 236, indicated that there would be less-than-significant impacts associated with the uncovering of buried bodies in terms of the generation of hazards. This would also apply to the analysis of odors in the air quality discussion (see initial study Section E.6, Air Quality, pp. 145-146), because the potential for noxious odors is limited based on the amount of time passed since the last known burial. The EIR analysis determined that the impacts from construction activities, including the generation of fugitive dust and criteria air pollutants (Impact AQ-1, EIR pp. 4.E.38-4.E.49) as well as toxic air contaminants contributing to health effects (Impact AQ-3, EIR pp. 4.E.52-4.E.60), would be less

[7] BAAQMD, *PM Box Scores*, http://www.sparetheair.org/stay-informed/particulate-matter/pm-box-scores, accessed April 8, 2019.

[8] BAAQMD, *Air District asks public to not burn wood Thanksgiving Day*, November 21, 2018, http://www.sparetheair.org/~/media/files/communications-and-outreach/publications/news-releases/2018/2018_096_voluntarythanksgiving_111918-pdf.pdf?la=en, accessed April 8, 2019.

[9] BAAQMD, *Spare the Air*, http://sparetheair.org/Stay-Informed/Todays-Air-Quality/Air-Quality-Index.aspx, accessed April 8, 2019.

[10] BAAQMD, Air Monitoring Data, http://www.baaqmd.gov/about-air-quality/current-air-quality/air-monitoring-data?DataViewFormat=monthly&DataView=aqi&StartDate=11/1/2018&ParameterId=316, accessed April 8, 2019.

than significant. Therefore, no construction mitigation measures were required and none were included in this EIR. This analysis accounted for residential and non-residential sensitive receptors and included the emissions from overlapping construction phases. The proposed project or project variant would comply with the local San Francisco Construction Dust Control Ordinance (San Francisco Health Code article 22B and San Francisco Building Code section 106A.3.2.6), effectively minimizing visible dust. As noted, wildfires in the counties north of San Francisco were considered part of the environmental setting, not as an impact related to project construction.

## COMMENT AQ-2: HEALTH RISK IMPACTS

"I APPRECIATE YOUR KINDNESS AND UNDERSTANDING THAT THERE ARE ELDERLY, DISABLED, CHRONICALLY ILL, HOMEBOUND PEOPLE WHO CANNOT AFFORD TO RELOCATE IN THE CITY, AND THE GRAND, LENGTHY, AND VARIANCES REQUIRED FOR COMMERCIAL,OFFICE RETAIL COMPLEX, AND SCALE OF THIS PROJECT, AND AIR TOXICITY, WILL BE A TRAGEDY FOR THEIR HEALTH AND WELL BEING." *(Gail Boyer, Email, January 2, 2019 [I-Boyer-1])*

"I am concerned about the air pollution which will affect our health, and the increased height which will cut out sunlight." *(Sharon Esker, Email, January 5, 2019 [I-Esker-8])*

"Page 4.E.59: According to Fig. 4.E.8, a partial shown below, there are specific cancer risks shown. Why is there only one location denoted by the yellow square on Laurel St. to be determined to be 'Offsite Resident Cancer Rick, PM2.5'? How was the information obtained to designate this parcel as such?

The cancer risks were estimated using the equation specified in Tables AQ-18 and AQ-20 in EIR Appendix F – what other parcels were studied using this equation? Please list or provide a map showing the parcels." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-44]) [Figure 4.E.8 referenced on p. 23 in Comment Letter I-Hillson2 is shown on EIR p. 4.E.59 and in RTC Attachment B.]*

## RESPONSE AQ-2: HEALTH RISK IMPACTS

The comments state that the air pollution from the proposed project or project variant will affect the health and well-being of the local community, specifically the elderly, disabled, chronically ill, and homebound people. Additionally, comments also pose questions asking about the calculation of cancer risks, the designation of parcels as the maximally exposed individual sensitive receptors in Figure 4.E.8, p. 4.E.59, and whether other parcels were studied using the equations specified in Tables AQ-18 and AQ-20 in EIR Appendix F.

As discussed in Response AQ-1: Construction Impacts, RTC pp. 5.G.3-5.G.11, the analysis conducted for the EIR determined that the impacts from toxic air contaminants from construction and operation of the proposed project contributing to health effects would be less than significant

(Impact AQ-3, EIR p. 4.E.52). The cancer risks and $PM_{2.5}$ concentrations relative to applicable thresholds are shown in Table 4.E.10, p. 4.E.58, and Table 4.E.11: Lifetime Cancer Risk and $PM_{2.5}$ Concentration Contributions from the Proposed Project and Project Variant at the Maximally Exposed On-Site Receptors, EIR p. 4.E.61.

Some comments specifically mention risks to sensitive receptors such as children and the elderly. Health risks were calculated for all sensitive receptors shown in Figure 4.E.7, p. 4.E.57, including residences and the other sensitive land uses specifically shown in Figure 4.E.2, EIR p. 4.E.30. As discussed on EIR pp. 4.E.17-4.E.18 and in Response AQ-1, above, all sensitive receptors were analyzed as residents because residents would have longer exposure durations and are therefore expected to have the highest health impacts. Therefore, by assuming all sensitive receptors are residential uses rather than non-residential, the analysis is conservative, because non-residential receptors would experience shorter exposure periods.

Figure 4.E.8 shows the maximally exposed off-site and on-site individual sensitive receptors for each health impact. Each health impact was calculated at all sensitive receptors shown in Figure 4.E.7; however, only the maximums are reported in Table 4.E.10 and Table 4.E.11 and shown in Figure 4.E.8. Cancer risk was calculated using the equations specified in Tables AQ-18 and AQ-20 in EIR Appendix F. The equations calculate cancer risk by multiplying the concentration of the pollutant by factors that take into account inhalation intake, cancer potency, and age sensitivity. The yellow square on Figure 4.E.8 represents the off-site receptor with the maximum cancer risk and $PM_{2.5}$ impact, or, stated another way, the location where the maximum cancer risk and $PM_{2.5}$ values as a result of the project were calculated. The maximums are determined using air dispersion modeling, which takes into account parameters such as location of emissions and meteorological conditions (e.g., wind direction). As discussed under Impact AQ-3 starting on EIR p. 4.E.52 and also under Response AQ-1, the lifetime excess cancer risk impacts from the proposed project or project variant at the off-site and on-site maximally exposed individual sensitive receptor locations would be less than significant. All other off-site individual sensitive receptor locations that would be exposed would experience impacts of similar or lower magnitudes, generally decreasing with distance from the construction area.

One comment raises a concern about increased building height and loss of sunlight; for a response to this issue, see Response WS-1: Wind and Shadow, on RTC pp. 5.J.46-5.J.48.

## COMMENT AQ-3: GENERAL AUTOMOBILE AIR POLLUTION

"The stopping and starting of vehicles as they cannot get around town and as signal timing is contributing to the automobile delay will increase air pollution on many streets around this project for at least ½-mile radius. One can see the automobile increase just from watching and this does not take any $100,000 "traffic study" to figure out.

This point about increase in vehicular travel in this area with nobody really going anywhere efficiently should also be a point under "AIR QUALITY" (***Chapter 4E & AQ***)." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-18])]*

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"However, the EIR concludes that Project operations and related traffic generation will not have a significant impact. I believe the traffic projections understate traffic and pollution levels that will occur when the Project is completed. The delivery vans and ride share services are increasing. This kind of traffic has more idling vehicles, more frequent stops and brake use, and more starts, all of which will increase the amount of emissions per vehicle in the vicinity of the Project." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-12])*

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**RESPONSE AQ-3: GENERAL AUTOMOBILE AIR POLLUTION**

The comments state that the neighborhood streets are already congested and delays from project-generated vehicle trips will increase air pollution in the community, particularly from the idling and starting of vehicles. Comments also assert that the traffic projections understate traffic levels and do not account for the increased use of transportation network companies and delivery services.

The air quality and health risk impact analysis conducted for the EIR evaluates emissions from construction and operation during the four-phase, seven-year construction program and at build-out. The health risk impact analysis evaluates emissions from construction and project operations plus 30 years of operation. Based on the planning department's experience with projects of this scale where construction would occur while completed phases become operational, the department requested that a comprehensive analysis be conducted to evaluate these impacts. Project-generated vehicle trips were accounted for in emissions calculations from both construction and operation of the proposed project or project variant. The proposed project or project variant would result in increased emissions from project-generated construction truck trips and operational trips. The analysis determined that the air quality impacts from construction activities, including the generation of fugitive dust and criteria air pollutants from construction vehicles (Impact AQ-1, as discussed beginning on EIR p. 4.E.38) as well as criteria air pollutants from project operations, which includes project-generated traffic (Impact AQ-2, EIR p. 4.E.49), would be less than significant. Project-generated travel demand and calculations to derive vehicle trips were conducted in accordance with planning department transportation analysis guidelines and methodologies and account for transportation network companies. For further response to the comments regarding an understated traffic count, see RTC Section 4, Master Response – Transportation and Circulation (see the discussion in subsection B.3, Trip Generation Estimates, starting on RTC p. 4.4).

Criteria air pollutant emissions from on-road construction vehicles are shown in Table AQ-7 of EIR Appendix F and toxic air contaminant emissions from on-road construction vehicles are shown in Table AQ-8 of EIR Appendix F. The criteria air pollutant emissions in Table AQ-7 of EIR Appendix F are incorporated into EIR Table 4.E.6: Emissions from the Proposed Project During

Construction and Operations, EIR p. 4.E.48, and Table 4.E.7: Emissions from the Project Variant During Construction and Operations, EIR p. 4.E.49. Toxic air contaminant emissions in Table AQ-8 of EIR Appendix F are used to calculate the health risks from construction vehicle traffic shown in EIR Tables 4.E.10 and 4.E.11 (pp. 4.E.58 and 4.E.61). Construction emissions were estimated using methods equivalent with CalEEMod version 2016.3.2, a model developed for the California Air Pollution Officers Association in collaboration with the California Air Districts.[11] Emission factors for starting and idling were included in the calculation of on-road exhaust emissions from construction vehicles. Brake wear and tire wear emission factors are also included in on-road fugitive dust emissions calculations for construction vehicles that were then used to analyze construction $PM_{2.5}$ emissions in the health risk analysis.

Table 4.E.8 on EIR p. 4.E.51 shows operational criteria air pollutant emissions from on-road fugitive dust and on-road vehicle exhaust for the proposed project, and Table 4.E.9: Emissions from the Project Variant During Operations at Full Build-Out, on EIR p. 4.E.53, shows operational criteria air pollutant emissions from on-road vehicles for the project variant. Table AQ-12b in EIR Appendix F shows toxic air contaminant emissions from project-generated traffic. Brake wear and tire wear emission factors are included in on-road fugitive dust emissions calculations. On-road vehicle exhaust emissions were calculated using running emission factors, which include idling for light-duty vehicles; starting emissions were excluded as they are assumed to be relatively small. Light-duty vehicles are assumed to make up over 80 percent of the operational vehicle trips. Starting and idling emission factors for the other classes of vehicles generally represent a smaller fraction of overall emissions compared to running emissions. Even if on-road exhaust emissions were doubled from the calculated values for light-duty vehicles shown in Table 4.E.8, the overall operational criteria air pollutant emissions would still not exceed thresholds of significance; therefore, the overall operational impact (Impact AQ-2) would remain less than significant.

Further, as shown in EIR Table 4.E.6, p. 4.E.48, project NOx emissions would be closest to the threshold of significance during "Phase 2/3 Construction Overlap + Phase 1 Operation" at 39 pounds per day, compared to a threshold of 54 pounds per day. On-road mobile emissions during operations would account for 21 pounds per day of the 39 pounds per day total. On-road exhaust emissions would have to be more than 1.7 times higher than the calculated 21 pounds per day, which would be a conservative estimate for starting and idling emissions, in order for operational plus construction emissions to exceed thresholds of significance.

Similarly, as shown in EIR Table 4.E.7, Project Variant ROG emissions would be closest to the threshold of significance during "Phase 2/3 Construction Overlap + Phase 1 Operation" at 41 pounds per day, compared to a threshold of 54 pounds per day. On-road mobile emissions make

[11] CalEEMod is the air district's recommended tool for CEQA criteria air pollutant and greenhouse gas quantification, and can be downloaded from the air district's Tools and Methodologies website: http://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools.

up 5.2 pounds per day of the 41 pounds per day total. Therefore, on-road exhaust ROG emissions would have to increase more than four-fold from starting and idling for ROG emissions to be higher than significance thresholds. It is not likely that the starting and idling emissions would contribute this large an increase to overall vehicle emissions; therefore, the overall impacts would remain less than significant.

In sum, even if starting and idling emissions were included for all vehicle categories, the overall operational criteria air pollutant emissions would still not exceed thresholds of significance; therefore, the overall operational impact (Impact AQ-2) would remain less than significant.

As shown in Tables 4.E.10 through 4.E.13 on EIR pp. 4.E.58 through 4.E.69, cancer risk and $PM_{2.5}$ concentrations attributed to on-road vehicle traffic is a small portion of the overall impact to both on-site and off-site receptors from the proposed project and project variant. Even a very large increase from starting and idling of vehicle emissions would not be enough to exceed health risk significance thresholds. Therefore, overall health impacts would remain less than significant.

## COMMENT AQ-4: AIR QUALITY SETTING

"The soot on my building and steps is terrible…" *(Sharon Esker, Email, January 5, 2019 [I-Esker-6])*

"Page 4.E.30: The map of the Sensitive Receptors has the legend covering up the 150 Parker School that is just as distant as the CPMC sensitive receptor yet it is not shown on the map nor mentioned in the list of sensitive receptors on Page 4.E.17.

"The area that is occupied by the California Pacific Medical Center (Hospital & Residential Care Facility) buildings (where the new residential replacement project is planned) is shown but not the 150 Parker School. The location of this school is covered by the white legend box.

"The young children attending this pre-school would appear to be sensitive receptors. Why is the 150 Parker Avenue School not shown on the map (Page 4.E.30) below?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-43]) [Figure 4.E.2 referenced on p. 23 in Comment Letter I-Hillson2 is shown on EIR p. 4.E.30 and in RTC Attachment B.]*

"C. Air pollution. The air in the vicinity of the Project is already dirty and Project operations will add to the problem." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-9])*

"Vehicle emissions may be less today, but brake pads, tires and road wear still generate unhealthy particulates. Ever present neighborhood construction and street repair work add to dust and grime. I live 1 ½ blocks eastward and mostly downwind of the Project, and even now there are quantities of black soot/dust on my windows, window sills and balcony. My balcony, on the east side of the building sheltered from California Street and prevailing winds, cannot be used without wiping all surfaces. Then the wash rag is black. Unless I keep my windows closed and stay inside, I am breathing those same pollutants." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-11])*

**RESPONSE AQ-4: AIR QUALITY SETTING**

The comments characterize the existing air quality in the neighborhood as "dirty" due to traffic-related emissions and emissions from local construction and street repair work. One comment questions the absence of the preschool located at 150 Parker Avenue (the One Fifty Parker Avenue School) on Figure 4.E.2 on EIR p. 4.E.30. One comment expresses an unspecified concern with the operations-related contribution to air pollution from the proposed project.

**Neighborhood Air Quality**

The ambient air quality in the San Francisco Bay Area and in the Laurel Heights neighborhood of San Francisco is discussed in detail under the Environmental Setting heading in Section 4.E, Air Quality (see EIR pp. 4.E.3-4.E.19). As shown in Table 4.E.2: State and Federal Ambient Air Quality Standards and Attainment Status for the San Francisco Bay Area Air Basin, EIR p. 4.E.7, the San Francisco Bay Area Air Basin is in non-attainment[12] for the $PM_{2.5}$ 24-hour standard and the 8-hour standard for ozone.

As shown on EIR pp. 4.E.10-4.E.11, the AQI statistics over recent years indicate that air quality in the Bay Area is predominantly in the "Good" or "Moderate" categories and healthy on most days for most people. Historical air district data indicate that the San Francisco Bay Area Air Basin experienced air quality in the red level (unhealthy) on seven days between 2013 and 2017. As shown in Table 4.E.3: Air Quality Index Statistics for the San Francisco Bay Area Air Basin for Ozone, on EIR p. 4.E.11, the air basin had 13 orange-level (unhealthy for sensitive groups) days in 2013, 9 days in 2014, 12 days in 2015, 11 days in 2016, and 3 days in 2017. Additionally, there was 1 red-level day in 2013, 1 day in 2014, 0 days in 2015, 1 day in 2016, and 4 days in 2017.

As discussed on EIR pp. 4.E.12-4.E.13, the City and County of San Francisco has separately conducted a citywide air quality dispersion modeling in an effort to identify areas of San Francisco most adversely affected by sources of toxic air contaminants. The citywide modeling results represent a comprehensive assessment of existing cumulative exposures to air pollution throughout the City. Model results were used to identify areas in the City with poor air quality, termed Air Pollutant Exposure Zones (APEZs), based on the following health-protective criteria: (1) cumulative $PM_{2.5}$ concentrations greater than 10 $\mu g/m^3$; and/or (2) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per 1 million persons exposed. Citywide modeling results indicate that the project site at 3333 California Street is not located in an area that meets the APEZ criteria. The nearest area that meets the APEZ criteria is approximately 2,000 feet southeast of the project site.

[12] "Non-attainment" indicates that the area does not meet the National Ambient Air Quality Standard for the specific pollutant.

**Sensitive Receptors**

The One Fifty Parker Avenue School was not included in EIR Figure 4.E.2. This figure has been revised to show this location as a sensitive land use; this revision does not affect the analysis or any results. As discussed on EIR pp. 4.E.17-4.E.18 and in Response AQ-1, pp. 5.G.3-5.G.11, all sensitive receptors shown on Figure 4.E.2 and Figure 4.E.7 such as daycare centers and hospitals were evaluated as residential land uses as a conservative assumption because residences would have longer exposure durations (compared to daycare centers and other non-residential sensitive land uses), and would therefore be expected to have greater health impacts. This is true for the One Fifty Parker Avenue School, which is over 1,000 feet west of the project site. As such, including this school on Figure 4.E.2 does not affect the location where the proposed project or project variant would have the maximum impact. See Figure 4.E.8, EIR p. 4.E.57, for the locations of the off-site and on-site maximally exposed individual sensitive receptors locations.

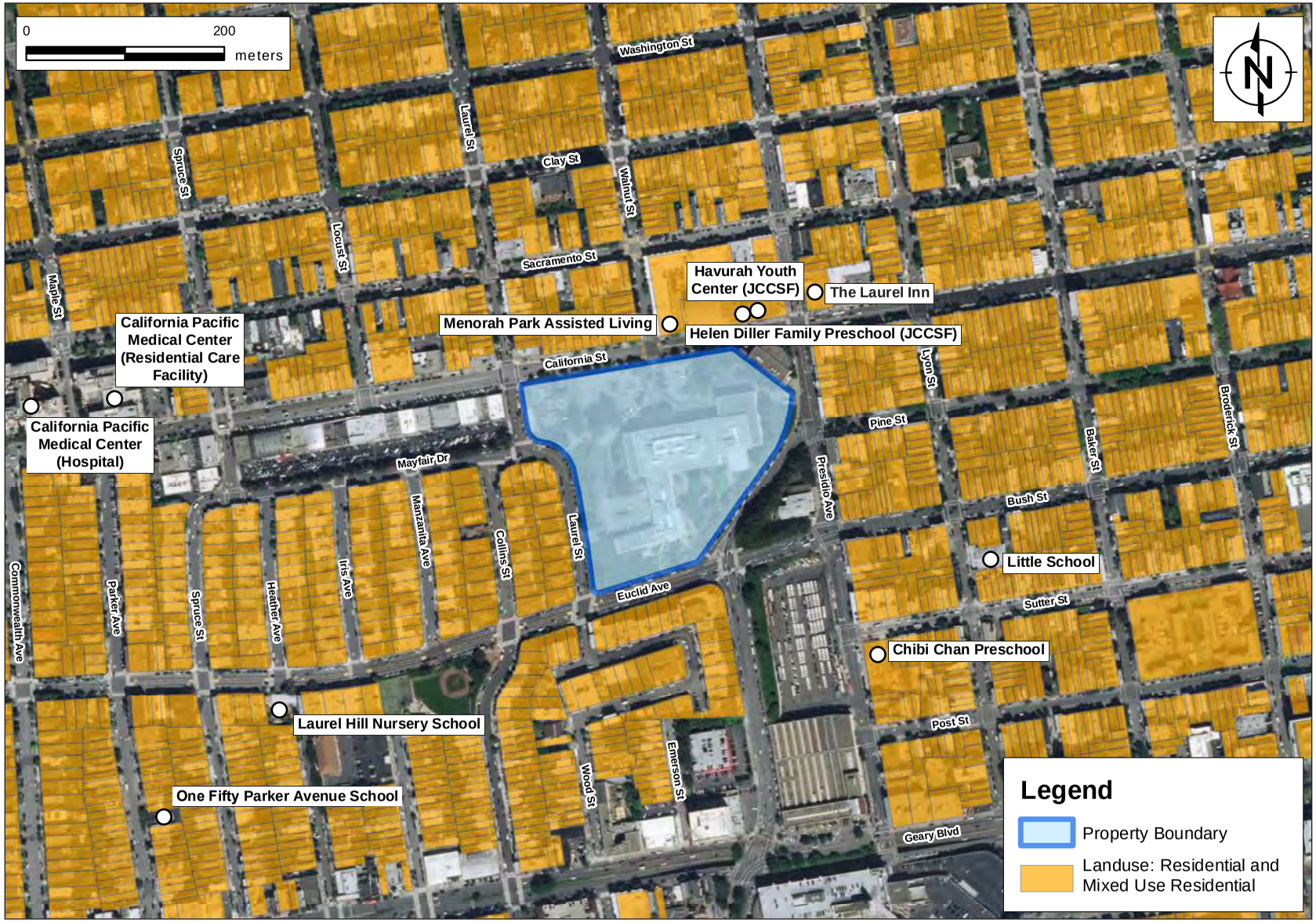
Figure 4.E.2, on EIR p. 4.E.30, has been revised to include a label for the One Fifty Parker Avenue School site. The revised figure is shown on the following page.

EIR Section 4.A, Introduction to Environmental Setting and Impacts, describes the existing land use setting, including nearby preschools, under "Land Uses in the Project Vicinity" on pp. 4.A.14-4.A.15. The second sentence of the last paragraph on p. 4.A.15 has been revised as follows (new text is double-underlined):

> The nearby daycare facilities include the Hellen Diller Family Preschool at the JCCSF,[18] the Laurel Hill Nursery School and Pre-K at 401 Euclid Avenue, the One Fifty Parker Avenue School at 150 Parker Avenue, and the Chibi Chan Preschool at the Booker T. Washington Community Center.[19]
>
> [*Footnotes 18 and 19 on EIR p. 4.A.15*]
>
> [18] Salgado, Craig, Chief Operating Officer, Jewish Community Center of San Francisco, e-mail correspondence with SWCA Environmental Consultants, October 27, 2017. The preschool serves children under the age of five and has a licensed capacity for 175. Actual enrollment may be greater as not all children are at the center at the same time.
>
> [19] Information available at http://www.jcyc.org/chibichanpreschool.htm, accessed May 25, 2018.

EIR Section 4.D, Noise and Vibration, lists nearby schools under "Existing Noise-Sensitive Land Uses" on pp. 4.D.10-4.D.12. The second sentence of the second paragraph on p. 4.D.11 has been revised as follows (new text is double-underlined):

> Although most nearby and adjacent sensitive receptors are residences, there are also several schools/daycare centers within 1,000 feet of the project site, including Laurel Hill Nursery School, San Francisco University High School - South Campus, Little School, Helen Diller Preschool at the Jewish Community Center of San Francisco, the One Fifty Parker Avenue School, and the Chibi Chan Preschool at the Booker T. Washington Community Center.




SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

(REVISED) FIGURE 4.E.2: SENSITIVE RECEPTOR PARCELS IN THE IMMEDIATE VICINITY OF THE PROJECT SITE

EIR Section 4.E, Air Quality, lists nearby schools under "Sensitive Receptors" on pp. 4.E.17-4.E.18. The fourth sentence of the third paragraph under "Sensitive Receptors" on p. 4.E.17 has been revised as follows (new text is double-underlined):

> The closest non-residential sensitive receptors include Laurel Hill Nursery School, San Francisco University High School - South Campus, Little School, Havurah Youth Center, the Helen Diller Family Preschool at the Jewish Community Center of San Francisco, the Menorah Park Assisted Living Senior Housing Complex, the One Fifty Parker Avenue School, and the Chibi Chan Preschool at the Booker T. Washington Community Center.

**Emissions Contributions from Project Operations**

One comment suggests that project operations, presumably the associated vehicle trips, would create emissions and contribute to air pollution. As discussed in EIR Section 4.E, Air Quality, under Impacts AQ-2 and AQ-3, EIR pp. 4.E.49-4.E.60, and under Response AQ-3, RTC pp. 5.G.13-5.G.15, the project-generated traffic would not exceed any thresholds of significance for criteria air pollutant emissions and would not be a substantial contributor to health risks.

Operation of the buildings on the project site, both new buildings and adaptively-reused existing structures, would have the potential to result in air quality impacts associated with area sources such as landscaping maintenance, and use of consumer products such as cleaners and toiletries; with energy sources such as natural gas for space and water heating; and with stationary sources including an emergency generator. These were all analyzed and the results presented in EIR Section 4.E, Air Quality, in the discussion under Impacts AQ-2 and AQ-3. None of these sources would cause any thresholds of significance for criteria air pollutants to be exceeded, nor would they contribute to significant health risks.

Therefore, air quality impacts from these sources would be less than significant.

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# 5.H ALTERNATIVES

The comments and corresponding responses in this section relate to the alternatives to the proposed project or project variant evaluated in EIR Chapter 6: Alternatives. The comments are further grouped according to the following alternatives-related issues that the comments raise:

- AL-1, Range of Project Alternatives
- AL-2, Laurel Heights Improvement Association of San Francisco, Inc.'s (LHIA) Alternative
- AL-3, EIR Alternative C: Full Preservation – Residential Alternative

A corresponding response follows each grouping of comments.

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## COMMENT AL-1: RANGE OF PROJECT ALTERNATIVES

"There's also a no higher density alternative, and I actually think this site could take more density than what's being proposed. I get, judging by the response today from neighbors, people aren't going to be too excited about higher density, but I think we're remiss, actually, in not looking at this site in a state density alternative. As the developer said, this site slopes down significantly and could take a state density bonus or more density. I think we're remiss not to look at a higher density alternative." *(Commissioner Rich Hillis, President, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp., 88-89 December 13, 2018 [A-CPC-Hillis-4]*

"And then the community should take a look at that and internalize that and say, 'Here's our alternative plan,' and maybe you would, at the time you did all this work, put that as, say a G or an H, or you change one of these alternatives. That's what the scoping process and scoping document is.

That all being said, it's a complex project, and I do support, as with Commissioner Moore and Commissioner Melgar, if there is a real viable alternative, I'd like to see it evaluated against the other alternatives." *(Commissioner Dennis Richards, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 84, December 13, 2018 [A-CPC-Richards-2])*

"But what if we combined the two, B and C? What would that look like? Because we've got all these other alternatives that are different heights – there's a lot of different variables, and it's hard to actually kind of compare them because you don't get the full programming one or the other; you get a partial, partial programming of that.

That all being said, since the landscape is an integral part of the I guess the historic nature of the site, as soon as you start putting anything on the landscaping, you've already degraded or defaced it, so there is no real full preservation alternative. I think the real full preservation alternative is no project alternative, right, because we just leave it like it is. So I'm struggling with that."

*(Commissioner Dennis Richards, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 85, December 13, 2018 [A-CPC-Richards-4])*

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"• The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts." *(Andrew Wolfram, President, San Francisco Historic Preservation Commission, Letter, December 11, 2018 [A-HPC-3] and Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-8])*

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**"4. The DEIR Inaccurately States the Characteristics and Impacts of Alternatives to the Proposed Project/Variant and Fails to Analyze Adequately a Reasonable Range of Alternatives.**

The DEIR inaccurately compares alleged characteristics and impacts of the alternatives with those of the proposed project or project variant and inaccurately evaluates the comparative merits of the alternatives and the ability of each alternative to meet most of the basic project objectives. Due to these inaccuracies and the DEIR's failure to analyze a reasonable range of alternatives, the DEIR fails to foster informed decision making and public participation.

Contrary to the impression created in the DEIR, there was no public scoping process that considered various site plans, building retention programs, building heights, views of the character-defining features, land use programs, or feedback from the Architectural Review Committee of the San Francisco Historic Preservation Commission prior to publication of the DEIR. DEIR 6.9. The Planning Department failed to inform the public or the Laurel Heights Improvement Association, which nominated the site for listing on the National Register, of the Architectural Review Committee hearing that considered a range of alternatives on March 21, 2018. The Planning Department went out of its way to exclude the public and LHIA from the formulation of alternatives that would be evaluated in the DEIR.

After the DEIR was published, LHIA and members of the public advocated for a Community Preservation Alternative at a December 5, 2018 hearing of the San Francisco Historic Preservation Commission. The San Francisco Historic Preservation Commission's December 11, 2018 letter to the San Francisco Planning Department expressed interest in seeing the Community Preservation Alternative. (See Ex. 2 to LHIA's transmittal of Treanor SOIS evaluation) Also, the terms of the approved nomination of the site control the nature of the character-defining features of the resource, but the DEIR inaccurately characterizes them as expert opinion.

The DEIR acknowledges that "alternatives with excavation and building construction programs scaled down from that of the proposed project or project variant and taking a shorter period of time to build would result in fewer overall occurrences of adverse construction noise impacts. Although a reduced development alternative would limit the ability to fully achieve some of the basic project objectives, it could reduce the duration of construction noise as well as the overall amount of development, and associated residential, employment, and parking rate increases that generate significant transportation impacts." DEIR 6.9. However, the DEIR omits a reasonable explanation of the manner in which a reduced development alternative would limit the ability to fully achieve some of the basic project objectives, and in this respect presents an unsupported conclusion that is inadequate. A reduced development alternative could still achieve basic project objectives by providing a lesser amount of development on the site.

The DEIR claims that its analysis of alternatives is "qualitative relative to the identified impacts of the proposed project or project variant" but such a facile characterization does not

justify the ambiguities and unsupported conclusions that are contained in the inadequate alternatives analysis. DEIR p. 6.10." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-18]*

"**Alternative F: "Code Conforming" Alternative**

The DEIR inaccurately claims that its Code Conforming Alternative addresses neighborhood requests for an "all-residential" alternative. The neighborhood actually requested an alternative that would comply with the Existing Zoning, which includes Resolution 4109, which bans retail on the site. However the Planning Department contorted this request into an alternative that does not reflect the zoning approvals that exist for the site. Instead, the Planning Department conceived of a non-existing zoning alternative that proposes uses that the applicant could apply for but have not been granted. Since application for conditional uses and other permissions has not yet been considered by the Planning Commission or Board of Supervisors, it cannot be determined whether the Planning Commission or Board of Supervisors would grant the exceptions or approvals requested in the Code Conforming Alternative.

The City unreasonably configured the so-called Code Conforming Alternative to avoid analyzing the alternative of constructing all new residential buildings in accordance with the RM-1 zoning that applies to the site along with Resolution 4109. For example, the DEIR acknowledges that under Planning Code section 304(d)(5), planned unit developments within residential districts may include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to limitations for neighborhood commercial cluster (NG21) districts. DEIR p. 6.10. The DEIR inaccurately claims that the Code Conforming Alternative includes limited ground-floor commercial uses because of the existence of this section, but the Planning Commission has not considered whether commercial uses are necessary to serve residents of the immediate vicinity, and a plan sheet shows a large proposed retail space that could be used for non-local retail. The project site is now amply served by retail uses, as it is immediately adjacent to the two-block Laurel Village Shopping Center (which contains two independent grocery stores and a wide range of commercial stores), one block from the Sacramento Street commercial corridor which contains many restaurants, one block from a Trader Joe's grocery store, and approximately one-two blocks from the City Center which includes a Target Store and other stores, and one-two blocks from the Geary Boulevard commercial corridor, and is within walking distance of the Clement Street commercial corridor. Thus, there is a reasonable possibility that, upon consideration of the facts, the Planning Commission would find that commercial uses on the project site are not necessary to serve residents of the immediate vicinity. Importantly, the DEIR lacks any land use or zoning studies discussing the types of commercial uses in the nearby established commercial centers that would support the DEIR's conclusion that any new commercial use is necessary to serve residents of the immediate vicinity.

**Alternative A: No Project Alternative**

The DEIR is inaccurate in claiming that Alternative A: No Project Alternative would not achieve any of the project objectives. The site currently includes office uses, a childcare center and a cafe (which is considered a type of retail use) Census data states that the site is mixed use. (Ex. I) Thus, Alternative A would meet the objective of having a mixed use development, although not to the same degree as the proposed project/variant.

**Alternative B: Full Preservation -Office Alternative**

Alternative B: Full Preservation -Office is unreasonably configured in the DEIR to include only 167 residential units and to construct a one-level vertical addition on the roof to expand the usable space for office uses. Given the City's housing needs, a reasonable alternative would be configured to reuse the existing office building to provide residential uses. Also, in Alternative B, the Plaza B and Walnut buildings are set back to retain brick perimeter wall along California Street, which could be changed to provide more space for residential uses. DEIR pp. 6.28. Alternative B is also unreasonably configured to eliminate the existing childcare center and fails to mention the existing cafe in the main building. Also, the Annex could be re-purposed and expanded vertically to accommodate residential use, instead of being kept in its existing state in Alternative B.

THE DEIR inaccurately states that pedestrians would not be able to walk through the site to Presidio, Masonic, or Euclid Avenues under Alternative B. In fact, there is an existing passageway through the main office building that leads to the Eckbo Terrace and exits onto Euclid/Masonic. If reasonably configured, Alternative B could include signage would explain that pedestrians would be allowed to use this north south throughway. In addition, pedestrians can now walk through the site and exit through the Mayfair or Laurel gate and walk from those points to Euclid Avenue.

Alternative B would excavate for a two-level California Street parking garage DEIR p. 6.29, 49. With a construction program limited to the northern portion of the site, and a shorter, single-phase construction schedule, the number of temporary construction-related noise events that could affect off-site sensitive receptor locations would be reduced from those under the proposed project or project variant. However, construction activities would be similar, e.g., the use of excavators with hoe rams to fracture and remove bedrock as part of the excavation for the California Street garage. Therefore, the potential to generate substantial temporary and periodic noise increases of at least 10 dBA or greater increase over ambient noise levels at off-site locations would remain. The DEIR admitted that under Alternative B, off-site sensitive receptors along the west side of Laurel Street would be exposed to similar, but slightly lower, noise levels due to less construction along Laurel Street and the south side of the project site, and that off-site sensitive receptors along the east side of Presidio Avenue and along the south side of Euclid Avenue would not be as directly exposed to the temporary, construction-related noise increases because of the greater distance from, and the more limited nature of, the construction activities. The DEIR concluded that as a result of the proximity of construction activities to off-site sensitive receptors along California and Laurel Streets, the nature of the construction activities and the potential for encountering bedrock, construction noise impacts under Alternative B (although more limited in terms of the number of noise events) would be significant and would require implementation of Mitigation Measure M-NO-1. DEIR p. 6.49." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-20]*

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"The project description and objectives are artificially narrow and preclude consideration of reasonable alternatives for achieving the project's underlying purpose. By describing the project as "mixed-use," the Initial Study seeks to prejudice the consideration of other adaptive reuse alternatives, such as all-residential development, which would conform with the existing zoning. The proposed project, however, would conflict with the existing land use controls, including controls prohibiting retail uses and new office uses at the site, heights in excess of 40-feet, violation of open space and rear yard requirements, and would seek other deviations. The project description and objectives would require numerous zoning changes, so is not an of-right project. The community has supported new residential construction, and the project objectives should be

corrected to seek to achieve adaptive reuse of this historically significant resource in a manner which complies with applicable land use controls and avoids or substantially reduces significant impacts on the environment under CEQA standards. An all-residential alternative should be included in the EIR so as not to artificially limit alternatives considered by omitting information from the EIR that is highly relevant to the Board of Supervisors, which would have to approve zoning changes to permit the project as proposed to proceed.

Further, the report of the project sponsor's consultant as to preservation alternatives states that all new construction proposed in the preservation alternative has been designed to the greatest extent that is technically feasible "to be comparable in square footage to the proposed Project or Project Variant." Ex. U, Page &Turnbull, 3333 California Street, Preservation Alternatives Report, excerpts, p. 8. According to the IS, the proposed project would have a total of 1,372,270 gross square feet, whereas the existing uses on the site occupy a total of 469,000 gross square feet. IS pp. 9, 21. The project variant would occupy a total of 1,476,987 gsf. Ex. U, p. 82. The EIR must clarify the actual objectives of the proposed project so as not to preclude consideration of reasonable alternatives for achieving the project's underlying purpose. Considering this information, together with the other information in the IS, it is unclear whether the project objectives are to build mixed-use development, to rezone the site to allow retail and new office uses and increased height limits, to achieve an amount of square footage of development that is now sought by the proposed project or project variant, or to achieve feasible adaptive reuse of a historically significant resource." *(Kathryn Devincenzi, Letter, June 6, 2018 [I-Devincenzi4-13])*

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"In connection with Laurel Heights Partners, LLC's proposed development at 3333 California St., and based on the Draft Environmental Impact Report, please consider continuing to use the site for higher education, such as an annex for the University of San Francisco. Under a scenario where the building is used for higher education, the historically significant building and its beautiful landscaping would be preserved. Architects, preservationists and developers could update the glass curtain façade and interior to serve students for the 21st century. No changes would be required to the surrounding landscape or the perfectly suitable existing surface parking lots and garage ramp structures. Most importantly, the multitude of concerns raised by nearby residents and citizens set forth in the Draft Environmental Impact Report and listed again below for the Planning Department's reference would be adequately addressed. It appears there are far too many concerns for the Planning Department to proceed with the proposed project. Therefore, please consider continuing to use the site for higher education, such as an annex for the University of San Francisco." *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-1])*

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"7. There is no need to destroy this historically significant site because alternatives are available which will achieve housing production by building on the parking lots." *(Marie McNulty, Letter, December 18, 2018 [I-McNulty-5])*

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"**5.** There is no need to destroy this historically significant site because alternatives are available which will achieve housing production by building on the parking lots." *(Zarin Randeria, Email, December 3, 2018 [I-Randeria1-5])*

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"We have objected to the destruction and removal of the existing green areas. We've asked the Applicant of the Proposed Project for an alternative preservation plan that is consistent with the design and aesthetics of the condominiums directly across the street from the Project on California Street between Laurel and Walnut (for example) without touching any of the green and

landscaped areas on Masonic, Euclid or Laurel. The neighborhood has expressed its desire to have the Applicant redesign the proposed Project so preserve as much of the site as possible and complete critically needed residential housing in the shortest time possible. We've written letters to the Applicant, addressed these issues in person with the Applicant at the Developer's poster-board sessions and at the Scoping Meeting at the JCC with the Planning Department but we have yet to see a design that warrants serious consideration by the neighborhood or the City." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-10])*

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"What I recommend is **Alternative Plan B**. That would be much less disruptive, while providing some residential units which the city needs. We (the people that live here) would also not be subjected to disruption for **7** years." *(Steven Zeluck, Email, November 10, 2018 [I-Zeluck-5])*

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"I would like to submit comments on the DEIR for 3333 California Street project. I live on Lupine and overlook Euclid Ave. In reviewing the DEIR, I would not be supportive of the current plan. Adding retail space to the area would, in my opinion, not be positive for the neighborhood. The area would benefit by residential units and some office space. No additional underground parking should be added above what is already in existence. The project height should not be increased more than one additional level from current height. Based on the DEIR, neither the planned project nor any of the alternatives satisfy these requirements. Hopefully the Planning Dept. and developer can adjust the proposal to include residential and office space only." (*John Zlatunich, Email, December 9, 2018 [I-Zlatunich1-1])*

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"I would like to reiterate my submitted previously on the DEIR for 3333 California Street project. I live on Lupine and overlook Euclid Ave. In reviewing the DEIR, I would not be supportive of the current plan. Adding retail space to the area would, in my opinion, not be positive for the neighborhood. The area would benefit by residential units and some office space. No additional underground parking should be added above what is already in existence. The project height should not be increased more than one additional level from current height. Based on the DEIR, neither the planned project nor any of the alternatives satisfy these requirements." (*John Zlatunich, Email, January 5, 2019 [I-Zlatunich2-1])*

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**RESPONSE AL-1: RANGE OF PROJECT ALTERNATIVES**

Comments express concerns with the public scoping process (assumed to be related to development of alternatives) and concurrence or disagreement with the range of alternatives and the features included in the alternatives presented and evaluated in the EIR.

The response below describes the public scoping process for the environmental review of the proposed project and project variant, and addresses the range of EIR alternatives generally, the project objectives used to define alternatives, the EIR alternatives selection process, and specific comments or questions about EIR alternatives (except those comments grouped and addressed separately under Response AL-2: LHIA Alternative and under Response AL-3: EIR Alternative C: Full Preservation Alternative). "LHIA Alternative" refers to the alternative submitted by the

Laurel Heights Improvement Association and is referred to by a number of commenters as the Community Full Preservation Alternative. It is referred to as LHIA Alternative in this document.

For a response to comments that mention construction time frames, see Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement on RTC pp. 5.B.9-5.B.15.

**CEQA Requirements for Analysis of Alternatives**

CEQA Guidelines section 15126.6(a) provides that "An EIR shall describe a *range of reasonable alternatives to the project*, or location of the project, which would *feasibly attain most of the basic objectives of the project* but would *avoid or substantially lessen any of the significant effects of the project* and evaluate the comparative merits of the alternatives." (*emphasis added*)

The alternatives need not meet all of the project objectives, but should meet most of the basic project objectives. The CEQA Guidelines recognize that the range of conceivable alternatives to a proposed project is potentially vast, and that an EIR need not consider every conceivable alternative to a project. However, it must include a reasonable range of potentially feasible alternatives that are limited by the "rule of reason" and that will foster informed decision-making and public participation (see CEQA Guidelines section 15126.6(a)).

The main purpose of presenting a range of alternatives to a proposed project is to focus on alternatives that are capable of reducing or eliminating any significant effects of the proposed project identified in an EIR (CEQA Guidelines section 15126.6(b)). The EIR for the 3333 California Street Mixed-Use Project meets this requirement. For example, the EIR includes two full preservation alternatives that eliminate the significant and unavoidable impact on the historic resource, as well as two partial preservation alternatives that reduce but do not fully avoid the significant and unavoidable historical resource impact, so that decision-makers can compare the policy trade-offs among these alternatives and the proposed project or project variant.

The range of potential alternatives is limited to those that could feasibly attain most of the basic objectives of the proposed project. Among the factors to be considered in feasibility are site suitability, economic viability, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project sponsor can reasonably acquire or have access to an alternative site (CEQA Guidelines section 15126.6(f)(1)).

EIRs are also required to analyze the No Project Alternative (CEQA Guidelines section 15126.6(e)). The purpose of presenting the No Project Alternative is to allow decision-makers to compare the impacts of the proposed project with the impacts of not approving the proposed project. When the proposed project is a development project on a specific site, the No Project

Alternative is generally a scenario with no changes at the project site and no construction activities.

The final determination of the feasibility of alternatives is made by the decision-makers, based on substantial evidence in the entire record, which includes, but is not limited to, information presented in the EIR, comments received on the draft EIR, and responses to those comments.

**Scoping and Selection Process for EIR Alternatives**

Comments express concern about the public scoping process for EIR alternatives. A comment asserts that there was no public scoping process that considered various alternative site plans, programs, and resource retention approaches.

The initial step in the environmental review process for the 3333 California Street Mixed-Use Project included the circulation of a Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting (NOP). The public scoping and review process for the EIR is described in EIR Chapter 1, Introduction, pp. 1.4-1.21, under the heading "Environmental Review Process," beginning with publication of the NOP announcing the planning department's intent to solicit public comments on the scope of the environmental analysis and to prepare and distribute a draft EIR on the 3333 California Street Mixed-Use Project for public comment. The planning department mailed the notice to the State Clearinghouse and relevant state and regional agencies; to occupants and owners of property within 300 feet of the project site; and to other potentially interested parties, including neighborhood organizations that have requested such notice. The planning department also published the notice of public scoping in a newspaper of general circulation on September 20, 2017. Publication of the NOP initiated a 30-day public review and comment period. Pursuant to CEQA section 21083.9 and CEQA Guidelines section 15206, the planning department also held a public scoping meeting on October 16, 2017, to receive input on the scope of the environmental review for this project. During the NOP review and comment period, a total of 54 comment letters, comment cards, and emails were submitted to the planning department and 28 speakers provided oral comments at the public scoping meeting.

Comments received during the EIR public scoping process related to alternatives are summarized and acknowledged as follows on EIR p.1.11.

> Commenters requested the study of a code-compliant alternative that includes only residential uses. Alternatives to the proposed project or project variant analyzed in this EIR include alternatives developed to reduce significant environmental impacts of the proposed project or project variant. These alternatives and a code-conforming alternative are described and analyzed in Chapter 6, Alternatives.

The planning department considered all scoping comments made by the public in preparation of the draft EIR for the proposed project.

As discussed in the section entitled "Alternatives Scoping Process" on EIR pp. 6.5-6.10, the scoping process to identify appropriate alternatives focused primarily on preservation alternatives that could avoid or lessen the significant and unavoidable impact on the historical significance of the site, although reduction of the significant impacts related to transit capacity and construction noise were also considered (see EIR p. 6.9). Therefore, in addition to being informed by the public scoping process, the preservation alternatives presented and analyzed in the EIR are the result of a deliberative and iterative process involving planning department preservation technical specialist staff, with assistance from the project sponsor and their preservation architectural specialists (Page & Turnbull), with direction from the Architectural Review Committee (ARC) of the Historic Preservation Commission,[1] and informed by expert opinion presented in the National Register Nomination Form. As discussed on EIR pp. 6.8-6.9:

> Thus, the preservation alternatives scoping process resulted in the refinement of the full preservation alternative and the two partial preservation alternatives presented to the ARC with greater focus on retaining the character-defining features of the property that best convey the association between the building and its designed landscape and limiting new construction to the northern and western portions of the site (with increasing development intensities along California Street to better meet some of the basic project objectives [e.g., increase the housing supply])…. [A] new full preservation alternative (Alternative B) was developed to reflect expert opinions in the application for listing the 3333 California Street property on the National Register. The preservation alternatives analyzed in this chapter include both office and residential uses for the existing office building in response to ARC input.

A comment asserts that the planning department failed to inform the public or the Laurel Heights Improvement Association about the ARC hearing on March 21, 2018, where the ARC considered the proposed preservation alternatives. There is no requirement for public scoping of EIR alternatives as the development of alternatives is determined by the results of the technical impact analyses and identification of significant impacts. The proposed preservation alternatives were presented to the ARC of the Historic Preservation Commission in compliance with Historic Preservation Commission Resolution No. 0746, in which the Historic Preservation Commission clarifies its expectations for the development and evaluation of preservation alternatives in environmental impact reports. Public notice of the agenda for hearings before the Historic Preservation Commission hearings on the review and comment of draft EIRs or before the ARC is by publication of the ARC and Historic Preservation Commission agendas one week prior to the hearing. Contrary to this assertion, the planning department complied with noticing requirements for both the March 21, 2018 ARC public meeting and the October 16, 2017 public scoping meeting.

[1] The Architectural Review Committee is a sub-committee of the Historic Preservation Commission that reviews and provides feedback when complex design issues require discussion prior to approval of a project, and reviews preliminary CEQA preservation alternatives.

In summary, the planning department conducted a complete public scoping process that included input from the public, from preservation experts on staff, and from the ARC of the Historic Preservation Commission in a public meeting.

On EIR pp. 6.214-6.218, several alternatives are presented that were considered and rejected, as required under CEQA Guidelines section 15126.6(c). These alternatives were not analyzed as EIR alternatives because they would not reduce project impacts, could result in greater impacts than the proposed project or project variant, or failed to meet most of the project's basic objectives identified on EIR p. 2.12.

**Accuracy and Adequacy of EIR Alternatives Analysis**

Comments generally assert that the EIR's comparison of each alternative's impacts with those of the proposed project and variant, and the EIR's assessment of each alternative's ability to meet most of the basic project objectives are inaccurate. These comments provide no specific factual substantiation of these general assertions, although to the extent they are embodied in specific comments about alternatives, they are addressed in responses below.

Range of Alternatives

A comment concurs with the range of EIR alternatives. Other comments request that additional alternatives, or variations thereof, be studied in the EIR.

The EIR presents an adequate and reasonable range of alternatives for redevelopment of the project site under CEQA Guidelines section 15126.6(a) as discussed below. In addition to the required Alternative A: No Project Alternative, the EIR describes, evaluates, and compares five alternative development programs: Alternative B: Full Preservation – Office Alternative, Alternative C: Full Preservation – Residential Alternative, Alternative D: Partial Preservation – Office Alternative, Alternative E: Partial Preservation – Residential Alternative, and Alternative F: Code Conforming Alternative.

Comments call for inclusion of additional EIR alternatives or express support for some other vision for the future use of the project site. Regarding comments that call for inclusion of the alternative submitted as the LHIA Alternative, please see Response AL-2: LHIA Alternative, on RTC pp. 5.H.54-5.H.69, and for those that suggest an all-residential variation of EIR Alternative C: Full Preservation – Residential Alternative or make other comments related to Alternative C, please see Response AL-3: Alternative C: Full Preservation – Residential Alternative, on RTC pp. 5.H.75-5.H.88.

One comment expresses a desire for a higher density residential alternative. Another comment expresses a desire for a new alternative that combines elements of two alternatives already analyzed in the EIR.

Alternatives were developed primarily to address the significant historic architectural resources impact. As discussed above and on EIR p. 6.8, the ARC suggested, among other things, that new development be limited to the north and west portions of the site along California and Laurel streets and that increased development intensities could be accommodated along California Street to better meet some of the basic project objectives (e.g., increase the housing supply). To more effectively retain the character-defining features of the property that best convey the association between the building and its designed landscape, the preliminary designs for preservation alternatives presented to the ARC were refined to address the input from the ARC. The inclusion of a higher density residential alternative would help fulfill the City's housing needs, but would require higher height limits for more of the buildings on the site, and/or loss of more of the existing, designed landscaping along Laurel Street to accommodate additional housing opportunities, as suggested in the comment. The scoping of the preservation alternatives and the determination of what would constitute a full preservation versus partial preservation alternative hinged on the amount of development along Laurel Street and on the southern portion of the site. As concluded for both Alternative D: Partial Preservation – Office Alternative (see EIR p. 6.115) and Alternative E: Partial Preservation – Residential Alternative (see EIR p. 6.149-6.151), the development of townhomes between Euclid Avenue and Mayfair Drive, south of the proposed Mayfair Building, and the Euclid Building (Alternative E only) on the southern portion of the site would not reduce the significant and unavoidable historical resource impact. Thus, an alternative that both increases the height of the proposed California Street buildings and develops more of the site along Laurel Street to increase housing would not reduce or eliminate the significant impacts of the proposed project or project variant on historic resources, transit, or construction noise and would not further reduce any of the significant impacts that could be reduced with mitigation measures identified in the EIR and initial study. The inclusion of another variation of a full preservation alternative would not address the impact on the identified significant historic resource in a substantially different manner than the full preservation alternatives already analyzed in the EIR.

Ability of Alternatives to Meet Project Objectives

A comment asserts that the EIR omits an explanation of how a reduced development alternative would limit the ability to meet project objectives.

In addition to the No Project Alternative, the EIR identified and analyzed five alternatives that included a reduced intensity development from that of the proposed project and project variant. Four of the alternatives involve fewer residential units than the proposed project or project variant, and all five of the alternatives involve fewer gross square feet of development than either the proposed project or project variant. See Table 6.1: Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternative, on EIR pp. 6.13-6.15, for a comparison of the components of the alternatives with those of the proposed project and project variant.

In selecting these reduced development scenarios as EIR alternatives, and despite a reduced development program under each, the EIR recognizes that these alternatives would still "feasibly attain most of the basic objectives of the project" and project variant, as required under CEQA Guidelines section 15126.6(a), although to a lesser degree than the proposed project and project variant. See Table 6.3: Ability of Alternatives to Meet Basic Project Objectives on EIR pp. 6.17-6.19. In addition, the discussion of each of these alternatives includes a section on the ability of the alternative to meet project objectives. For example, see EIR p. 6.37 for a discussion of the ability of Alternative B: Full Preservation – Office Alternative to meet project objectives. A similar discussion is provided on EIR pp. 6.75-6.76 for Alternative C: Full Preservation – Residential Alternative, on EIR p. 6.110 for Alternative D: Partial Preservation – Office Alternative, on EIR pp. 6.144-6.145 for Alternative E: Partial Preservation – Residential Alternative, and on EIR p. 6.182 for Alternative F: Code Conforming Alternative. Thus, contrary to assertions in the comments, the EIR provides a detailed discussion of how each of the reduced development alternatives would or would not meet project objectives. It is important to note that a comment asserting an inability to understand the objectives of the project was submitted as a comment on the initial study. The initial study project description did not include the project sponsor's objectives as that is not required by CEQA. The project objectives are included in the EIR project description (see EIR p. 2.12) as required by CEQA Guidelines section 15124. For a response to comments regarding the process for development of the project objectives and whether or not they are too narrowly defined or inaccurate, as asserted, see Response PD-6: Project Objectives on RTC pp. 5.B.33-5.B.36.

Alternative A: No Project Alternative

A comment states that the real full preservation alternative is the No Project Alternative. While the No Project Alternative would avoid any impact of the proposed project or project variant on the ability of the site to convey its historic significance, it would not achieve any of the basic project objectives. The EIR analyzes two alternatives – Alternative B: Full Preservation - Office Alternative and Alternative C: Full Preservation - Residential Alternative – that would avoid a substantial adverse change in the significance of the historical resource (as defined in CEQA Guidelines section 15064.5(b)), while achieving some of the basic project objectives such as allowing for adaptive reuse of the existing office building, building additions, selective removal of existing on-site features, and new construction within the project site. See the analysis of impacts on historic architectural resources under Alternative B on EIR pp. 6.38-6.42 and under Alternative C on EIR pp. 6.76-6.81. Thus, the EIR includes two full preservation alternatives in addition to the No Project Alternative. The historic resources impact analysis for the alternatives applied the same approach as that for the proposed project and project variant as it relates to conformance with the secretary's standards and the determination of whether or not the changes to the existing building and landscaping would result in a material impairment of the physical

characteristics of the resources that convey historical significance. The comment does not provide evidence regarding why Alternative B and Alternative C are not full preservation alternatives.

A comment expresses support for the use of the project site for higher education, preserving the existing building and landscape. Before the existing building on the site was purchased and occupied by UCSF, it was used as office space, first by the Fireman's Fund insurance company and later by other office uses. Thus, an academic use was not the original use of the building and grounds. Subsequent to the initiation of the environmental review, UCSF sold the site to the project sponsor and, regardless of the ultimate decision on project approval, UCSF will vacate the site and relocate the existing uses to its Mission Bay campus, as well as to its Parnassus campus once improvements are completed, based on its Long Range Development Plan. The No Project Alternative assumes that UCSF's departments and childcare facility would relocate, but the site would continue to be occupied by office use. The continued use of the existing office building on the project site for academic uses would reflect the continuation of existing conditions and, like the No Project Alternative, would have no impact on the historic resource. If the No Project Alternative is approved (in effect rejecting the proposed project and project variant as well as the other alternatives to the project), an academic institution could choose to occupy the existing building on the site at some time in the future.

A comment states that the EIR is inaccurate in claiming that Alternative A: No Project Alternative would not achieve any of the project objectives, which includes the creation of a mixed-use project, and that the project site is already mixed-use in that it has an office use, a child care center, and a café (described in the comment as a retail use). Although there are three land uses on the site, the existing café is open only to UCSF employees and therefore is not a typical retail use because it does not attract customers separate from the main institutional use.[2] The child care use is limited to UCSF employees. A vibrant mix of uses generally includes residential uses to promote activity throughout the day and into the evening that supports the other land uses. UCSF has not had any residential uses on the project site. Thus, the site is not a mixed-use site, as asserted. It is more accurately described as an institutional use. No other project objectives were identified by the commenter as being potentially met by the No Project Alternative. As shown on Table 6.3: Ability of Alternatives to Meet Basic Project Objectives, on EIR pp. 6.17-6.19, the No Project Alternative would not meet any of the basic objectives of the proposed project and variant in any substantial manner. It would not redevelop the site with a number of residential uses.

Alternative B: Full Preservation – Office Alternative

A comment asserts that Alternative B: Full Preservation – Office Alternative is unreasonably configured to include only 167 residential units and to construct a one-level vertical addition on

[2] The existing building including the café is for UCSF staff only and is not open to the public. See Response PD-4: Site Access on RTC pp. 5.B.25-5.B.28.

the roof of the existing building to expand the usable space for office uses. The comment expresses a preference for an all-residential program for the site that retains the existing childcare center and café.

As described on EIR pp. 4.B.2 and 4.B.17-4.B.18, in February of 2018, an application to list the project site on the National Register of Historic Places, privately prepared by Michael Corbett and Denise Bradley on behalf of the Laurel Heights Improvement Association, was submitted to the California Office of Historic Preservation for review and comment. The National Register Nomination Form was updated by Mr. Corbett on April 19, 2018. The property was determined by the California State Historical Resources Commission to be eligible for the National Register of Historic Places, and on August 29, 2018, the property was officially determined eligible for the National Register following publication of notice in the Federal Register. The finding of eligibility for the National Register automatically places the property in the California Register of Historical Resources (California Register).

The National Register Nomination Form is one of several documents consulted by the planning department preservation staff experts in making its independent determination as to the eligibility of the 3333 California Street buildings and site for inclusion in the California Register. Others include the records at the California Parks and Recreation Department, a *Historic Resource Evaluation, Part I* prepared by LSA, and evaluations by Carey & Co., Inc. prepared for the University of California San Francisco (see EIR pp. 4.B.16-4.B.17). As summarized on EIR pp. 4.B.21-4.B.22, the planning department's evaluation of 3333 California Street in its historic resource evaluation response determined that the property is eligible for listing on the California Register as an historical resource under Criterion 1 (Events) and Criterion 3 (Architecture/Design/Construction). The department's determination took into account the information in the National Register Nomination Form prepared for LHIA. The department's findings as the lead agency differ from those in the National Register Nomination Form, and both are disclosed in EIR Section 4.B, Cultural Resources, on EIR pp. 4.B.22 and 4.B.25.

As stated there, the department concurs with the National Register Nomination Form's determination that the site is significant under Criteria A/1 (Events) and C/3 (Architecture/Design/Construction) but differs with specific findings related to those eligibility criteria. The department did not concur with findings in the National Register Nomination Form that the site is significant for its association with the Fireman's Fund Insurance Company or as the work of a master architect, Edward B. Page. The department also does not agree with some of the character-defining features listed in the National Register Nomination Form, such as the annex (service) building and circular garage ramp structures identified in the nomination as important architectural elements. The department determined that the National Register Nomination Form's list of character-defining features was simply a description of the landscape,

rather than a distillation of the essential features that communicate its significance as a Midcentury Modern landscape.

As described on EIR pp. 6.38-6.40, Alternative B was developed in response to the information on contributing features presented in the National Register Nomination Form. The intent of Alternative B is to retain, to the greatest extent, the architectural and landscape features described in the National Register Nomination Form (including the office building, annex building, perimeter brick wall, circular garage ramp structures, landscape features, and views of the site), while allowing for expanded office use within the existing office building on the site and residential units within new residential buildings at the northern portion of the site.

The EIR on pp. 6.38-6.39 lists the character-defining features of the project site and shows that Alternative B would retain nearly all of them. The proposed changes to the site and landscape features would be concentrated on the northern portion of the site where the surface parking lots are located, while existing conditions on the southern and eastern portions of the site would be maintained. Changes to the existing office building would be limited to the replacement of the glass curtain wall, the removal of the existing mechanical penthouse, and construction of a one-story addition. In-kind replacement of glass curtain wall systems originally designed for office uses and one-story additions that would be set back from the original structure would meet the *Secretary of Interior's Standards for Rehabilitation* (secretary's standards) related to rehabilitation of historic structures.

Alternative B represents, by degree, the least physical change to the historic resource within the range of two full and two partial preservation alternatives analyzed in the EIR and proposes a mixed-use program to occupy existing and new buildings within the site, and was determined to be the environmentally superior alternative. As such, it is reasonable that Alternative B would include the smallest number of residential units of all of the preservation alternatives. Alternative C: Full Preservation – Residential Alternative, provides a mixed-use program with a substantial amount of residential use instead of continuing the office use of the existing building as in Alternative B.

A comment asserts that the public would be able to walk through the office building under Alternative B, as under current conditions, to make a pedestrian connection between California Street and Euclid Avenue using "an existing passageway." This is incorrect. See Response PD-4: Site Access on RTC pp. 5.B.25-5.B.28, which discusses existing access to the project site and the University of California San Francisco's limitations on public access to the interior of the existing building.

A comment correctly notes that construction noise impacts under Alternative B, although more limited in terms of the number of days when noise events occur, would be significant and would require implementation of Mitigation Measure M-NO-1, as noted on EIR p. 6.49.

Alternative F: Code-Conforming Alternative

A comment asserts that Alternative F: Code Conforming Alternative does not address neighborhood requests for an all-residential alternative. Comments assert that the characterization of Alternative F as "code-conforming" is inaccurate because it would require approval of new discretionary authorizations by the Planning Commission including a finding of conformance with Resolution 4109.

Alternative F was selected to address development of the project site with none of the revisions to the Planning Code or Zoning Map included in the proposed project or project variant.

The EIR acknowledges that Alternative F would require planned unit development authorization to allow for additional residential density, and to allow the limited amount of retail that would otherwise not be allowed without such authorization. As discussed on EIR p. 6.171:

> The approach to site planning and the land use program for Alternative F focused on the maximum residential development potential of the site as allowed by the planning code within the RM-1 and 40-X zoning and height and bulk districts, and with respect to the conditions of Resolution 4109. Resolution 4109 includes restrictions on the size of buildings, the locations and types of buildings on the site, and specific considerations for development along Euclid Avenue and Laurel Street (see Chapter 2, Project Description, pp. 2.24-2.26, for a more detailed discussion). Under Alternative F, the 3333 California Street project site would be redeveloped with residential uses and limited retail uses and would eliminate daycare center and office uses. Unlike the proposed project or project variant, rezoning would not be required; however, a planned unit development would be requested which would allow increased density and limited retail to support the development pursuant to planning code section 304(d)(5).[27]
>
> [*Footnote 27 on EIR p. 4.B.2]*
>
> [27] Pursuant to Planning Code Section 304(d)(5), Planned Unit Developments shall, within R Districts, include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts.

The term "code conforming" is not defined in the planning code or CEQA. Referring to Alternative F as "code-conforming" in the context of the EIR indicates that the alternative could be approved without the need to amend the current planning code or zoning map. Generally, an alternative is considered "code conforming" when it can be developed with a conditional use authorization or a planned unit development authorization under planning code sections 303 and 304, or any other authorization or exception provided for in the planning code, or to modify stipulations that are applicable under the provisions of planning code section 174(b). Contrary to the comment, "code-conforming" includes, but is not limited to, proposals which are "principally permitted" or "as-of-right."

Comments on Alternative F: Code-Conforming Alternative (and other EIR alternatives) express a preference for an all-residential vision for the project site. As discussed below in Response AL-2

LHIA Alternative, RTC pp. 5.H.54-5.H.69, an all-residential alternative would not substantially satisfy any of the basic objectives of the proposed project or project variant related to redeveloping the site as a mixed-use community. The approximately 14,995 gross square feet of retail space included in Alternative F is substantially less than the amount of retail included in the proposed project, project variant, and all other alternatives, except the two full preservation alternatives (Alternatives B and C). As with the proposed project and project variant, due to its limited size the retail space proposed in Alternative F would not support a regional-serving retail use.

Comments noted above about Alternative F present no substantial evidence that the range of alternatives presented in the EIR is inadequate under CEQA Guidelines section 15126.6(a). Rather, these comments express a vision for the development of the project site preferred by some neighbors, as expressed through the LHIA Alternative. Comments expressing a preference for all-residential development of the project site, or some other vision for the project site, do not raise issues concerning the adequacy or accuracy of the EIR's coverage of the proposed project's and its variant's environmental impacts under CEQA. To the extent that comments expressing a preference for the LHIA Alternative express opposition to the proposed project, a response to such comments is also found in Response ME-1: Merits of the Proposed Project, RTC p. 5.L.6. Such comments, in and of themselves, do not raise specific environmental issues or identify issues related to the adequacy or accuracy of the EIR's analysis of physical environmental impacts that require a response in this Responses to Comments document under CEQA Guidelines section 15088. The opinions expressed in the draft EIR hearing transcript, comment letters, and emails will be provided to the decision-makers for their consideration prior to taking any approval actions on the project.

## COMMENT AL-2: LAUREL HEIGHTS IMPROVEMENT ASSOCIATION OF SAN FRANCISCO, INC.'S (LHIA) ALTERNATIVE

"But I am wondering if that gives you enough time, 15 days, to incorporate perhaps another alternative which we haven't even seen. So I'm actually interested in that alternative. I mean, I remember you guys worked pretty fast when we had another alternative for that Christian Scientist, you know, Church project." *(Commissioner Myrna Melgar, Vice-President, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 81, December 13, 2018 [A-CPC-Meglar-2]*

"And so I would be really interested to see what a preservation alternative looks like, if it actually works.

And just from an environmental point of view, reusing something is always more environmentally conscious than knocking it down and building it new.

So I'd be interested in seeing that. So does 15 days give you enough time to do that with people's holidays and stuff?" *(Commissioner Myrna Melgar, Vice-President, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 81, December 13, 2018 [A-CPC-Meglar-3]*

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"I support President Hillis' comment on a community preservation alternative. I would like that to be visually added to the alternatives. I would like -- if at all possible, like to see that further evaluated. The seamless factor of the alternatives, as they're proposed, is a little bit disturbing to me because it is only about adding and subtracting pieces. There are not really any new ideas in the alternatives here, and this particular alternative may indeed add a completely different view on how the site is used and how the site lays itself out as a change in land use yet reflects adjoining community concerns -- for example, the location of retail, continued presence of office on the site, where retail is, et cetera, et cetera." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp.78-79, December 13, 2018 [A-CPC-Moore-9])*

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"I spoke about…adding the community preservation alternative,.." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 80, December 13, 2018 [A-CPC-Moore-13])*

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"The other thing is I think there is an inadequate alternative to the full preservation alternative. So I'd love to see, regardless of what it looks like, the project sponsor's programming needs in the full preservation alternative model. So would we have to go eight stories? How do we get all this stuff squeezed into that site with the full preservation alternative? We always say a full preservation, we have office, then residential." *(Commissioner Dennis Richards, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp. 84-85, December 13, 2018 [A-CPC-Richards-3)*

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"• The HPC expressed interest in understanding more about a "neighborhood alternative" that was discussed by the public during public comment at the hearing." *(Andrew Wolfram, President, San Francisco Historic Preservation Commission, Letter, December 11, 2018 [A-HPC-4 and Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-9])*

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"There are two new Full Preservation Alternatives which are feasible.

This Commission should support the Community Full Preservation Alternative because such an alternative is feasible and would avoid substantial adverse changes in character-defining features of the historically significant resource. This Alternative would include the same number of housing units as the proposed project (558 units) and the project variant (744 units). This Commission should request that the Draft EIR (DEIR) be revised to substitute the Community Full Preservation Alternative for DEIR Alternative C, because Alternative C would have 24 less housing units than the proposed project and substantial new retail uses, which are not permitted under the current site zoning. Retail was banned when the site was rezoned from First Residential to limited commercial in order to prevent adverse effects on the Laurel Village Shopping Center and Sacrament Street merchants.

Public Resources Code section 21002 confirms that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible

mitigation measures available which would substantially lessen the significant environmental effects of such projects. The DEIR admits that the developer's proposed concept "would cause a substantial adverse change in the significance of a historical resource." DEIR p. B.41.

**1. COMMUNITY FULL PRESERVATION ALTERNATIVE**

The Community Full Preservation Alternative would have the same number of housing units as the project (558 units) or project variant (744 units) and would build new residential buildings where the parking lots are located along California Street. Also, a residential Mayfair building would be built on a small portion of the landscaping. Other than that, the historically significant landscaping including the beautiful Terrace designed by the renowned landscape architects Eckbo, Royston &Williams and the majority of the 185 mature trees would be retained and would continue to absorb greenhouse gases. Under this Alternative, the existing 1,183 asf cafe and 11,500 gsf childcare center would remain in the main building. Approximately 10,000 gsf of office uses in the existing main building could be retained, at the developer's option.

The site would not be rezoned for approximately 54,117 gsf of retail uses or a 49,999 gsf new office building. By using all the newly constructed buildings for housing, some units large enough to be attractive to middle-income families would be provided along with other affordable housing." (*Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-3])*

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"The Community Alternative would retain all of the existing office building's character-defining features and the bulk of the character-defining features of the site and landscape. Also, this Alternative would be built in approximately 3 years, as opposed to the 15 years which the developer is requesting in the development agreement so that if "conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability." Attachment A, October 12, 2017 email from Dan Safier. An architect is drawing up a graphic of the Community Alternative, which we will submit as comment on the Draft EIR." (*Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-5])*

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"The Commission should support the Community Full Preservation Alternative which would construct the new residential uses in approximately three years, rather than 7-15 years, under the developer's proposal. This Commission should also request that the Community Full Preservation Alternative be substituted for Alternative C in the DEIR." (*Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-10])*

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"Our community preservation alternative is better because it would have the same number of housing units and it would preserve the landscaping, the115-foot cypress tree that's a holdover from the cemetery. And we ask that it be evaluated in the same degree of detail as the other alternatives in the EIR." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc, Draft EIR Hearing Transcript and Handout, p. 46, December 13, 2018 [O-LHIA3-8]*

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"As comment on the Draft EIR (DEIR), the Laurel Heights Improvement Association hereby submits for evaluation the Community Full Preservation Alternative and Variant (Community Alternative, unless otherwise indicated) along with the evaluation of that Alternative's

compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation (SOIS) by Nancy Goldenberg, Principal architect and architectural historian with TreanorHL. Ms. Goldenberg was formerly Principal architect at Carey & Company, Inc.

Ms. Goldenberg's SOIS evaluation is attached hereto as Exhibit 1, and the Community Full Preservation Alternative/Variant is attached thereto as Appendix A.

The Laurel Heights Improvement Association specifically requests that the Environmental Impact Report evaluate the Community Full Preservation Alternative/Variant with the same degree of specificity as the DEIR used to evaluate the alternatives discussed in the DEIR." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-1])*

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"The Community Full Preservation Alternative would meet the basic objectives of the project described at DEIR p. 2.12, as follows:

- Redevelop a large site into a new high quality walkable mixed-use community with a mix of uses on site including 558 new residences (744 in the Community Alternative Variant), an existing 1,183 asf cafe, an existing 11,500 gsf childcare center, 5,000 gsf of existing nonconforming office uses and substantial open space, while building these new residential units adjacent to the Laurel Village Shopping Center, one block from Trader Joe's grocery store and one block from the Sacramento Street neighborhood commercial uses.
- Create a mixed-use project that encourages walkability and convenience by opening the existing north/south throughway on the first floor of the main building to the public and maintaining other existing pathways that pass through the landscaping, building substantial new housing units adjacent to the existing Laurel Village Shopping Center, and providing on-site childcare and on-site office use.
- Address the City's housing goals by building the same number of new residential dwelling units on site as the proposed project (and proposed project variant), including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco.
- Open and connect the site to the surrounding community by opening the existing north/south throughway on the first floor of the main building to the public, designating the Eckbo Terrace as privately-owned, publicly accessible open space, maintaining other existing pathways that pass through the landscaping, and maintaining the extensive existing natural landscaping that provides a welcoming atmosphere for the public.
- Create complimentary designs and uses that are compatible with the surrounding neighborhoods by conforming with the scale of surrounding development and maintaining the active, natural landscaped, neighborhood-friendly spaces along the west, south and eastern perimeter of the site.
- Provide a high quality and varied architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's topography and other unique characteristics.
- Provide substantial open space for project residents and community members by maintaining the existing welcoming, natural green space and walkable environment that will encourage continued use of the landscaped areas and community interaction.

- Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use.
- Include sufficient off-street parking for residential and office uses below grade and childcare center uses above grade to meet the project's needs.
- Work to retain and maintain the integration of the office building into the development to promote sustainability and eco-friendly infill redevelopment.

The Community Alternative would meet most of the basic project objectives and would be superior to the proposed project/variant because it would maintain the historically significant characteristics of the site by preserving the existing main building and integrated landscaping in its present, neighborhood-friendly, natural form.

The Community Alternative would redevelop a large site with the same amount of new residential units as the proposed project but with a lesser number of commercial uses, retaining the existing cafe, childcare center and 5,000 square feet of office use on site. The Community Alternative would construct the same number of new housing units as the proposed project/variant in a location that is rich with easily accessible retail uses at the adjacent Laurel Village Shopping Center and is located one block from a Trader Joe's grocery store and Sacramento Street neighborhood commercial uses. Also, a Target variety store is located approximately one-two blocks from the site. Given the location of the project site directly adjacent to the Laurel Village Shopping Center but not near the downtown, the lesser amount of on-site retail and office space that the Community Alternative would provide would not materially impair achievement of Objective 1.

The Community Alternative would meet Objectives 2, 4, 7 and 8 by enhancing the public open space by designating the Eckbo Terrace as privately-owned, publicly accessible open space, opening the existing north south passageway to the public, maintaining the other existing pathways that pass through the landscaping, and maintaining the extensive existing natural landscaping that provides a welcoming atmosphere for the public. Due to the maintenance of the natural landscape, the welcoming atmosphere would be greater under the Community Alternative and the public accessibility would be similar under the Community Alternative with passageways open to walkers from the north, south and west of the site. On balance, the Community Alternative would satisfy the Objectives 2, 4, 7 and 8 to substantially the same degree as the proposed project.

The Community Alternative would increase the City's housing supply to the same degree as the proposed project/variant but would better meet the Objective of including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco. The Community Alternative specifically includes 56 family-size units (average size 1,821 square feet) for middle-income families in the new California Street Front buildings and additional on-site affordable housing as determined by the Board of Supervisors. In contrast, the proposed project does not state the amount or type of affordable housing that it would have onsite or commit to build the amount of affordable units on-site that are currently required by the Planning Code. The ambiguity in the project description maintains other options, such as paying a fee in lieu of building a portion of the affordable housing on-site or requesting an adjustment under Planning Code provisions applicable to development agreements. Further, the proposed project does not indicate that it would build affordable housing for middle-income families on site, so the Community Alternative would better meet Objective 3 by providing housing for middle-income families, which is the income level for which the City's housing production is the most deficient

under ABAG allocations. Thus, the Community Alternative would better meet Objective 3 than the proposed project.

The Community Alternative would better meet Objectives 5 and 6 than the proposed project, because the design of the Community Alternative would conform with neighborhood scale and complement its character by building new structures that conform with the scale and character of surrounding buildings and would maintain the landscaped set backs on the west, south and east of the site, which better integrate the site with the surrounding residential community. In contrast, the proposed project/variant would add two to three additional floors to the existing main building that would not be compatible with the predominant 40-foot height limit in the surrounding neighborhoods, would build 40-foot tall structures along the east side of Laurel Street (with rooftop decks) that would not be compatible with the scale of the residences on the western side of Laurel Street, and would remove portions of the landscaped buffer that now exists between the site and those residences by building new residential buildings on portions of that landscaping.

The Community Alternative would meet Objective 9 to the substantially same degree as the proposed project, because it would provide almost one on-site parking space for each residential unit, but the spaces provided would have direct access, so would be more accessible than the mechanically accessible spaces proposed for the project/variant. The Community Alternative would provide above-ground parking spaces for the on-site childcare use.

The Community Alternative would meet Objective 10 to a far greater degree than the proposed project because the Community Alternative would preserve the existing main building and the majority of its integrated landscaping, including maintaining large Monterey Cypress trees that remain from the Laurel Hill Cemetery (California Registered Historical Landmark number 760). (Ex. 3, Memo from Denise Bradley concerning Location of Trees that were part of the Laurel Hill Cemetery) Thus, the Community Alternative would be a superior example of sustainability and eco-friendly development. In contrast, the proposed project would destroy character defining features of the main building by dividing it in two, demolishing its wings, destroying its integrated landscaping by building on top of it and conducting substantial excavation including by removing large portions of the slope of Laurel Hill.

CONCLUSION

The Community Alternative meets all the basic objectives of the proposed project and is feasible. It would entail far less excavation for underground garages and be completed in approximately three years, as opposed to the seven to fifteen years which the developers request to construct the proposed project. Moreover, the Community Alternative is far superior as to compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation.

The project objectives do not even mention compliance with those standards as to rehabilitation of a historically significant resource, which is a telling omission and proof that the statement of project objectives in the DEIR is unduly narrow. DEIR p. 2.12." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-3])*

COMMUNITY FULL PRESERVATION ALTERNATIVE

The Laurel Heights community has come up with its own preservation alternative. This alternative retains more of the historic resource while providing more residential units than does Preservation Alternative C.

The Community Full Preservation Alternative (Community Alternative) would construct the same number of new housing units as the developer's proposed project (558 units) or project variant (744 units) and would be completed in approximately three years rather than the 7-15 years requested by the developer to complete his proposals. It would preserve virtually all of the character-defining features of the main building and its integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. In addition, the Community Alternative would excavate only for a single, one-level underground parking garage and for the foundation for the Mayfair Building. In contrast, the developer proposes to excavate for three new underground garages including a three-level one.

The Community Alternative would keep the main building in its entirety, only adding light wells to bring light and air into the center. The existing north-south through passage would remain. As in the other proposals, the Service Building would be demolished. Anew residential building would be constructed near the intersection of Mayfair Drive and Laurel Street. Two other new buildings would be constructed along California Street, replacing what are now surface parking lots and the former Service Building.

These new buildings would match the scale and massing of the residential townhouse buildings across California Street, and would also be designed to be compatible with the Main Building.

For a complete description of this Alternative, please see Appendix A.

GRAPHIC *(See Comment Letter O-LHIA4, p. 6, in RTC Attachment B for an image titled "Figure 6 - The Community Full Preservation Alternative" that accompanies this excerpted comment.*)

**SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS**

The following evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for Rehabilitation (Standards). Where appropriate, we also compare the compliance of the Community Preservation Alternative with that of the Proposed Project as well as "Preservation Alternative C," as presented in the Environmental Impact Report.

The Standards are listed below. Each of the 10 Standards is shown in italics, with the analysis of how each of the three proposals – the Community Full Preservation Alternative, the Proposed Project, and Preservation Alternative C from the Draft EIR – meets or fails to meet each standard.

*1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*

While the historic use of the property was office, with an office building set amongst green space and parking, the conversion of the property to residential could be done while retaining the character-defining features of the building and site. While the proposed Project design does not retain these features, the Community Preservation Alternative does. Therefore, the Community Preservation Alternative design complies with Standard 1.

Since the Proposed Project would destroy most of the character-defining features of the building and site, it does not comply with Standard 1, although given the proposed use, this standard can certainly be met, as is demonstrated by the Community Preservation Alternative. Preservation Alternative C, like the Community Preservation Alternative, does meet Standard 1.

*2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

The Community Preservation Alternative retains most of the character-defining features of the main building and site. Most of the new construction will occur at the parking lot along California Street, which is not considered character-defining. The main building will be retained in its entirety, except for lightwells that will provide interior illumination. The landscaping will also be retained. The Proposed Project removes the wing from the main building and cuts it in two. The Proposed Project also destroys most of the existing landscaping. Therefore, while the Community Preservation Alternate complies with Standard 2, the Proposed Project does not.

Preservation Alternative C is more compliant with Standard 2 than is the Proposed Project but will have more impact on the property than will the Community Preservation Alternative. Preservation Alternative C proposes to add a story to the Main Building and replace the building's glass curtain wall. Without knowing the design of the vertical addition, or what will replace the curtain wall, it is difficult to determine whether these features will be compatible. Also, it should be noted that many residential buildings now feature curtain walls, so it is unclear why the existing curtain wall is incompatible with residential uses.

*3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*

The Community Preservation Alternate does not propose adding any conjectural features that would create a false sense of historical development. Therefore, the Community Preservation Alternative complies with Standard 3.

Neither the Proposed Project nor Preservation Alternative C propose changes that would create a false sense of historical development, so these designs would also comply with Standard 3.

*4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*

As described in the California Register Nomination, the Main Building was constructed in phases. The first part of the building was completed in 1957. However, its siting, plan and structure were designed such that it could accommodate future expansion. This expansion took place from 1963 to 1967, in three phases, which added wings to the building. The work was designed by the original architect, and constructed by the original contractor for the original client (Fireman’s Fund). The wings are now over 50 years old, and are considered part of the historic resource even if they were not part of the original construction. Since that time, most alterations have occurred on the interior, typical of open-plan office buildings. Under the Community Preservation Alternative, the wings would be retained; under the Proposed Project they would not be. The Community Preservation Alternative therefore meets Standard 4, while the Proposed Project does not. Similar to the Community Preservation Alternative, Alternative C complies with Standard 4.

*5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*

The Community Preservation Alternative will retain all distinctive features of the main building and landscape, including the curtain wall and footprint. And, by not raising the height of the building, its horizontality will also be retained. Character defining features of the site will also be retained. (The Service Building, however, will be demolished under this scheme, as it would under the Proposed Project and Preservation Alternative C. While the Service Building is an original feature of the site and contributes to its historic significance, the loss of this building would have only a minor impact on the overall integrity of the property). Therefore, the Community Preservation Alternative complies with Standard 5.

The Proposed Project is demolishing too much of the Main Building and the landscaping to comply with Standard 5. Preservation Alternative C is superior to the Proposed Project but will have a greater impact on the property than will the Community Preservation Alternative. Alternative C proposes to replace the curtain wall and add a vertical addition, which could impact the building's horizontality, which according to the California Register Nomination is an important character defining feature. Therefore, while better than the Proposed Project, Alternative C does not fully comply with Standard 5.

*6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*

During the design phase, the property, including building and landscape features, should be carefully surveyed to determine the condition of all character defining features. If any of these features are found to be deteriorated, they should be repaired rather than replaced, and any features that are deteriorated beyond repair should be replaced in kind, or, if substitute materials must be used (if, for example, the same material is no longer available), then the substitute material should match the old in design, color, texture and any other visual qualities. If that is done, then the Community Preservation Alternative will comply with Standard 6.

The Proposed Project, however, since it will remove most of the character defining features of the property, will not comply with this Standard. Alternative C, since it retains more of the historic resource, would not fully comply with Standard b because it would replace the glass curtain window wall system "with a residential system that would be compatible with the historic character of the resource; e.g. operable windows with small panes divided by a mullion and muntins." DEIR p. 6.77. The Community Alternative would retain and repair the existing window system if feasible for residential use, or replace it with a residential system that would be compatible with the historic character of the resource.

*7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*

No harsh chemical or physical treatments are contemplated at this time. If they are avoided, then the Community Alternative will meet Standard 7.

Since the Proposed Project is removing so much of the resource, the SOIS Analysis in the Draft Environmental Impact Report simply claims that Standard 7 does not apply. The Community Alternative and Alternative C could comply with Standard 7 provided that harsh chemical or physical treatments are prohibited.

*8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*

Since the project site was formerly part of a cemetery, it is possible that archaeological resources may be encountered during the construction of any project on this site. Language in the specifications must direct construction personnel to stop work should any archeological features be encountered. A professional archeologist would then be alerted to come and identify, document, and safely remove (if warranted) the feature. If such protocols are put into place prior to the start of construction, the project will comply with Standard 8.

According to the EIR, "Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level. Thus, the Proposed Project or Project

Variant would conform with Standard 8." If Alternative C and the Community Preservation Alternative follow similar protocols, than they too would comply with Standard 8.

*9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

For the Community Preservation Alternate, the exterior envelope of the Main Building will be kept intact, and new construction is proposed primarily along California Street, where currently non-character-defining parking lots exist. These new structures can be designed such that they are compatible with both the Main Building and the existing buildings along the north side of California Street. This can be accomplished by utilizing brick, glass, and concrete as exterior materials (tying into the materials of the Main Building), while maintaining the rhythm and scale of the townhouses across California Street. The Community Alternative will therefore comply with Standard 9. In addition, the Mayfair Building would be designed to be compatible with the Main Building.

The proposed project, on the other hand, does not comply with this Standard. Portions of the Main building will be removed, and most of the landscape will be destroyed. Therefore, the Proposed Project will not comply with Standard 9.

Preservation Alternative C is more compliant than the Proposed Project. However, the massing of the new buildings along California Street is very different from the buildings across California Street, and from the residential development surrounding the site.

*10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

For the Community Preservation Alternative, new construction would be relegated to the parking lots along California Street and a Mayfair Building. The Main Building would retain its existing form, and the curtain wall would be retained if feasible for residential use or replaced with a system that would be compatible with the historic character of the resource (however, given that the present curtain wall, according to the California Register nomination, has become darker since the sale of the building to UCSF in 1985, the curtain wall could be revised if the original tint can be determined.) The work proposed for the Main Building would almost entirely occur on the interior, with the exception of proposed lightwells. So, if the proposed new development is removed in the future, the property could easily be returned to its historic appearance.

The Proposed Project would make so many changes to the building and landscape that it would not comply with Standard 10. Alternative C does better at compliance than the Proposed Project. However, with the developer's proposal to replace the curtain wall and add a story to the building, it is difficult to see how the original form and integrity of the property could be returned if the changes were reversed.

Therefore, Alternative C would not comply with Standard 10.

Conclusion

The above discussion evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. It also discusses how and whether the Proposed Project and Alternative C complies with these standards. Here are the results:

Community Preservation Alternative: Complies with all 10 Standards

Proposed Project: Complies with Standards 3 and 8 only.

Alternative C: Complies with Standards 1, 3, 4, 6, 7, and 8. Partially complies with Standards 2, 5 and 9. Does not comply with Standard 10.

The Community Alternative is clearly superior in its compliance with the Standards than are the other two designs evaluated. In addition, it provides more housing units than Alternative C, and the new construction is more compatible with surrounding neighborhood development." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-4])*

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"The Community Full Preservation Alternative would construct the same number of new housing units as the developer's proposed project (558 units) or project variant (744 units) and would be completed in approximately three years rather than the 7-15 years requested by the developer to complete his proposals. The Community Full Preservation Alternative would preserve virtually all of the character-defining features of the main building and its integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. The Community Full Preservation Alternative would excavate only for a single, one-level underground parking garage and for the foundation for the Mayfair Building. In contrast, the developer proposes to excavate for three new underground garages including a three-level one.

The Community Full Preservation Alternative would: (1) convert the interior of the main building to residential uses while retaining the existing 1,183 asf cafe, 11,500 gsf childcare center, and 5,000 gsf of the existing office space (at the developer's option, this existing office space could be converted to residential use), (2) construct three new residential buildings along California Street where parking lots are now located and also construct a new residential building near the intersection of Mayfair Drive and Laurel Street, (3) provide at least 56 flat-type units affordable to and sized for middle-income families, with additional on-site affordable housing determined by the Board of Supervisors, (4) excavate for only a single, one-level underground parking garage and the foundation for the Mayfair Building, (5) require all freight loading and unloading to be conducted in the underground freight loading areas accessed from Presidio Avenue and all passenger loading and unloading to be conducted inside the site in turnarounds or in the underground parking garage, (6) retain the historically significant landscaping designed by the renowned landscape architects of Eckbo, Royston & Williams which is integrated with the window-walled main building, including the Eckbo Terrace and existing landscaped green spaces along Laurel Street, Euclid Avenue and Presidio Avenue, which would be designated as community benefits in the development agreement, (7) preserve the majority of the 195 mature trees on the site which are comprised of 48 different tree species (Initial Study p. 16), and (8) maintain public vistas of the downtown and Golden Gate Bridge and the historically significant main building and integrated landscaping. The Community Full Preservation Variant Alternative would add 110 more units to the Walnut Building, which could be used for senior housing, and additional units within the other buildings which would result in smaller unit sizes, as described herein. The Community Full Preservation Alternative and Variant would use all the new construction for residential use and would not rezone the site for approximately 54,117 gsf of retail uses or a 49,999 gsf new office building, as the developer proposes.

**THE COMMUNITY FULL PRESERVATION ALTERNATIVE WOULD PROVIDE THE SAME AMOUNT OF NEW HOUSING UNITS IN APPROXIMATELY THREE YEARS WITHOUT DESTROYING A HISTORICALLY SIGNIFICANT RESOURCE.**

The Community Full Preservation Alternative (Alternative) would preserve virtually all of the character-defining features of the main building and integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. (Ex. A, confirmation of listing) The window-walled main building would be converted to primarily residential use. This Alternative would have the same number of residential units as the developer's proposed project (558 units) and would be constructed in approximately three years because the existing main building would be converted to residential use at the same time as the new residential buildings are constructed. (See Exhibit B, layout of buildings) The Alternative would entail far less excavation, as it would have only one new level of underground parking garages along California Street and a total of approximately 460 on-site parking spaces. In contrast, the developer proposes to construct four new underground parking garages, including up to three levels of parking, to provide a total of 896 parking spaces for the developer's proposed project (970 parking spaces for the developer's proposed variant).

The Community Alternative would retain the existing Eckbo Terrace and green landscaped areas along Laurel Street, Euclid Avenue and Presidio Avenue, except for a small portion to be occupied by the Mayfair Building. The existing Terrace would be designated as Privately-Owned, Publicly-Accessible Open Space in recorded deed restrictions and would be open to the public from 8:00 am to sundown. The existing passageway that runs through the first floor of the existing main building and opens onto the Terrace and thence onto Masonic Avenue would be retained and opened to the public from 8 am to sunset and marked with signage identifying it as a public throughway.

The character-defining features of the existing main building that the Community Alternative would retain include all of the following:

> Plan of the building with wings open along the sides to the immediate landscape and to views of the distant city.
>
> Horizontality of massing.
>
> Horizontal lines of projecting edges of concrete floors.
> Horizontal bands of nearly identical window units.
>
> Uninterrupted glass walls.
>
> Window units of aluminum and glass.
>
> Brick accents and trim.
>
> Wrought iron deck railings that match gates in the landscape.

The character-defining features of the existing landscape that the Community Alternative would be retain include all of the following:

> In the Eckbo Terrace, which was designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco), key character-defining features include its biomorphic-shaped (amoeba-shaped) lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick), brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.
>
> The Concrete Pergola atop terraced planted beds facing Laurel Street, which creates a welcoming, shaded transition area where the inside and outside merged. (Draft EIR pp. 4.B.12 and 21)

In the Entrance Court, providing a connection between the Executive Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria wing, key character-defining features include narrow planting beds adjacent to sidewalks; exposed aggregate sidewalks, and a low free-standing brick wall along its north side.

In the two outdoor sitting areas on the east and west sides of the area now used as an auditorium, key character-defining features for the area on the west side include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete, and metal benches; key character-defining features for the area on the east side include the pavement (concrete divided into panels by wood inserted into expansion joints).

The Brick Wall (constructed of red brick set in running bond pattern similar in appearance to the brick used in the exterior of the main building) that takes several forms and which forms a continuous and unifying element around the edges of the site, would be retained except for the areas of the wall that surround the Service Building and which run along California Street. The brick from these areas will be retained, if feasible, and reused as trim on the bottom portions of the new California Street Back Buildings.

The Community Alternative would retain the three gated entrances - the entrance on California Street at Walnut Street, the service entrance at Mayfair and Laurel Street, and the executive/visitor entrance on Laurel Street. In this Alternative, much of the internal circulation system will be retained (entrance drive, service drive and executive/visitor entrance). All passenger loading, pick-ups and drop-offs will be internal to the site, and turnarounds will be provided in front of the main building to the east of the entrance on California/Walnut and in front of the executive/visitor entrance on Laurel Street. (See Ex. C, circulation and loading plan) All freight loading and unloading will be conducted in the underground freight loading areas accessed from Presidio Avenue.

Vegetation features that help to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods that will be retained include (1) the large Cypress trees in the existing west parking lot area, (2) the lawns on the west, south and east sides of the property, and (3) the planted banks along Laurel and Masonic streets.

The service building and circular garage ramps would not be retained.

In the Community Full Preservation Alternative, the existing 1,183 asf cafe and 11,500 gsf childcare center would remain in their present locations in the main building. At the developer's option, the existing 12,500 gsf of storage in the main building could be converted to parking spaces or used for underground off-loading or other functions. Approximately 5,000 square feet of the existing nonconforming office space in the main building would remain, which the developer could continue to use for offices. At the developer's option, this existing office space could be converted to residential use.

In the Community Alternative, new residential buildings would be constructed along California Street where parking lots are currently located, and a Mayfair building would also be constructed at the same approximate location as the Mayfair building proposed by the developer. The new California Front buildings would be designed for middle-income families, and their average size would be 1,821 square feet. They would be designed to be compatible with both the main building and the existing buildings along the north side of California Street and would maintain the rhythm and scale of the townhouses across California Street. Each California Front building would be 40 feet tall, approximately 28.5 feet wide and 100 feet in length with 25% of that length consisting of a private rear yard. Approximately 14 new buildings containing 56 units

for middle-income families would be built in California Front between Laurel Street and Walnut Street.

The new California Street Back buildings would face inward toward the existing main building and be constructed with window walls designed to be compatible with the character-defining features of the windows in the existing main building. They would be sculpted around the large Monterey Cypress trees that remain from the Laurel Hill Cemetery, so the lengths of the buildings would vary from approximately 65 to 50 or 40 feet long, and each building would be approximately 28.5 feet wide. They would have 56 units, with the average unit size ranging from 1,575 to 1,215 to 971 square feet depending on location, and the buildings would be 40 feet tall and be constructed between Laurel Street and Walnut Street. For each residential unit in the California Street Front and Back Buildings, one parking space with direct access would be provided in a new one-level underground garage constructed under these buildings.

In the Community Alternative, approximately 292 residential units would be provided in the existing main building, averaging 798 square feet in size. The developer can configure the size of the units and/or eliminate the office use. Internal Light Courts similar to those described on Developer's August 17, 2017 plan sheets A6.15 and A6.16 will be located where feasible.

For these units, parking with direct access would be provided in the existing underground garage in the main building.

A new 40-foot tall Walnut Building would be built along California Street between Walnut Street and Presidio Avenue. This building would contain approximately 118 residential units with an average square footage of 809 square feet. The developer can configure the size of the units. For these units, parking with direct access would be provided in a new one-level underground garage to be built under this building.

In the Community Alternative, a new 40-foot tall Mayfair Building would be constructed approximately east of Mayfair Drive at Laurel Street. The Mayfair Building would have 36 residential units with an average size of 1,073 square feet. The Mayfair Building would not contain an underground parking garage. For these units, parking with direct access would be provided in the new underground garages constructed under the California Street Front and Back Buildings. The Mayfair Building would be constructed of window walls designed to be compatible with the character-defining features of the windows in the existing main building. A small portion of a grassy area of the existing landscaping would be occupied by this building.

Other than removing the circular garage ramps, the Community Full Preservation Alternative would not make any of the exterior or interior circulation or site access changes proposed by the developer in August 17, 2017 plan sheets C.202 or Ll.01 or in the "PRELIMINARY DESIGN" dated 08/2018. Under the Community Alternative, all Truck Loading or Unloading would occur in the underground garage accessed on Presidio Avenue, and trucks and automobiles will have ingress and egress to these areas for loading, unloading, pick- ups, drop-offs and parking. Truck Loading or Unloading will be permitted from 8 am to 8 pm only. Passenger vehicles and automobiles will also have ingress and egress to the site through the Walnut Gate at Walnut and California Streets and through the Mayfair Gate at Mayfair and Laurel streets. Passenger vehicles and automobiles will also have access to a turnaround for passenger loading and unloading through the Laurel Street gate and through the Walnut gate.

In the Community Full Preservation Alternative Variant (Variant), there would be 228 residential units with an average of 732 square feet in a 7-floor Walnut Building, which would require a height limit change for this area of the property only. Under the Community Variant, there would be 64 new residential units in the California Street Front Buildings with an average

of 1,594 square feet, and 64 new residential units in the California Street Back Buildings with an average of 1,332, 1,275 or 850 square feet; these buildings would be 25 feet wide under this Variant, and lengths would vary with location. Under the Community Variant, there would be 48 new residential units in the Mayfair Building, with an average of 805 square feet. All new buildings would be 40 feet tall except the Walnut Building. The developer could configure the size of the residential units. In addition to the existing cafe, childcare center and 5,000 gsf of office space, in the Community Variant, the main building would be converted to approximately 340 residential units, with an average of 686 square feet.

The Community Alternative Variant would comply with all applicable laws and regulations, including by making any modifications in the design needed to achieve such compliance or to provide additional space for necessary functions.

In the Community Full Preservation Alternative, the glass curtain wall of the existing main building would be retained and repaired if feasible for residential use, or replaced with a window system that would be designed to be compatible with the character of the historic resource. DEIR pp. 6.66 and 6.77. In the Community Alternative, any replacements of the glass curtain wall would be compatible with the geometric pattern of the windows in the existing main building.

The Community Full Preservation Alternative Variant would have the same characteristics as the Community Alternative, unless otherwise indicated above." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-5])*

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"I also fully support the community full preservation residential alternative for 3333 California because it takes into consideration the need for housing more than anything related to retail space, and also that it preserves the historic significance and characteristics of the neighborhood." *(Perviz Randeria, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, pp. 39-40, December 13, 2018 [O-LHIA6-2])*

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"Please consider the same alternative plan." *(M.J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, p. 51, December 13, 2018, [O-LHIA7-7])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333**

It preserves the Historic Characteristics of this wonderful historic site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk."

*(Sal Ahani, Email, January 8, 2019 [I-Ahani-2])*

"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 8,000 retail caused the Developers Destructive Proposal. The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses. The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more. We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal calls for. One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-4])*

"In a recent Petition Drive at Laurel Village over 800 residents signed the Petition opposing the Developers Full Destruction and Massive ROC plan and supporting the Community's residential Alternative. Three people opposed it the Petition. These signatures were gathered in less than 8 hours." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-6])*

"**We pollute less and protect the environment:** the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative: **We destroy less:** we preserve the historic site. **We build less:** 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building. **One single level underground parking garage for 450 spaces** versus a complex of parking garages, some of three levels, for 896 spaces; **We excavate less:** 90,000cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads); **We preserve and protect our local businesses and shops**: no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business; **We better protect the health and well being of everyone: no** 13,000+ auto trips to pollute the air, generate the noise, put pedestrians at risk, unload trucks on the streets, etc. **the Community's solution will always be three times better than the Developers solution.**" *(Sal Ahani, Email, January 8, 2019 [I-Ahani-10])*

"The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-19])*

"**We strongly support the Residential Alternative plan for 3333.** I can assure you that although you may not get a letter from every single resident on "our" block, the support for the residential plan is unanimous.

This plan addresses many of the neighborhood concerns regarding the developers plan including:

1. Can be completed in 3 years, significantly less burdensome for families and elderly

2. Preserves the character of the neighborhood

3. Does not add unwanted and excess retail, supports small business owners

4. Lessons the harmful impacts on the environment

5. Will create far less traffic and safety hazards

6. Does not line the developers pockets at the expense of a community"

*(Jim and Jessica Bassuk, Email, January 7, 2019 [I-Bassuk-2])*

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"The residential plan is superior in addressing the city's housing shortage. That is the purpose of this project, correct?" *(Jim and Jessica Bassuk, Email, January 7, 2019 [I-Bassuk-4])*

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"…and supporting the community alternative." *(David Bercovich, Email, January 7, 2019 [I-Bercovich-2])*

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"That being said, it is my understanding that this project sponsor has been challenging. It is my understanding that, because of ongoing challenges, that the neighborhood decided to develop the community alternative. Besides maintaining the historical and architectural integrity of this site, the community option alternative achieves the following: Meets the city's housing goals, does not a contain retail component which would compete with existing neighborhood serving businesses, maintains a portion of the office space which is consistent with the original purpose of the buildings.

I would urge the department and the commission to seriously consider the community alternative." *(Eileen Boken, Draft EIR Hearing Transcript, pp. 24-25, December 13, 2018 [I-Boken-4])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333**

It preserves the Historic Characteristics of this wonderful historic site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk."

*(Gail Boyer, Email, January 2, 2019 [I-Boyer-2])*

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"THE NEIGHBORHOOD RESIDENTIAL ALTERNATIVE SATISFIES THE NEED FOR ADDITIONAL HOUSING IN SAN FRANCISCO BUT WITH SIGNIFICANTLY LESS DAMAGE TO THE ENVIRONMENT WHILE MAINTAINING THE CHARACTER OF THE NEIGHBORHOOD." *(Barbara and Jim Brenner, Email, January 3, 2019 [I-Brenner-6])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333 because:**

It preserves the Historic Characteristics of this wonderful historic site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial

Complex that the Developer continues to insist upon.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk."
*(Michael Coholan, Email, January 6, 2019 [I-Coholan-2])*

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"I…urge the Planning Department to accept and review and the Commission to adopt the Community Residential Alternative." *(Adam Cole, Email, January 6, 2019 [I-Cole-2])*

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"The Community Residential Alternative addresses these and other issues and draws the right balance between the need for more housing and preservation of this historic neighborhood." *(Adam Cole, Email, January 6, 2019 [I-Cole-5])*

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"Fortunately, there's a much better way to address the need for a development at Laurel Hill that both meets the housing demands and still protects the historic building as well as the beautiful landscaping that surrounds it. It's called the neighborhood full preservation alternative. It provides the same number of residential housing units as the Prado project, 558 with a 744 variant, protects the majority of the 185 mature trees, and does not include major retail that would only negatively compete with Laurel Village shopping center which borders the site and already has two supermarkets, Starbucks and Pete's Coffee, Ace Hardware, three restaurants, three banks, several boutiques, a Gap store, and a variety of other shops -- not to mention Sacramento Street, where there are many others.

We don't need new retail in Laurel Heights. We need affordable housing, built without changing the existing zoning laws, without 10-story buildings, and using the available space primarily for housing which allows for some units big enough for middle class families. The neighborhood alternative does all that and can be built in about three years, not seven-and-a-half to 15.

Please consider supporting our plan," *(Bill Cutler, Draft EIR Hearing Transcript, pp. 26-27 December 13, 2018 [I-Cutler1-3])*

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"Fortunately, there is a much better way to address the need for a development at Laurel Hill that both meets the housing demands and still protects the Historic Building as well as the beautiful landscaping that surrounds it. It's called the Neighborhood Full Preservation Alternative. It provides the same number of residential housing units as the Prado project, 558 with a 744 variant, protects the majority of the 185 mature trees, and does not include major retail that would only negatively compete with Laurel Village Shopping Center, which borders the site. For perspective, Laurel Village already has two supermarkets, Cal-Mart and Bryan's, Starbucks and Peet's coffee, a liquor store, Ace Hardware, several restaurants, including Beautifull! and Rigolo Cafe, 3 banks, Bank of America, Wells Fargo and First Republic, Walgreen's Pharmacy, multiple doctors, dentists, and psychotherapy offices, Peninsula Beauty, a GAP store, several boutiques and a variety of other businesses. Sacramento Street, which is one block away from the development, has numerous restaurants, including The Magic Flute, Spruce, Sociale, Cafe Luna

and Osteria, The Vogue movie theater, 3 dry cleaners, multiple boutiques, antique shops, nail salons, hair salons, a automotive repair shop, several liquor stores, a shoe repair shop, and many other businesses, all within a short walking distance of Laurel Hill. It is also important to remember that the development is directly across California Street from the San Francisco Jewish Community Center, which offers a pool, a fitness center, a spa, a concert hall, a full calendar of performances, lectures, and a host of other amenities." *(Bill Cutler and Judy Doane, Email, January 5, 2019 [I-Cutler2-6])*

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"Among the many things that make the Neighborhood Alternative a much better solution than any of the alternatives presented in the DEIR are as follows: it preserves the characteristics of this wonderful historic site, it provides 558 (or 744 in the Variant) housing units, it does not create 8000 retail auto trips per day, it does not generate approximately 15,000 tons of greenhouse gases, it preserves both the present childcare center and the existing cafe, and it matches the surrounding neighborhood for character, style, scale and bulk. In short, it is the ideal solution—providing housing without destroying what makes Laurel Heights a desirable place to live in San Francisco." *(Bill Cutler and Judy Doane, Email, January 5, 2019 [I-Cutler2-8])*

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"I and other community members propose a smaller development (the "Community Full Preservation Alternative" or CFPA) that will still add substantial needed housing but take only three (3) years to complete. The CFPA does not include the massive unneeded, unwanted and probable dead-on-arrival retail/office/commercial complex that the Destructive 3333 developer continues to insist upon. CFPA does not create outmoded 13,000+ retail auto trips per day; it does not generate approximately 15,000 tons of greenhouse gases. The CFPA preserves both the present childcare center and the existing café, a source of deep, positive social capital in our community. It matches the surrounding neighborhoods for character, style, scale and bulk." *(Evelyn Davidson, Email, January 8, 2019 [I-Davidson-5])*

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"The Community Full Preservation Alternative will however generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the developers' Destructive 3333 Project." *(Evelyn Davidson, Email, January 8, 2019 [I-Davidson-7])*

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"I also support the community full preservation residential alternative for 3333." *(Krisanthy Desby, Draft EIR Hearing Transcript, p. 31, December 13, 2018 [I-Desby-2])*

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"Anyway, I ask that you reject the Prado proposal and accept the community full preservation residential alternative in its place." *(Krisanthy Desby, Draft EIR Hearing Transcript, p. 32, December 13, 2018 [I-Desby-5])*

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"The Community Preservation Alternative/Variant would avoid this significant impact on public vistas because it would retain the existing landscaped areas largely in their present form and existing public vistas from sidewalks and open space used by the public." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-6])*

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"After examining available plans, including the plan proposed by the developer, Prado, and an alternative the neighbors themselves have produced, I am supporting the neighborhood full

preservation alternative…" *(Judy Doane, Draft EIR Hearing Transcript, p.29, December 13, 2018 [I-Doane-3])*

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"Two, the neighborhood full preservation alternative will retain the same number of units, 558 or the variant of 744, as the Prado plan.

Three, a neighborhood plan will also keep the unique features of the original historically significant building and landscaping. That means some of the old growth trees on the lot can be retained, protecting the important ecological aspects of this space for our beautiful, green city.

Four, the three to five years of construction of the neighborhood plan will be much more tolerable than Prado's proposed seven to 15 years.

Please consider the neighborhood full preservation plan." *(Judy Doane, Draft EIR Hearing Transcript, p. 30, December 13, 2018 [I-Doane-6])*

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"In addition, I'd like to say that the community full preservation alternative will protect the retail in Laurel Village and on Sacramento Street where I live." *(Sonya Dolan, Draft EIR Hearing Transcript, p. 52, December 13, 2018 [I-Dolan-2])*

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"If you have not visited the area, it is truly a neighborhood in the traditional sense, and the proposed construction would destroy that aspect. My husband and I have lived across from the proposed site -- we can see it from our window -- for eight years, and we fully support the community full preservation residential alternative for 3333 California." *(Sonya Dolan, Draft EIR Hearing Transcript, pp. 52-53, December 13, 2018 [I-Dolan-7])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333**

It preserves the Historic Characteristics of this wonderful site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It is compatible with the surrounding neighborhoods for character, style, scale and bulk."

*(Jane Drake, Email, January 7, 2019 [I-Drake-2])*

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"I fully support the Community Full Preservation Alternative:

It preserves the historic character of the site

It provides 558 housing units built in 3 years

It does not include retail or office space, it does not generate increased auto traffic for retail

It preserves the present childcare center and dining cafe

It matches the surrounding neighborhoods for character and style

It will preserve the existing small businesses in the neighborhood ( Laurel shopping and Sacramento St.)"

*(Sharon Esker, Email, January 5, 2019 [I-Esker-2])*

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"As an alternative to the proposed development, I would like to support the Community Full Preservation Residential Alternative for 3333 (to be built in 3 years). Please take our concerns seriously." *(Zhubin Fardis, Email, January 8, 2019 [I-Fardis-6])*

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"For your information, I am thoroughly familiar with the Developer's Proposal (which I find to be intrusive to say the least) but strongly support the Community Full Preservation Alternative.

The Alternative is of great importance to my fellow neighbors, to my family and to our family business (also located near the proposed project)." *(Arlene Filippi, Email, December 13, 2018 [I-Filippi1-1])*

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"While I am very much against the Developer's Proposal, I am in favor of the Community Full Preservation Alternative. Unlike the Developer's Proposal, the Alternative does not include the massive Retail/Office/Commercial Complex. It retains the character of the neighborhood and provides 558 housing units to be built in three years and not fifteen." *(Arlene Filippi. Email; January 7, 2019 [I-Filippi2-4])*

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"As an alternative to the proposed development, I would like to support the Community Full Preservation Residential Alternative for 3333 (to be built in 3 years)." *(Shannon Fong, Email, January 8, 2019 [I-Fong-5])*

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"I am writing…to express support for the Community Alternative." *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-2])*

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"Instead, I strongly support the Community Alternative, which will produce the same amount of much-needed housing. It will increase the density of housing in the area, but will not have the excessive and unneeded retail, office and commercial space. It also can be completed in a reasonable timeframe, thus balancing the needs of the neighborhood and the city as a whole." *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-7])*

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"Last week the SF Historic Preservation Commission expressed support for a full preservation alternative.

Our Community Full Preservation Residential Alternative which I totally support preserves this historic site plus offers the same amount of housing units (558 with a 744 variant) as the developers. Our Alternative plan does not destroy the award winning building and landscaping with trees dating back to the days of the Laurel Hill Cemetery. This plan is expected to be completed in approximately 3 years. It is a thoughtful, balanced and timely use of this property." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-2])*

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"Therefore, for these reasons I fully support the Community Full Preservation Residential Alternative for 3333 California Street and strongly oppose the PSKS plan." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-8])*

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"I completely support the Community Full Preservation Residential Alternative plan for 3333 California Street. The reasons are many including the fact that it preserves the historical characteristics of this site by keeping the existing award winning building plus the original landscape and hardscape. This Community Alternative plan provides the same number of housing units as the developers plan, that is 558 or 744 in the variant, without generating massive amounts of greenhouse gases. There will not be unnecessary excavation as in the developers plan thereby lessening the dirt, dust, noise and other pollutants. There is serpentine rock under the site that, if disturbed, can release asbestos dust, a well known health hazard. The Community Full Preservation Residential Alternative plan is expected to be completed in about 3 years. This bears repeating. The Community Full Preservation Residential Alternative plan is expected to be completed in about 3 years." *(Janet Frisbie, Email, January 7, 2019 [I-FrisbieJ2-1])*

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"These desirable neighborhoods surrounding the 3333 California Street property deserve a thoughtful, balanced and relevant use of this beautiful 10+ acre parcel. The Community Full Preservation Residential Alternative plan will give them the best of the historical characteristics and a 21st century prospective that will continue the tradition for what has always been a very special area of The City. Show the 800+ signers of the petition that you understand the importance and magnitude of this decision." *(Janet Frisbie, Email, January 7, 2019 [I-FrisbieJ2-4])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333**

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It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It is compatible with the surrounding neighborhoods for character, style, scale and bulk."

*(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-3] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-9])*

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"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 8,000 retail caused the Developers Destructive Proposal.

**The Community Full Preservation Alternative Preserves and Protects Small and Family Owned Businesses**

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses.

The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more.

We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal calls for.

One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense.

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents?

**The Community Unanimously Opposed the Developers' Massive Retail, Office, Commercial (ROC) Complex.**

In a recent Petition Drive at Laurel Village over 800 residents signed the Petition opposing the Developers Full Destruction and Massive ROC plan and supporting the Community's residential Alternative. Three people opposed it the Petition. These signatures were gathered in less than 8 hours." *(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-5] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-11])*

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"**The Community Alternative is Superior, Sooner and Safer**

**We pollute less and protect the environment:** the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative:

**We destroy less:** we preserve the historic site.

**We build less:** 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building.

**One single level underground parking garage for 450** spaces versus a complex of parking garages, some of three levels, for 896 spaces;

**We excavate less:** 90,000 cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads);

**We preserve and protect our local businesses and shops:** no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business;

**We better protect the health and well being of everyone:** no 13,000+ auto trips to pollute the air, generate the noise, put pedestrians at risk, unload trucks on the streets, etc.

**The Community's Full Preservation Alternative solution will always be three times More Climate Friendly; Far Less Disruptive; Far More Family Friendly; Far Safer for Pedestrians; Far Healthier Air Quality-wise; and Provide Critical Housing at Least Three**

**Times Faster than Developers' solution.**" *(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-8] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-14])*

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"**The Community Full Preservation Alternative Protects the Historic Site, Protects the Greenspaces, Maintains the Existing RM-1 Zoning and Resolution 4109, Maintains the Public's Permanent Right-of-Use of the Greenspaces .**" *(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-12] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-18])*

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"By contrast, the Community Full Preservation Alternative generates approx. 9,000 dump truck loads, one quarter as many!

After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings.

How many large truck loads, concrete truck loads, etc. will this require?

The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads." *(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-16] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-22])*

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"The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4." *(Richard Frisbie, Email, January 7, 2019 [I-FrisbieR1-18] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-24])*

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"And I fully support the community full preservation alternative, and I support everything the last speaker, that Kathy said." *(Holly Galbrecht, Draft EIR Hearing Transcript, p. 47 [I-Galbrecht1-2])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333 California.**

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.
- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 8,000 retail auto trips per day.
- It does not generate approximately 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It matches the surrounding neighborhoods for character, style, scale and bulk."

*(Holly Galbrecht, Email, January 2, 2019 [I-Galbrecht2-1])*

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"The Community Full Preservation Alternative will generate zero retail auto trips to 3333 California as opposed to the 8,000 retail auto trips caused by the Developers Destructive Proposal. The Community Full Preservation Alternative will protect the small, family owned Businesses in Laurel Village, Sacramento St. and Presidio Avenue. A quick walk around these Neighborhoods will clearly show the immense pressure these businesses are experiencing." *(Holly Galbrecht, Email, January 2, 2019 [I-Galbrecht2-3])*

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"i support the full preservation alternative for the project as preserving the historic site will be good for the neighborhood as it will provide housing units which we all need in San Francisco ." *(Ronald Giampaoli President Cal Mart Supermarket, Email, January 8, 2019 [I-Giampaoli-1])*

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"I and the entire community strongly support our full preservation alternative that protects these cherished historic features of this important and iconic site." *(Linda Glick, Draft EIR Hearing Transcript, p. 57, December 13, 2018 [I-Glick1-6])*

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"I, and the entire Community strongly supports our Full Preservation Alternative that protects these cherished Historic features of this important and iconic site." *(Linda Glick, Draft EIR Hearing Handout, December 5, 2018 [I-Glick1-11])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333.**

- It preserves the Historic Characteristics of this wonderful historic site.
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- It does not create 13,000+ retail auto trips per day.
- It does not generate approx. 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It matches the surrounding neighborhoods for character, style, scale and bulk.

*(Linda Glick, Letter, January 6, 2019 [I-Glick2-2])*

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"And so from what I've heard, I would really support the proposed neighborhood alternative, which apparently provides the same housing, but with a much shorter period and with much less impact on the neighborhood both during the construction and afterwards." *(David Goldbrenner, Draft EIR Hearing Transcript, p. 33, December 13, 2018 [I-Goldbrenner1-3])*

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"I am writing…to express support for the Community Alternative." *(David Goldbrenner and Zhenya Fridlyand, Email, January 4, 2019 [I-Goldbrenner3-2])*

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"Instead, I strongly support the Community Alternative, which will produce the same amount of much-needed housing. It will increase the density of housing in the area, but will not have the

excessive and unneeded retail, office and commercial space. It also can be completed in a reasonable timeframe, thus balancing the needs of the neighborhood and the city as a whole." *(David Goldbrenner and Zhenya Fridlyand, Email, January 4, 2019 [I-Goldbrenner3-6])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333**

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It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk."

*(Mary Gwynn, Email, January 7, 2019 [I-Gwynn-3])*

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"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the Developers Proposal.

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses." *(Mary Gwynn, Email, January 7, 2019 [I-Gwynn-5])*

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"We fully support the Community Full Preservation Residential Alternative for 3333 California, and if you examine the matter closely, I think you will too." *(Anne Harvey, Email, December 13, 2018 [I-Harvey1-2])*

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"I am writing to you to strongly urge you to reject the draft EIR as being insufficient. It fails to consider the proposal the community put forward. The community put forward a full preservation residential alternative for 3333 California Street. I strongly believe that the community proposal should be adopted." *(Anne Harvey, Email, January 08, 2019 [I-Harvey3-1])*

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"Please do not rezone this area. Please adopt the neighborhood proposal as it is much better than what the developer is doing." *(Anne Harvey, Email, January 08, 2019 [I-Harvey3-3])*

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"Heard about a neighborhood alternative that can give equal number of units as proposed or even as the project variant proposed. However, the neighborhood version has not been made public. Not sure if this neighborhood version would build where the original Monterey Cypress from Laurel Hill Cemetery stands or other larger trees historic to the site are located. Perhaps Planning can review it, have the Historic Preservation Commission review it, and then have the Planning Commission review it. It was not available at the December 5, 2018 Historic Preservation

meeting. The alternative may meet the goals and not have such adverse impacts to the historic resource which includes not only the building but also the landscaping as that was the corporate campus use but today is used for public recreation. Today, it is used as a recreational area and childcare and office use with no retail. The retail use will change the ambiance of the existing historical neighborhood open space and noncommercial public use in a quiet residential area." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-72])*

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"Alternatives analyzed in the draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.

I fully support the Community Full Preservation Residential Alternative for 3333

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It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 13,000+ retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk."

*(Henry N. Kuechler IV, Email, January 03, 2019 [I-KuechlerIV-3])*

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"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333, as opposed to the 12,000-15,000 retail caused the Developers Destructive Proposal." *(Henry N. Kuechler IV, Email, January 03, 2019 [I-KuechlerIV-5])*

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"I am in favor of progress and the betterment of neighborhoods. I support the Neighborhood Full Preservation Alternative for the 3333 California Street project for the following reasons:

"1. It offers the same number of residential units as the developer's proposal (558 with a 744 variant).

"2. It preserves the character-defining features of the historically significant landscaping as well as much of the architecture of the original design. It maintains the majority of the 185 mature trees of various significant and rare species that would continue to absorb greenhouse gases. People from the neighborhood and elsewhere regularly use this green space for recreational purposes and is very important to the community.

"3. The Alternative would not have retail that would compete with the merchants at Laurel Village (and also on Sacramento Street). By using all the space for housing, some units would be large enough for middle-income families.

"4. It would be built in approximately 3 years instead of the 7-15 years the project applicant wants. I am not sure if there are any neighborhoods in SF that would agree to such a long and drawn out construction timeline. Imagine the noise, pollution, traffic, quality of life for the people not only the immediate neighborhood but those who must travel through this area daily to get to wherever they have to go to.

"5. I understand that the new Draft EIR Full Preservation Residential Alternative has 24 less residential units than the project. However, if some of the 44,306 sq ft of retail in this Alternative is used for 24 residential units, the Alternative would offer the same number of residential units as the proposed project. There will be retail along California Street under the Alternative and NO retail along Euclid. The location of retail shops along Euclid is most unattractive - it is windy, hilly and steep. It is NOT a pleasant strolling area for shoppers." *(Tina Kwok, Email, December 4, 2018 [I-Kwok1-1])*

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"I support…the Laurel Heights community alternative plan for the development of 3333 California Street, a 10-acre site. It projects a three-year plan build-out rather than the seven to 15 year planned construction time." *(Tina Kwok, Draft EIR Hearing Transcript, p. 53, December 13, 2018 [I-Kwok2-3])*

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"I am in Support for the Community Alternatives." *(Gary Laufman, Email, January 8, 2019 [I-Laufman-1])*

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"I urge you to…instead encourage the developers to pursue a project more in line with the alternative presented by the Laurel Heights Improvement Association (of which I am not a member). An all-residential project would mitigate – if not completely eliminate – many of the negative issues raised in the EIR and would be a solution that would work for the developers and for the community.

The Community Full Preservation Residential Alternative for 3333 California Street provides the same number of housing units as proposed by the developers, but preserves the integrity and historical significance of the site and better integrates the project into the surrounding neighborhood." *(Larry Mathews, Email, January 8, 2019 [I-Mathews2-2])*

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"Please take note that the community alternative builds the same number of housing units as the developers propose, but we do so in three years, not in seven to 15 years, as proposed by the developer. It took less than five years to build the Salesforce Tower, after all.

Clearly, the developers and planning don't appreciate the fact that San Francisco has a housing crisis and needs housing now, not in 2030 or beyond. Housing activists, NIMBYs and others should pay careful attention to this glaring discrepancy." *(Adam McDonough, Draft EIR Hearing Transcript, p. 23, December 13, 2018 [I-McDonough1-3])*

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"I am writing to…lend my full support for the community "full preservation" alternative." *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-2])*

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"The community alternative provides the same number of housing units without the excessive, bulky, towering, commercialized and paved project proposed by the developer." *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-9])*

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"I support the Neighborhood Full Preservation Alternative because:

1. It has the same number of residential units as the project (558 with a 744 variant).

2. It would retain the character-defining features of the historically significant landscaping including the beautiful Terrace designed by Eckbo, Royston & Williams, and the majority of the 185 mature trees that would continue to absorb greenhouse gases. People regularly use the green space on the site for recreational purposes and that space is very important to the community.
3. It would not have retail that would compete with the merchants at Laurel Village Shopping Center. By using all the space for housing, some units would be large enough for middle-income families.
4. It would be built in approximately three years rather than the seven to fifteen years the project applicant is proposing."

*(Marie McNulty, Letter, December 18, 2018 [I-McNulty-2])*

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"So I would urge you to look -- support the neighborhood full preservation measure. That will leave everything basically as it is. It currently provides access all over the place, unlike what they're telling you; there is no north/south access. But there isn't hardly any place you can't walk up and enjoy the campus. And even though they have separations, it's always been open to the public and family. And dogs, pets, everybody uses it all the time, and has for years, and it's always been welcomed. And if they get away with this mess, you'll have no more housing in comparison to what you can get with the existing premises. And, therefore, that's what I urge you do to. It will give you 100 percent of the characteristics, and the historic site would remain the same. It provides up to 744 units of housing. It doesn't provide any commercial. It builds them in three years instead of seven to fifteen –" *(Roger Miles, Draft EIR Hearing Transcript, pp. 20-21, December 13, 2018 [I-Miles1-4])*

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It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex envisioned by the Developer.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk.

It protects the small, family owned businesses in Laurel Village, Sacramento Street and Presidio Avenue."

*(Ellen Miller, Letter, January 8, 2019 [I-MillerE-1])*

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"Thank you for your time in reading this email and for seriously considering alternative plans put forth by the Laurel Heights Improvement Association." (*Cristina Morris, Email, December 10, 2018 [I-Morris1-7])*

"That said, I had never heard of the community project before. I don't know if it's in the documentation, and I'm sorry if I missed it in the EIR. If that's the fastest way to build, sure, I would be very much in support of the community program. I don't know if they have secured a developer yet, and I know it's really hard to secure one without retail attached to the project, but if that's the case, that might be a faster way. Otherwise, if that's not possible, the fastest way may be to accept retail on site." *(Arielle Mouller, Draft EIR Hearing Transcript, pp. 60-61, December 13, 2018 [I-Mouller-2])*

"Last week, the San Francisco Historic Preservation Commission stated strong support for preserving this resource by building a residential alternative." *(Anne Neill, Email, December 12, 2018 [I-Neill-4])*

"I support the Community Full Preservation Alternative which would have the same number of housing units as the proposed project (558) with a variant for 744 and would build new buildings on the vast parking lots along California Street in approximately 3 years rather than the 7-15 years requested by the developer. Under the community alternative, the main building would be converted to housing units rather than demolishing half of it, and there would also be a new Mayfair residential building. The existing cafe and childcare center would remain, and there is an existing pathway through the building that opens onto the Terrace and onto Masonic. **Please direct the Planning Department to evaluate this alternative with the same level of detail as they do for the alternatives in the Draft EIR.**" *(Anne Neill, Email, December 12, 2018 [I-Neill-8])*

"1. We fully support the Community Full Preservation Residential Alternative proposal:

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.
- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 8,000 retail auto trips per day.
- It does not generate approx. 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It is compatible with the surrounding neighborhoods for character, style, scale and bulk."

*(Marsha and Wolfgang Nonn, Email, January 8, 2019 [I-Nonn2-1])*

"I fully support the Community Full Preservation Residential Alternative for 3333 California St. I support this plan because:

- It preserves the Historic Characteristics of this unique and wonderful historic site.

- It provides 558 (or 744 in the Variant) housing units.

- It builds these units in three years.

- It does not include the Retail/Office/Commercial Complex (large and unneeded and unwanted but that the Developer continues to insist upon), and in doing so

- avoids adding another 13,000+ retail auto trips per day to a city already overwhelmed by cars and short of parking

- avoids forcing traffic and parking demand into the adjacent neighborhoods

- avoids adding 15 kilotons per year of private transportation-generated pollutants to the cities environment

- preserves both the present childcare center and the existing café.

- better matches the character, style and scale of the surrounding residential neighborhoods"

*(Phillip Paul, Email, January 7, 2019 [I-Paul-2])*

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"The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing." *(Phillip Paul, Email, January 7, 2019 [I-Paul-4])*

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"For all these above reasons, I urge the Commission to consider I strongly urge the Commission to consider the Community Full Preservation Residential Alternative for 3333 California. The proposed plans submitted by the developers," *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-11])*

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"I strongly support the Community Full Preservation Residential Alternate for 3333 California Street Project.

It preserves the historic characteristics of this wonderful site.

It preserves the outdoor open space frequently enjoyed by residents in the neighborhood.

It includes the 558 residential units.

It can be built in 3 years with only 4 additional new buildings.

It does not add a retail or commercial which is not needed due to the local Laurel Heights Shopping Center (4 banks, 2 supermarkets, 2 clothing stores, 2 coffee shops, a large variety store, 3 restaurants, Walgreen's drugstore). Trader Joe's and Target are one block from the building site.

This plan does not markedly increase the amount of noise, air pollution, and congestion as the Developers' Proposal." *(Ann Prato, Email, January 7, 2019 [I-Prato-1])*

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"I live in the neighborhood affected by any development at 3333 California Street. I support the Community Full Preservation Residential Alternative for 3333 California because:

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.

- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 13,000+ retail auto trips per day.
- It does not generate approx. 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It is compatible with the surrounding neighborhoods for character, style, scale and bulk."

*(Sandra Price, Email, January 7, 2019 [I-Price-1])*

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"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the Developers Destructive Proposal." *(Sandra Price, Email, January 7, 2019 [I-Price-3])*

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"**2. You should support the Neighborhood Full Preservation Alternative** because:

A. It has the same number of residential units as the project (558 with a 744variant).

B. It would retain the character-defining features of the historically significant landscaping including the beautiful Terrace designed by Eckbo, Royston & Williams and the majority of the 185 mature trees that would continue to absorb greenhouse gases.

It is important for you to know that people from our neighborhood and other neighborhoods regularly use the green space on this site for recreation playing with their dogs, having impromptu picnics and simply visit with one another. This **SPACE IS VERY IMPORTANT TO OUR COMMUNITY.**

C. We support using all the space for housing which is affordable and can accommodate the diverse population of our City. By using all the space for housing, some units would be large enough for middle-income families. We do **not need retail** space as that would compete with the merchants at Laurel Village Shopping Center.

D. Any construction to re-formulate this space needs to be built in approximately 3years rather than the 7-15 years the project applicant wants." *(Zarin Randeria, Email, December 3, 2018 [I-Randeria1-2])*

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"**I fully support the Community Full Preservation Residential Alternative for 3333 California Street, San Francisco, CA because:**

**It preserves the Historic Characteristics of this wonderful historic site.**

**It provides 558 (or 744 in the Variant) housing units.**

**It builds them in three years.**

**It does not include the massive *unneeded* and *unwanted* Retail/Office/Commercial Complex that the Developer continues to insist upon.**

**It does not create 8,000 retail auto trips per day, and,**

**It does not generate approx. 15,000 tons of greenhouse gases.**"

*(Zarin Randeria, Email, January 5, 2019 [I-Randeria2-2])*

"Okay. So, in addition, most people in our neighborhood would very much like to maintain the height limits in the existing zoning. There's a 40-foot height limit, and in the neighborhood full preservation alternative, these height limits would be maintained." *(Kelly Roberson, Draft EIR Hearing Transcript, p. 49, December 13, 2018 [I-Roberson1-3])*

"I write in order to express my support for the Community Alternatives which promotes reasonable scale residential development within our quiet Victorian neighborhood…" *(Kelly Roberson, Email, January 8, 2019 [I-Roberson2-1])*

"Again, I express my support for the Community Alternatives which promotes reasonable scale residential development and my opposition to the Developer's destructive proposal which could decimating the peaceful Victorian neighborhood where we appreciate the quiet." *(Kelly Roberson, Email, January 8, 2019 [I-Roberson2-4])*

"I support the Community Preservation Alternative. I believe it addresses my concerns. It will provide new housing and retail but with less negative impact on the surrounding community." *(Stefanie Rosenberg, Email, January 8, 2019 [I-Rosenberg-2])*

"**I fully support the Community Full Preservation Residential Alternative for 3333**

It preserves the Historic Characteristics of this wonderful historic site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 13,000+ retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk."

*(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-2])*

"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the Developers Destructive Proposal.

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses.

The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more.

We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal call for.

One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense.

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents?" *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-4])*

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"**We pollute less and protect the environment:** the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative.

**We destroy less:** we preserve the historic site.

**We build less:** 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building.

**One single level underground parking garage for 450** spaces versus a complex of parking garages, some of three levels, for 896 spaces;

**We excavate less:** 90,000 cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads);

**We preserve and protect our local businesses and shops:** no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business;

**We better protect the health and well being of everyone:** no 13,000+ auto trips to pollute the air, generate the noise, put pedestrians at risk, unload trucks on the streets, etc. **the Community's solution will always be three times better than the Developers solution.**

The Developers Destructive Proposal not only destroys the Historic Site it destroys our climate. Concrete is a major contributor to GHG, in fact the GHG generated by the manufacture of cement and steel equals the GHG generated by traffic. **And, 95% of the cement used in the Bay Area is manufactured in the Bay Area so the GHGs are OUR GHGs.** The cement is not made somewhere else in the country it is made here." *(Laura Rubenstein, Email, January 2, 2019 [I Rubenstein-8])*

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"The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4." *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-15])*

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"We appreciate your time and look forward to hopefully the community preservation idea going through since it keeps the housing, drops the retail, and lessens the impacts of seven to 15 years of construction." *(Colleen Ryan, Draft EIR Hearing Transcript, p. 39, December 13, 2018 [I-RyanC-5])*

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"We are writing as neighbors of 3333 California Street for over 30 years to respectfully request the planning commission consider the Community Full Preservation Alternative as opposed to the developers harsher proposal." *(Jim, Colleen, Neil, Julia and Seamus Ryan, Email, January 8, 2019 [I-RyanJ-1])*

"The Community Full Preservation Alternative can be completed within 3 years." *(Jim, Colleen, Neil, Julia and Seamus Ryan, Email, January 8, 2019 [I-RyanJ-4])*

"I and other community members propose a smaller development (the "Community Full Preservation Alternative" or CFPA) that will still add lots of needed housing but take only three (3) years to complete. The CFPA does not include the massive unneeded and unwanted retail/office/commercial complex that the Destructive 3333 developer continues to insist upon. It does not create outmoded 13,000+ retail auto trips per day. It does not generate approximately 15,000 tons of greenhouse gases. The CFPA preserves both the present childcare center and the existing café, a source of deep, positive social capital in our community. It matches the surrounding neighborhoods for character, style, scale and bulk." *(Rita Sater, Email, January 8, 2019 [I-Sater-5])*

"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the developers' Destructive 3333 Project. Thank you for your time and consideration of this better alternative that can be done in 12 less years with less destruction, obstruction in and around the area and yet preserve the lifestyles of surrounding neighborhoods." *(Rita Sater, Email, January 8, 2019 [I-Sater-7])*

"I and other community members propose a smaller development (the "Community Full Preservation Alternative" or CFPA) that will still add lots of needed housing but take only three (3) years to complete. The CFPA does not include the massive unneeded and unwanted retail/office/commercial complex that the Destructive 3333 developer continues to insist upon. It does not create outmoded 13,000+ retail auto trips per day. It does not generate approximately 15,000 tons of greenhouse gases. The CFPA preserves both the present childcare center and the existing café, a source of deep, positive social capital in our community. It matches the surrounding neighborhoods for character, style, scale and bulk." *(Sebastiano Scarampi, Email, January 8, 2019 [I-Scarampi-4])*

"The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the developers' Destructive 3333 Project." *(Sebastiano Scarampi, Email, January 8, 2019 [I-Scarampi-6])*

"So, anyway, I do support our neighborhood alternative plan, and I hope you will consider removing the retail and office areas." *(Debra Seglund, Draft EIR Hearing Transcript, p. 58, December 13, 2018 [I-Seglund-4])*

"Number two, I fully support the community full 11 preservation residential alternative for this site," *(Joe Scaroni, Draft EIR Hearing Transcript, p. 41, December 13, 2018 [I-Scaroni-2])*

"We are in support of the same amount of 550 -- 552, is it -- 558 units or the 744 alternatives. We want that to happen. And it can happen in the three years instead of perhaps a lengthy delay of seven to 10 years to get this done. So I appreciate your time and consideration." *(Joe Scaroni, Draft EIR Hearing Transcript, p. 41, December 13, 2018 [I-Scaroni-5])*

"A Community Alternative Plan (hereinafter referred to as "CAP") is being created to reflect what we believe will preserve the entire Historical Building. The design will include re-purposing of the Historical Building to residential use. The "CAP" will preserve Eckbo Terrace, Children's Childcare Playground, along with the Redwood trees, and preserve all Historic Landscaping. The existing green spaces on Laurel, Euclid, Masonic and Presidio will remain intact in this redesign. The "CAP" will accomplish the Applicant's goal of providing 558-744 housing units (Variant) by a design of three or four, four-story buildings on the existing surface parking lots facing California Street; with no retail or office. As we understand it, the housing units facing California Street in the CAP will be consistent with the design and aesthetics of the condominiums directly across the street as mentioned above. The number of trees and landscaping to be removed will be substantially less in the CAP Plan. We have not seen the fully-designed CAP but we whole heartedly support the draft of a plan that we have seen because it is less destructive and can be completed and on line satisfying the immediate need for additional housing within the timeline of three to five years; not 15 years.

Applicant's Proposed Plan does not serve any of us well. They have had every opportunity to redesign and submit an Alternative Preservation Plan and they have refused to do that. My sincerely hope is the Planning Department will want to consider the CAP which is timely and less impactful to the neighbors and the many neighborhoods and stop the negative impact that will undoubtedly occur by approval of the Applicant's Proposed Plan before this goes any farther." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-12])*

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"Last week, the **San Francisco Historic Preservation Commission** expressed strong support for reviewing an alternative development plan that would **not** destroy the historic resource of the building by cutting it in half along with the removal of the surrounding landscaping including trees; referred to as the character of the defined feature of the site.

The Commissioners expressed their strong assessment of the interconnection between the building and the landscaping as the important resource and vital to the neighborhood. They believe that this project needs the neighborhood and the developer to come together to create a win-win for all parties as the only way it can be measured as a success. The Commission stated they wished they could have reviewed the **Community Full Preservation Alternative Plan** which was discussed but not available for review by the **S.F. Historic Preservation Commission** at the December 5th meeting. The Commissioners expressed their willingness to insure the integrity of the Historic elements are maintained and to get a second look at what will be the "final" alternative development plan supported by the community and the developer when sent back to them from the Planning Commission." *(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-1])*

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"Under the community alternative, the main building would be converted into housing units rather than demolishing the smaller wing and cut through half of it. There would be, in addition to the residential units on California Street, a new Mayfair residential building. The existing cafe and childcare center would remain, and the existing pathway through the building that opens onto the Terrace and onto Masonic, would remain eliminating the need for additional public pass-through access to be constructed." *(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-3])*

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"We urge you to extend the **comment period on the Draft EIR** in order to evaluate this **Community Full Preservation Alternative Plan** and compared it to the **DEIR Full**

**Preservation Alternative C** with the same level of detail as the alternatives in the **DEIR** because it will be less impactful on the surrounding neighborhoods and **will not** destroy the historic resource of the building and the surrounding landscaping. The **Community Full Preservation Alternative Plan** will give the City of San Francisco the housing it desires for the site in 3-5 years and builds 4 new buildings versus 14 new buildings in 7 to 15 years as proposed by the developer." *(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-6])*

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"I know for myself, I want to see a common-sense approach to building as we look to the future. Why destroy, remove or create hazardous conditions when you don't need to. With that in mind, 'The Community Full Presentation Residential Alternative' for 3333 California Street as it is now called, **would** do the following:

a) Preserve the Historic characteristics of the building and landscaping.

b) It would limit construction to the California Street side of the property and to Mayfair

c) It will match the surrounding architectural design in character and style consistent with those residential condominiums directly across the street on California.

d) It will allow for the retention of far more of the mature trees and landscaping

e) It will provide for 558 (or 744 in the Variant) housing units without rezoning and revoking Resolution 4109, the agreement that runs with the site between the City and the surrounding neighbors.

f) It builds the housing units in three years

g) It will keep the impact of construction on the community and environmental risks to a minimum.

h) It will preserve the present childcare center and play area and the community's access to the existing green areas bordering the site on four sides.

i) It will protect the small, family-owned businesses in Laurel Village, Sacramento Street, Presidio Avenue which are the very fabric of the neighborhood. They are already under immense pressure.

What it **won't** do:

j) It won't bring excessive, unnecessary, and unwanted traffic and congestion, noise, pollution to the neighborhoods this site touches by turning it into a mini-city and destination

k) It won't bring unneeded retail/office/commercial spaces as the developer has insisted upon

l) It won't add unneeded height to a building when we already have six floors to look at on Presidio Avenue.

m) It won't take 15 years to built and decimate the community and surrounding streets.

n) It won't be an opportunity to sell a new entitlement on an up-zoned property."

*(Victoria Underwood, Letter, January 4, 2019 [I-UnderwoodV3-2])*

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"There are so many downsides to the developer's proposals and I now choose light and positive energy instead. None of the "issues" are issues under our Community Full Presentation Plan.

Whether it be too many ingress-egress driveways cutting into traffic on Masonic, Euclid, Presidio Avenue, eliminating the right most lane at Presidio Avenue, introduction of retail on city blocks with almost no pedestrians because it's basically a freeway, the loss of parking and the addition of loading zones that people and mini-buses will have to back into on this "freeway" maze. The tremendous loss of quality of our lives at the advancement of noise, pollution, environment impact, loss of green spaces and trees. All of it, unnecessary and hardly a positive step forward.

When considering the future, please don't forget the neighborhoods that currently thrive and exist around this site. Repurposing isn't a bad thing when the impact is less overall. Everyone says we need more housing and that they think it's a great idea. But when I say back to them, "So you wouldn't mind 558-744 housing units being built across the street from where you live over the course of 15 years? The reply is always the same, "Oh, no I wouldn't like that at all!" We are trying to find something that works and doesn't burden the people who already live in direct proximity and work in nearby small businesses. What is really happening when you drill down past the minutia is taking a single-user site and repurposing it to accept multi-users. Nothing in that description implies destruction. We believe our plan accomplishes that and it has Community support.

The Commission is faced with making a decision on whether to go with the "Community Full Preservation Plan" or to go with some version of the developer's "Destructive Plan". We think our plan makes the most sense for all the right reasons. We believe that our plan can be approved without further studies and delays in construction to bring the needed housing on line.

Thank you for your time and serious consideration of our Community Full Preservation Plan."

*(Victoria Underwood, Letter, January 4, 2019 [I-UnderwoodV3-6])*

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"I understand the local neighborhood association has submitted an alternative plan that I would support AND would be built in approximately three years. Hopefully the Planning Dept. and developer can adjust the proposal to include residential and office space only as detailed by this or one of the other alternative plans." (*John Zlatunich, Email, January 5, 2019 [I-Zlatunich2-2])*

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**RESPONSE AL-2: LAUREL HEIGHTS IMPROVEMENT ASSOCIATION OF SAN FRANCISCO, INC.'S (LHIA) ALTERNATIVE**

Comments include submission of an alternative developed by the Laurel Heights Improvement Association of San Francisco, Inc. (LHIA) for consideration as another full preservation alternative in the EIR. This proposed alternative is variously called the "Community Full Preservation Alternative," the "all-residential alternative," and the "neighborhood alternative" among other descriptions in the draft EIR public hearing transcript, and in comment letters and email comments on the draft EIR. For purposes of the RTC document this alternative is referred to as the "LHIA Alternative." The submission included a variant to the LHIA Alternative that would increase the height of the proposed Walnut Building and provide additional residential units in the Walnut Building. The commenter submitted, along with the description of the LHIA Alternative, an analysis of how the alternative would meet the secretary's standards compared to the commenter's analysis of the proposed project and Alternative C: Full Preservation – Residential Alternative in relation to the secretary's standards. The submission also included the

commenters' analysis of how the LHIA Alternative would meet project objectives as defined in the comment. Comments made at the public hearing on the draft EIR, and prior to receipt by City staff of any details about the LHIA Alternative, request information about the LHIA Alternative based on the amount of public support expressed for it at the public hearing and in comments submitted on the draft EIR. Comments assert that the EIR is inadequate because it does not include the LHIA Alternative, and express support for this alternative, asserting that it more effectively addresses the impacts of the proposed project or project variant.

**LHIA Alternative under CEQA Guidelines**

As discussed above in Response AL-1: Range of Alternatives on RTC pp. 5.H.6-5.H.17, the EIR presents a reasonable range of alternatives. CEQA Guidelines section 15126.6(a) directs lead agencies to develop a range of reasonable alternatives with the nature or scope of alternatives governed by the "rule of reason," and to include alternatives that feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the identified significant impacts of the project. CEQA does not require that an EIR consider every conceivable alternative or permutation or combination of alternatives. The EIR would not be required to be recirculated to include the LHIA Alternative or its variant because they are not considerably different from other alternatives that were included in the EIR, as discussed below.

The EIR contains a reasonable range of alternatives, and thus CEQA does not require that this responses to comments document include a description and analysis of the LHIA Alternative or its variant in the alternatives chapter. City staff nevertheless thoroughly reviewed the information provided by LHIA to determine whether it would clearly lessen the significant environmental impacts of the proposed project or its variant, and whether it differs considerably from the range of alternatives in the EIR.

Description of LHIA Alternative and Variant

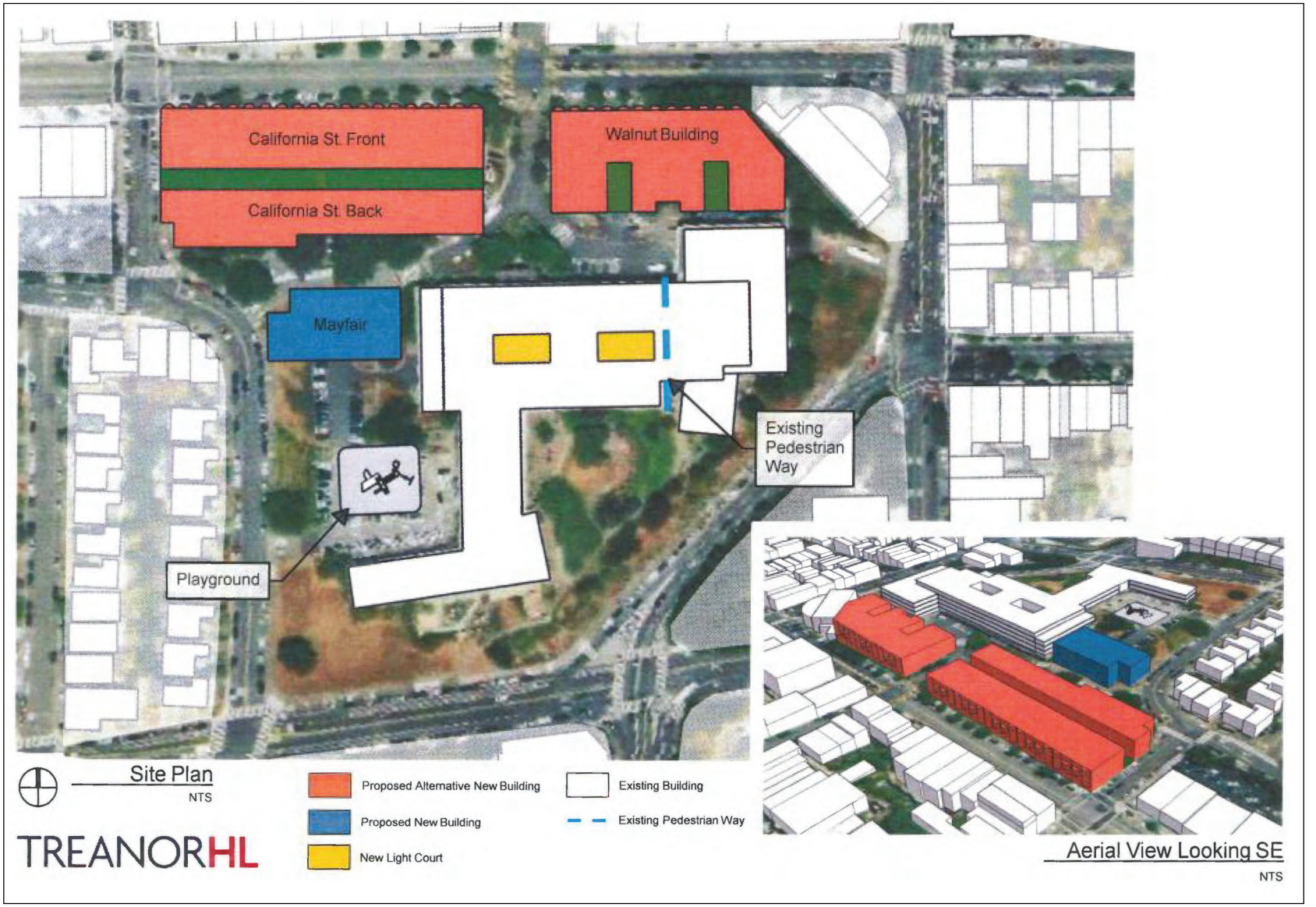
As presented in Comment Letter O-LHIA4 and its exhibits and attachments, the LHIA states that the LHIA Alternative and its variant would develop the same number of residential units as the proposed project (558 units) and the project variant (744 units), that it would provide 460 on-site parking spaces, some with direct access from the residential units to a single-level below-grade garage along California Street, and that it would entail substantially less excavation than the proposed project or variant because of the reduced building and parking program. It would also retain a childcare use (approximately 11,150 gross square feet) and a café (approximately 1,183 gross square feet) in the existing building and allow for the retention of a nominal amount of office space (approximately 5,000 gross square feet). Except for the retention of the café there would be no retail uses under the LHIA Alternative.

As illustrated in RTC Figure 5.H.1: LHIA Alternative Site Plan, the LHIA Alternative and its variant would focus development on the northern portion of the site with the construction of 30 new buildings on the parking lots and open areas – the California Street Front and Back buildings, the Walnut Building, and the Mayfair Building. The adaptive reuse of the existing building would be limited to the demolition of the circular garage ramp structure and internal changes to accommodate the adaptive reuse as a residential building. The demolition of the Annex Building would allow for the construction of the California Street Front Building, which would consist of 14 buildings that would be approximately 28.5 feet wide and 75 feet deep, with a 25-foot-deep rear yard. The California Street Back Building would also consist of 14 buildings but these buildings would be approximately 28.5 feet wide with depths ranging from 40 to 65 feet to allow for preservation of on-site trees. The California Street Front and Back buildings, the Walnut Building, and the Mayfair Building would all be 40 feet tall except under the variant of the LHIA Alternative, which would include a 67-foot-tall Walnut Building to accommodate additional residential development, as allowed through a planned unit development. The additional residential units in the variant would be accommodated by additional floors in the Walnut Building and by additional, but smaller units in all of the buildings. The LHIA Alternative's design program as described in the comment letters would be based on the massing, scale, and architectural characteristics of the existing buildings immediately adjacent to the site.

The LHIA Alternative would retain much of the internal site circulation, with access to the site and the below-grade parking garages provided via Walnut Street, Laurel Street, and Presidio Avenue. The existing parking garage under the retained and adaptively reused building in the LHIA Alternative would be accessed from the existing driveway on Presidio Avenue, while parking for the Mayfair Building, the California Street buildings and the Walnut Building would be accessed from California and Walnut streets and Laurel Street/Mayfair Drive (see RTC Figure 5.H.2: LHIA Alternative Circulation Plan). All freight loading would be located underground and accessed from Presidio Avenue.

Redevelopment of the site under the LHIA Alternative or its variant would take three years according to the comment letter, and would require relief from certain planning code requirements such as dwelling unit exposure,[3] and, in the case of its variant, amendments to the height and bulk map, similar to the proposed project, project variant, and the alternatives analyzed in the EIR. See Comment Letter O-LHIA4 and its exhibits and attachments in RTC Attachment B for LHIA Alternative's narrative description, illustrations, and figures.

[3] In dwelling units in all use districts the required windows of at least one room that is equal to or greater than 120-square-foot minimum superficial floor area shall face directly onto an open area, typically required to be at least 20 to 25 feet in width, with specific dimensional requirements of the open area specified based on the type of open area (such as a public street or alley, required rear yard, or inner court). See sections 503 and 504 of the housing code and section 140 of the planning code.




Source: TREANORHL and Laurel Heights Improvement Association of San Francisco, Inc. (2019)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

**RTC FIGURE 5.H.1: LHIA ALTERNATIVE SITE PLAN**




Source: TREANORHL and Laurel Heights Improvement Association of San Francisco, Inc. (2019)

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

**RTC FIGURE 5.H.2: LHIA ALTERNATIVE CIRCULATION PLAN**

Lessening or Avoiding Significant Effects of the Project

Based on the information provided in the comment, the LHIA Alternative or its variant are considerably similar to Alternative C: Full Preservation – Residential Alternative already included in the EIR. Alternative C would preserve the existing historic building without any physical division and would partially preserve the existing landscaping with its curvilinear shapes in pathways, driveways and planting areas, constructing new buildings only along the northern and northwestern parts of the project site. Like Alternative C, the LHIA Alternative and variant would retain and adaptively reuse the existing historic structure and would concentrate demolition and new construction within the northern portion of the site, and would partially preserve existing landscape features. Both the LHIA Alternative and Alternative C would, therefore, avoid significant impacts on the historic architectural character of the existing office building and loss of prominent primary views of character-defining features of the site from Presidio Avenue, Masonic Avenue, and Pine Street that would occur with the proposed project or variant. As such, the LHIA Alternative or its variant does not lessen or avoid any significant impact identified for the proposed project or project variant that is not already avoided and adequately addressed by Alternative C: Full Preservation – Residential Alternative.

Because the LHIA Alternative and its variant are considerably similar to Alternative C, and the other alternatives analyzed, there is no requirement to include another alternative to the EIR. The range of alternatives included in the EIR is adequate under CEQA Guidelines section 15126.6. No additional alternatives are required.

Ability of LHIA Alternative to Attain Basic Project Objectives[4]

Although the LHIA Alternative or its variant would attain some of the basic project objectives, it would not attain several of the objectives of the proposed project or project variant. The first two objectives for the proposed project or project variant identified on EIR p. 2.12 are as follows (these are also presented in Table 6.3 on EIR pp. 6.17-6.19, Objectives 1 and 2):

- Redevelop a large underutilized commercial site into a new high quality walkable mixed-use community with a mix of compatible uses including residences, neighborhood-serving ground floor retail, on-site child care, potential office/commercial uses, and substantial open space.
- Create a mixed-use project that encourages walkability and convenience by providing residential uses, neighborhood-serving retail, on-site child care, and potential office/commercial uses on site.

[4] It is noted that the objectives listed in Comment O-LHIA4-3 that begin LHIA's discussion of how the LHIA Alternative would meet the basic objectives of the project, are not identical to the project objectives on EIR p. 2.12. Most of them (except Objectives 6 and 8) have been modified in the comment. The analysis below is based on the project objectives as presented in the EIR.

Due to the size and location of the mix of uses presented in the LHIA Alternative, the alternative would not satisfy the primary objectives of the proposed project or project variant to create a high quality, walkable, mixed-use community within the project site that connects with and complements the existing neighborhood commercial uses. As presented, the LHIA Alternative would retain the 11,500 gross-square feet of childcare, the 1,183-gross-square-foot café that serves UCSF staff (compared to 40,261 gross square feet of retail use under the revised project and 34,496 gross square feet under the revised variant), and up to 5,000 gross square feet of office use (compared to 49,999 gross square feet under the revised project, with no office use under the revised variant). With only a childcare facility, and less than 6,200 square feet of other non-residential uses, the LHIA Alternative does not include a substantial mix of uses that could be characterized as a mixed-use development. In order to access the proposed retail use (the café) at the center of the site and limit the extent of any exterior modifications to the retained historic building, the existing building would need to be redesigned to include internal public access. Compared to the active retail uses proposed along California Street that would connect the commercial uses to the west in the Laurel Village Shopping Center to those east of Presidio Avenue, the LHIA Alternative would only locate a very small amount of retail at the center of the site, which would not be visible from public streets and would be in a location within the rehabilitated historic building that would pose challenges to commercial viability due to its limited access. Alternative C: Full Preservation – Residential Alternative would include about 44,300 gross square feet of neighborhood-serving ground-floor retail space in the new buildings proposed along California Street in addition to retaining the existing child care use, and therefore would partially meet the objective of providing a mixed-use community.

Objective 3 in EIR Table 6.3 is related to addressing the City's housing deficit by building new residential units on the site, including on-site affordable units. As presented, the LHIA Alternative and its variant would provide the same number of housing units as under the proposed project and project variant (558 and 744, respectively), including the required number of affordable housing units pursuant to planning code section 415. Although as presented, there is not enough information to ascertain the accuracy of the residential unit count or the ultimate mix of residential units (e.g. studio, one-bedroom, two-bedroom), the LHIA Alternative is presumed to meet the provisions of this objective, for purposes of this analysis of meeting project objectives.[5] Alternative C would also meet the provisions of this objective by providing 534 residential units (24 fewer units than the proposed project and 210 fewer units than the project variant) but to a slightly lesser degree.

[5] As discussed below, the ability of the LHIA Alternative or its variant to provide 558 or 744 units due to the physical constraints on the site is highly speculative. Alternative F, the code conforming alternative, would provide 629 units.

The fourth item in the list of project objectives on EIR p. 2.12 (Objective 4 in Table 6.3 on EIR p. 6.18) calls for establishing connectivity with the surrounding community. This objective states:

- Open and connect the site to the surrounding community by extending the neighborhood urban pattern and surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces, including a north-south connection from California Street to Euclid Avenue that aligns with Walnut Street and an east-west connection from Laurel Street to Presidio Avenue.

The proposed project and project variant would accomplish this objective by providing Walnut Walk and Mayfair Walk. The LHIA Alternative would fully preserve the existing historic building with no physical division, and thus would not extend the neighborhood urban pattern and surrounding street grid into the site. As presented, the LHIA Alternative would not provide the east-west pedestrian pathway from Laurel Street to Presidio Avenue that would be developed under Alternative C, the proposed project, or project variant. Although the north-south open-air pedestrian pathway from California Street to Euclid Avenue that would be part of the proposed project or project variant would not be part of the LHIA Alternative, a different north-south public connection would be provided through the center of the rehabilitated and adaptively reused building. Therefore, the LHIA Alternative would only partially meet the intent of this objective. This aspect of the LHIA Alternative would be similar to EIR Alternative C. As noted on EIR p. 6.75, Alternative C would only partially meet the provisions of this objective because it would provide only partial north-south connectivity. Thus, the LHIA Alternative would be similar to Alternative C in that it also would only partially meet the objective, but to a lesser degree than Alternative C.

The fifth project objective on EIR p. 2.12 (and item 5 in Table 6.3) relates to both building design and compatible land uses, stating:

- Create complementary designs and uses that are compatible with the surrounding neighborhoods by continuing active ground floor retail uses along California Street east from the Laurel Village Shopping Center, adding to the mix of uses and businesses in the area, and providing activated, neighborhood-friendly spaces along the Presidio, Masonic and Euclid avenue edges compatible with the existing multi-family development to the south and east.

While Alternative C would meet the provisions of this objective by providing active ground-floor retail uses along California Street continuing east from the Laurel Village Shopping Center, the LHIA Alternative would have substantially less active ground-floor retail space and none along California Street, as described above, and would not meet this part of the objective.

Objective 6 in EIR Table 6.3 is related to the provision of a high quality, varied, and integrated architectural and landscape design. The LHIA Alternative, as presented in the comment, would match the massing, scale and architectural vocabulary of the adjacent multi-family buildings on

the north side of California Street and the existing historic structure at the center of the site, however no architectural renderings were provided. However, for analysis purposes, the LHIA Alternative is assumed to meet this project objective, as does Alternative C.

Objectives 7 and 8 in EIR Table 6.3 are related to the provision of a robust open space program that connects to the surrounding community and that exceeds the amount required under the planning code. As with Alternative C, the LHIA Alternative, as presented, would also provide open space (and retain some of the existing open space). However, based on the site plan provided (see RTC Figure 5.H.1), the amount and diversity of open space to be provided under the LHIA Alternative would not be as varied or as accessible to pedestrians as that provided under Alternative C, the proposed project, or the project variant. In retaining the existing landscaping on the southern and eastern sides of the project site, the LHIA Alternative does not appear to include pedestrian access from Presidio Avenue or ADA accessible access from Euclid Avenue. As such, the LHIA Alternative would partially meet these project objectives but to a lesser degree than Alternative C, the proposed project, or project variant.

The LHIA Alternative would include off-street parking; however, there is not enough information to ascertain whether the LHIA Alternative would meet Objective 9, to provide sufficient parking to meet the project's needs in below-grade garages. The LHIA Alternative would retain, integrate, and adaptively reuse the existing office building and meet Objective 10, to retain and integrate the existing office building to promote sustainability and eco-friendly development, as would the full preservation alternatives analyzed in EIR Alternative B and Alternative C.

Overall, the LHIA Alternative would be similar to Alternative C in avoiding the significant impact on the historic resource but would meet or partially meet fewer of the project objectives presented in the EIR than would Alternative C. Because similar alternatives that fully preserve the historic resource and meet most of the objectives of the project are already analyzed in EIR as Alternative B and Alternative C, it is not necessary to include the LHIA Alternative in the EIR.

**Physical Feasibility of the LHIA Alternative**

To respond to the public comments regarding the request to include the LHIA Alternative in the EIR and comments from commissioners for more information about the LHIA Alternative, the planning department has evaluated the physical feasibility of the LHIA Alternative. The evaluation relied on the San Francisco Public Works (public works) architects and engineers' independent peer review of information from the project sponsor. The project sponsor and their architects, engineers, general construction contractor, and geotechnical consultants prepared a letter responding to the planning department's request to provide information that would facilitate an evaluation, based on the project sponsor's understanding of existing conditions and constraints

at the project site (including the condition of the existing office building, and geological and topographical conditions).[6] Public works also provided relevant supplemental information to assist the planning department in evaluating the alternative. The project sponsor's analysis[7] and public works staff's peer-review analysis and their findings are summarized below.[8]

The LHIA Alternative was described narratively and the written description was supplemented with a site plan and a circulation/access schematic. These graphics were provided as rough overlays to aerial photographs and are general in nature. LHIA has not submitted adequate information regarding the LHIA Alternative that would allow the department to confirm precisely the number of units or parking spaces that could be provided in the LHIA Alternative. The plans/schematics provided were also not detailed enough to determine whether the LHIA Alternative could meet applicable building code requirements, or applicable planning code requirements (or enable public works staff to determine which requirements would need to be amended, waived, or otherwise addressed). Whereas the alternatives in the EIR were based on the project's site plan and in most cases provided detail regarding the alternatives' total square footages for each proposed use, the residential unit mix, and the number of parking spaces, off-street freight loading spaces, and bicycle parking spaces, LHIA has not provided this information regarding the LHIA Alternative. In the absence of such information, both the project sponsor and public works made reasonable assumptions based on the standard practice of the architectural and construction industries in evaluating the LHIA Alternative, as described in their reports. As a result, the estimated numbers in the project sponsor's and public works' analyses are approximate.

Unit Count and Unit Mix

LHIA states that the LHIA Alternative would provide a total of 558 residential units. Both the project sponsor and public works conclude that the LHIA Alternative would not be able to provide 558 units as described. The sponsor concludes that the LHIA Alternative could provide up to 470 residential units. Similarly, public works concludes that the LHIA Alternative can provide up to 473 residential units.

LHIA states that the LHIA Alternative would include 292 units, averaging 798 square feet in size, in the existing main building. The sponsor's analysis concludes that the existing building could

[6] San Francisco Planning Department, *Letter from Kei Zushi, Environmental Review Coordinator, to Don Bragg, Prado Group, Inc.*, Request for Information regarding 3333 California Street Mixed-Use Project (Case No. 2015-014028ENV), March 20, 2019.

[7] The Prado Group, *Letter from Don Bragg, SVP / Director of Development, to Kei Zushi, San Francisco Planning Department*, Response to Request for Information regarding 3333 California Street, April 2, 2019.

[8] San Francisco Public Works, *Letter from Vito Vanoni, AIA, Senior Architect & Technical Manager, to Kei Zushi, San Francisco Planning Department*, Independent Peer Review of 3333 California Street – Proposed Alternative, August 15, 2019 (see RTC Attachment D).

include only 231 units, based on the net area in the building, or 184,450 square feet (i.e., not including lightwells, pedestrian circulation, mechanical equipment and exits, or square footage dedicated to other uses). Based on the configuration of the building, of these 231 units, many would be excessively deep and narrow, requiring a large percentage of units (72 percent) with "nested" bedrooms (bedrooms that are open to other areas with access to light and air), or studios. Similarly, public works finds, based on its analysis of the computer-aided drawing files of the existing main building, that the building includes a total of 180,064 square feet of net area. Based on this, public works concludes that the LHIA Alternative could provide up to 226 residential units (226 units = 180,064 square feet / 798 square feet). Public works also concluded that many of the units would be long and narrow, requiring those units to be studios or have nested bedrooms.

LHIA states that the LHIA Alternative would include 56 units in the proposed California Back building, with the average unit size ranging from 971 to 1,575 square feet. LHIA proposes to sculpt the building around the existing mature trees to preserve them, resulting in the lengths of the buildings varying from approximately 40 to 60 feet long and 28.5 feet wide. Both the sponsor and public works concluded that only 40 units could be built in the California Back building because the 40-foot-deep units are not buildable and a loss of 16 units (from 56 units as proposed by LHIA) would result. The public works analysis explains that fitting one elevator, two stairs, and a short corridor and mechanical shafts within each 28.5-foot-by-40-foot building would reduce efficiency to 42 percent and that the resulting unit size would average 425 square feet. LHIA states that the LHIA Alternative would include 118 units in the Walnut Building, averaging 809 square feet in size. The project sponsor concludes only 107 units can be built in the Walnut building based on its analysis showing that the building would include 86,440 square feet in net area. Public works reached a slightly different conclusion, finding that 115 units could be built in the Walnut building if it included double-loaded corridors.[9] Both public works and the project sponsor conclude that the LHIA Alternative could include 56 and 36 units in the California Front and Mayfair buildings, respectively, as proposed.

No unit mixes were provided for the LHIA Alternative. Based on their analyses, however, both the project sponsor and public works concluded that the LHIA Alternative would not comply with the unit mix requirements of planning code section 207.7, which requires no less than 25 percent of a project's total units to have two or more bedrooms and no less than 10 percent of the total units to have three or more bedrooms. The project sponsor concludes that the LHIA Alternative would provide approximately 95 two-bedroom units (17 percent of the total units) and

[9] The term "double-loaded corridor" describes an arrangement of units along both sides of a linear corridor. This arrangement is the most efficient and allows for a minimum number of stairs and elevators. A single-loaded corridor arrangement has units along only one side of a linear corridor and is typically less efficient because only one side of the building has access to required light and air. Single-loaded and double-loaded can also be used to describe arrangement of parking stalls along drive aisles.

approximately 39 three-bedroom units (seven percent of the total units). Similarly, public works concludes that the LHIA Alternative would provide approximately 112 two-bedroom units (20 percent of the total units) and approximately 39 three-bedroom units (seven percent of the total units).

Amount of Excavation

LHIA claims that the LHIA Alternative would require less excavation for underground garages because it would have only one new level of underground parking garage along California Street, as compared with three levels under the proposed project or project variant and three levels under Alternative C. The project sponsor notes that due to the existing slope on the project site (approximately 30 to 35 feet of grade change from the proposed LHIA Alternative garage entries in front of the Mayfair Building lobby and existing building lobby to the lower exit onto Presidio Street), the LHIA Alternative would, as a matter of definition, require a minimum of two levels of excavation.

Both the project sponsor and public works conclude that three or more levels of excavation would be required to provide a total of 460 on-site parking spaces, as proposed in the LHIA Alternative. The project sponsor explains that the LHIA Alternative would only be able to provide 337 on-site parking spaces (183 spaces underneath the California Front and Back and Walnut buildings and 154 spaces in the existing main building) without three or more levels of excavation. Public works concludes that the LHIA Alternative would provide only 323 on-site parking spaces (75 spaces in the California Front and Back buildings, 106 spaces in Walnut Building, and 142 spaces in the existing main building). Both the project sponsor and public works find a similar square footage in the one-level below-grade parking garage underneath the California Front and Back and Walnut Buildings (110,000 gross square feet in the sponsor's analysis and 108,840 gross square feet in public works' analysis). Based on the gross square footage, the project sponsor concludes that the parking garage could provide up to 183 spaces (183 spaces = 110,000 square feet / 600 square feet per space). Public works reached a similar conclusion, finding that the parking garage would provide only 181 spaces, considering that a portion of the California Back buildings would be only 40 feet in depth, as discussed above, and that the California Front and Back buildings would be required by the building code to provide 28 elevators and 28 stairs. The project sponsor concludes that the garage below the existing main building could include up to 154 spaces. Public works reached a slightly different conclusion, stating that only 142 spaces could be provided in the garage, given that, due to demolition of the circular ramps, at least two new ramps would be required to access the spaces in the garage.

The LHIA Alternative proposes to include all freight loading underground, accessed by the existing driveway on Presidio Avenue. However, the project sponsor and public works note the height of the existing opening is not tall enough to accommodate freight vehicles. Public works further explains that the floor-to-floor height of the existing parking garage is not tall enough to

accommodate freight vehicles. Thus, underground freight loading would require additional excavation.

Construction Duration

LHIA claims that the LHIA Alternative or its variant can be built within approximately three years because the existing main building would be converted to residential use at the same time as the new residential buildings are constructed, and because the excavation required for the LHIA Alternative or its variant would not be as extensive as the proposed project or project variant. Public works concludes that the three-year construction timeline would be challenging, given that the LHIA Alternative or its variant would involve: excavation along the entire California Street frontage; approximately 469,000 gross square feet of new construction including a garage underneath the Walnut and California Front and Back buildings; and 458,000 gross square feet of renovation at the existing main building. Public works also notes that with excavation, construction, and renovation occurring across much of the project site at the same time, the only areas suitable for construction staging would be the asphalt parking lot near the entrance court off Laurel Street, unless some of the historic landscaped areas were to be used for construction staging.

Other Issues

LHIA suggests that the LHIA Alternative would retain all existing mature trees on the project site. Public works finds that six existing mature trees in the existing east and west parking lots noted on page 2 of Exhibit 3 to LHIA's January 8, 2019 letter would need to be removed to construct the LHIA Alternative. Further, public works finds that some of the open space that LHIA suggests would be publicly accessible would not be accessible under the ADA requirements, unless additional ramps are constructed. Construction of such additional ramps could further limit the area in which residential units or parking spaces can be provided, and could impact the historic landscaping.

Finally, public works finds that the seven-story Walnut Building under the variant to the LHIA Alternative could provide up to 218 units (103 more units than under the LHIA Alternative), given the three additional floors and the smaller average unit size proposed in the Walnut Building under the variant (732 square feet, compared to 809 square feet under the LHIA Alternative). Based on this, public works concludes that the variant could provide up to 576 units (576 units = 473 units under the LHIA Alternative plus 103 additional units in the Walnut Building). Thus, the variant also would not be able to provide the number of units (744 units) or parking spaces (a total of 460 on-site spaces) that LHIA suggests would be provided.

Additional Unit Count for Walnut Building Under LHIA Alternative Variant

LHIA states that the LHIA Alternative and its variant would comply with all applicable laws and regulations by making any modifications in the design needed to achieve compliance or to provide additional space for necessary functions. LHIA's January 8, 2018 letter does not clarify the nature of design modifications that LHIA intends to make. Based on the information submitted about the alternative, it is unlikely that the LHIA Alternative, or the variant to the LHIA Alternative, could provide the number of residential units (558 units in the LHIA Alternative or 744 in the variant to the LHIA Alternative) and on-site parking spaces (460 spaces in total) within the LHIA's proposed building envelopes as described in LHIA's January 8, 2018 letter, unless three or more levels of excavation is undertaken, or the units are considerably smaller than proposed.

In sum, it is unlikely that either LHIA Alternative, or the variant to the LHIA Alternative, could be constructed as described. In addition to the LHIA Alternative or its variant not being considerably different from the analyzed alternatives, the feasibility of the LHIA Alternative or its variant is highly speculative. Accordingly, it is not included or analyzed as an alternative to the proposed project or project variant in this EIR.

**Preference for the LHIA Alternative**

Comments express a preference for the LHIA Alternative over the proposed project, the project variant, and/or the Full Preservation Alternatives analyzed in the EIR.

By indicating a preference for the LHIA Alternative, many of the comments from organizations and individuals express their preference for a residential, smaller-scaled development for the project site and a shorter construction period than the proposed project or its variant. Comments that express a preference for the LHIA Alternative and thereby indicate a preference for some other vision of development for the project site, or indicate opposition to the proposed project or its variant, do not raise issues concerning the adequacy or accuracy of the EIR's coverage of the proposed project's and its variant's environmental impacts under CEQA, nor do they present substantial evidence that the range of alternatives presented in the EIR is inadequate under CEQA Guidelines section 15126.6(a). These comments, in and of themselves, do not raise specific environmental issues that require a response in this RTC document under CEQA Guidelines section 15088. The opinions in comments from organizations and individuals will be provided to the decision-makers for their consideration prior to taking any approval actions on the project.

Some comments support the LHIA Alternative based on a shorter stated construction period (three years), compared to the construction timeframe for the proposed project or project variant (7 years to up to 15 years) and Alternative C (approximately 5.5 years). EIR p. 2.91 explains that the longer timeframe for construction of the proposed project or its variant would involve periods

of dormancy when no construction would occur. The analysis of the alternatives in the EIR identifies shorter construction periods depending on the scale of the proposed development. There is not enough information in the description of the LHIA Alternative to confirm that its 3-year construction period would be feasible. Although it is reasonable to assume that construction of the LHIA Alternative would take less time than the proposed project or project variant, it is also reasonable to assume that construction would take approximately as long as the timeframe presented for Alternative C because of the substantially similar program for development that includes new buildings along California and Laurel streets; a new subsurface parking garage; and adaptive reuse of the existing building (see Figure 6.5: Alternative C: Full Preservation – Residential Alternative Site Plan, on EIR p. 6.67 and RTC Figure 5.H.1: LHIA Alternative Site Plan, above on p. 5.H.57).

A comment related to transportation issues contrasts the number of truckloads of demolition and excavation materials needed for the proposed project or project variant (stated as 32,000 in the comment) with an estimated number for the LHIA Alternative, presented in the comment as 9,000 (see Comments under TR-6, Construction Impacts, on RTC p. 5.E.57). It is not clear how either of the values in this comment were developed. However, it is not necessarily accurate to assume that because the LHIA Alternative would develop 4 new buildings (or up to 30 buildings as the California Front and Back buildings are characterized as multiple structures within the comment letter) rather than the 11 included in the proposed project and project variant, the number of truckloads of material hauled off site from excavation and demolition would be proportionally smaller. Excavation for garages and building foundations would generate the majority of the materials to be hauled off site. While the likely depth and horizontal extent of excavation needed for the subsurface garage and building foundations in the LHIA Alternative is not known, there is no reason to assume that it would be proportional to the number of new buildings planned. The amount of excavation for Alternative C, Full Preservation – Residential Alternative, would be substantially less than for the proposed project or project variant because the parking garages and buildings on the south side of the project site would not be constructed. It is reasonable to assume that the amount of excavation for the LHIA Alternative would be similar to that for Alternative C.

A comment related to loading facilities contrasts the LHIA Alternative with no on-street loading to the proposed project and project variant that include on-street freight loading on California Street and several passenger loading zones at various locations around the site (see responses to loading comments under Response TR-10, Loading, starting on RTC p. 5.E.91. As explained in the EIR, while the proposed project and project variant would fully satisfy loading demand for the project site in the off-street loading area of the California Street Garage, delivery vehicles could concentrate near the uses they would serve, resulting in the possibility of double-parking along the western end of California Street for the ground-floor retail uses proposed to be located there (see EIR p. 4.C.96). An on-street yellow curb freight loading zone would avoid the potential for

occasional double-parked delivery vehicles. The LHIA Alternative would not include any ground-floor retail space along California Street; therefore, there would be no need for an on-street freight loading area.

Comments assert that the Historic Preservation Commission supports inclusion of the LHIA Alternative as an EIR alternative. The LHIA Alternative was not presented at the December 5, 2018 Historic Preservation Commission meeting or at the December 13, 2018 Planning Commission hearing on the draft EIR. As stated in the letter from Andrew Wolfram, President of the Historic Preservation Commission, dated December 11, 2018 (Letter A-HPC in RTC Attachment B), "The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts. The HPC expressed interest in understanding more about a 'neighborhood alternative' that was discussed by the public during public comment at the hearing." Thus, the San Francisco Historic Preservation Commission has not expressed support for inclusion of the LHIA Alternative as an EIR Alternative, as demonstrated by their December 11, 2018 draft EIR comment letter to the planning commission.

**Approval of the Proposed Project or Variant**

A comment asserts that, under CEQA, the City may not approve the proposed project/variant when a feasible alternative is available that would avoid or substantially reduce the project's significant impact on scenic resources and calls for approval of an alternative that would preserve existing landscaping.

CEQA Guidelines section 15091(a), provides that,

> No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

Among the possible findings relevant to the proposed project and variant are that,

> Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

As such, to approve the proposed project or project variant or any of the alternatives in place of the proposed project or project variant, the decision-makers are required to adopt findings related to the feasibility of each rejected alternative.

## COMMENT AL-3: EIR ALTERNATIVE C: FULL PRESERVATION – RESIDENTIAL ALTERNATIVE

"• The HPC also supported combining some elements of the different alternatives in order to increase the amount of housing in the Full Preservation Alternative C. Commissioner Hyland specifically requested that Alternative C incorporate some elements from alternatives B and D such as increased building heights along California Street (up to 65 feet), the conversion of some areas of office or retail to residential use, and the incorporation of duplexes along Laurel Street." *(Andrew Wolfram, President, San Francisco Historic Preservation Commission, Letter, December 11, 2018 [A-HPC-5] and Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 O-LHIA4-10])*

"**2. ALTERNATIVE C: FULL PRESERVATION RESIDENTIAL ALTERNATIVE**

There is also a new alternative in the Draft EIR (DEIR) which was not presented to the Architectural Review Committee of the San Francisco Historic Preservation Commission on March 21, 2018.

DEIR Alternative C: Full Preservation Residential Alternative would have 534 residential units plus 44,306 gsf of retail uses. DEIR p. 6.13. Please note that some of the proposed retail uses under this Alternative can be converted to residential uses to add 24 more residential units in order to match the 558 residential units in the proposed project. The DEIR unreasonably configured this alternative to have 24 less residential units than the project, in order to provide a false pretext for its rejection.

Alternative C would not divide the existing office building with a 40-foot-wide pathway, demolish the south wing of the building or destroy the Eckbo Terrace and majority of the historically-significant landscaping. (See Attachment B hereto - Alternative C Site Plan from DEIR p. 6.67) This alternative would also have 14,650 gsf of daycare uses. *Ibid*.

According to the DEIR, Alternative C would retain most of the existing office building's character-defining features and many of the character-defining features of the site and landscape. DEIR p. 6.78. It is unclear what the DEIR means by stating that "the glass curtain wall system would be replaced with a system compatible with the historic resource," as the DEIR only states that the replacement would be "a residential system that would be compatible with the historic character of the resource; e.g. operable windows with small panes divided by a mullion and muntins." DEIR pp. 6.77-6.78. Illustrations do not appear to have been provided. It is also unclear what the DEIR means by stating that the proposed one-story vertical addition (12-feet tall) "would appear visually subordinate to the historic portion of the building" and that "the new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles." DEIR pp. 6.77-6.79. Illustrations do not appear to have been provided. The Final EIR should explain exactly what is meant by these two items so that their impact on the character-defining features of the resource can be determined." (*Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, December 5, 2018 [O-LHIA1-6])*

"In the alternative, this Commission should propose that Alternative C be modified so that no portion of the exterior of the existing office building be removed or expanded and that 24 additional residential units be constructed in the space allocated for 44,306 gsf of retail uses in

Alternative C so that the total number of residential uses in Alternative C would match the 558 units in the proposed project and 744 units in the project variant." (*Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., letter, December 5, 2018 [O-LHIA1-11])*

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"Alternative C, their preservation alternative, has 26 less housing units and it's unreasonably configured to have less." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc, Draft EIR Hearing Transcript and Handout, December 13, 2018, p. 46 [O-LHIA3-9]*

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"At the December 13, 2018 hearing on the Draft EIR, members of the San Francisco Planning Commission stated that the Community Alternative should be evaluated during the environmental review process with the same degree of specificity that the DEIR used to evaluate the alternatives discussed in the DEIR. In addition, members of the San Francisco Historic Preservation Commission expressed interest in understanding more about the community alternative that was discussed by the public in the hearing held before that Commission on December 5, 2018. (See Ex. 2, December 11, 2018 Letter from Andrew Wolfram, President of Historic Preservation Commission to Environmental Review Officer; video of hearing on SFGOV-TV and transcript of hearing reported by court reporter. It is important that a full evaluation of the Community Alternative be performed because DEIR Alternative C: Full Preservation -Residential Alternative would have 24 fewer residential units than the proposed Project and 210 fewer units than the proposed Project Variant. DEIR p. 6.75. Based on this discrepancy and other characteristics of the alternatives described in the DEIR, the Draft EIR failed to present a reasonable range of alternatives for evaluation in the DEIR." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Letter, January 8, 2019 [O-LHIA4-2])*

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"Also, DEIR Alternatives B and C would retain the existing landscaped areas largely in their present form and avoid this significant impact on public vistas. DEIR 6.35 and 6.67.

Under CEQA, the City may not approve the Proposed Project/Variant, because a feasible alternative is available that would avoid or substantially reduce the project's significant impact upon scenic resources.

> **Mitigation Measure:** Approve an alternative that would preserve the existing landscaped areas surrounding the main building on the southern and western portions of the site in their present form and do not locate any new construction on these areas."

*(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-7])*

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"The DEIR claims that alterations that are not entirely in conformance with *The Secretary of Interior's Standards for the Treatment of Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Secretary's Standards) may, or may not result in a significant impact under the "material impairment" significance standard of CEQA Guidelines Section 15064.5(b)(1). DEIR p.

However, Rehabilitation Standard 6 states that "deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. DEIR p. 6.11. The DEIR states that if there are character-defining features identified in the preservation alternatives that would be retained, they would be repaired or replaced in

conformance with Standard 6. *Ibid.* However, this claim is inaccurate because Alternative C would not replace the glass curtain walls with new windows that match the old in design, color, texture and materials." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-19]*

**"Alternative C: Full Preservation -Residential Alternative**

Alternative C demolishes the Annex building and concludes that the character-defining features of the existing building are "mostly retained." DEIR p. 6.65. Site and landscape features contributing to the corporate campus setting are mostly retained. Most prominent views of the project site are retained with minimal change. *Ibid*.

The DEIR unreasonably configured Alternative C: Full Preservation -Residential Alternative to have 534 residential units and 44,306 square feet of ground-floor retail space. Alternative C would have 24 less residential units than the proposed project, but if reasonably configured would construct 24 residential units in some of the ground-floor space proposed for retail uses.

Alternative C is also unreasonably configured to have a new exit-only driveway onto Masonic Avenue near the intersection with Pine Street for the California Street Garage and the retained parking garage under the adaptively reused building (residential, retail, commercial, daycare, and car-share parking spaces). This exit near the intersection of Masonic with Pine Street would create a potential traffic hazard on a Major Arterial that serves substantial traffic in the P.M. peak hour. This Alternative unreasonably bars automobiles from exiting on Presidio Avenue, which is one of the principal means of egress from the existing underground garage, while Alternative C has three exits onto Laurel Street. DEIR p. 6.71. A reasonable configuration of Alternative C would allow automobile ingress and egress from all existing points of entry that are retained.

The DEIR inaccurately claims that under Alternative C, pedestrians would not be able to travel through the site to, or access the site from, Masonic and Euclid avenues. DEIR p. 6.73. As previously stated herein, there is an existing north south passageway through the main building that leads from the northern entrance of the building, through the building, opens onto the Eckbo Terrace and leads to Masonic and Euclid avenues, which can be marked with signage as open to the public.

The DEIR states that under Alternative C, solid waste would be collected at the off-street refuse staging area adjacent to the off-street freight loading dock in the California Street Garage and compacted for offsite transport. DEIR 6.74. The DEIR's meaning is unclear. Please clarify whether the proposed off-street refuse and staging area and the adjacent off-street freight loading dock would both be located inside the proposed garage.

As to construction duration, how much time would it take to construct the first phase of Alternative C described at DEIR p. 6.75 (consisting of demolition of the circular garage ramp structures and the northerly extension of the east wing of the existing office building and alterations to the existing office building)? How much time would it take to construct the second phase of Alternative C described at DEIR p. 6.75 (consisting of demolition of the existing annex building and the surface parking lots on the north and west portions of the site, excavation and site preparation for construction of the California Street buildings and the Mayfair Building and associated garages)?

The DEIR p. 6.75 states that as with the proposed project or project variant excavation under Alternative C would extend to a depth of approximately 40 feet below ground surface and would encounter bedrock, and site disturbance would occur in an area of know soil and groundwater contaminants from historic uses. Under the proposed project, project variant and Alternative C,

please describe which portions of the site would be excavated to a depth of approximately 40 feet below ground surface, which portions of the site would be occupied by underground levels, and state the number of levels of underground garage or other underground structure that would be constructed in each location. It appears from the DEIR that excavation to a depth of approximately 40 feet below ground surface that would encounter bedrock would occur in locations other than under the proposed Walnut building. Also, how long do you expect that it would take to remediate the known soil and groundwater contaminants from historic uses and explain what is known to date about the potential methods of remediation and provide all writings describing the potential methods and duration of remediation and measures that would be taken to protect the public from exposure.

In addition, what is the estimated cost of demolishing the northerly extension of the east wing of the existing office building, repairing and/or supporting the remaining structure in this location, and the estimated duration of that demolition? Also, what is the estimated cost of dividing the existing main building and its southern wing (including any reinforcement needed)? What is the estimated cost of strengthening the existing main building to be able to support additional stories? Note that this information is relevant to the feasibility of alternatives. Alternative C is also unreasonably configured because it would have 210 fewer residential units than the project variant. A variant of Alternative C could have been developed that constructed residential units in some of the space that Alternative C proposes to use for retail uses.

Please explain why Alternative C would allegedly provide fewer activated neighborhood-friendly spaces along the adjacent streets than the proposed project or project variant. DEIR p. 6.75. Please explain how Alternative C would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics. DEIR p. 6.75. The information provided in the DEIR does not explain this statement. Please explain how Alternative C would construct some open spaces such as the plazas and Mayfair Walk that would be usable to project residents and the public, but not as many as the proposed project or project variant. DEIR p. 6.75. Please explain how Alternative C would partially meet Objective C by providing code-required open space and how each component of such space could be used for recreational purposes.

The DEIR fails to acknowledge at p. 6.76 that Alternative C would retain the views of prominent character-defining features of the property. Alternative C would retain public vistas from the landscaped green spaces along Euclid Avenue and Laurel Street to the integrated window-walled building and to the Downtown and other areas of the City, which are also prominent character-defining features of the property. So are views of large trees and other landscaping visible from the public ways.

Please explain exactly what the EIR means by replacing the existing glass curtain wall system with "compatible residential window wall system," how the new system would be different, and whether the system would retain the geometric patterns which the existing window walls have. DEIR p. 6.76. The DEIR only states that the replacement windows would have "small panes divided by a mullion and muntins."

Also, please explain the nature of the materials proposed for the vertical addition in Alternative C that would appear visually subordinate to the historic portion of the building. DEIR. pp. 6.77-78. Please explain the nature of the contemporary design that would distinguish the proposed rooftop addition from the original building.

The DEIR states at p. 6.77 that under Alternative C, the rooftop mechanical penthouse would be removed. Please explain the location at which such equipment would be relocated including whether it would be on the exterior of the building and the nature of the equipment. DEIR p. 6.78

states that the existing mechanical penthouse would be replaced, and if replacement on the rooftop is intended, please explain the proposed location of the replacement and the location, height and materials proposed to be used in any proposed screening.

The DEIR inaccurately neglects to mention that under Alternative C, the existing green spaces and lawns used by the public that run along Laurel Street and the landscaped beds along Laurel Street would be retained in addition to such areas along Euclid Avenue, although the drawing on DEIR p. 6.72 shows that these areas would be retained except for the area at which the new proposed Mayfair Building would be constructed.

At page 6.77, the DEIR states that under Alternative C, the proposed addition would increase the height of the existing building (by approximately 12 feet for a total height of approximately 67 feet), but at page 6.78, it describes the addition as a **"two-story, stepped vertical addition."** (Emphasis added) Please clarify this discrepancy and confirm that under Alternative C, the proposed addition would be one-story and state the amount of additional height that it would have.

The DEIR inaccurately claims that the best examples of the integration of the character-defining features of the site occur on the southern and eastern portions of the site, whereas elsewhere, it identifies the concrete pergola and landscaped beds along Laurel Street as character-defining features. DEIR p. 6.80. The DEIR fails to acknowledge that the landscaping along Laurel Street is also integrated with the main building.

Alternative C is unreasonably configured because the DEIR lacks any explanation or justification for the conclusion that Alternative C would provide retail parking at a higher rate per square footage of retail space than the proposed project and project variant, respectively. DEIR p. 6.82. The proposed project would provide 54,117 square feet of retail uses, but Alternative C would provide only 44,306 gsf of retail space. Please explain why Alternative C could not provide retail parking at the same rate per square footage of retail as the proposed project and project variant, respectively.

Also, the DEIR inaccurately claims at page 6.85 that pedestrians would not be able to travel through the site to Masonic and Euclid Avenues because the southern half of the north-south Walnut Walk would not be developed. As previously explained, there is an existing pathway that runs through the office building and opens onto the Eckbo Terrace and runs therefrom to Masonic and Euclid avenues through a gate. Signage could identify this passageway as a public throughway. Also, pedestrians can travel through the Walnut gate and through the site and exit onto Mayfair or Laurel streets. The same comments apply to bicycle access under Alternative C.

DEIR p. 6.97 states that all new construction would be subject to the "Historical Building codes." Please explain exactly what codes are meant by this statement and please provide citations to all such applicable codes." *(Kathryn Devincenzi, Letter, January 8, 2019 [I-Devincenzi3-21])*

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"Again, we are not opposed to developing this site, but the project as it stands is not reasonable and we strongly oppose it and urge you to work with the developer on a version that scales down the number of units, the retail, and the construction timeframe to 3-5 years at most." *(David Goldbrenner and Zhenya Fridlyand, Email, December 18, 2018 [I-Goldbrenner2-4])*

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"5. The new Draft EIR Full Preservation Residential Alternative has 24 less residential units than the project. I recommend that some of the 44,306 square feet of retail in this Alternative be used for 24 residential units so the Alternative has the same number of residential units as the

proposed project. This Alternative would have retail along California Street but not also at Euclid, which the proposed project would have. The applicant should explain the exact type of replacement windows proposed and why the proposed new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles." *(Marie McNulty, Letter, December 18, 2018 [I-McNulty-3])*

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"Draft EIR Full Preservation Alternative C was unreasonably configured to have 26 less housing units than the project and 44,306 square feet of retail, which can be converted to housing to match the number of housing units in the proposed project." *(Anne Neill, Email, December 12, 2018 [I-Neill-9])*

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"**3.** We recommend that some of the 44,306 square feet of retail in this Alternative be used for 24 residential units so the Alternative has the same number of residential units as the proposed project. This Alternative would have retail along California Street but not also at Euclid, which the proposed project would have. Additionally, the applicant should explain the exact type of replacement windows proposed and why the proposed "new rooftop addition" that would distinguish it from the original building yet be compatible with Midcentury Modern design principles." *(Zarin Randeria, Email, December 3, 2018 [I-Randeria1-3])*

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"It should be noted that the **DEIR Full Preservation Alternative C** shows 26 fewer housing units than the Project and 44,306 square feet of retail, which we already thought was planned to be converted to housing to match the number of housing units in the proposed project." *(Victoria Underwood, Letter, December 12, 2018 [I-UnderwoodV2-4])*

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**RESPONSE AL-3: EIR ALTERNATIVE C: FULL PRESERVATION – RESIDENTIAL ALTERNATIVE**

Comments question the adequacy of Alternative C: Full Preservation – Residential Alternative, as presented and analyzed in the EIR. Comments question the number of residential units included; question whether appropriate character-defining features are retained; suggest removing ground-floor retail uses; question various aspects of the site layout under Alternative C; and ask about construction phasing and duration under this alternative.

None of the comments present evidence that the analysis of Alternative C was inadequate or that the alternative would have significant impacts not identified in the EIR. To the extent that comments embody, by comparison, a comment on the adequacy of the range of alternatives studied in the EIR, a response to such comments is found in Response AL-1: Range of Alternatives. To the extent that comments reflect, by comparison, support for inclusion of the LHIA Alternative in the EIR and/or support its adoption as the future development scheme for the project site, a response to such comments is found in Response AL-2: LHIA Alternative. Additionally, responses to comments that express a preference for a scaled-down version of the proposed development and/or concerns with the construction duration are found in Response ME-1: Merits of the Proposed Project and Response PD-1: Construction Duration, Phasing and

Staging, and Development Agreement on p. 5.L.6 and pp. 5.B.9-5.B.15, respectively. All of the alternatives analyzed in detail in EIR Chapter 6, Alternatives, present some level of scaled-down versions of the proposed project or project variant, in that all have fewer square feet and less retail than the proposed project or project variant.

**Number of Residential Units under Alternative C**

Comments assert that Alternative C, Full Preservation – Residential Alternative, with 534 residential units, unreasonably provides 24 fewer residential units than the proposed project.

The number of units in Alternative C is somewhat restricted compared to the number in the proposed project because new construction under this alternative is limited to the northern portion of the project site to preserve the existing primary views of the site from the east, south, and west and to retain character-defining features on the east and south sides of the site. The number of units is also affected by the inclusion of a retail component that, while reduced, includes an amount consistent with project objectives related to redeveloping the site as a mixed-use community (see EIR p. 2.12). As explained in Response AL-1 above, the preservation alternatives were developed based in part on input from the Architectural Review Committee (ARC) of the Historic Preservation Commission, including increasing the height limit for some portion of the buildings fronting California Street (see also EIR p. 6.7 that acknowledges this ARC suggestion). The Walnut Building in Alternative C would be 67 feet tall, as recommended by the ARC. This additional height allows for additional residential units while maintaining ground-floor retail space, meeting the project objectives to provide a mixed-use community.

Alternative C accommodates over 95 percent of the residential units that would be provided under the proposed project. As such, it reasonably accommodates a comparable, though not precisely equal, number of residential units as the proposed project. No analysis of an additional alternative that exactly matches the unit count under the proposed project is required.

**Retention and Replacement of Character-Defining Features**

Comments dispute that character-defining features of the project site would be mostly retained under Alternative C. In particular, comments assert that the rooftop addition and window replacement under Alternative C would not retain the architectural character of the office building and its character-defining features. Comments request specific design details for Alternative C, including details about the window wall replacement for the existing office building, the design of the vertical addition, the landscape design, and the placement of the mechanical penthouse.

Under CEQA Guidelines section 15126.6(d), “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project.” The requested specific design information for Alternative C is not necessary for

meaningful evaluation and comparison with the proposed project or project variant. CEQA does not require a fully designed alternative scheme for presentation in the EIR. The EIR's description of Alternative C provides reasonable and adequate parameters for redevelopment of the project site that could feasibly avoid a significant impact on the historical resource under CEQA while allowing for adaptive reuse of the resource, and provides sufficient information to allow a determination as to whether the alternative would result in any significant environmental impacts.

Changes to the project site would be required under Alternative C to facilitate the adaptive reuse of the existing office building for residential use and to maximize its development potential within the project site (see discussion above, on RTC p. 5.H.76, where comments assert that Alternative C includes *too few* residential units). An adaptive reuse project that proposes a modest vertical addition set back from the retained and rehabilitated structure, and that also is compatible with, and does not merely mimic, the architectural vocabulary and material palette of the historic structure, is generally considered to be, on balance, in compliance with the secretary's standards. Thus, a constrained and strictly construed approach to adaptive reuse of historic structures in formulating preservation alternatives, as suggested in the comment, with no balancing among the various provisions of the secretary's standards and other preservation policies, would unnecessarily limit consideration of feasible alternatives to the proposed project. The inclusion of Alternative C, as presented, is appropriate in the context of a residential development because such a proposal could better attain a project objective such as maximizing housing than one that precludes any vertical additions.

The EIR presents substantial evidence that existing character-defining features of the project site would be mostly retained under Alternative C on EIR pp. 6.76-6.78. The analysis there lists the character-defining features of the existing office building and the site and landscaping, and identifies those features that would be retained, those that would be replaced, and those that would be demolished under the proposed project or its variant and each alternative, including Alternative C. On EIR pp. 6.80-6.81 the analysis concludes that because most of the character-defining features of the existing building would be retained and/or rehabilitated, and many of the character-defining features of the site and landscape would be retained, the property would continue to convey its historic significance, and the alternative would not have a significant impact on the historic resource. A comment states that the EIR does not acknowledge that Alternative C would retain views of character-defining features of the property. The historic resource is most visible from public locations including Pine Street and Presidio and Masonic avenues; these views were considered when defining the alternatives to be evaluated in the EIR and most would be retained in Alternative C. Views from the project site of downtown or other similar vistas are not character-defining features, contrary to statements made in comments. Thus, preserving views *from* the project site was not considered in the historic resources analysis leading to the conclusion regarding the significant impacts of the proposed project or its variant. The conclusion that Alternative C would reduce the proposed project's and project variant's

significant impact on the historic resource to a less-than-significant level was based on its retention and/or preservation of many of the identified character-defining features of both the existing building and its site and landscape, including public views of the site and building from Pine Street, Presidio Avenue and Masonic Avenue. The analysis and conclusions appropriately did not consider any views *from* the project site.

A comment correctly states that the annex building would be demolished and the character-defining features would be mostly retained in Alternative C. As explained in EIR Section 4.B, Cultural Resources, the planning department's Historic Resource Evaluation Response determined that the annex building and circular garage ramp structures are not character-defining features (see EIR pp. 4.B.25). Therefore, Alternative C remains a "full preservation" alternative without retaining the annex building and circular garage ramp structures. Alternative B: Full Preservation – Office Alternative would retain the annex building and adjacent brick wall and the circular garage ramp structures, and therefore addresses the statements in the commenter's National Register Nomination Form, prepared privately by Michael Corbett and Denise Bradley, that the annex building and circular garage ramp structures are among the site's character-defining features (see also EIR pp. 6.7-6.8).

A comment states that Alternative C only partially complies with Standards 2, 5, 9, and is not in compliance with Standard 10. As discussed in EIR Chapter 6, on pp. 6.78-6.80, and contrary to what the comment states, Alternative C is in conformance with Standards 2, 5, 9, and 10 as described below.[10]

The comment states that Alternative C is less compliant with Standard 2 than the LHIA Alternative due to the fact that the main building would have a one-story addition and the building's glass curtain wall would be replaced. The comment states it is unclear that the vertical addition would be compatible with the existing building. However, the EIR clearly states that the one-story vertical addition would have a 15-foot setback from the east, west, and south elevations, would feature a contemporary design with steel and glazing, and would be visually subordinate in relation to the overall size of the existing office building (see EIR p. 6.31). Based on input from the Architectural Review Committee, a north setback was not incorporated as it was determined that other views of the identified resource were more important (as summarized on EIR p. 6.7, it is for this reason that Alternative C would focus development on the northern portion of the site).[11] The addition as proposed would be visually subordinate to the historic

[10] U. S. Department of the Interior, National Park Service (Kay D. Weeks and Anne E. Grimmer), *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction of Historic Buildings*, 1995, updated 2017, p. 2, https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf, accessed July 26, 2019.

[11] San Francisco Planning Department, Meeting Summary for Architectural Review Committee of the Historic Preservation Commission re: Review and Comment for 3333 California Street Preservation Alternatives for Draft EIR, Case No. 2015-014028ENV, April 5, 2018.

resource after analyzing sight line studies from the most prominent viewpoints, as demonstrated in EIR Figure 6.6, Alternative C: Full Preservation – Residential Alternative Building Massing, on EIR p. 6.69. Additionally, the contemporary design of the addition in steel and glazing would be visually compatible with the historic resource which features a simple glass curtain wall on most elevations.

Although Alternative C would include removal and replacement of the glass curtain wall with a system that would be compatible with residential use to incorporate more operable panes, it has always been anticipated that the new proposed glass curtain wall would be compatible with the character of the existing glass curtain wall. The historic resource contains a relatively simple fenestration system of an aluminum frame glass curtain wall with a pattern of muntins and mullions. While it was identified as a character-defining feature of the resource, the glass curtain wall is not a precious irreplaceable window such as a stained-glass window or a leaded glass window, and does not represent unique craftmanship in its design or installation. It instead represents a modern technological innovation of mass-produced products that became commonplace for buildings of this type and period and continues to be produced on an industrial scale. Furthermore, the existing glass curtain wall has seen alterations that include tinting of the windows and spandrel panels between 1984 and 1985 (see integrity analysis on EIR p. 4.B.20), so while the glass curtain wall may be original, it has seen alterations and modifications over time. For this reason, a one-story vertical addition and compatible replacement of the glass curtain wall would be fully consistent with Standard 2.

The comment also states that the proposal to replace the glass curtain wall and add a vertical addition would impact the building's horizontality and is therefore not fully in compliance with Standard 5. See the above explanation as to why the vertical addition is compatible with the character of the resource based on sightline studies.

The comment states that Alternative C would not meet Standard 9 because "the massing of the new buildings along California Street is very different from the buildings across California Street, and from the residential development surrounding the site." The comment does not explain how this relates to Alternative C's impacts on known historic resources or renders Alternative C out of conformity with the identified historic resource. None of the properties on the north side of California Street have been identified as historic resources so it is irrelevant whether Alternative C is compatible with the massing of the properties across the street. The comment does not explain why Alternative C is not in conformance with Standard 9.

The comment states that due to the inclusion of a one-story addition and removal of the glass curtain wall it is "difficult to see how the original form and integrity of the property could be returned if the changes were reversed." However, it must be understood that the Standard 10 analysis under Alternative C evaluates the alternative as it would affect the 10.25-acre resource in its entirety, not just the individual main office building. Under Alternative C the development on

the site was focused along California Street and the northern portion of Laurel Street so as to keep the remaining site and landscape features intact. If Alternative C were to be removed in the future, these important landscape features would remain. Furthermore, it is not inconceivable that the vertical addition could be removed in the future without compromising the integrity of the main building. The glass curtain wall could be replaced to match the original glass curtain wall exactly, and the main building's essential form and integrity would be unimpaired. Therefore, Alternative C would be in conformance with Standard 10.

As explained in more detail in the preceding paragraphs, comments assert that Alternative C would be only in partial conformance with some of the secretary's standards. Alternative C would, however, be in conformance with the secretary's standards with regard to the project site in its entirety, a 10.25-acre site with buildings and landscaping, the majority of which would be retained, repaired or replaced. The EIR, on pp. 6.78-6.80, provides a detailed analysis of how Alternative C would meet the secretary's standards, focusing on how replacing the existing glass curtain wall system with one compatible with the historic resource would conform with Standards 1, 2, and 5, and how the single-story rooftop addition to the office building and demolition of a small part of the building would conform with Standards 9 and 10. The alternative was found to be in overall conformance with the secretary's standards. The conclusion is based on the overarching intent of the rehabilitation standards, which balances new construction and alterations with retention of character-defining features.

Further, the commenter requests that the EIR provide a detailed description or illustrations of the proposed one-story vertical addition to the existing office building in Alternative C. As discussed above, a detailed analysis of how Alternative C would meet the secretary's standards is provided on EIR pp. 6.78-6.80. The analysis concludes that the property under Alternative C would, on balance, continue to convey its historic and architectural significance as a Midcentury Modern-designed corporate campus and thus meeting the secretary's standards. No additional descriptions or illustrations of the proposed one-story vertical addition are required to be included in the EIR.

The commenter asserts that Alternative C would not meet Standard 6 because Alternative C could replace, rather than repair, the existing glass curtain walls, or could replace the existing glass curtain walls with new windows that do not match the old in design, color, texture and materials. The secretary's standards are advisory, and not regulatory or technical, standards. The preamble to the secretary's standards states that these standards "are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility." A project is evaluated against the secretary's standards on an on-balance approach. As discussed on EIR on p.6.79, the glass curtain wall system would be replaced with a residential-based design that would still be compatible with the character of the existing windows under Alternative C. Standard 6 does allow for replacement of materials and for this reason, Alternative C would, on balance, meet the secretary's standards as discussed above.

The commenter states that the draft EIR neglects to mention that the existing green space along Laurel Street and Euclid Avenue would be retained under Alternative C. The statement is incorrect. As discussed on EIR p. 66 and shown on Figure 6.5, Alternative C: Full Preservation – Residential Alternative Site Plan, on EIR p. 6.67, the EIR clearly shows the existing greenspace along Laurel Street and Euclid Avenue that would be retained under Alternative C and the existing greenspace that would be removed due to the construction of the proposed Mayfair Building. The commenter also asserts that the draft EIR fails to acknowledge that the landscaping along Laurel Street is also integrated with the main building because it claims that the best examples of the integration of the character-defining features of the site occur on the southern and eastern portions of the site on p.6.80. Contrary to the assertion, the EIR acknowledges that the landscaping along Laurel Street is integrated with the main building. See EIR pp. 4.B.15-4.B.16.

As such, Alternative C would allow for the adaptive reuse of a project site from its original and current use as an office park complex, to a mixed-use residential community that complies, on balance, with the secretary's standards. The secretary's standards recognize that the standards should be applied with flexibility to allow for adaptive reuse of historic buildings for new purposes. The preface to the secretary's standards states "The Standards are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility."[12]

The EIR concludes on pp. 6.80-6.81 that Alternative C would not result in a substantial adverse change in the significance of an historical resource. Rather, Alternative C would retain and/or rehabilitate most of the character-defining features of the existing building and retain many of the character-defining features of the site and landscape. As such, it would preserve the ability of the property to convey its historic and architectural significance as a Midcentury Modern-designed corporate campus overall.

The comments overall do not provide substantial evidence that the alternative would fail to conform to the secretary's standards.

**Residential Variant to Alternative C**

Comments express support for eliminating the ground-floor retail component (44,306 gross square feet) under Alternative C and replacing it with residential units to match the number of residential units under the proposed project. Comments state that retail uses are currently not permitted within the project site. Converting this amount of ground floor space to residential use

[12] U. S. Department of the Interior, National Park Service (Kay D. Weeks and Anne E. Grimmer), *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction of Historic Buildings*, 1995, updated 2017, p. 2, https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf, accessed July 26, 2019.

could bring the total number of residential units closer to the 558 units included in the proposed project. Assuming that residential units could be accommodated within the ground-floor retail spaces under Alternative C, the mix of uses under the requested residential variant to Alternative C would not substantially satisfy the basic objectives to create a mixed-use community. The alternatives presented in the EIR provide a reasonable range of alternatives, with one alternative providing more residential units and same amount of retail space as Alternative C and another providing more units and less retail space. Alternative E: Partial Preservation – Residential Alternative, described on EIR pp. 6.135-6.145, would provide 588 units and 44,306 gross square feet of retail space (54 more units than Alternative C and the same amount of retail space). Alternative F: Code Conforming Alternative, described on EIR pp. 6.170-6.183, would provide 629 units and 14,995 gross square feet of retail (95 more units and 29,311 fewer gross square feet of retail space). Furthermore, the analyses of the proposed project and the alternatives provided in the EIR enable a general understanding of the physical effects of a residential variant of Alternative C.

The analysis of a preservation alternative that is not considerably different than the four preservation alternatives already included in the range of alternatives analyzed in the EIR (not including the No Project Alternative) is not required. Although replacing the retail component in Alternative C with residential uses would more fully meet the project objective related to the provision of housing, it would not meet the basic objectives related to the development of a mixed-use community. Likewise, replacing the retail component with additional residential units in Alternative C would not be any more effective than Alternative B: Full Preservation – Office Alternative or Alternative C in avoiding or substantially lessening any of the identified unmitigable impacts of the proposed project or project variant. Pursuant to CEQA Guidelines section 15126.6(f), the range of alternatives is governed by the rule of reason and inclusion of a residential variant to Alternative C is not required. These comments will be transmitted to decision-makers for their consideration.

Comments expressing a preference for this variant to Alternative C: Full Preservation – Residential Alternative, or some other vision for the project site, do not raise issues concerning the adequacy or accuracy of the EIR's coverage of environmental impacts under CEQA.

**Other Issues Related to Alternative C**

A number of specific questions about Alternative C were raised in the comments. They are summarized and addressed by subtopic here. None of these comments present evidence of new or substantially more severe impacts than those identified for the alternative in the analysis of Alternative C on EIR pp. 6.76-6.99, or make the analysis of alternatives in the EIR inadequate. No new mitigation measures would be required.

Location of Driveways

Comments assert that the location of driveways under Alternative C is unreasonably configured and would create potential hazards. The site access plan for Alternative C (Figure 6.7: Alternative C: Full Preservation Alternative – Residential Alternative Site Access, EIR p. 6.72) is based on that of the proposed project (Figure 2.22: Proposed Site Access, EIR p. 2.62) to the extent applicable under Alternative C, in order to maintain a reasonable basis for comparison between site access impacts under the proposed project (EIR pp. 4.C.81-4.C.83) and under Alternative C (EIR pp. 6.68-6.78). For both analyses, the EIR found no hazardous conditions. The comments do not present evidence that Alternative C is unreasonably configured or would result in any new significant impacts that have not been identified in the EIR. Since publication of the draft EIR the proposed project and its variant have been modified slightly to remove proposed curb cuts along Laurel Street and to decrease the width of the remaining proposed curb cuts on Laurel Street and the curb cut on Masonic Avenue. No other circulation changes were introduced. See RTC Section 2: Revisions and Clarifications to the Project Description and RTC Figure 2.22: Revised Project and Revised Variant Site Access on RTC p. 2.12.

Parking Rate

A comment asks why the parking rate for retail uses in Alternative C is higher than that for the proposed project and project variant as shown in Table 6.8 on EIR p. 6.83. While Alternative C would have fewer parking spaces than either the proposed project or project variant, the retail parking *rate* (that is, the number of parking spaces divided by the amount of retail square feet/1,000) would be slightly higher at 3.95/1,000 sq. ft. compared to 3.66/1,000 sq. ft. for the proposed project and 3.87/1,000 sq. ft. for the project variant. To reduce the parking rate to the same as that for the proposed project, Alternative C could provide 162 parking spaces, or 13 fewer than the 175 included. To reduce to the rate for the project variant, Alternative C could provide 171 parking spaces, or 4 fewer than proposed. Regardless, the parking rate for all three development scenarios would exceed the neighborhood parking rate for retail, and the same significant impact would occur. The somewhat larger rate would not result in a substantially more severe significant impact than that identified in the analysis of the proposed project or project variant, and the same mitigation measure would be applicable, as explained in the text on EIR p. 6.83. Since publication of the draft EIR the proposed project and its variant have been modified slightly to reduce the retail component of the development program and the associated parking spaces. As described in RTC Section 2, Revisions and Clarifications to the Project Description, pp. 2.7 and 2.10-2.11 and shown in RTC Tables 2.2 and 2.3 on RTC pp. 2.3 and 2.10, 60 parking spaces (originally proposed to replace the existing public parking available on the site) would be eliminated, and the retail parking for the proposed project and its variant would be reduced by 52 and 12 spaces, respectively, to 86 and 74 retail spaces.

Pedestrian Travel Through Existing Project Site

Comments assert that the draft EIR inaccurately claims that pedestrians would not be able to travel through the site to, or access the site from, Masonic and Euclid avenues under Alternative C; and claim that the public would be able to travel through the site under Alternative C using an existing pathway that runs through the office building.

As described in the EIR, on pp. 2.15-2.16, existing internal pedestrian pathways provide access to and through the site from California Street to Laurel Street via entrances at Walnut Street and Laurel Street/Mayfair Drive. However, the existing building does not provide public access to or through the building; thus, direct and unfettered access from California Street to Masonic Avenue through the building and enclosed open space on the southeast side of the building is not and would not be possible under Alternative C. Alternative C would develop east-west access through the site with the proposed Mayfair Walk; and a portion of the proposed north-south connection would also be developed (the north portion of Walnut Walk and the roundabout). However, the southern portion of Walnut Walk that would connect with Euclid and Masonic avenues would not be developed, nor would a public pathway through the adaptively-reused building be developed, as suggested in the comment, given privacy and security concerns for the residential units in the adaptively reused building. As noted on EIR p. 6.75, Alternative C would only partially meet the project objective of extending the neighborhood urban pattern and street grid through the site in both north-south and east-west directions (Objective 4 in Table 6.3 on EIR p. 6.18). See also Response PD-4, on RTC p. 5.B.25, for a response related to existing access to and through the project site and limitation to public access.

Location of Mechanical Equipment

As noted in a comment, and similar to the proposed project and project variant, the existing rooftop mechanical equipment would be removed in Alternative C to accommodate the one-story addition (see EIR p. 6.68). Similar to the proposed project and project variant, new mechanical equipment would be needed for Alternative C and would be placed on the roof above the addition (see Chapter 2, Project Description, EIR p. 2.35). The mechanical equipment would not exceed the maximum height of 10 or 16 feet for permitted obstructions pursuant to planning code sections 260(b)(1)(A) or (B), as applicable, based on a height limit either above or below 65 feet. The mechanical equipment would not be an unusual feature on top of a multi-unit, multi-story building and would not result in new or substantially more severe significant environmental impacts.

Solid Waste Collection

A comment requests clarification as to solid waste collection under Alternative C. The off-street refuse staging area adjacent to the off-street freight loading dock would be located within the

California Street Garage (EIR p. 6.74), similar to the refuse staging area in the same garage for the proposed project or project variant (see EIR p. 2.78). Alternative C would also include curbside collection of refuse from the Mayfair Building on Laurel Street, similar to the proposed project or project variant.

Construction Phasing

A comment asks how much time would be needed to construct the first phase and second phase of Alternative C. As described on EIR p. 6.75, Alternative C would be constructed in approximately 5.5 years in two phases. The adaptive reuse of the existing building, i.e., Phase 1 of Alternative C would last approximately 2.5 years. Development along California Street, i.e. Phase 2 of Alternative C, would last approximately 3 years.

Underground Levels

A comment asks which portions of the site would be occupied by underground levels, and how many levels of underground garage or other underground structure would be constructed in each location. Underground levels for the Mayfair, Plaza A, Plaza B, and Walnut buildings under Alternative C are described on EIR p. 6-71 and are assumed to be similar to the California Street and Mayfair garages described for the corresponding buildings under the proposed project on EIR pp. 2.39-2.47 and pp. 2.56-2.61. Unlike the proposed project, Alternative C would retain 80 surface parking spaces near Laurel Street.

Site Remediation

A comment asks how long it would take to remediate the soil and groundwater contaminants and asks for information about hazards remediation. Information regarding the length of time for the remediation efforts is not required under CEQA. Remediation of the site, where determined to be necessary based on the site mitigation plan, would meet the environmental screening levels for residential development and would be overseen by the public health department. See initial study Section E.15, Hazards and Hazardous Materials, pp. 227-240, and EIR Section 4.F, Initial Study Supplement, pp. 4.F.2-4.F.14, for information about hazards within the project site and remediation and EIR pp. 6.97-6.98 for a summary of hazards removal for Alternative C. As noted there, the overall excavation for Alternative C would be more limited than for the proposed project or project variant, and therefore the amount of naturally occurring asbestos encountered would be expected to be less. As with the proposed project or project variant, compliance with all applicable state and local laws and regulations related to the management, transport, use and disposal of hazardous materials would ensure that impacts would continue to be less than significant. See also Response HZ-1: Exposure to Hazardous Materials on RTC pp. 5.J.120-5.J.125.

Building Codes

A comment asks for clarification as to the application of the Historical Building Code to new construction and requests citations to the applicable codes. The sentence referred to in the comment is on EIR p. 6.97 and states in its entirety: "Additions to the existing building and all new construction would be subject to the San Francisco and/or Historical Building codes." To clarify, new construction would be subject to the provisions of the San Francisco Building Code, which is the California Building Code and the Green Building Code (in California Code of Regulations Title 24 Part 2) with San Francisco's adopted additions. [13] Additions or modifications to the existing building could be subject to the California Historical Building Code[14] if the building remains a historic resource, as in Alternative C, and if the property owner requests use of the Historical Building Code by the Department of Building Inspection during its plan review. Thus, new construction would not be allowed to use the Historical Building Code, but the project sponsor could choose to request use of that code for alterations to the historic building. In contrast, the Historical Building Code would not be applicable to the proposed project or project variant because the existing building would no longer be an historical resource.

Cost of Work

A comment asks for the estimated cost of work for the adaptive reuse of the existing office building under Alternative C. The estimated cost is unknown; however it is reasonable to assume that the cost would be substantially less than the cost of work for the adaptive reuse of the existing office building under the proposed project and variant, primarily because the existing building would not be divided in half. Although exact cost estimates are unknown, staff has determined that Alternative C is potentially feasible, and thus included it as an EIR alternative.

Accessible Open Space

A comment asks why Alternative C would provide less public open space than the proposed project and requests specific descriptions of the open spaces under Alternative C. As discussed on EIR p. 6.96, Alternative C would have a smaller development footprint and would retain more of the existing on-site open space than the proposed project or project variant, in particular the southern and eastern portions of the site where the most prominent features of the designed landscape are located. Under Alternative C the existing open space at Euclid Avenue and Laurel Street would remain; however, the open space at Masonic and Presidio avenues would be redeveloped with a garage exit driveway for the California Street Garage. Publicly accessible open spaces on the northern portion of the site would be developed and would not be substantially different than those in the proposed project

[13] The San Francisco Building Code is available online at https://sfdbi.org/codes, accessed July 29, 2019.
[14] The Historical Building Code is available online at https://codes.iccsafe.org/content/document/664?site_type=public, accessed July 29, 2019.

or project variant because the building footprints for the California Street buildings and the Mayfair Building would be the same. The EIR is required to provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project (CEQA Guidelines section 15126.6(d)). The requested precise design information for Alternative C is not necessary for meaningful evaluation and comparison with the proposed project or project variant. CEQA does not require that an EIR present a fully designed alternative scheme: rather, it must present sufficient detail about the alternative's proposed development program and physical environmental changes to allow for an analysis of the various CEQA topics.

A comment asserts that the EIR does not acknowledge retention of existing accessible open spaces and views of character-defining features from accessible green spaces at the perimeter of the project site along Euclid Avenue and Laurel Street. Retention of accessible open spaces and views of character-defining features over these accessible open spaces are covered in the EIR (see EIR p. 4.B.41) and were part of the alternatives scoping process that resulted in Alternatives B and C, both of which retain the design landscape and open space along Laurel Street and preserve views of the integrated landscape and building from the west (see EIR pp. 6.7-6.9 and 6.76-6.78). The list showing the disposition of character-defining features under Alternative C on EIR p. 6.77 states "Open area along Euclid Avenue and Laurel Street - Retained."

A comment asserts that the landscaped area along Laurel Street that includes the concrete pergola is integrated with the office building. The pergola along Laurel Street is identified in the EIR as a character-defining feature (see Figure 4.B.1: Character Defining Features of 3333 California Street on EIR p. 4.B.22). However, unlike landscaped open areas to the south and east of the office building, the pergola area to the west of the office building is separated from the office building by a paved driveway and parking. As such, the pergola area is less integrated with the office building than open spaces to the south and east of the office building.

Less Activated Neighborhood Friendly Space

A comment asks why Alternative C would provide "fewer activated neighborhood-friendly spaces along adjacent streets," citing EIR p. 6.75. The proposed ground-floor retail uses along California Street and the office use in the Walnut Building on California Street that are included in the proposed project would activate the adjacent sidewalks with visitors coming and going to and from those buildings. In addition, pedestrians would be able to walk through the site between Laurel and Pine streets on Mayfair Walk and into the site from California Street via the Cypress Steps and the portion of Walnut Walk extending from California Street to the adaptively-reused building at the center of the site, adding to the pedestrian activity on the site. By contrast, Alternative C would have less residential and retail space along California Street and would not have pedestrian access similar to Walnut Walk extending north-south all the way through the site because the existing building would not be separated. Rather than duplexes along Laurel Street with pedestrian entrances from the street, Alternative C would retain the existing driveway and

parking lot. Therefore, the alternative would have less activated space adjacent to sidewalks around the site perimeter, as stated in the EIR.

One-Story Vertical Addition

A comment correctly identifies an error in the EIR regarding the one-story vertical addition to the office building included under Alternative C. The EIR, at the bottom of p. 6.78, incorrectly identifies a two-story vertical addition. The EIR text is corrected as follows (new text is double-underlined and deleted text is shown in ~~strikethrough~~):

> Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, the glass curtain wall system would be replaced with a system compatible with the historic resource. Other changes to the building's historic features would be minimal, i.e., ~~two~~ one-story, stepped vertical addition and removal of the northerly extension of the east wing.

This correction does not change any of the analyses or conclusions of the EIR.

# 5.I CUMULATIVE IMPACTS

Comments in this section relate to the issue of cumulative impacts as evaluated in the EIR and initial study. A corresponding response follows the grouped comments.

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## COMMENT CU-1: CUMULATIVE SETTING/PROJECT LIST

"By the same token, I would be interested in seeing the EIR address cumulative impact on construction phasing and construction realization in the corridor, with the public mentioning that the large Children's Hospital's complex is being taken down in 2019. The demolition of that site and construction of a very large project on that particular site definitely has interactive cumulative effects together with what's intended here on the 3333 California Street site." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 78, December 13, 2018 [A-CPC-Moore-7])*

"I spoke about cumulative construction effects for Children's Hospital." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 80, December 13, 2018 [A-CPC-Moore-11])*

"Also, to point out, we're going to have a lot of action in that particular neighborhood because two blocks away in 2019 Children's Hospital will be torn down and there will be 307 units developed there. So that's something to consider, that we are not without new housing. Thank you." *(M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, pp. 51-52, December 13, 2018 [O-LHIA7-8])*

"In addition to Prado's proposal, there are three other large real estate projects already approved to be built in this same neighborhood over the next few years:

*A residential building (95 units) at the current site of the former Lucky Penny Restaurant at Geary and Masonic.

*A residential development (270 units), covering two and a half blocks at the current site of CPMC on California Street.

*A new housing development nearby on Sacramento Street.

Along with the Prado project, these will bring thousands of new residents to Laurel Heights in the coming years, so the YIMBY argument that there is no new housing in the Western Addition makes little sense once you take into account how many new buildings will be going up in our neighborhood simultaneously. In fact, in a recent petition drive at Laurel Village, over 800 residents signed the petition opposing the developer's plan for ROC (retail, office, and commercial) space, and fully supporting a development consisting of new housing only." *(Bill Cutler and Judy Doane, Email, January 5, 2019 [I-Cutler2-5])*

"Please include the 3637-3657 Sacramento Street Mixed Use Project in your cumulative projects analysis." *(Brandon Ponce, Email, January 8, 2019 [I-Ponce-1])*

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**RESPONSE CU-1: CUMULATIVE SETTING/PROJECT LIST**

The comments request inclusion of certain projects in the cumulative impact analyses of the project, including the 3700 California Street project (referred to in comments as "Children's Hospital"), the 2675 Geary Boulevard project (referred to in comments as "Lucky Penny"), and the 3637-3657 Sacramento Street project.

Cumulative analyses for all environmental topics are provided in the EIR together with the initial study. Two of the cited projects, the 3700 California Street project and the 2675 Geary Boulevard project, are included in the cumulative setting for the impact analyses in the initial study (pp. 94-99), and in the EIR (Section 4.A, pp. 4.A.6-4.A.13). However, the 3637-3657 Sacramento Street project was not part of the cumulative projects list.

As delineated in the City's planning information map and database, the 3637-3657 Sacramento Street project is located on south side of Sacramento Street on the block surrounded by Sacramento, Spruce, Locust, and California streets. The project consists of two lots and would demolish a single-story, 75-space parking garage; a two-story, medical/dental office building with three surface parking spaces; and a three-story medical/dental office building (totaling approximately 13,000 square feet of existing medical office use).[1] The project would construct a four-story, 40-foot tall, mixed use building containing approximately 6,500 square feet of retail/commercial use, approximately 10,000 square feet of medical offices, 18 residential units (approximately 17,100 gross square feet) on the third and fourth floors, 51 parking spaces on two below-grade levels, and 35 class 1 and class 2 bicycle parking spaces. The planning department received a conditional use authorization application for the 3637-3657 Sacramento Street project in June 2014. On September 20, 2018, it was determined that the 3637-3657 Sacramento Street project qualified for a Class 32 categorical exemption for infill development under CEQA Guidelines section 15332 (Planning Department Case No. 2007.1347E); and one was issued by the planning department. Thus, the project was exempt from further CEQA environmental review. On November 8, 2018 the planning commission granted conditional use authorization with conditions for the project. An appeal of the department's CEQA determination and conditional use authorization was filed on December 7, 2018. Public comments on the CEQA determination and the planning commission's decision to grant conditional use authorization for this project were heard before the San Francisco

[1] A summary of the proposed conditional use authorization was provided to the Planning Commission for consideration on November 11, 2018, http://commissions.sfplanning.org/cpcpackets/2007.1347CUAVAR.pdf, accessed April 2, 2019.

Board of Supervisors on January 29, 2019; and on February 5, 2019 and February 12, 2019.[2,3] At the February 5, 2019 hearing, the board upheld the categorical exemption determination. At the February 12, 2019 hearing, the conditional use authorization with planning department conditions was disapproved, and additional conditions were imposed by the board of supervisors and approved subject to adoption of written findings. The conditional use authorization with the new conditions (along with findings of consistency with the general plan and the eight priority policies) were approved on March 12, 2019.

The construction timeline for the 3637-3657 Sacramento Street project would be approximately 20 months; however, the start of construction is not known. The environmental analysis conducted for the 3637-3657 Sacramento Street project determined that it would have less-than-significant construction truck, construction noise, construction air quality, and water quality impacts. At buildout, it would introduce 18 new residential units, reduce existing medical office use by approximately 3,000 square feet, and introduce approximately 6,500 square feet of retail/commercial use (netting an increase of approximately 3,500 square feet of commercial use). As part of the Class 32 categorical exemption review, impacts on habitat for endangered, rare, or threatened species; operational impacts on transportation, transit, noise, and air quality; and demand on public services were determined to be less than significant.

Cumulative impacts of the identified projects are discussed throughout the EIR, including construction traffic (see Impact C-TR-1 on EIR pp. 4.C.101-4.C.102), noise (see Impact C-NO-1 on EIR pp. 4.D.68-4.D.70), and air quality (see EIR p. 4.E.66-4.E.72). As stated in Impacts C-TR-1, C-NO-1, C-AQ-1, and C-AQ-2, cumulative impacts associated with construction traffic, construction noise, and construction air quality were each determined to be less than significant. Other construction-related cumulative impacts were analyzed in initial study Section E, Evaluation of Environmental Effects, in their respective topics. The conclusions of the cumulative analyses provided for all topics either in the EIR or the initial study would not change with the addition of the 3637-3657 Sacramento Street project because it is a relatively small infill project that would not combine with impacts of other reasonably foreseeable projects to generate significant cumulative construction- or operation-related impacts.

Comments expressed general concern regarding the cumulative population impact of the projects identified. As stated in initial study Section E.2, Population and Housing, on pp. 120-123, the initial study evaluated a total of 900 new residential units including the proposed project (1,086 new residential units including the project variant) and 123,036 square feet of commercial space

[2] City and County of San Francisco Board of Supervisors, Motion M19-0016, Affirming the Categorical Exemption Determination - 3637-3657 Sacramento Street, February 5, 2019, available online at https://sfbos.org/sites/default/files/m19-0016.pdf, accessed May 21, 2019.

[3] City and County of San Francisco Board of Supervisors, Motion M19-0049, Adoption of Findings Related to Conditional Use Authorization - 3637-3657 Sacramento Street Project, March 12, 2019, available online at https://sfbos.org/sites/default/files/m19-0049.pdf, accessed May 21, 2019.

including the proposed project (67,513 gross square feet in combination with the project variant). The impact of the proposed project or project variant in combination with these nearby projects with regard to increase in residential units and the resulting residential population was discussed on initial study pp. 120-123. As discussed on initial study p. 122, the increase in the number of residents and workers under the proposed project or project variant in combination with the reasonably foreseeable future projects would be less than significant and consistent with the total citywide growth projections; would not constitute substantial, unplanned growth; and would not require the expansion of roads, infrastructure or public services that would cause additional off-site physical changes to the environment. Furthermore, the cumulative projects, which have primarily housing and retail uses, would align with ABAG's criteria for focusing growth in areas with existing neighborhood-serving uses and infrastructure.

An increase of 18 residential units associated with the 3637-3657 Sacramento Street project would represent 2 percent of the cumulative residential growth analyzed (1 percent under the project variant) and 3,500 gross square feet of commercial use would represent 2 percent of cumulative employment growth analyzed (5 percent under the project variant) and would not substantially change the conclusions or analyses performed in the initial study or EIR, and no new or substantial increase in significant cumulative environmental impacts would be identified. For these reasons, impacts associated with increased population and employment were determined to be less than significant and would continue to be less than significant even with the inclusion of the 3637-3657 Sacramento Street project.

Comments express a general concern regarding the cumulative impact of the proposed project or its variant and the 3700 California Street project with respect to demolition and construction. The comment does not clarify what in particular the environmental analysis is missing. As stated in Impact C-TR-1, on EIR pp. 4.C.101-4.C.102, construction of the proposed 3700 California Street project is anticipated to run concurrently with construction of 3333 California Street and would commence around the same time; however; the 3700 California Street project is a smaller scale project and any contribution to cumulative construction activities would be minimal.

As stated in Impact C-NO-1, on EIR pp. 4.D.68-4.D.69, the 3700 California Street project is located more than 1,320 feet west of the project site and the nearest offsite noise-sensitive receptor in the direction of 3700 California Street is Receptor R5, representative of residential uses immediately north of the project site along the north side of California Street. As described on EIR p. 4.D.6-4.D.7, based on the City's noise level map this receptor is currently subject to high levels of traffic noise (70 dba or greater) from California Street and significant cumulative construction-related impacts would not be expected. Furthermore, haul traffic noise emissions from the proposed project or project variant would not be noticeable in a busy urban environment and the effects combined with those of the 3700 California Street project would not result in significant cumulative construction noise impacts. Lastly, as discussed under Impact C-AQ-2 on EIR pp. 4.E.70-4.E.72,

the 3700 California Street project would result in a net reduction in operational health risks from existing conditions, and quantitative modeling of cumulative construction impacts determined that proposed project or project variant plus existing background risks and cumulative development projects would not result in significant cumulative health risk impacts. These cumulative impacts would continue to be less than significant even with the inclusion of the 3637-3657 Sacramento Street project, given its location and relatively small scale.

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# 5.J INITIAL STUDY TOPICS

The initial study for this project was issued April 25, 2018, and public comments were received on the initial study. The EIR includes a section 4.F which provides information to supplement and clarify information presented in the initial study. During the public comment period for the draft EIR, comments were received on topics analyzed only in the initial study (EIR Appendix B), not in the EIR itself, as well as on initial study topics for which supplemental information was presented in EIR section 4.F. This section of the RTC addresses these comments and is organized by the following environmental topics:

- Population and Housing
- Greenhouse Gas Emissions
- Wind and Shadow
- Recreation
- Utilities and Service Systems
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Energy Resources

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## POPULATION AND HOUSING

The comments in this subsection relate to the topic of Population and Housing evaluated in the initial study (EIR Appendix B, Section E.2). The comments are further grouped according to the following population and housing-related issues that the comments raise:

- PH-1, Housing Displacement
- PH-2, Population Growth and Effects on Infrastructure

A corresponding response follows each grouping of comments.

## *COMMENT PH-1: HOUSING DISPLACEMENT*

"I'm committed to the people who made this city what it is, the creative people, the people who are being displaced from their housing. And the environmental impact that this is not having – it's not displacing anyone. There's no housing being lost to build this." *(Ed Munnich, SF YIMBY Action, Draft EIR Hearing Transcript, pp. 64-65, December 13, 2018 [O-YIMBY2-4])*

"Critically, unlike some other projects that have been proposed, no one would be displaced by new housing at 3333 California, since not a single rent-controlled or otherwise affordable housing unit would be lost. It is a win-win for the people of San Francisco." *(Ed Munnich, Email, December 13, 2018 [I-Munnich-4])*

### *RESPONSE PH-1: HOUSING DISPLACEMENT*

The comments state that the project would not displace people or housing units. This is correct. As discussed in initial study Section E.2, Population and Housing, on p. 120, the project site does not contain existing housing units, and the approximately 1,200 employees associated with the UCSF Laurel Heights Campus would be relocated to another UCSF campus location in accordance with the 2014 UCSF Long Range Development Plan.

## *COMMENT PH-2: POPULATION GROWTH AND EFFECTS ON INFRASTRUCTURE*

"**8. The Determination that the Project Could Not Have Significant Growth-Inducing Impacts is Not Supported by Substantial Evidence.**

As required by section 15126.2(d) of the CEQA Guidelines, an EIR must consider the ways in which the proposed project could directly or indirectly foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

Implementation of the proposed project would require numerous zoning changes to establish new land use controls for the project site. As previously discussed herein, retail and new office uses are not allowed by the existing zoning set forth in Resolution 4109, and the project would propose to construct housing units in excess of the approximately 508 housing units allowed under Resolution 4109. The zoning changes sought and resulting land uses would change the mix and types of land uses that could be developed on the project site, and would allow for increased building heights and density.

The EIR should analyze whether the proposed project and project variant would result in residential development at a greater average housing density per acre than currently exists on the project site or in the immediate project vicinity.

Also, implementation of the proposed project would include the expansion of infrastructure for the provision of new or expanded distribution lines for water, gas and electrical service and sewer system lines.

The proposed project could be growth inducing if it would extend water supply infrastructure and/or gas and electric distribution infrastructure or sewer service infrastructure beyond what is necessary to serve uses proposed under the project.

The IS states that the project would include construction of new natural gas and sewer lines to serve the project site. IS p. 119. However, the IS provides no support for its conclusion that this infrastructure would not indirectly induce substantial population growth in the project area because the project site is an infill site surrounded by existing development and "the proposed infrastructure improvements would be sized to meet only project needs and would not enable additional development." IS p. 119. The project description did not include specifications as to the sizing of new or expanded infrastructure or impose limitations on its size as an enforceable condition of approval of the project.

The following mitigation measure should be adopted as a condition of approval of the proposed project:

> **MITIGATION MEASURE.** The EIR will set forth technical specifications that show without question that proposed infrastructure improvements installed in connection with the project would be sized to meet only the needs of the project or project variant as proposed in the project description in the EIR and would not enable additional development; a qualified professional engineer will review the proposed specifications and sign a report verifying that such specifications will allow such infrastructure to only meet the needs of the project or project variant as proposed in the project description in the EIR and would not enable additional development; such report will be included in the Draft EIR and submitted for public comment; and the project approval will incorporate as enforceable mitigation measures such technical specifications that specifically provide that infrastructure installed on and/or nearby the project site would be sized to meet only the needs of the project or project variant as proposed in the project description in the EIR and would not enable additional development.

Absent substantial evidence to support the conclusion that no indirect impacts related to population growth as a result of expansion of infrastructure would occur, the evidence contained in the IS supports a fair argument that the expansion of infrastructure could indirectly foster population growth. The EIR must analyze this impact as a potentially significant impact.

Also, CEQA Guidelines section 15126.2(d) recognizes that increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The EIR should analyze in detail whether the project's demand for water, gas, electricity and sewer service could adversely affect the current supply of water, gas, electricity and sewer service to residences surrounding the site or in the immediate vicinity, so that new or expanded connections could be required." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-11])*

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"Summary of several concerns raised by nearby residents and citizens of San Francisco:…6. Increased population on the project site and effects on infrastructure" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-7])*

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### *RESPONSE PH-2: POPULATION GROWTH AND EFFECTS ON INFRASTRUCTURE*

One of the comments states that the EIR should analyze whether the proposed project or project variant would result in residential development at a greater average housing density per acre than currently exists on the project site or in the immediate project vicinity. Another comment states that the proposed project or project variant would include expansion of water, sewer, gas, and electrical service, asserting that the project could be growth inducing if it would extend infrastructure beyond what is necessary to serve the proposed uses. One comment states that sizing of proposed new natural gas and sewer lines was not included in the project description, and therefore the initial study's conclusion—that the proposed project would not indirectly induce substantial population growth—is not supported. The comment further requests a mitigation measure that sets limitations on infrastructure improvements.

Additionally, the comment states that the project would require numerous zoning changes. The comment asserts that the zoning changes sought and resulting land uses would change the mix and types of land uses that could be developed on the project site and would allow for increased building heights and density beyond what is currently allowed. The comment specifically states that the project would construct housing units in excess of what is allowed by Resolution 4109, and the comment states that approximately 508 housing units would be allowed under Resolution 4109. One comment was submitted as a comment on the published initial study regarding clarification on the entitlements being sought. To address this comment, additional project information including the entitlements that are being sought by the project sponsor was provided in the draft EIR that was published after the initial study.

**Residential Density**

Comments base the maximum allowable density for the project site on the stipulations in Resolution 4109, resulting in a smaller number of dwelling units than proposed in the project or its variant. Conflicts with Resolution 4109 were disclosed in Chapter 3, Plans and Policies (see EIR pp. 3.10-3.11). As described, the board of supervisors has the authority to rescind or amend Resolution 4109 and its stipulations. Thus, any conflict with the provisions of the resolution would be resolved by board action to rescind or waive its provisions.

Generally, with respect to residential uses, the RM-1 Zoning District (Residential, Mixed, Low density) in which the project site is located provides for up to one unit per 800 square feet of lot area. The project site, at approximately 10.25 acres (or 446,490 square feet), would allow for up to 558 units based on the lot area. Residential density in the adjacent neighborhoods varies from low-density, single-family homes on Laurel Street to medium-density, multi-family buildings on California Street and Euclid Avenue. The proposed project, with 558 residential units, would conform to the residential density limitation provided by the RM-1 zoning district. As allowed by the planning code, the project variant would seek approval of a conditional use

authorization/planned unit development to allow for more residential units (744 units total) than principally permitted in the RM-1 zoning district. For these reasons, the residential component of the proposed project or project variant would be within the existing allowable density of the project site and does not constitute unplanned growth.

As discussed in the initial study in Section E.2, Population and Housing, on pp. 112-120, substantial population growth is considered an increase in population that is unplanned without consideration of, or planning for, infrastructure services and housing needs to support new residents, employees, and visitors. The project site is located in an area that is consistent with San Francisco General Plan and Housing Element goals and policies and the Association of Bay Area Governments priority development area goals and criteria; i.e., it is located on an infill site, served by existing transit, and is in an area containing a mix of moderate-density housing, services, retail, employment, and civic or cultural uses. Therefore, the proposed project's and project variant's estimated population growth would not constitute substantial unplanned growth.

**Employment**

Under the proposed project, employment is generally considered on a citywide and regional scale, as workers may commute from various parts of the city or greater Bay Area. As stated on initial study p. 117, project-related employment growth would represent considerably less than 1 percent (0.45 percent under the proposed project and 0.23 percent under the project variant) of the City's estimated job growth between the years 2020 and 2040 per ABAG's Projections 2013 and Plan Bay Area 2040 reports. The estimated change in employment would be negligible in the context of total jobs in San Francisco and would not exceed projected employment growth, and the non-residential uses would not directly or indirectly contribute to demand for expanded infrastructure in the project area.

**Infrastructure Improvements**

No expansion of water, sewer, electricity, or natural gas services would be provided by the proposed project or project variant beyond that needed to serve the project site, and the project description provided in the initial study and EIR provides sufficient support for this conclusion. The proposed project's or project variant's proposed infrastructure systems are discussed in EIR Chapter 2, Project Description, on pp. 2.87-2.90 and on initial study pp. 70-73 under "Proposed Infrastructure Systems." In particular, the discussion in both locations explains that the new and renovated existing buildings would be connected to existing potable water mains, and would not require a new or upgraded water main. The project would require the construction of an approximately 8-inch-diameter, 180-foot-long sewer line extension under Masonic Avenue to connect to the existing 16-inch-diameter combined sewer main under Presidio Avenue but would not require upgrades for the purpose of increasing the capacity of the existing mains. The project would not expand the existing capacity of the 16-inch-diameter combined sewer main under

Presidio Avenue. Electricity and natural gas service to the project site would be provided by PG&E from 12-kilovolt distribution lines with connections to the existing grid, and the project would not involve increasing the 12-kilovolt capacity of the existing distribution network. The new and renovated existing buildings would be connected to existing PG&E natural gas lines, and the project would not involve increasing the capacity of existing natural gas mains. As discussed in initial study Section E.10, Utilities and Service Systems, on pp. 173-188, as well as in Response UT-1 below, no significant utilities and service systems impacts have been identified, the utility improvements necessary to serve the proposed project or project variant would not be growth inducing, and no mitigation is required.

Comments also state that the increased population on the project site would have effects on existing infrastructure, requiring construction of new facilities, including water, gas, electricity, and sewer. Impacts associated with the infrastructure listed are analyzed in initial study Section E.10, Utilities and Service Systems, on pp. 173-188, and section E.16, Mineral and Energy Resources, on pp. 242-245. As discussed there on p. 245, construction and operation of the proposed project or project variant would not use natural gas or electricity resources in an inefficient or wasteful manner and would not require expansion of existing power facilities.

The proposed project or project variant would not include the extension of area roadways or expansion of water or wastewater treatment facilities, as discussed on initial study p. 119. The proposed project would include the construction of new natural gas and sewer lines to serve the project site, connecting to existing facilities and sized to meet only project needs. Therefore, no indirect impacts related to unplanned population growth as a result of expansion of infrastructure would occur.

Additionally, the proposed project and project variant would meet and improve upon Title 24 energy conservation standards, including on-site generation from solar photovoltaic systems and solar hot water heaters. An energy assessment with calculations for the proposed project's or project variant's estimated contribution to regional energy demand was prepared to support the analysis in the initial study.[1] Calculation errors related to the proposed project's or project variant's contribution to the regional energy demand were identified in the supporting documentation for the Mineral and Energy Resources section of the initial study, and corrections were identified in section 4.F, Initial Study Supplement, on EIR pp. 4.F.2 and 4.F.17. The corrections provided did not change any impact conclusions related to energy resources. The revised Energy Assessment and Calculations memorandum is available for review at the planning department offices as part of Case File No. 2015-014028ENV. While statewide efforts are being made to increase power supply and to encourage energy conservation, the project-generated demand for energy would be negligible in the context of overall demand within San Francisco,

[1] SWCA, 3333 California Street Mixed-Use Project Energy Assessment and Calculations, Case No. 2015-014028ENV, April 12, 2018; revised on July 23, 2018.

the greater Bay Area, and the state, and would not in and of itself require any expansion of power facilities.

## GREENHOUSE GAS EMISSIONS

The comments in this subsection relate to the topic of Greenhouse Gas Emissions evaluated in initial study Section E.7. The comments are further grouped according to the following greenhouse gas emissions-related issues that the comments raise:

- GHG-1, Methodology
- GHG-2, Accuracy of Greenhouse Gas Emissions Calculations
- GHG-3, General Greenhouse Gas Concerns

A corresponding response follows each grouping of comments.

### *COMMENT GHG-1: METHODOLOGY*

"The Developers Destructive Proposal not only destroys the Historic Site it destroys our climate. Concrete is a major contributor to GHG, in fact the GHG generated by the manufacture of cement and steel equals the GHG generated by traffic. **And, 95% of the cement used in the Bay Area is manufactured in the Bay Area so the GHGs are OUR GHGs.** The cement is not made somewhere else in the country it is made here." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-11])*

"And, the use of TNCs makes the GHG situation worse.

Let's assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles. Data shows that many people will now use a TNC rather than drive their own cars. This will be even more pronounced if Parking is reduced! So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles. When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip! So, not only do we have 8,000 retail auto trips, excluding the effect of TNCs (not addressed) to deal with we have many of them generating significant more GHG per trip! Planning needs to do a comprehensive analyses using credible data and a credible methodology so that the public knows the extent of the GHG generated. We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly. In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-14])*

"**7. The Proposed Project Could Have a Significant Adverse Impact on Greenhouse Gas Emissions.**

The Initial Study states that the project's impact on greenhouse gas emissions ("GHG") would be significant if it would:

> Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment" or

> Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases." IS p. 146.

New CEQA Guideline section 15064.4, on the determination of significance of GHG emissions, reflects the existing CEQA principle that there is no iron-clad definition of "significance." CEQA Guidelines section 15064(b). Accordingly, lead agencies must use their best efforts to investigate and disclose all that they reasonably can regarding a project's potential adverse impacts. *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm.* (2001) 91 Ca1.App.4th 1344, 1380-81; Ex. T, California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009. Section 15064.4 is designed to assist lead agencies in performing that required investigation. *Id*., p. 20; In particular, it provides that lead agencies should quantify GHG emissions where quantification is possible and will assist in the determination of significance, or perform a qualitative analysis, or both as appropriate in the context of the particular project, in order to determine the amount, types and sources of GHG emissions resulting from the project. *Ibid*. Regardless of the type of analysis performed, the analysis must be based "to the extent possible on scientific and factual data." *Ibid*. In addition, lead agencies should also consider several factors. *Ibid.*

As further explained in *Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009, pp. 21-22:

> "With the foregoing principles in mind, the quantification called for in proposed section 15064.4(a)(1) is reasonably necessary to ensure an adequate analysis of GHG emissions using available data and tools, in accordance with Public Resources Code Section 21083.05. Even where a lead agency finds that no numeric threshold of significance applies to a proposed project, the holdings in the *Berkeley Jets and Protect the Historic Amador Waterways cases*, described above, require quantification of emissions if such quantification will assist in determining the significance of those emissions. OPR and the Resources Agency find that quantification will, in many cases, assist in the determination of significance, as explained below. (State CEQA Guidelines, § 15142 ("An EIR shall be prepared using an interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the consideration of qualitative as well as quantitative factors.").)
>
> First, quantification of GHG emissions is possible for a wide range of projects using currently available tools. Modeling capabilities have improved to allow quantification of emissions from various sources and at various geographic scales. (Office of Planning and Research, *CEQA and Climate Change: Addressing Climate Change Through the California Environmental Quality Act Review*, Attachment 2: Technical Resources/Modeling Tools to Estimate GHG Emissions (June 2008); CAPCOA White Paper, at pp. 59-78. Moreover, one of the models that can be used in a GHG analysis, URBEMIS, is widely used in CEQA air quality analyses. (CAPCOA White Paper, at p. 59) Second, quantification informs the qualitative factors listed in proposed section 15064.4(b). Third, quantification indicates to the lead agency, and the public, whether emissions reductions are possible, and if so, from which sources. Thus, if quantification reveals that a substantial portion of a project's emissions result from energy use, a lead agency may consider whether design changes could reduce the project's energy demand.
>
> Proposed section 15064.4(a)(1) also reflects existing case law that reserves for lead agencies the precise methodology to be used in a CEQA analysis. (See, e.g. *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Ca1.App.4th 357, 371-373.)

As indicated above, a wide variety of models exist that could be used in a GHG analysis. (CAPCOA White Paper, at pp. 59-78.) Further, not every model will be appropriate for every project. For example, URBEMIS may be an appropriate tool to analyze a typical residential subdivision or commercial use project, but some public utilities projects, such as waste-water treatment plants, may require more specialized models to accurately estimate emissions. (*Id*. at pp. 60-65.) The requirement to disclose any limitations in the model or methodology chosen also reflects the standard for adequacy of EIRs in existing State CEQA Guidelines section 15151...

If the lead agency determines that quantification is not possible, would not yield information that would assist in analyzing the project's impacts and determining the significance of the GHG emissions, or is not appropriate in the context of the particular project, section 15064.4(a) would allow the lead agency to consider qualitative factors or performance criteria...

The existing CEQA Guidelines state that the determination of significance requires a lead agency to use its judgment based on all relevant information. (State CEQA Guidelines, §15064(b); see also *Id*. at §§ 15064.7 (thresholds may be qualitative), 15142 (analysis should be interdisciplinary and both qualitative and quantitative.).)

Subdivision (a) would also allow a lead agency to rely on performance-based standards to assist in the determination of significance. Just as with quantification, the purpose of engaging in a qualitative or performance standard based analysis is to develop information relevant to a significance determination. Several examples exist of the types of performance standards that might appropriately be used in determining the significance of greenhouse gas emission. Proposed section 15183.5(b)(1)(D), for example, contemplates that a plan for the reduction of greenhouse gas emissions may contain performance based standards. Where such standards are developed as part of such a plan, a lead agency would have evidence indicating that compliance with such standards would indicate that the impact of greenhouse gas emissions would be less than significant. Further, in adopting SB375, the Legislature acknowledged that regional transportation plans, and the environmental impact reports prepared to analyze those plans, may contain performance standards that would apply to transit priority projects. (See, e.g., Public Resources Code, § 21155.2.) Other potential examples include the Bay Area Air Quality Management District's proposed Best Management Practices for Construction Greenhouse Gas Emissions (calling for use of alternative fuels, local building materials and recycling), and the California Public Utilities Commission's Performance Standard for Power Plans [sic] (requiring emissions no greater than a combined cycle gas turbine plant). Compliance with such standards may be relevant to the significance determination, when considered in conjunction with the project's total projected emissions...

Similar to use of a significance threshold, a lead agency must exercise care to ensure that performance standards do not replace a full analysis of all potential emissions. (*Protect the Historic Amador Waterways, supra*, 116 Ca1.App.4th at 1109 ("in preparing and EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect.).) For example, while a Platinum LEED ® rating could assist a lead agency in determining whether emissions related to a building's energy use may be significant, that performance standard may not reveal sufficient information to evaluate transportation-related emissions associated with that proposed project.

As indicated above, even a qualitative analysis must be based to the extent possible on scientific and factual data. Further, the type of analysis that is required will depend on the context of a particular project....The following hypothetical examples may illustrate, however, how section 15064.4(a) could operate:

> **Project 2:** a large commercial development is proposed in an suburban context. Heavy-duty machinery would be required in various construction phases spanning many months. Following construction, the development would rely on electricity, water and wastewater services from the local utilities. Natural gas burners would be used on site. The development would employ several hundred workers and attract thousands of customers daily. A traffic study has been prepared for the project. The local air quality management district's guidance document recommends that projects of similar size and character should use URBEMIS, or another similar model, to estimate the air quality impacts of the development.

In the context of Project 2 a quantitative analysis would likely be appropriate. The URBEMIS model, which would likely be used to analyze other emissions, could also be used to estimate emissions from both project-related transportation and on-site indirect emissions (landscaping, hot-water heaters, etc.) Modeling is typically done for projects of like size and character. Other models are readily available to estimate emissions associated with utility use. In the context of Project 2, a lead agency may find it difficult to demonstrate a good faith effort through a purely qualitative analysis. (See, e.g., *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm.* (2001) 91 Ca1.App.4th 1344, 1370...

Factors Potentially Indicating Significance

The qualitative factors listed in the proposed section 15064.4(b) are intended to assist lead agencies in collecting and considering information relevant to a project's incremental contribution of GHG emissions and the overall context of such emissions. Notably, while subdivision (b) provides a list of factors what should be considered by public agencies in determining the significance of a project's GHG emission, other factors can and should be considered as appropriate.

Determine Whether Emissions Will Increase or Decrease

The first factor in subdivision (b), for example, asks lead agencies to consider whether the project will result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting. All project components, including construction and operation, equipment and energy use, and development phases must be considered in this analysis. (State CEQA Guidelines, § 15378 (Project includes "the whole of the action").)...

This section's reference to the 'existing environmental setting' reflects existing law requiring that impacts be compared to the environment as it currently exists. (State CEQA Guidelines, § 15125.) This clarification is necessary to avoid a comparison of the project against a 'business as usual' scenario as defined by ARB in the Scoping Plan. Such an approach would confuse 'business as usual' projections used in ARB's Scoping Plan with CEQA's separate requirement of analyzing project effects in comparison to the environmental baseline. (*Compare* Scoping Plan, at p. 9 ('The foundation of the Proposed Scoping Plan's strategy is a set of measures that will cut greenhouse gas emissions by nearly 30 percent by the year 2020 as compared to business as usual.' *with Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (existing environmental conditions normally constitute the baseline for *environmental* analysis); see also *Center for Bio. Diversity v. City of Desert Hot Springs*, Riverside Sup. Ct. Case No. RIC464585 (August 6, 2008) (rejecting argument that a large

subdivision project would have a 'beneficial impact on CO2emissions' because the homes would be more energy efficient and located near relatively uncongested freeways). Business as usual may be relevant, however, in the discussion of the 'no project alternative' in an EIR. (State CEQA Guidelines, §15126(e)(2) (no project alternative should describe what would reasonably be expected to occur in the future in the absence of the project).).

Thresholds of Significance

The second factor in subdivision (b) asks whether a project exceeds a threshold of significance for GHG emissions...

Several agencies have developed, or are in the process of developing, thresholds of significance for GHG emissions. For example, thresholds are currently being developed, or have already been adopted by the Bay Area Air Quality Management District for operations and construction, the City of Davis for residential developments, and the South Coast Air Quality Management District for industrial projects. Regardless of the threshold chose, however, this section does not alter the pre-existing rule under CEQA that if substantial evidence supports a fair argument that a project may result in significant impacts, despite *compliance* with a threshold, an EIR must be prepared. (*Meija v. City of Los Angeles* (2005) 130 Cal. App.4th 322, 342.) Further, "in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect." (*Protect the Historic Amado Waterways, supra*, 116 Ca1.App.4th at 1109.)

Consistent with the above, if relying on a threshold developed by another agency, lead agencies must exercise caution in selecting a threshold to ensure that the threshold is appropriately applied...Some agencies have adopted 'thresholds' pursuant to other laws that may not be applicable in the CEQA context. ARB has adopted several thresholds pursuant to AB32, for example, to address specific purposes that are unrelated to CEQA. For example, the *de minimus* threshold governs the level at which emissions will be regulated by ARB's AB 32 regulations. (Health &Safety Code, § 38561(e); Scoping Plan, at pp. 96-97.) CEQA does not permit use of a *de minimus* threshold, however...Additionally, the Reporting Threshold is the level at which emissions from large industrial sources are required to be reported.

Consistency with a Plan or Regulation

Finally, the third factor in subdivision (b) directs consideration of the extent to which a project complies with a plan or regulation to reduce GHG emissions. That section further states, however, that to be used for the purpose of determining significance, a plan must contain specific requirements that result in reductions of GHG emissions to a less than significant level. This clarification is necessary because of the wide variety of climate action plans and GHG reduction plans that are currently being adopted by public agencies. ARB, for example, recently adopted its statewide Scoping Plan. That plan may not be appropriate for use in determining the significance of individual projects, however, because it is conceptual at this state and relies on the future development of regulations to implement the strategies identified in the Scoping Plan. (Scoping Plan, at p. 9.) Regulations that will require actual reductions of GHG emissions may not be adopted unti12012. (*Ibid*.) Once those regulations are adopted and being implemented, they may, if appropriate, be used to assist in the determination of significance, similar to the current use of air quality, water quality and other similar environmental regulations. (*CBE, supra* 103 Ca1.App.4th at 111...

In addition to the regulations that will be developed to implement the Scoping Plan, this factor would also allow lead agencies to consider plans that are developed to reduce GHG emissions on a regional or local level. (Scoping Plan, at p. 26.) The proposed section 15064.4(b)(3) is intended to be read in conjunction with the section 15064(h)(3), as proposed to be amended, and proposed section 15183.5. Those sections each indicate that local and regional plans may be developed to reduce GHG emissions. If such plans reduce community-wide emissions to a level that is less than significant, a later project that complies with the requirements in such a plan may be found to have a less that significant impact.

Notably, CEQA does not provide a specific definition of 'comply' in the context of determining a project's consistency with a particular plan. Some guidance may be gleaned, however, from case law interpreting the requirements that a local government's activities be consistent with its General Plan. In that context, a 'zoning ordinance [for example] is consistent with the city's general plan where, considering all of its aspects, the ordinance furthers the objectives and policies of the general plan and does not obstruct their attainment.' (*City of Irvine v. Irvine Citizens Against Overdevelopment* (1994) 25 Cal.App.4th 868, 879.) **Reading section 15064.4 together with 15064(h)(3), however, to demonstrate consistency with an existing GHG reduction plan, a lead agency would have to show that the plan actually addresses the emissions that would result from the project.** Thus, for example, a subdivision project could not demonstrate 'consistency' with the ARB's Early Action Measures because those measures do not address emissions resulting from a typical housing subdivision. (ARB, Expanded List of Early Action Measures for Reduce Greenhouse Gas Emissions in California Recommended for Board consideration, October 2007; see also State CEQA Guidelines, §§ 15063(d)(3) (initial study must be supported with information to support conclusions), 15128 (determination in an EIR that an impact is less than significant must be briefly explained).) (Emphasis added)

**SECTION 15064.7. THRESHOLDS OF SIGNIFICANCE**

**Specific Purposes of the Amendment**

Proposed subdivision (c) of section 15064.7 would allow a lead agency to adopt a threshold developed by another agency, or recommended by experts, provided that such threshold is supported with substantial evidence...In adopting any threshold of significance, including one developed by an expert or agency with specialized expertise, the lead agency must support the threshold with substantial evidence in the administrative record. (State CEQA Guidelines, § 15064.7(b).)...Because any threshold must be supported with substantial evidence, and must be adopted through a public process, any threshold recommended by an expert that is ultimately adopted will undergo sufficient scrutiny to ensure its legitimacy. (State CEQA Guidelines, § 15064.7(b).)

**SECTION 15126.4 CONSIDERATION AND DISCUSSION OF MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS.**

**Specific Purposes of the Amendment.**

Section 21083.05 of the Public Resources Code expressly requires OPR and the Resources Agency to develop regulations on the 'mitigation of greenhouse gas emissions.' The goals of this legislative mandate are to (1) reduce GHG emissions and (2) to provide consistency in the development of GHG emissions reduction measures...

Existing section 15126.4 provides guidance on CEQA's general mitigation requirements. To emphasize that mitigation of GHG emissions is subject to those existing CEQA requirements, OPR and the Natural Resources Agency added a new subdivision (c) to the existing section

15126.4. The Amendments identify five general methods of mitigation that may be tailored to the specific circumstances surrounding a specific project...

Mitigation of Greenhouse Gas Emissions

Comments submitted on the Amendments indicated general concerns that mitigation for GHG emissions may not be effective or reliable. To further clarify the existing mitigation requirements that would apply to measures to reduce greenhouse gas emissions, the Natural Resources Agency revised the lead-in sentences in subdivision (c). Specifically, the Natural Resources Agency added that all mitigation must be supported with substantial evidence and be capable of monitoring or reporting. This addition reflects the requirement in Public Resources Code that a lead agency's findings on mitigation be supported with substantial evidence and that it must adopt a mitigation monitoring and reporting program along with the project if mitigation measures are required. (Public Resources Code, §§ 21081(a)(1), 21081.6.)...

Consistent with section 15126.4)a), a lead agency must support its choice of, and its determination of the effectiveness of, any reduction measures with substantial evidence. Substantial evidence in the record must demonstrate that any mitigation program or measure is [sic] will result in actual emissions reductions...

**Measures to be Implemented on a Project-by-Project Basis**

Finally, the fifth type of measure that could reduce GHG emissions at a planning level is the development of binding measures to be implemented on a project-specific basis. Proposed subdivision (c)(5) recognizes that, for a planning level decision, appropriate mitigation of GHG emissions may include the development of a program to be implemented on a project-by-project basis...

This type of mitigation is subject to the limits of existing law, however, Thus, proposed subdivision (c) (5) should not be interpreted to allow deferral of mitigation. Rather, it is subject to the rule in existing section 15126.4 (a) (1)(B) that such measures 'may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.'

**SECTION 15130. DISCUSSION OF CUMULATIVE IMPACTS**

**Specific Purposes of the Amendment**

Section 15130(b)(1)(B)

Section 21083(b) of the Public Resources Code requires that an EIR be prepared if the 'possible effects of a project are individually limited but cumulatively considerable.' that section further defines 'cumulatively considerable' to mean that 'the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.'

In determining whether a project may have significant cumulative impacts, a lead agency must engage in a two-step process. First, it must determine the extent of the cumulative problem. To do so, a lead agency must examine the 'effects of past projects, the effects of other current projects, and the effects of probably future projects.' Once it does so, the lead agency then determines whether the project's incremental contribution to that problem is cumulatively considerable...

The existing Guideline section 15130(b) addresses the first step of the process. It offers two options for estimating the effects resulting from past, present and reasonably foreseeable

> projects. A lead agency may either rely on a list of such projects, or a summary of projections to estimate cumulative impacts. Existing section15130(b)(1)(B) allows a lead agency to rely on projections in a land use document or certified environmental document that addresses the cumulative impact under consideration...
>
> The proposed amendments would also allow a lead agency to rely on information provided in regional modeling programs. The best projections of the cumulative effect of GHG emissions may be available in up-to-date models such as the International Council for Local Environmental Initiative's Local Government GHG Protocol and the California Climate Action Reserve's Registry general, industry and project type protocols. (Ex. T, California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97*, pp. 20-28, 30, 46, 49, 50, 53, 54)

The Initial Study failed to quantify GHG emissions that could result from the proposed project, and such quantification is reasonably necessary to ensure adequate analysis of GHG emissions using available data and tools, and such quantification would assist in determining the significance of those emissions. URBEMIS is one model that is widely used in CEQA air quality analyses and can also be used to analyze a project's GHG emissions. In fact, the local air quality management district's guidance document recommends that projects of a similar size and character to a large commercial development proposed in a suburban context "should use URBEMIS, or another similar model, to estimate the air quality impacts of the development..." Ex. T, p. 23.

In addition, in June 2010, the BAAQMD adopted recommended thresholds with two alternatives for determining significance for most nonindustrial development projects. One is a bright-line threshold of 1100 MT/year of carbon dioxide equivalent emissions. The other recommended threshold is a per capita threshold of 4.6 MT/yr of CO2-equivalent emissions, based on the service population of the project. Ex. S, CEB, Practice Under the California Environmental Quality Act, § 20.81A, p. 20-100.

The Housing Element EIR states that BAAQMD has updated their CEQA air quality guidelines and "adopted significance standards for GHGs on June 2, 2010." The updated CEQA Air Quality Guidelines includes significance thresholds, assessment methodologies, and mitigation strategies for GHG emissions. Ex. C, p. V.I-12. The recently adopted GHG thresholds of significance, as discussed in BAAQMD's May 2010 CEQA Air Quality Guidelines, includes two sets of GHG thresholds: one that would apply to specific development projects, and another threshold that would apply to plan-level CEQA analysis. Ibid.

The California Resources Agency has identified "the Bay Area Air Quality Management District's proposed Best Management Practices for Construction Greenhouse Gas Emissions (calling for use of alternative fuels, local building materials and recycling" as performance-based standards that are appropriate to use in determining significance of GHG emissions. Ex. T, p. 22.

The Initial Study has not provided substantial evidence that the project's GHG emissions, and/or the project's percentage reduction from business as usual ("BAU") correlates with statewide, regional or local goals. The IS's claim that GHG impacts would not be significant was not supported by substantial evidence that the project's energy-efficiency goals, construction- related GHG emission goals, and transportation-related GHG emission goals would be reached.

Moreover, the IS failed to consider "whether the project will result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting. All project components, including construction and operation, equipment and energy use, and development

phases must be considered in this analysis." Ex. T, p. 24. Instead, the IS evaluated the project's consistency with applicable local and regional plans for GHG reduction rather than considering whether the project will "result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting." Thus, the IS erroneously used existing plans as the baseline against which potential project effects were analyzed, instead of increases or decreases in different types of GHG emissions relative to the existing environment.

The IS's consistency evaluation was supported by the bald claim that the project would comply with various regulations and programs relating to energy efficiency, waste reduction, tree planting and landscaping, etc. This analysis was inadequate because it was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance. Also, the environmental evaluation did not commit the project sponsor to implementation of specific performance criteria as mitigation measures agreed as a condition of approval of the project or objective performance criteria for measuring whether the project would achieve the goals of such programs or regulations.

The Initial Study states that "construction-related emissions would still have the potential to conflict with or obstruct implementation of the applicable air quality plan...Both construction and long-term operational emissions have the potential to result in emissions that could conflict with or obstruct implementation of the applicable air quality plan. IS p. 144. "As described above, construction and operation of the proposed project or project variant would generate criteria air pollutant and ozone precursor emissions that would contribute to regional air emissions and affect regional air quality. It is possible that the levels of emissions generated during construction or operation could violate or contribute substantially to an existing or projected air quality violation." IS pp. 144-145.

The Initial Study's claim that the project would comply with various plans or regulations to reduce GHG emissions is also deficient because the IS has failed to show that the plans or regulations contain specific requirements that would result the proposed project's reducing GHG emissions to a less than significant level. Ex. T, p. 26. The IS has failed to show that the referenced plans or regulations actually address that emissions that would result from this proposed project or project variant. Ex. T, p. 27.

Thus, the IS has failed to comply with CEQA because it has failed to determine the extent to which the proposed project either increases or decreases GHG emissions, by comparing the project's emissions to the current environment and whether the anticipated GHG emissions associated with the project exceed a threshold of significance set by the lead agency or another agency with jurisdiction over resources affected by the project.

Moreover, the IS's GHG analysis is deficient under CEQA because it failed to provide substantial evidence that the proposed project's percentage reduction in GHGs from business as usual would correlate with achieving AB 32's statewide goal of reducing emissions by approximately 30 percent below BAU by 202, or other applicable goals of the City or other agencies. The IS lacks substantial evidence to show that the proposed project would reduce its GHG emissions to levels that would be consistent with achieving applicable state, regional, local or other agency GHG reduction goals.

The IS does not present substantial evidence demonstrating that project GHG emissions would be consistent with SB 32's goal of reducing GHG emissions by 40% below 1990 levels by 2030 (IS p. 147, fn. 124), of the goals of Executive Order S-3-OS to reduce emissions to 1990 levels by 2020, and to reduce emissions to 80% below 1990 levels by 2050 (IS p. 147 fn. 121), or the targets of Executive Order B-30-15 of reducing GHG emissions to 40 percent below 1990 levels by 2030. (IS p. 147, fn. 122) Also, the IS inadequately relied on the claim that San Francisco has

met the State and regional 2020 GHG reduction targets citywide, but this proposed project would have significant adverse air emissions from 7-15 years of construction and operations which would result for years after 2020, so the GHG analysis should have been performed for a longer time-range.

In addition, the IS failed to implement mitigation measures requiring as a condition of approval that during operations and construction the project proponent implement enforceable measures that would ensure that targeted reductions in GHG emissions would actually occur.

For the reasons stated above, the IS failed to follow CEQA procedures in determining the significance of the project's effect on GHG emissions, failed to support with substantial evidence in the record its determination that the project's and project variant's effect on GHG emissions would not be significant, and failed to provide substantial evidence in the record showing that the project and project variant's percentage reduction in GHGs in comparison with business as usual would correlate with achieving state, regional or local goals." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-10])*

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"And, the use of TNCs makes the GHG situation worse.

Let's assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles.

Data shows that many people will now use a TNC rather than drive their own cars. This will be even more pronounced if Parking is reduced!

So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles.

When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip!

So, not only do we have 8,000 retail auto trips, excluding the effect of TNCs (not addressed) to deal with we have many of them generating significant more GHG per trip!

Planning needs to do a comprehensive analysis using credible data and a credible methodology so that the public knows the extent of the GHG generated.

We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly.

In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR." *(Richard Frisbie, Letter, January 8, 2019 [I-FrisbieR1-11] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-17])*

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"In addition to the comments in this letter I am resubmitting my revised Initial Study Comments (Attachment 1) as the Planning Department has failed to address them and has withheld critical, pertinent and specific information from the public. The revisions reflect information gleaned from the Initial Study and subsequent documents. It also reflects corrections and adjustments to relevant criteria.

As noted below, had Planning provided the information requested it would have permitted the GHG issue to be analyzed quickly but, to date, the public has not been provided this fundamental data.

Regardless, the Community Alternative will generate less than one third the GHG generated by the Developers' Project. It will also clearly shows that the Community Alternative is a far superior solution in that it generates approx. 30% of the total GHG generated by the Developers' Plan. A significant Mitigation Measure in itself.

In the Initial Study Impact C-AQ-1 (Attachment 3) was deemed "less than Significant."

No data or analyses was provided to support this erroneous determination which was incomplete, incorrect and inadequate. The text which followed was simply a rehash of all the relevant documents but nowhere was there any analyses that showed compliance with the requirement to consider "greenhouse gas emissions, directly or indirectly".....

No Indirect GHG were calculated as noted in Attachment 1 and required by Attachments 3, 4 and 5.

The only information provided in Volume 2 dealt with construction GHG and operational GHG, nothing addressed the GHG related to the manufacture and use of the basic building materials to be used in constructing the buildings, underground garages, etc.

Indirect GHG are required to be calculated, analyzed and incorporated into the conclusions and Mitigation Measures. The Planning Department has failed to do any of this. Indirect GHG are also required to be similarly addressed in the San Francisco 2004 and 2009 Housing Element Impact GH-1 (Attachment 4). None of this was done.

CEQA Guidelines section 15358(a)(2) defines "effects" of a project to include "indirect" effects. These indirect effects are cumulative in nature. They are also reasonably foreseeable and the DEIR was inadequate for failure to consider them.

15358. EFFECTS "Effects" and "impacts" as used in these Guidelines are synonymous. (a) Effects include: (1) Direct or primary effects which are caused by the project and occur at the same time and place. Association of Environmental Professionals 2018 CEQA Guidelines 261 (2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems. (b) Effects analyzed under CEQA must be related to a physical change. Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21068 and 21100, Public Resources Code.

Despite multiple requests we have not been provided with an estimate of the volumes of concrete, weights of steel and glass to be used in the project. This information would quickly reveal the massive amounts of GHG involved in the Developers' 3333 Plan. Planning supposedly oversees thousands of major projects and PSKS supposedly develops multiple large buildings/projects and yet no such estimates are available, or so we are told.

Planning has had access to a detailed GHG Study prepared by SWCA since August 2018 which specifically addresses GHG in the Attachment E AB900 Analysis by Ramboll. The SWAC Study lists total construction GHG of 4,273 metric tons (Attachment E Construction GHG Emissions Table 4 pg. 8) which clearly exceeds the limits in Attachment 6.

However, these are only "direct" GHG and do not include the "indirect" GHG generated by the manufacture of the concrete, steel, glass, etc. which will be used to construct the buildings.

ALL indirect GHG are missing from ALL the Planning Department's documents and conclusions which are incorrect, incomplete, and inadequate. Nothing in Attachment 6 excludes construction

materials from the process. In fact the very term “energy associated with treatment” on page 2 can refer to the treatment of raw materials. The etc. at the end of the same sentence clearly indicates that a number of other “indirect” GHG are to be considered if present. None of this has been done.

The DEIR Lacks Substantive Evidence That GHG are “Less Than Significant.”

**Processing of Demolition Debris**

Furthermore, nowhere in the Initial Study, the DEIR or the SWAC Report is there any mention, analyses or compilation for the GHG generated by processing the debris from the demolition of the site as required by the City’s applicable Ordinance -Planning Department’s Reference FN 130 “Compliance Checklist Greenhouse Gas Analysis” pg. 19 “San Francisco Construction and Demolition Debris Recovery Ordinance” (Attachment 5).

The first paragraph of the Requirements says that “All (100 percent)...to be processed for recycling.”

Second paragraph says that “projects that include full demolition of a structure...” allows for the processing of a minimum 65% of the demolition debris....”

The Developer is NOT demolishing 100% of the main building and MUST recycle 100% of the demolition debris from the main building. Attachment 7 “the existing approx. 55.5-foot tall building at the center of the site would be partially demolished.....” Pretty clear statement and supporting drawings.

Demolishing 100% of the Annex building does not qualify as exempting the debris from the main building from the 100% requirement.

In the Remarks column the Planning Department states that a “minimum of 65%...” and then references the Annex building in an attempt to limit the overall processing to 65%.

The Annex Building demolition is trivial with comparison to the main building and yet is used in an attempt to reduce the 100 percent processing required of the main building debris. This is a deliberate abuse of the language and intent of the Ordinance. The Annex building and main building are separate and distinct and the disparity in volume of debris is more than an order of magnitude.

The Developer must process 100% of all the debris from the main building demolition.

Using the annex building as a pretext for setting the processing percentages is disingenuous and violates the City’s own Ordinance.

In addition, no calculation is shown that indicates the amount of GHG generated from the processing of the 65% of the Annex Building and the 100% of the main building debris as well as the parking lots, garage ramps, etc.

All of these generate the “indirect GHG” required to be addressed in the GHG totals. No calculations for the processing of the demolition debris has been presented. The GHG analysis is further invalidated by the incorrect interpretation and implementation of the City’s own Ordinance and the failure to make the appropriate GHG calculation. Frankly this is a deliberate attempt to circumvent the City’s own rules!

In addition, Attachment 2 Item 9 “Consistency with statutory Requirements for CEQA Streamlining” states “to offset GHG emissions....” certain steps will be taken. Interesting that mitigation measure are proposed for a situation that is already defined “Less than Significant” in the Initial Study. One might even consider it bizarre.

However, the steps proposed fall woefully short of offsetting the "direct and indirect" (the indirect are yet to be calculated but I offer the attached table in order to assist the Planning Department in complying with CEQA) GHG generated during the construction phases(s).

It is simply impossible to conclude, as C-AQ-1 attempts to do, that the GHG generated are "less than Significant."

Furthermore, the California Air Resource Board itself requires that both direct and indirect GHG be calculated.

DEMAND is that we be provided with ALL data, calculations, documentation, etc. that have any bearing on GHG associated with 3333 California Street inclusive of Initial Study, Application for an Environmental Leadership Project, the DEIR and 3333 California Street in toto.

DEMAND is that ALL GHG, direct and indirect, including those generated by the manufacture and transport of the building materials themselves, be calculated as required by both the City and the State.

DEMAND is also that the GHG be reclassified properly as "Significant" and are as of now Unmitigated.

DEMAND is that the Community's Alternative GHG levels, one third of the Developers' levels, be used as the baseline for setting the standard for 3333 California St.

DEMAND is that the processing of demolition debris from the main building be properly calculated by requiring 100% processing of the main building debris.

DEMAND is that the GHG generated by this processing be accounted for: a minimum of 65% of the Annex Building and 100% of the main building debris. No information is provided as to the percentage of the parking lots and garage ramps that will be processed. We require this information.

**The DEIR is incomplete, inaccurate and incorrect in totally ignoring GHG from construction material manufacture and transport, demolition debris, etc.**" *(Richard Frisbie, Letter and Attachments, January 8, 2019 [I-FrisbieR2-1])*

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"The Initial Study's (Reference 4[2] to this submission) conclusion on page 146 per the Table, items 7(a) and (b) as well as on page 148 "Impact C-GG-1" that the construction phase of the project will generate "Less than significant" Greenhouse Gases is incomplete, inaccurate, inadequate and invalid. The approximate 14,000 tons of Greenhouse Gases generated, direct and indirect, as a consequence of the construction phase of the proposed development is hardly a "less than significant" tonnage as stated in the Initial Study and not addressed in the DEIR. Essentially the subject is being ignored.

The Community Residential Alternative, supported by the coalition of neighbors surrounding 3333, will generate only 30% (4,100 tons) of the Greenhouse Gases generated by the PSKS plan, as a consequence of their construction phases, while protecting the historically significant main building and landscaping. The Community Alternative provides a significant mitigation of Greenhouse Gases and the destructive impact they have on health, quality of life and climate change.

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[2] The list of references within Comment I-FrisbieR2-2 can be reviewed in Attachment 1 of Letter I-FrisbieR2 which is available in its entirety in RTC Attachment B.

Notes:

This document addresses only the generation and release of Carbon Dioxide, direct and indirect, as a consequence of the construction phase. However, the other Greenhouse Gases associated with this type of work —methane, nitrous oxide, etc.- although present at much lower levels than carbon dioxide have a GWP (Global Warming Potential) anywhere from 25-300 times greater than carbon dioxide (Reference 11[3]) and need to be addressed as well.

The indirectly generated Greenhouse Gases has not been taken into account in either the Initial Study or the DEIR.

San Francisco and the California Air Resources Board (CARB) require that all Greenhouse Gases, direct and indirect, be calculated, analyzed and properly presented with mitigation measures being required. The DEIR is incomplete, incorrect and inadequate as it fails to address the indirect Greenhouse Gases.

INTRODUCTION

Reference 4[4] Section E. 7 -Greenhouse Gas Emission pages 146-150:

Impact C-AQ-1 (Potentially Significant). "Potential cumulative air quality impacts will be addressed in the EIR."

Table: 7 GREENHOUSE GAS EMISSIONS (page 146)

Would the project:

(a) "Generate greenhouse gas emissions, either directly or indirectly (underline added), that may have a significant impact on the environment?" "Less Than Significant" is checked.

(b) "Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases?" "Less Than Significant" is checked.

Not a single calculation, analysis, compilation or comparison is presented to support these inadequate conclusions of "Less Than Significant."

These conclusions are incomplete, inaccurate, inadequate and invalid in toto.

The project proposed by the developers (PSKS) would generate as a consequence of the construction phase alone approximately:

13,525 TONS OF GREENHOUSE GASES (see Note 1)

Due to the complete absence of any supporting data, as well as Planning's delayed response to relevant questions, it has been necessary to make some assumptions in analyzing details of the PSKS plans. By comparison, the Community Residential alternative, supported by the coalition of neighbors surrounding 3333, would generate Greenhouse Gases at levels less than 30 percent (4,100 tons) of the PSKS levels. The Community Residential alternative represents a 70% mitigation of these harmful gases to health, well-being and the environment.

Thus, without the relevant data and corresponding analyses based on available air emission models, Planning's conclusions have no basis in fact and are incorrect, incomplete, inadequate and invalid.

[3] Ibid
[4] Ibid.

On page 148, first paragraph, of reference 4[5], it is stated "The following analysis of the proposed project....."

In reality there is no analysis whatsoever in the referenced document as to the Greenhouse Gases generated as a consequence of the construction phase which, as shown above, produces significant amounts of harmful Greenhouse gases.

Pages 148-150 speak exclusively to the Operational phase of the project while completely omitting even a reference to the construction phase.

There is no reference made as to the volume of concrete, weight of steel, weight of glass, etc. included in the project -all of which have profound implications as to the levels of Greenhouse Gases emitted into the atmosphere as a consequence of the construction phase.

I am still awaiting answers to question submitted to Planning on related issues.

It would appear that no analyses have been made, certainly none are presented, as to the Embodied Energy content of the construction methods and materials. Such analyses would immediately highlight the significant levels of Greenhouse Gases that would be generated as a consequence of the PSKA planned construction phase and highlights the need for mitigation measures.

Due to the absence of data it was necessary to use information listed in the references[6] to develop the approximate levels of Greenhouse Gas tonnages generated as a consequence of the construction phase. Had the Initial Study, which, forms the basis for the EIR, carried out some fairly straightforward analyses we could have compared the results to determine where additional study is required.

At such time as the City provides the necessary technical data, such as the energy required to recycle the main building debris (see note 1), volume of concrete and weight of steel, glass, etc. required for the re-construction, etc. the estimated Greenhouse Gas tonnages generated as a consequence of the construction phase could be re-calculated accordingly.

Notes:

1. There appears to be no calculation or consideration in any of the City's documents that addresses the Greenhouse Gases generated by the recycling of the debris from the main building. Recycling steel and concrete is energy intensive and needs to be properly accounted for in the Greenhouse Gases budget. The only thing more harmful is to simply dispose of reusable materials in a landfill.

DISCUSSION

The Greenhouse Gases generated as a consequence of the Construction phase will be discussed in the following order:

1. Demolition of portions of main building, service building, parking lots, garage ramps.
2. Removal of Debris generated in 1. Above.
3. Excavation of site for underground parking, building foundations, etc.
4. Removal of Spoils generated in 3. Above.
5. Reconstruction, strengthening and increased height of the main building.
6. Construction of underground parking garages.
7. Construction of Masonic, Euclid and Mayfair buildings.

[5] Ibid.
[6] Ibid.

8. Construction of Plaza A &Band Walnut buildings.
9. Construction of Laurel St. duplexes.

1-4: DEMOLTION, EXCAVATION AND REMOVAL OF DEBRIS AND SPOILS.

The first four activities, 1-4, listed above will be looked at together as they basically utilize energy to carry out the activity.

PSKS proposes to demolish approximately 50% of the existing main historic building as well as most of the historic landscaping. In addition, the various parking lots and roadways on the site will be demolished as well as the circular garage ramps. After demolition the debris will be removed and the site will be excavated and the spoils hauled away. Reference 26[7] shows the approximate amount of fuel, diesel and gasoline, and electricity consumed. Some of this is spread over the construction phase of the building cycle. As items such as the map of the routes selected (Reference 9[8]) have not been made available, but have been requested, it is impossible to judge the reasonableness of some of these calculations.

It should be noted that the 0.05 gallons per horsepower-hour used in the Reference 26[9] is 10-15% lower than industry data available from multiple sources (see Reference 29[10], the value 0.056, as an example).

Also of significance, which is not addressed, is the volume of serpentine that could be present and which requires significantly more energy to remove than soils and clays.

The five primary boring sites related to geology are of considerable interest.

Major excavation will take place along Masonic and Euclid and yet no borings were made at any intermediate location along this >600ft segment of the property.

The boring sites appear in Reference 30[11].

A boring (B-3) was done at Masonic and Presidio where no excavation will take place.

The only other boring on the southern half of the property was taken very near the Euclid-Laurel intersection (B-4) where, again, no excavation will take place.

So, all the excavation for the Masonic and Euclid buildings will be done without any specific first-hand knowledge of the geology at those locations.

And yet it was deemed appropriate to do boring B-5, a site where the Laurel St. duplexes will be constructed and which require significant less critical subsoil information as they do not have underground garages supporting major buildings.

Outcrops of serpentine exist throughout this general area so it is probable that these areas of excavation will encounter significant deposits of serpentine, the excavation of which is far more difficult and energy intensive than for stiff clays etc. as well as posing a health risk which could be of a much greater magnitude than that presented in the Initial Study.

Frankly one could conclude that the boring sites were carefully selected to avoid discovering any controversial conditions that may well underlay the site!

[7] Ibid.
[8] Ibid.
[9] Ibid.
[10] Ibid.
[11] Ibid.

The net result is that the energy discussed in Reference 26[12] must be considered to be at the very low end of likelihood.

Higher values should be expected and this likelihood is not addressed in the DEIR.

Despite the optimistic view of Reference 26[13], these phases of the project will still generate approx.

3,500 TONS OF GREENHOUSE GASES

As noted above in the Introduction, no consideration appears to have been made for the energy associated with the recycling of the reusable components of the debris from the main building.

So, what would be a more realistic estimate?

The Community Residential alternative would generate approx. 23 percent of that, or 800 tons, of Greenhouse Gases.

5. RECONSTRUCTION. STRENGTHENING AND INCREASED HEIGHT OF MAIN BUILDING

First, the remaining portions of the historical main building will require strengthening as it was not originally designed or built to accommodate three additional floors and their related infrastructure. The volumes of concrete and steel involved will result in significant generation of Greenhouse Gases, no mention of which appears anywhere in the Initial Study or the DEIR! The DEIR is simply incorrect, incomplete and inaccurate with respect to direct and indirect greenhouse gases and also Air Quality. The DEIR should, but did not, disclose the volumes of concrete and/or weight of wood, as well as the weights of steel and glass that would be used in the PSKS proposed development.

This information is relevant to the calculation of Greenhouse Gas Emissions.

Projects involving buildings of this size, and larger, have seen significant reductions savings of Greenhouse Gases saved through re-use of the building as opposed to major demolition and reconstruction.

So, conservatively it can be estimated that this re-construction will generate approx.

2,000 TONS OF GREENHOUSE GASES

Had we been provided with information regarding volumes of concrete and weight of steel required for this rebuild, strengthening and height increases, we could have provided a more specific estimate. It should be noted that concrete has an Embodied Energy Content of 12.5MJ/kg, Steel 11.OMJ/kg. and Wood 2.OMJ/kg.

Cement is an energy intensive product and generates significant Greenhouse Gases during its production process so a cubic yard of concrete is responsible for approximately 500 lbs. of Greenhouse Gases being released into our atmosphere. See References 16, 17, 18 and 23[14].

95% of the cement used in the Bay Area is manufactured here so these GHG are our GHG.

This estimated 2,000 tons of Greenhouse Gas generated by PSKS would hardly seem to be compatible with Page 146 and the “Less Than Significant” conclusion by the City, further

[12] Ibid.
[13] Ibid.
[14] Ibid.

reinforcing the conclusion that the Initial Study, and this DEIR, is inaccurate, inadequate, incomplete and invalid.

The Community Residential alternative generates 0 tons of Greenhouse Gas emissions.

There is no demolition of the main building; no additional strengthening or structure for additional floors; no rebuilding of the exterior of the main historic building.

However, to take into account modifications for providing sunlight courts, etc. let's assign a number of 200 tons of Greenhouse Gases.

6. CONSTRUCTION OF UNDERGROUND PARKING GARAGES.

The site will be underpinned by underground parking garages over approx. 60% of the site.

Along California St. these are two and three levels.

Under Masonic, Euclid and Mayfair these are one level.

Construction is assumed to be steel reinforced concrete designed to support the buildings that are above all the parking garage areas.

The DEIR failed to disclose the volumes of concrete and weight of steel, glass, etc. required.

Concrete's Embodied Energy is 12.5MJ/kg., weighs approx. 2 ton per cubic yard which emits up to 500 lbs. in Greenhouse Gases, CO2, during the manufacture and construction processes.

As no volumes of concrete or weight of reinforcing steel has been provided by the City, the calculations of Greenhouse Gases generated as a consequence of the construction phase has used industry standards for parking garages (Reference 25).[15]

These are all above ground garages without any overlying buildings so the calculations should be considered on the low end when applied to an underground complex supporting 4-7 story buildings above.

The average cubic yards of concrete to square foot of structural slab ratio varies from 4.5% to 10% (Reference 25).[16]

Assume a 6% ratio which is conservative due to the nature of the complex AND excludes any consideration of the required reinforcing steel.

When Planning provides the necessary information, these calculations can be updated.

Again, with apparently no information, no calculations, etc. Planning concluded that the

6,000 TONS OF GREENHOUSE GASES

generated as a consequence of the construction of the underground parking garages are "Less Than Significant" on page 146 of the Initial Study and not even addressed in the DEIR.

The DEIR fails to address indirect Greenhouse Gases as required; it is incomplete, inaccurate and incorrect.

The Community Residential alternative generates approx. 1,000 tons of greenhouse gases, as it requires only a new single level residential parking garage along California St.

[15] Ibid.
[16] Ibid.

7. CONSTRUCTION OF MASONI` C, EUCLID AND MAYFAIR BUILDINGS.

Once again it is necessary to include the following caveat "the Initial Study provides no information as to the construction methodology proposed nor the volumes of concrete and weight of steel required." However, at public meetings, as well as smaller private ones, it was indicated that reinforced concrete and glass would be the primary components of construction so these assumptions have been adopted herein.

Applying References 16-24[17] with included references to the proposed buildings for reasonably equivalent sized buildings, the proposed buildings would generate approx.

450 TONS OF GREENHOUSE GASES.

If Planning will provide the appropriate information concerning construction methodology, materials, volumes of concrete, weight of steel, etc. we can adjust the calculations accordingly.

The All Residential alternative will construct only the Mayfair Building and generate approx. 100 tons of Greenhouse Gases as we do not intend to destroy these historically significant landscaped areas.

8. CONSTRUCTION OF PLAZA A &BAND WALNUT BUILDINGS.

The same assumptions as to construction methodology applied in 7 above is utilized herein.

These three buildings will generate

1,500 TONS OF GREENHOUSES GASES WITH THE VARIANT PROPOSED.

The Community Residential alternative would generate less than 1,000 tons of greenhouse gases.

For details refer to References 16-24[18] with included references.

9.CONSTRUCTION OF LAUREL ST. DUPLEXES.

It is assumed that these are constructed predominantly of wood should generate less than

75 TONS OF GREENHOUSE GASES.

If this assumption is incorrect the tonnage of greenhouse gases generated would be significantly higher. I await Planning's information on construction methodology.

The Community Residential alternative concept will generate ZERO tons of Greenhouse Gases as it does not envision destruction of the historic nature of that area.

SUMMARY OF GREENHOUSE GENERATED (tons)

| PHASE of PROJECT | GREENHOUSE GASES-TONS | |
|---|---|---|
| | PSKS | AR (1) |
| Demolition of portions of main building, service building, parking lots, garage ramps; Removal of Debris generated above; Excavation of site for underground parking, building foundations, etc.; and Removal of Spoils generated above. References[19]: 26, 27, 28. x | 3,500 (2) | 800 |

[17] Ibid.
[18] Ibid.
[19] Ibid.

| | | |
|---|---|---|
| Reconstruction of main building with strengthening and additional floors. | | |
| References[20]: 14 thru 19. | 2,000 | 200 |
| Construction of underground parking garages. | 6,000 (3) | 2,000 |
| Construction of Masonic, Euclid &Mayfair buildings. | 450 | 100 |
| Construction of Plaza A &Band Walnut buildings. | 1,500 | 1,000 (4) |
| Construction of Laurel St. duplexes. | 75 | 0 |
| TOTALS (5) | 13,525 | 4,100 |

1. AR: All Residential alternative supported by the coalition of neighbors surrounding the site.
2. The literature indicates that the fuel consumption listed in Reference 26[21] is approx. 10-15% lower than other industry consumption figures. The lower SWCA (reference 26[22]) number is used.
3. Low estimate: approx. 26,000 cubic yards of concrete; no reinforcing steel included.
4. As noted previously this number is based on a 7 story Walnut Building to be consistent with the PSKS Variant. The All Residential alternative envisions a 4 story Walnut Building which achieves the requisite 558 residential units.
5. At such time as Planning provides all the relevant data associated with the project the Greenhouse Gas tonnage estimates can be revised. However, regardless of revisions to the tonnages, the All Residential alternative will always represent a small, less than one third, portion of the PSKE proposed development and the required mitigation measures will have to reflect this." *(Richard Frisbie, Letter and Attachments, January 8, 2019 [I-FrisbieR2-2])*

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"Attachment 1: SWAC Report 3333 California Street Mixed-Use Project Application for Environmental Leadership Development Project - Attachment E (Ramboll) -Table Con-5 Project Construction Trip Assumptions.

Attachment 2: 3333 California St. Mixed-Use Project DEIR Volume 2c: Appendices D-G Cover: EIR Appendix D "Transportation and Circulation"; Table of Contents: Section 8 "Truck Turning Templates."

Table Con - 5 grossly understates the number of trips that will be required to remove the demolition debris and excavated soils from the site. Neither the authors of the reference nor the Planning Department have shown by analyses or data that this information is accurate or correct. The data is provided strictly by the "Project Sponsor" and no one has performed the basic due diligence needed to validate it.

The Project Sponsor understates the number of Hauling Trips by approx. 45% which directly under-represents the GHG calculations (in violation of FN 130 Planning Department "Compliance Checklist for GHG Analysis"; of Impact C-AQ-1 "less than Significant" conclusion pg. 146 of the Initial Study dated April 25, 2018; and of San Francisco 2004 and 2009 Housing element), under-reports the impact on Air Quality calculations and the resulting conclusions based on this discrepancy are simply erroneous and incorrect.

Table Con-5 shows a total of 18,020 Hauling Trips to remove the 288,000 cubic yards of demolition debris and Excavated Soils. This is an average of 16 cubic yards per trip. A dump truck capable of hauling 16 cubic yards would be unable to safely navigate 5 of the 6 major intersections around the site and pass safely through the surrounding neighborhoods. The DEIR

[20] Ibid.
[21] Ibid.
[22] Ibid.

Section 8 Truck Turning Templates of Volume 2 Appendix D "Transportation &Circulation Section 8 "truck Turning Templates."

A large tandem dump truck can haul approx. 11 cubic yards of soil and less of a mixed debris such as concrete, asphalt, steel. It is approx. 30ft in length and is also wider, by 11%, than the truck shown on Template SU-30. The narrower truck barely is able to make legal turns and this assume ideal conditions, no obstructions-cyclists, pedestrians, rain, etc. A wider dump truck would impinge on incoming traffic. A 16 cubic yard truck would be significantly more hazardous as s can be seen from Template WB-40 Circulation Exhibit; such a vehicle could not operate safely in any of the neighborhoods surrounding the site.

The number of trips is grossly underestimated by the Project Sponsor.

Assuming approx. 88,000 cubic yards of hard debris —concrete, asphalt, steel, aluminum, etc. - and an average load of 9 cubic yards results in approx. 9,800 dump truck loads.

Assuming the remaining 200,000 cubic yards to be soil, some wet, and an average load of 11 cubic yards results in 18,200 loads for a total of 28,000 loads or 1.55 times the number submitted by the Project Sponsor and accepted without validation by the Planning Department.

As a result the GHG calculations in the Attachment are significantly understated by approx. 45% and the GHG are in fact "Significant" and require that they be correctly and accurately studied in the EIR. The Air Quality around the site will also be impacted by this gross under-calculation and the DEIR GHG, Air Quality and Traffic Analysis conclusions are, by definition, defective and invalid. The information is incomplete, incorrect, inaccurate.

Our DEMAND is that the number of Hauling Loads be recalculated using appropriate load factors; that the resulting GHG be properly and accurately re-calculated; that the Air Quality issues be revised to reflect the higher number of trips by the largest pieces of site equipment; that the Traffic Circulation be redone to reflect accurate information.

Our DEMAND is that GHG be correctly re-classified as "Significant" and addressed appropriately.

Our DEMAND is that the Developer's excessive, unmitigated "Significant" GHG be compared against the Community Alternative Plan which generates less than one third of the GHG; impacts Air Quality by having one third the impact on the Hauling Trip totals alone (9,000 vs 27,000+).

The Community Alternative actually meets the standard for "Less than Significant."

The failure to validate key information provided by the Project Sponsor and their subcontractors is a major failing of the DEIR. The Planning Department's failure to exercise the appropriate oversight of the information it uses to reach conclusions results in the DEIR being a collection of erroneous and self-serving conclusions that fails to meet the criteria for accuracy, completeness and correctness." *(Richard Frisbie, Letter and Attachments, January 8, 2019 [I-FrisbieR2-3])*

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"DEIR does not mention that the cultural resource of remnant large mature trees from Laurel Hill Cemetery that were incorporated into the Firemen's Fund Building site as historic character-defining features are work horses in mitigating greenhouse gas emissions. Planting small trees over a span of 15 years, as if that would provide equivalent or reduced greenhouse gases from thousands of vehicle miles traveled associated with the new retail uses to negatively impact everyone's health is very concerning." *(Rose Hillson, Draft EIR Hearing Transcript, December 13, 2018, pp. 47-48 [I-Hillson1-2])*

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"DEIR doesn't mention that the cultural resource of remnant large mature trees from Laurel Hill Cemetery that were incorporated into the Firemen's Fund Building site as historic character-defining features are workhorses in mitigating GHG emissions. Planting small trees over a span of 15 years as if that would provide equivalent or reduced GHGs from thousands of VMTs associated with NEW retail uses to negatively impact everyone's HEALTH is concerning." *(Rose Hillson, Draft EIR Hearing Transcript Handout, December 13, 2018 [I-Hillson1-5])*

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"Air Quality Table AQ-1 (shown below): It shows the project being done from 2020-2027. With this timeline, I think the GHGs will not be remedied with the current trees of unknown species being planted even if in greater quantities than the existing number of mature trees. The mature trees are the ones that do the heavy cleaning of the air. There should be some consideration of tree species that also will not cause harm to the existing mature trees in the area to be retained and are in good condition." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-19]) (See Comment Letter I-Hillson2, p. 7, in RTC Attachment B for the table referenced in this excerpted comment.)*

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"In re school end times, there will be more kids and parents (pedestrians) out so what is the change to pedestrian volume around this area? Has this been factored in to VMTs, GHGs from automobile delay (idling & driving at low RPMs and stop-and-go pollution)? *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-40])*

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"Also, in the DEIR, it states there will be ***13,500+ automobile trips generated per day from the site***. If every project in the city keeps adding to the overall trips made, the GHGs will increase. Each electric vehicle creates pollution to make and to make the batteries that go in them. Having electric cars replacing gasoline-powered cars does not mean that pollution is going down when the factories making the items that go into making the electric cars and enabling them to run cause pollution. This is not a sustainable practice. How many batteries are needed to keep the cars going for the number of trips that are projected to go to and from this site upon completion? How many tons of pollution come from manufacturing them?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-58])*

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"5. It incompletely addresses the damaging effects of greenhouse gases emitted during and after the construction period;" *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-8])*

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"And, the use of TNCs makes the GHG situation worse. Let's assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles. That's a very conservative calculation as the average trip for TAZ 709, 3333 area, states an average trip of 7.9 miles! Data shows that many more people will use a TNC rather than drive their own cars. So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles. When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip! So, not only do we have 13,000 retail auto trips to deal with we have many of them generating significant more GHG per trip! Planning needs to do a comprehensive analyses using credible data and a credible methodology so that the public knows the extent of the GHG generated. We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly. In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR. *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-10])*

***RESPONSE GHG-1: METHODOLOGY***

The text below addresses several issues raised by commenters: The comments question the analysis and impact conclusions of the greenhouse gas (GHG) section of the initial study (see EIR Appendix B). Comments state that the analysis of the proposed project failed to assess the significance of GHG impacts consistent with state and Bay Area Air Quality Management District (air district) guidelines. In particular, comments state that the GHG analysis is not adequate because it fails to show that the plans or regulations contain specific requirements that would result in the proposed project's reducing GHG emissions to a less than significant level. Comments posit that the EIR should have performed a quantitative assessment of emissions from the proposed project and project variant for this CEQA documentation. Comments also describe potential quantitative emissions estimates from transportation network companies (TNCs); quantitative emissions comparisons to a neighborhood alternative (also referred to as the LHIA Alternative), the proposed project, and the project variant; construction haul trip calculations; tree planting; types of trees planted; and embedded emissions from electric vehicle batteries. Comments also describe and calculate potential lifecycle GHG emissions associated with construction and materials; this issue is generally addressed in Response GHG-2: Accuracy of GHG Emissions Calculations, RTC pp. 5.J.39-5.J.40.

**GHG Approach**

As described below, the significance criteria and GHG methodology used in the initial study are consistent with approaches established by the San Francisco Planning Department to demonstrate compliance with San Francisco's qualified GHG reduction strategy (described below). As acknowledged by the air district,[23] the City's Strategy meets the criteria for a qualified GHG reduction strategy as described in the air district's CEQA Guidelines. This is the preferred approach under the air district CEQA guidelines[24] (CEQA Air Quality Guidelines) and supported in CEQA case law, including the California Supreme Court decision in *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204 (*CBD v. CDFW*) and the First Appellate District's decision in *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 150 (*Mission Bay Alliance*). Thus, contrary to the assertion in the comments, a quantitative analysis of the proposed project's or project variant's GHG emissions is not required under CEQA.

[23] San Francisco Planning Department, *Letter Regarding Draft GHG Reduction Strategy*, October 28, 2010, http://sfmea.sfplanning.org/GHG/BAAQMD_Letter_GHGStrategy_2010.pdf, accessed June 10, 2019.

[24] Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed July 25, 2019

The GHG impacts of the proposed project and project variant were both found to be less than significant. The GHG emissions significance thresholds are based on CEQA Guidelines Appendix G, Section VII. These thresholds state that the project would have a potentially significant impact related to GHG emissions if the project were to: "generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases." The analysis in the initial study is consistent with CEQA Guidelines sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions (see initial study p. 146). CEQA Guidelines section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project; a quantitative analysis is not mandated in the CEQA Guidelines. CEQA Guidelines section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases and describes the required contents of such a plan. This approach is in recognition of the fact that while no single project could generate enough GHG emissions to noticeably change the global average temperature, the combination of GHG emissions from past, present, and future projects around the world have contributed and will continue to contribute to global climate change and associated environmental impacts. Therefore, the impact analysis focuses on the project's contribution to cumulatively significant GHG emissions (see initial study pp. 147-148).

Accordingly, San Francisco has prepared its own Greenhouse Gas Reduction Strategy (described below), which the air district has reviewed and concluded that "Aggressive GHG reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."[25] San Francisco's Greenhouse Gas Reduction Strategy identifies actions the city is implementing to achieve cleaner energy, energy conservation, and alternative transportation and solid waste policies. For instance, the City has implemented mandatory requirements and incentives that have measurably reduced GHG emissions; these actions include, but are not limited to, increasing the energy efficiency of new and existing buildings, installation of solar panels on building roofs, implementation of green building strategies, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City's transportation fleet (including buses), and a mandatory recycling and composting ordinance. The Strategy identifies 42 specific regulations for new development that would reduce a project's GHG emissions. San Francisco's policies and programs have resulted in a reduction in GHG emissions to below 1990 levels, exceeding statewide AB 32 GHG reduction goals. Furthermore, updating the 2016 information on initial study p. 147, the city has exceeded its 2017 GHG reduction goal of reducing GHG emissions to 25 percent below 1990 levels by 2017 by reducing emissions by 36 percent over that

[25] Ibid.

timeframe despite a population increase of 22 percent.[26] Other existing regulations, such as those implemented through Assembly Bill 32, will continue to reduce a proposed project's contribution to climate change. In addition, San Francisco's local GHG reduction targets are consistent with the long-term GHG reduction goals of Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32, Senate Bill 32, and the 2017 Clean Air Plan (initial study p. 147).

The initial study's analysis for determining the significance of GHG impacts is based on finding consistency of the proposed project and project variant with San Francisco's qualified Greenhouse Gas Reduction Strategy. Because the City's local GHG reduction targets are more aggressive than those of the region or the state, consistency with the city's qualified Greenhouse Gas Reduction Strategy necessarily demonstrates consistency with the state's GHG regulations, the Governor's executive orders, and the Bay Area 2017 Clean Air Plan. If the proposed project or project variant is consistent with the approved Greenhouse Gas Reduction Strategy, it would also be consistent with the GHG reduction goals of Executive Order S-3-05, Executive Order B-30-15, Assembly Bill 32, Senate Bill 32, and the 2017 Clean Air Plan; would not conflict with these plans; and would therefore not exceed San Francisco's applicable GHG threshold of significance, then the proposed project's and project variant's impacts related to GHG emissions would be considered less than significant. As described in Impact C-GG-1 (initial study pp. 146-150), the project would be consistent with the City's Greenhouse Gas Reduction Strategy, as documented on the Greenhouse Gas Analysis: Compliance Checklist for the 3333 California Street Mixed-Use Project. This document is available in the project's files. Although the project would contribute to annual long term increases in GHGs as a result of increased vehicle trips (mobile sources), energy and water use, wastewater treatment, solid waste disposal, and temporary construction activities, the proposed project or its variant would be subject to and required to comply with many regulations adopted to reduce GHG emissions, as identified in the Greenhouse Gas Reduction Strategy. As described above, the strategy is effective, as evidenced by the continual reduction in GHGs in San Francisco.

The proposed project or project variant would comply with the following regulations or their equivalent that reduce transportation emissions: Commuter Benefits Program; Emergency Ride Home Program; transportation demand management programs; Transportation Sustainability Program; Jobs-Housing Linkage Program; Bicycle Parking requirements; and Fuel-Efficient Vehicle and Carpool Parking. Further, the project would be required to comply with energy efficiency and renewable energy requirements of the San Francisco Green Building Code; San Francisco Stormwater Management Ordinance; San Francisco Water Efficient Irrigation Ordinance; Residential Water Conservation Ordinance; Commercial Water Conservation Ordinance; and Residential Energy Conservation Ordinance (see initial study pp. 148-150). The proposed project's or its variant waste-related emissions would be reduced through compliance

[26] San Francisco Department of the Environment, *San Francisco's Carbon Footprint (2019),* April 2019, https://sfenvironment.org/carbon-footprint, accessed June 10, 2019.

with San Francisco's Recycling and Composting Ordinance, Construction and Demolition Debris Recovery Ordinance, Construction and Demolition Debris Recycling Requirements, and Green Building Code Requirements.

A comment asserts that the GHG impact analysis in the initial study inappropriately relied on the fact that San Francisco has met the state and regional 2020 GHG reduction targets citywide and recommends that the GHG analysis be performed for a longer time range. Contrary to this assertion, the GHG impact analysis evaluates whether the proposed project or project variant would be consistent with the City's GHG Reduction Strategy by documenting the specific requirements and regulations that would be applicable to the proposed project or project variant. The information that San Francisco has met the 2020 GHG reduction targets is provided in the initial study to show that the City's GHG Reduction Strategy is effective. The City (Department of the Environment) regularly evaluates the effectiveness of the GHG Reduction Strategy in order to measure the City's progress on meeting the statewide GHG emission reduction goals.

A comment asserts that the initial study erroneously used existing plans (presumed to mean the City's GHG Reduction Strategy) as the baseline against which potential project effects were analyzed. This assertion is incorrect. No baselines were used, or required, in the proposed project's or project variant's GHG impact analysis because a qualitative approach was used as discussed above.

Comments state that the proposed project's GHG emissions should be quantified and compared to a business as usual (BAU) scenario. The BAU scenario is not a required approach to analyzing the effects of GHG emissions, and in fact, use of such an approach was called into question in a 2015 California Supreme Court case, which considered the CEQA issue of determining the significance of GHG emissions in *CBD v. CDFW*. The court questioned a common CEQA approach to GHG analyses for development projects that compares project emissions to the reductions from BAU that would be needed statewide to reduce emissions to 1990 levels by 2020, as required by AB 32. The court determined that the percentage below BAU target developed by the AB 32 Scoping Plan is intended as a measure of the GHG reduction effort required by the state as a whole, and the Scoping Plan's BAU target cannot necessarily be applied to the impacts of a specific project in a specific location. The court stated that other approaches, such as the compliance-based analysis using a qualified GHG reduction strategy used in San Francisco, are acceptable. As stated in the court decision "Local governments thus bear the primary burden of evaluating a land use project's impact on greenhouse gas emissions. Some of this burden can be relieved by using geographically specific greenhouse gas emission reduction plans to provide a basis for the tiering or streamlining of project-level CEQA analysis."

A comment recommends that URBEMIS be used to quantify GHG emissions. URBEMIS is an outdated emissions model that is no longer supported or even available for download. It was used in the San Francisco 2004 and 2009 Housing Element EIR prepared in 2010. At this time for

projects that need to quantify GHG emissions, the BAAQMD currently recommends the use of the California Emissions Estimator Model (CalEEMod®). However, as discussed above, the EIR for the proposal at 3333 California Street was not required to quantify GHG emissions and relied on compliance with San Francisco's GHG Reduction Strategy.

A comment asserts that the San Francisco 2004 and 2009 Housing Element EIR requires that a quantitative analysis of indirect GHG emissions be prepared for this project. While the San Francisco 2004 and 2009 Housing Element EIR includes a detailed quantitative analysis of GHG emissions, it was published in July 2010, prior to preparation of San Francisco's Greenhouse Gas Reduction Strategy in November 2010. The Final EIR on the 2004 and 2009 Housing Element and subsequent Addendums include a statement that "implementation of the 2009 Housing Element would not conflict with Assembly Bill (AB) 32 or San Francisco's Strategies to Address Greenhouse Gas Emissions." That EIR, prepared for one of the elements of the San Francisco General Plan, includes a plan-level analysis, unlike the EIR for the 3333 California Street Mixed-Use Project that analyzes a development project. Therefore, the 2004 and 2009 Housing Element EIR is not an appropriate model or standard for the analysis of GHG impacts of the proposed project or project variant. The numeric GHG thresholds cited in the comment relate to a quantified analysis prepared for an application for certification as an Environmental Leadership Development Project as discussed below under "Assembly Bill 900 Approach," not to the approach used in the 3333 California Street Mixed-Use Project EIR, which uses a qualitative project-specific analysis based on San Francisco's GHG Reduction Strategy, consistent with the requirements of CEQA and the CEQA Guidelines.

**Assembly Bill 900 Approach**

Although not part of the draft EIR, some comments pertained to the quantitative GHG analysis that was performed for the Assembly Bill (AB) 900 process, where the project sponsor applied to the Governor for certification as an Environmental Leadership Development Project (ELDP). The following responses to those comments are provided for informational purposes.

As required by AB 900, CEQA section 21183(c), ELDPs must "result in [no] net additional emissions of greenhouse gases, including greenhouse gas emissions from employee transportation, as determined by the State Air Resources Board….". A summary of these calculations is as follows: Year-by-year emissions were quantified using a State-approved methodology for construction and operations for the baseline, project, and project variant. Emissions were quantified for sources including transportation, building energy use, water, solid waste, stationary sources, and area sources. Where emissions exceeded baseline (i.e., existing) emissions, the project sponsor committed to enforceable offset requirements to reduce net emissions to zero. This enforceable requirement is not a CEQA mitigation, but instead is a commitment by the project sponsor pursuant to the requirements of AB 900 to offset any emissions that would exceed existing condition emissions either with on-site measures such as

additional solar panels or through the purchase of qualified GHG credits. The California Air Resources Board (air resources board) reviewed and approved the proposed project's GHG analysis for its ELDP application in January 2019, and the Governor certified the project as an ELDP in June 2019.[27] This quantified GHG analysis was not prepared for the EIR and is not required in CEQA or the CEQA Guidelines, as explained above.

Comments assert potential inconsistencies with assumptions used in the construction energy and emissions quantification and that the comments imply that different assumptions should have been used in the AB 900 quantification of GHG emissions. In particular, they assert that the haul trucks may not be able to carry 16 cubic yards of material per trip. The amount of material per trip is a CalEEMod® default, from CalEEMod® Appendix A Section 4.5, which states "Haul trips are based on the amount of material that is demolished, imported or exported assuming a truck can handle 16 cubic yards of material." CalEEMod® is the accepted tool for quantifying emissions for land use developments in California, and certain default assumptions such as the quantity of material per haul trip cannot be edited by the model user. In addition, heavy-duty truck emission factors are used to quantify emissions and fuel use from these large trucks. If smaller trucks were used to haul materials for this project as one comment posits, the emissions per trip would be lower.

These comments question other metrics used in the energy analysis, including the estimate of fuel use per horsepower hour. The AB 900 quantification of GHG emissions for off-road construction equipment is based on Air Resources Board OFFROAD/CalEEMod emission factors, load factors, and construction hours for the equivalent equipment, as required, not on the entirely separate energy use calculations.

One comment questions whether idling and starting emissions associated with congestion have been factored into the VMT or emissions calculations. While a quantitative GHG emissions analysis was not required for the CEQA analysis in the EIR (as described further above), the mobile emission factors model used for the AB900 GHG emissions calculations includes starting, idling, and running emissions for aggregated speed bins[28] in San Francisco County (e.g., including congested conditions).

Documents supporting these calculations and the AB 900 application can be found in the project files. The air resources board determined that the project did not result in any net additional emissions and certified the project as compliant with CEQA section 21183(c). Comments

[27] The ELDP application, Governor's certification, and air resources board approval documents are available online on the California Office of Planning and Research website: http://opr.ca.gov/ceqa/california-jobs.html. Accessed July 26, 2019.

[28] Speed bins are groupings of vehicle speeds (e.g., 0-5 miles per hour, 5-10 mph, 10-15 mph, etc.) with assumptions of the total numbers of vehicles in each "bin" for each jurisdiction, used in the GHG quantification model when performing a project-level analysis that includes vehicle running exhaust emissions.

regarding the GHG calculations for the AB 900 analyses were made via the California Governor's Office of Planning and Research website for the application. The results of the GHG analysis conducted as part of the AB 900 process further support the findings of the GHG emissions impact analysis in the initial study, which used a CEQA-compliant qualified GHG Reduction Strategy approach.

**Other Potential Emissions Sources**

For the traffic safety issue related to trucks moving around the site, please see Response TR-7: Traffic Hazards on RTC p. 5.E.64.

Comments question other metrics used in the energy analysis, including the estimate of fuel use per horsepower hour. Because San Francisco uses a qualified GHG Reduction Strategy to qualitatively assess GHG impacts, as noted above, calculation of GHG emissions is not required for the CEQA analysis of GHG impacts. Therefore, the accuracy of the calculations presented in the comments has not been assessed. Minor corrections were made in EIR section 4.F, Initial Study Supplement, to the energy assessment prepared for the energy resources analysis in the initial study. See initial study Section E.16 and EIR section 4.F, Initial Study Supplement for further information.

In response to the discussion in the comments that transportation network companies are not accounted for in the GHG Reduction Strategy, the strategy includes a number of regulations for reducing emissions from the transportation sector including the transportation demand management ordinance and requirements to support alternative modes of transportation such as the provision of bicycle parking in new development. See discussion above on pp. 5.J.29-5.J.31 for more information regarding the City's approach to GHG analyses under a qualified GHG Reduction Strategy, EIR Section 4.C, pp. 4.C.74-4.C.78, for a discussion of the effectiveness of transportation demand management measures, and EIR Section 4.E, pp. 4.E.60-4.E.64 for a discussion of how the proposed project or project variant would conform to the 2017 Bay Area Clean Air Plan.

A comment also discusses the lifecycle emissions of electric cars and erroneously claims that electric vehicles fail to reduce GHG emissions. Although lifecycle emissions[29] do not have to be addressed under CEQA (see Response GHG-2), studies show that the lifecycle GHG emissions from electric cars are lower than the lifecycle emissions from internal combustion engine (ICE)

[29] Lifecycle emissions include the overall GHG emissions, including each stage of production, use, and disposal. For vehicles, this may include emissions from extracting and manufacturing parts and fuel, combustion emissions from driving (or indirect emissions from electricity supply for electric vehicles), and emissions from vehicle disposal. See US EPA, Lifecycle Analysis of Greenhouse Gas Emissions under the Renewable Fuel Standard, https://www.epa.gov/renewable-fuel-standard-program/lifecycle-analysis-greenhouse-gas-emissions-under-renewable-fuel, accessed June 10, 2019.

vehicles, particularly in states with low-carbon electricity grids such as California.[30] After accounting for the GHG emissions from raw material and production, lifecycle GHG emissions from electric vehicles can be up to 90 percent lower than equivalent ICE vehicles if the vehicles are charged with carbon-free electricity.[31]

Comments state that the alternative presented and submitted by the Laurel Heights Improvement Association of San Francisco (LHIA Alternative) would generate fewer GHG emissions than the project. In response to these comments, while there is limited information about the LHIA Alternative, its GHG emissions would be similar to those of Alternative C because the LHIA Alternative would have approximately the same building sizes as Alternative C, but slightly more residential units and less retail space. As discussed in EIR Chapter 6, Alternatives, for each of the alternatives, the GHG impacts would be less than significant based on compliance with the GHG Reduction Strategy because all of the alternatives would be required to comply with the same San Francisco regulations to reduce emissions as described above for the proposed project or project variant. This is the same as the determination of a less-than-significant impact for the proposed project and project variant. In response to assertions that construction GHG emissions would be reduced in the LHIA Alternative, although construction GHG emissions would be reduced, a quantitative assessment of construction GHG emissions has not been performed because a compliance-based analysis is used to determine whether a significant impact would occur (as described further above). See Response GHG-2 below regarding GHG emissions of the LHIA Alternative and AL-2: LHIA Alternative, on RTC pp. 5.H.54-5.H.69, for further discussion of the LHIA Alternative.

One comment states that 100 percent of all demolition debris from the existing office building must be recycled. This statement is incorrect. The San Francisco Environmental Code section 1402(a) requires that all construction and demolition debris must be processed at a facility registered with the San Francisco Department of Environment, but does not require that all construction and demolition debris generated from the partial demolition of the office building be recycled. The commenter conflates this requirement with the requirement in the Environmental Code section 1402(b) that a person conducting full demolition of an existing structure must divert, at a minimum, 65 percent of the construction demolition and debris from landfills, including materials source separated for reuse or recycling.

[30] E.g., Ellingsen, L.A-W. 2016. The size and range effect: lifecycle greenhouse gas emissions of electric vehicles. *Environ. Res. Lett.* 11 054010, https://iopscience.iop.org/article/10.1088/1748-9326/11/5/054010/pdf, accessed June 10, 2019. Huo, H., et al. 2015. Life-cycle assessment of greenhouse gas and air emissions of electric vehicles: A comparison between China and the U.S. *Atmospheric Environment* 108, https://www.sciencedirect.com/science/article/pii/S1352231015002022, accessed June 10, 2019.

[31] European Environmental Agency. 2018. Electric vehicles from life cycle and circular economy perspectives, Transport and Environmental Reporting Mechanism Report, https://www.eea.europa.eu/publications/electric-vehicles-from-life-cycle, accessed June 10, 2019.

Although the complete demolition of the annex building is cited as the trigger requiring a waste diversion plan, 100 percent of mixed construction demolition and debris would be transported by a registered hauler to a registered facility and processed to avoid landfilling construction and demolition debris, as required. As noted in the Greenhouse Gas Analysis: Compliance Checklist for 3333 California Street Mixed-Use Project (available in the project file), the project sponsor would adhere to the requirement to submit a waste diversion plan to the department of the environment that shows a minimum 75 percent diversion of all construction and demolition debris. The project sponsor would be required to process 100 percent of all construction and demolition debris including that from the partial demolition of the existing building at the center of the site. In addition, the project sponsor has committed to achieving Leadership in Energy and Environmental Design (LEED) for Neighborhood Development certification at a minimum Gold level for the full development, targeting platinum. Using sustainable building materials is a potential pathway toward achieving this certification.

The proposed project or its variant would also comply with the city's street tree planting requirements, limit refrigerant emissions, and would comply with the air district's wood-burning regulations. For details on measures the proposed project or project variant would use to comply with these requirements, see initial study Section A, Project Description, pp. 62-74. Therefore, on the basis of consistency with San Francisco's qualified Greenhouse Gas Reduction Strategy, the proposed project's or project variant's impacts on GHG emissions were determined to be less than significant.

The comments include a discussion of geotechnical boring locations, noting the presence of serpentinite and suggesting that serpentinite requires significantly more energy to remove than soils and clays. A comment also states that the information is incomplete. As noted in Response GEO-1 on p. 5.J.101, the preliminary geotechnical study has been used in the EIR analyses where appropriate, and a final geotechnical study will be prepared for each building site as part of the building permit process. Thus, the information in the preliminary geotechnical study will be refined where necessary prior to construction. The proposed project or project variant would comply with requirements in the city's GHG Reduction Strategy.

**Conclusion**

As described above, the GHG analysis for the project was conducted accurately and in accordance with local and statewide regulations. GHG impacts would be less than significant. The commenters do not raise any issues that require additional analyses.

## *COMMENT GHG-2: ACCURACY OF GREENHOUSE GAS EMISSIONS CALCULATIONS*

"The Developers Destructive Proposal is well named. Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG) and the many associated and far more destructive climate changing gases that accompany the primary CO2. The Community's Full Preservation Alternative will, by comparison, generate approx. 4,100 tons of GHG. The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.

The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required. The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required." *(Sal Ahani, Email, January 8, 2019 [I-Ahani-8])*

"**The Developers Destructive Proposal Generates Excessive Levels of Greenhouse Gases and Even More Destructive Climate Gases**.

Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG) and the many associated and far more destructive climate changing gases that accompany the primary Carbon Dioxide gas.

The Community's Full Preservation Alternative will, by comparison, generate approx. 4,100 tons of GHG.

The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.

The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required.

The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required.

**Could there be something they want to conceal from the public?**

Much like they concealed the Historic nature of 3333 for over 4 years?

Planning ignores the GHG generated by the construction materials despite the requirement to address "indirect" GHG. Planning requires the GHG generated in dispensing water to control dust, etc, to be calculated but not the GHG generated in manufacturing the materials used in the construction!

**Example: The GHG generated by the diesel fuel burned to deliver a load of concrete is calculated to the decimal point but the GHG generated by the concrete itself is ignored.**

What do the numbers show?

Assume a 30 mile round trip: the truck burns approx. 10 gallons of diesel and generates 225 lbs. of CO2. The concrete in the truck generated over 5,000 lbs. of CO2 during manufacture.

So, Planning recognizes the 225bs. but claims the 5,000lbs. is irrelevant **essentially ignoring 95% of the real GHG!**

And using this logic throughout the Initial Study Planning concludes that GHG are "Less than Significant" and therefore need not be addressed!

Folks, you can't make this stuff up as its beyond one's imagination.

The steel, glass, etc. are all treated similarly.

Apparently if you can't see the GHG actually being emitted into the air it doesn't actually exist so there is no need to consider it. So much for a responsible approach to Climate Change.

As noted above the Community Full Preservation Alternative generates less than one third the GHG, however Planning chooses to calculate them. **NOTE: Over 95% of the cement/concrete used in the Bay Area is totally manufactured in the Bay Area beginning with the mining process so these GHG are being injected into our air."** *(Richard Frisbie, Letter, January 7, 2019 [I-FrisbieR1-7] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-13])*

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"The Developers Destructive Proposal is well named. Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG) and the many associated and far more destructive climate changing gases that accompany the primary CO2.

The Community's Full Preservation Alternative will, by comparison, generate approx. 4,000 tons of GHG.

The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.

The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required. The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required." *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-6])*

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### *RESPONSE GHG-2: ACCURACY OF GREENHOUSE GAS EMISSIONS CALCULATIONS*

The comments state that the LHIA Alternative (referred to as Community Full Preservation Alternative in comments) would reduce GHG emissions compared to the proposed project. In addition, the comments provide a quantified estimate of GHG emissions for the LHIA Alternative and attempt to quantify embedded emissions from materials used in constructing new buildings and remodeling existing buildings for the proposed project, and indicate that the GHG analysis should have used this type of calculation for the quantification of GHG emissions for the proposed project and project variant.

As described in Response GHG-1, the methodology used to determine the GHG impact for the project and variant in the EIR is consistent with San Francisco's qualified Greenhouse Gas Reduction Strategy, (described in Response GHG-1), which the air district has reviewed and concluded that "Aggressive GHG reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a

model from which other communities can learn,"[32] and is an approach supported in the *CBD v. CDFW* and *Mission Bay Alliance* decisions cited in Response GHG-1. Further, the project has been certified by the Governor as an AB900 Environmental Leadership Development Project, based in part on a quantified analysis showing that there would be no net increase in GHG emissions (including offsets for construction emissions). This analysis has been reviewed and accepted by the air resources board.[33] Therefore, the analysis in the EIR and the quantification presented for the ELDP certification, are both accurate and appropriate.

If constructed, the LHIA Alternative would also be required to comply with applicable measures from the City's GHG reduction strategy. See also Response AL-2 on RTC pp. 5.H.54-5.H.69.

Although there is no regulatory definition for embedded or "lifecycle emissions," the term is generally used to refer to all emissions associated with the creation and existence of a project, including emissions from the manufacture and transportation of component materials such as cement, concrete, and steel, and even emissions from the manufacture of the machines required to produce those materials (see also Response GHG-1). However, since it is impossible to accurately estimate the entire chain of emissions associated with any given project, lifecycle analyses are speculative and limited in effectiveness (relative to assessing or reducing project-specific emissions for the CEQA analysis). The California Natural Resources Agency (CNRA) has stated that lifecycle analyses are not required under CEQA,[34] and in December 2018 the CNRA issued energy conservation guidelines for EIRs that make no reference to lifecycle emissions.[35] The CNRA has explained that: (1) there exists no standard regulatory definition for lifecycle emissions, and (2) even if a standard definition for 'lifecycle' existed, the term might be interpreted to refer to emissions "beyond those that could be considered 'indirect effects'" as defined by CEQA Guidelines, and therefore, beyond what an EIR is required to estimate and mitigate.[36]

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[32] San Francisco Planning Department, *Letter Regarding Draft GHG Reduction Strategy*, October 28, 2010, http://sfmea.sfplanning.org/GHG/BAAQMD_Letter_GHGStrategy_2010.pdf, accessed June 10, 2019.

[33] California Air Resources Board Executive Order G-18-101, Relating to Determination of No Net Additional Greenhouse Gas Emissions Under Public Resources Code section 21183, subdivision (c) for 3333 California Street Mixed-Use Project, January 30, 2019, and Attachment 1, CARB Staff Evaluation of AB900 Application for 3333 California Street Mixed-Use Project.

[34] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009, pp. 71-72, http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed March 27, 2019.

[35] State CEQA Guidelines, Appendix F. These new guidelines were part of amendments issued pursuant to SB97.

[36] California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009, p. 71, http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed March 27, 2019.

## *COMMENT GHG-3: GENERAL GREENHOUSE GAS CONCERNS*

"From the EIR itself and the environmental impact, it can't be stated enough that the number one threat to our planet right now is global warming, from a 30,000 foot big picture perspective. And if we don't build these 744 homes here, they are going to be built out in Modesto and Merced and Fresno, and those people are going to be commuting into the San Francisco Bay Area because this is a fantastic place to be, and that will end up putting more CO2 into the air. It will slowly, slowly, slowly continue to kill our planet, and that's what we're all trying to avoid." *(Cory Smith, San Francisco Housing Action Coalition, Draft EIR Hearing Transcript, p. 69, December 13, 2018 [O-SFHAC-4])*

"• The size and scope of the project will have major environmental impact in terms of the amount of GHG released." *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-6])*

"• The size and scope of the project will have major environmental impact in terms of the amount of GHG released." *(David Goldbrenner and Zhenya Fridlyand, Email, January 4, 2019 [I-Goldbrenner3-5])*

"Recent studies and peer-reviewed publications state that certain mafic and ultramafic rocks, like serpentinite and peridotite formations would sequester CO2 via magnesium (Mg) oxides and silicates. Air quality with increased pollution should be one of the highest priorities for the residents of the city. The property may contain certain geologic formations that sequester carbon in the Franciscan type band formation that runs from the NW to the SE of the city. The findings of such geologic formations would be a rare chance for scientists to study this peculiar formation in a large quantity as it exists in the city vs. elsewhere. The ground under the site may well be a jewel in sequestering carbon in considerable quantity. On the "Pre-cautionary Principle," perhaps some geologists should study the site as it may well prove to be a natural carbon-sequestration supersite; and rather than do more harm than good to the environment, perhaps this should be studied well in advance of construction to sort out exactly what rock formations exist under all parts of the site and in what quantities. This would be a great educational discovery to be shared with the community. The DEIR does not state such rocks are present on this property but parcels in this area have these rocks.

Also, the sand in this area may already contain this ultramafic soil that might be useful for propagating plants that thrive on it rather than be dumped into landfill.

Links to articles on geologic formations and their carbon-sequestration potentials:
https://www.osti.gov/biblio/900485 (This is from the federal ***Department of Energy***.)
https://www.nps.gov/goga/learn/education/geology-resources.htm (This is from the ***National Park Service.***)" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-66])*

"The original trees are large and are the workhorses for carbon sequestration and GHG remediation. When large trees are cut down, they release the carbon back into the environment. The smaller tree replacements, though in more quantity than the existing count of trees, would not be sufficient to provide an equivalent environmental benefit in re carbon or GHG sequestration. Smaller trees also do not turn into the lush, mature park-like environment of this site overnight. It would be good to retain and enhance the health of the large Monterey Cypress that is a remnant from the days of the Laurel Hill Cemetery. Different species of trees sequester GHGs differently.

The large workhorses do more carbon sequestration than a bunch of smaller trees. The DEIR goes not state what species will be planted but perhaps those that sequester more GHGs can be considered. The Presidio of San Francisco is planting clones of the largest trees from California – the redwoods. They are the giant workhorses to combat climate change. The project sponsors and the city would be sending the wrong message to its inhabitants about the value of such large trees if we keep chopping them down. Chopping down large trees also releases all the carbon back into the environment to pollute. What analyses has been done to calculate the carbon that will be released from those trees planned to be removed? *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-70])*

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"Finally, anyone concerned about eliminating climate change should pay special attention to the greenhouse gases that will be released by the two solutions. The developer's plan generates three times that of the community alternative. Thank you." *(Adam McDonough, Draft EIR Hearing Transcript, pp. 23-24, December 13, 2018 [I-McDonough1-4])*

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***RESPONSE GHG-3: GENERAL GREENHOUSE GAS CONCERNS***

One comment notes that if the housing proposed by the project is not built in San Francisco, then it may be built farther away from Bay Area jobs resulting in longer commutes and higher GHG emissions. The comment further states that this would contribute to global warming. Other comments note general concerns about the GHG emissions from the proposed project due to its size and scale; however, they do not provide a specific issue to respond to.

One comment describes the carbon sequestration potential of certain geologic formations. While rocks can sequester carbon, geologic sequestration takes place on geologic timescales (e.g., millions of years) and does not relate to the impacts of a proposed mixed-use housing development project with a likely life span much lower than those timescales.

Contrary to the assertion in one comment, the EIR does discuss the presence of serpentinite on the project site in Chapter 2, Project Description (p. 2.98) and in the initial study (EIR Appendix B) in Section E.13, Geology and Soils, on pp. 206 and 213, and in Section E.15, Hazards and Hazardous Materials, on p. 235.

Another comment describes the potential carbon sequestration and releases from planting and removing trees. As described in Response GHG-1, the proposed project or its variant would comply with all San Francisco tree- and landscaping-related ordinances and would result in a net increase in the number of trees on the project site and in the surrounding sidewalks. The Intergovernmental Panel on Climate Change (IPCC), a large scientific expert body on climate change, notes that when trees and vegetation reach maturity (aka, are "full grown"), there will be no further net carbon sequestration (i.e., the carbon released from dead biomass would be balanced with carbon sequestration from the growing biomass). As stated by the IPCC, "the accumulation of carbon in biomass slows with age, and thus for trees greater than 20 years of age,

increases in biomass carbon are assumed [to be] offset by losses from pruning and mortality."[37] Therefore, planting new trees on the project site would increase carbon sequestration compared to existing conditions until the new trees reached maturity. In addition, cutting down a tree does not immediately "release" its carbon as stated in the comment; rather, that carbon would remain sequestered from the atmosphere unless the tree was burned or decomposed.

The comments do not present any evidence that the analysis of GHG emissions provided in the initial study (EIR Appendix B) is inaccurate or that significant impacts are not identified.

## WIND AND SHADOW

The comments in this subsection relate to the topics of Wind and Shadow, evaluated in initial study Section E.8. The comments are further grouped according to the following wind- and shadow-related issues that the comments raise:

- WS-1, Increased Wind
- WS-2, Shadow

A corresponding response follows each grouping of comments.

### *COMMENT WS-1: INCREASED WIND*

"In re *__WINDS__* (DEIR Page 1.9 <Pages 151-162 in Topic E.8 in Initial Study; EIR Appendix B)…The wind report by RWDI (Rowan, Williams, Davies & Irwin, Inc., 600 Southgate Drive, Guelph, ON NIG 4P6, Canada) contains only general statements about how winds along Euclid and California may be such that a pedestrian would be "chilled" or that the winds would be "noticeable" but no specific speeds noted for any of the immediately surrounding or "nearby streets."

Page 4.E.2: "Wind measurements recorded on the San Francisco mainland indicate a prevailing wind direction from the west and an average annual wind speed of 10.1 miles per hour.3" (Footnote #3: Western Regional Climate Center, website query, Prevailing Wind Direction and Average Monthly Wind Speed (2001-2011), https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_dir_avg and https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_speed_avg.2001-2011, accessed May 25, 2018.)

While the "average" wind speed of 10.1 miles is quoted for the prevailing wind on the "mainland," when buildings are erected, they channel the wind through openings between them in all directions.

In fact, in RWDI's analysis report, it states:

[37] Intergovernmental Panel on Climate Change (IPCC), "IPCC Good Practice Guidance for Land Use, Land-Use Change and Forestry", Appendix 3a.4, p. 3.298, 2003, http://www.ipcc-nggip.iges.or.jp/public/gpglulucf/gpglulucf_files/Chp3/App_3a4_Settlements.pdf, accessed March 27, 2019.

> "Winds can also accelerate between two closely spaced buildings and through a passage underneath a building or bridge. If these building/wind combinations occur for prevailing wind directions, there is a greater potential for increased winds."

Also, when the wind is blocked by a large plane that blocks the wind from going east-west, the air ekes outward onto the avenues running north-south. Further wind studies may be necessary. Just historically, this site was given up as a cemetery not only because of the developers in the 1940s and 1950s wanted to build on it but also because the wind was so fierce that the sand was blowing away and the underlying lids to the caskets got blown open – an unpleasant sight.

In addition, the speed of the wind on balconies on the buildings, the street level – public areas – should not be made so that people have a comfortable experience. I believe there is a speed that is generally acceptable as comfortable and that could be around 17 mph. Where is the data to show that the winds will be at "LESS THAN SIGNIFICANT" ("LTS") when the Initial Study and the DEIR does not have any data to back this up?

The consequence of categorizing the WIND IMPACT at "LTS" as stated in the Planning Department Memo that prefaces the DEIR Document, would be that any recommendations under "LTS" categories do not have to have measures that are actionable to remedy unlike "S" (Significant) level impacts. Thus, having the wind portion with no data to back up the claim for potential damaging effects to the neighborhood should be further studied with data for all the "nearby streets" during each phase and at the completion of all phases for the project and any variants. Inclusion of one statement about the wind conditions with reference only to a *citywide* average to say that this and any other project has no wind impact is just a guess without data. One should try to visit this site where historically it has been one of the windiest parts of the city next to Geary and Masonic. If people have a hard time standing in fair weather, this may be unsafe for the pedestrians during inclement weather. Try standing around this site from 3PM on while the "citywide" average wind speed is 10MPH. Again, this is near "regionalization" of a metric that should be local for true impact analysis.

Page 6.57 "Wind":

The statements that since a building is "upwind north" or how wind in certain areas will be "somewhat reduced" does not give specific data on wind speeds. These general statements are not backed by scientific measurements and have no modeling of any sort in the DEIR. Yet, with no scientific data to back up any of the generalized wind statements, the DEIR states that the "Wind" impact category is "LESS THAN SIGNIFICANT" ("LTS"). The consultant's (RDWI's) report also has no scientific data measurements provided) so that this part of the DEIR is not only INCOMPLETE but flawed and the conclusion of the wind impact as being "LTS" INACCURATE. Please provide data for wind analysis. Please provide mitigation measures for the areas where, per RDWI's report, the pedestrians will be "chilled" or have the winds be "noticeable" and include the specific MPH ratings for all streets adjacent and the other nearby streets within at least 1/8-mile of the site. If you had the specific scientific data from when RWDI performed the wind report please provide; also provide for current winter season wind speeds.

The wind issue is important also due to the Child Care Facility. When the children are out on the play area the wind speeds and circulation may make the area unpleasant to take part in activities. It is not only the public areas but also on the site grounds where the children who will be playing.

A November 27, 2018 *Chronicle* article talks about the sustained 40-50MPH winds from the ocean. Once the westward winds hit the hills of Laurel Heights on the upslope of Jordan Park to its west, they pick up speed:

***"Wind gusts over 60 mph forecast for San Francisco Bay Area"***

<picture deleted>

"People check out the Golden Gate Bridge during a storm on Monday, Feb. 20, 2017, in San Francisco, Calif. The National Weather Service announced flood, snow and wind advisories throughout the upper half of California. Photo: Santiago Mejia, **The Chronicle**

After a storm drizzling rain over the San Francisco Bay Area Tuesday moves out of the region, a second system is forecast to sweep in Wednesday night, delivering more rain and breezy conditions. The winds are expected to kick up late Wednesday and will gradually steer more west to northwest into Thursday.

The National Weather Service issued an advisory warning sustained winds could blow between 40 and 50 mph and isolated gusts could reach in excess of 60 mph.

> "These west to northwest winds have the potential to be locally strong and damaging, particularly along the coast on Thursday afternoon and evening," the NWS warns."

What is the San Francisco's wind hazard criterion set at today? Last I heard, it was 26MPH. As Planning Code Sec. 148 for wind speed in certain SUDs (Special Use Districts) do not currently apply to this parcel, given that a SUD is being proposed, perhaps the wind criteria needs to be introduced as being applicable to this site. As taller and more buildings get established nearby, this Code Section 148 may need to be made applicable prior to the establishment of this SUD which is being sought by the developer.

People in public seating areas and in areas where they may frequent shops along California Street would not necessarily be pleased to encounter uncomfortable wind speeds whether sustained or as gusts. In order to minimize the unpleasantry of "uncomfortable" wind speeds there might be a similar adoption of comfortable wind scenarios for the site as is in the CPMC Long-range Development Plan EIR, Case No. 2005.0555E, Page 4.9-15, e.g., wherein several SUDs are mentioned for having Planning Code Sections applicable (e.g. C-3 Downtown Commercial Districts, Van Ness Avenue SUD <Sec. 243(c)(9)>, Folsom-Main Residential/Commercial SUD <Sec. 249.1>, and Downtown Residential District <Sec. 825>). Planning Code Section 148 allows for "comfort levels" such that the wind speeds do not exceed 7MPH for "public seating areas," and 11MPH for "substantial pedestrian use." Would this be something to entertain for the 3333 California site – potential SUD?

The project area is very windy not just **sustained wind** but also **gusts** due to the ocean breezes rising up slope as the wind travels eastward from the ocean. Winds should not be so fierce as to create a pedestrian to not be able to walk comfortably on California Street and Euclid Avenue. The DEIR does not have a comprehensive data in the main DEIR nor in the Appendices for the wind measurements on the streets surrounding the site with current conditions at different times of the year such as summer, winter, spring, autumn. Wind speeds per second increase considerably during the stormy season and people may not be able to stand erect without difficulty, especially for the elderly and disabled and children in the area.

When will the data for the above be available for the public?"*(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-78])*

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"Summary of several concerns raised by nearby residents and citizens of San Francisco:…13. Wind and shadow impacts on public streets and sidewalks and on existing private open space and recreational facilities" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-14])*

***RESPONSE WS-1: INCREASED WIND***

Comments express concern with the characterization of the existing wind environment and the effect that phased new construction would have on wind speeds on and near the 3333 California Street project site, especially along California Street and Euclid Avenue. Comments express concern with the lack of wind speed measurements and the qualitative approach to the wind analysis. Comments request that the proposed special use district include language similar to that in Planning Code section 148 for Downtown (C-3) districts as well as certain special use districts which include similar wind-protective provisions. Comments express reservation with the finding of a less-than-significant wind impact without quantitative data to support the conclusion. Comments also request that mitigation measures be implemented to address winds that would "chill" or be "noticeable" to pedestrians.

Existing conditions on and adjacent to the project site are discussed on initial study pp. 152-153, and the impact assessment is provided on initial study pp. 153-156. The prevailing wind directions on the project site are west and northwest winds, with windier conditions in the summer and spring and in the mid- to late afternoon. Projects are not required to implement measures to improve existing wind conditions under CEQA.

The effects of the proposed project or project variant on ground-level public areas are summarized in the initial study based on RWDI's screening-level wind analysis, which was directed by planning department staff. RWDI is a qualified wind consultant, and the wind analysis they conducted was scoped and reviewed by planning department staff. Based on the evidence, analysis, and conclusions presented in the RWDI report, the planning department determined that quantification of wind speeds was not necessary to understand the wind effects of the project or variant. Thus, existing and future wind speed measurements on and around the project site will not be provided as requested. The qualitative approach provides a screening-level estimation of potential wind impacts on ground-level public areas. Screening-level estimations are an acceptable approach in determining the significance of wind impacts in areas of the city not specifically identified in the planning code as areas of concerns, e.g., C-3 District, or where the proposed development is less than 80 feet tall. Other factors include the topography, degree of change to a site, the proposed orientation of buildings in relation to prevailing wind conditions, and the differential in height of new structures with existing building heights.

The screening-level wind analysis was based on the RWDI wind experts' review of the long-term meteorological data for the San Francisco area; review of project design drawings and information; extensive experience with wind-tunnel studies for buildings in San Francisco; and engineering judgment, experience, and expert knowledge of wind flows around buildings. RWDI

staff include certified meteorological consultants with years of experience working in San Francisco preparing both screening-level wind analyses and detailed wind tunnel studies.[38]

As discussed on initial study pp. 153-156, the proposed buildings would need to be tall enough (typically 80 feet or more) to have the potential to adversely alter ground-level wind currents in public areas for either pedestrian comfort or wind hazard conditions. As described in the initial study, the height and shape of the proposed new buildings on the site perimeter along California Street, Masonic Avenue, and Laurel Street would not be substantially different than the building heights in the surrounding area, and their orientation with respect to prevailing wind conditions would not pose any unusual concerns related to wind deflection and acceleration of ground-level wind currents. Increased height as a result of the two- to three-story vertical additions to the Center A and B buildings (80 and 92 feet) at the center of the site would have a limited effect on wind conditions in public areas or sidewalks at the perimeter of the site because of the intervening distance to the public sidewalks on the windward sides of the buildings (approximately 210 feet from the California Street sidewalk and 190 feet from the Laurel Street sidewalk).

As stated in Section E.8 of the initial study (p. 151) under "Approach to Screening-Level Wind Analysis," proposed projects in Downtown (C-3) districts are required to comply with the provisions of Planning Code section 148 related to comfort criteria as part of the entitlement process, which regulates the speed of ground-level wind currents created by the construction of new buildings or additions to existing buildings. Other districts within the city are also subject to wind analyses as part of the entitlement process. For example, projects located in the Van Ness special use district would be subject to equivalent standards, as set forth in Planning Code section 243(c)(15). The proposed project is not in a C-3 District or other special use district that requires wind analyses for the purpose of entitlement; the project site is in a Residential-Mixed, Low Density (RM-1) District. For this reason, the proposed project and its variant are not subject to the provisions of Planning Code section 148 or other planning code sections related to the regulation of ground-level wind currents for the purpose of project entitlements. Typically, wind tunnel testing is required for high-rise buildings over 80 feet in C-3 districts and other special use districts in order to demonstrate that a project will comply with the ground-level pedestrian comfort criteria (equivalent[39] wind speeds of 7 miles per hour in public seating areas and 11 miles per hour in areas of substantial pedestrian use) and the wind hazard criterion (an equivalent wind speed of 26 miles per hour measured and averaged over a single hour of the year) established in Planning Code section 148.

The planning department uses the wind hazard criterion identified in section 148 as the CEQA significance threshold for potentially significant wind impacts, while the wind comfort criteria are

[38] RWDI's report is available for review at the planning department offices as part of Case File No. 2015-014028ENV. The administrative record is also online at https://www.ab900record.com/3333cal.

[39] The Planning Code defines the term "equivalent wind speed" to mean an hourly mean wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians.

separately assessed as part of the review for entitlements. The wind comfort levels are sometimes provided for informational purposes in the environmental review process. For this reason, although the project site is not located in a C-3 downtown district, the wind hazard criterion in Planning Code section 148 was used in the wind analysis as a CEQA significance threshold.

Based on the pedestrian-level wind analysis prepared by RWDI and summarized in the initial study, it was concluded that the development of the proposed project or project variant would result in less-than-significant wind impacts. The proposed buildings on the perimeter of the site along California Street, Masonic Avenue, and Laurel Street and the vertical additions to the adaptively reused building at the center of the site would alter wind conditions along the adjacent sidewalks and be visually noticeable because the new buildings would occupy previously open areas. However, because the proposed new buildings would generally conform to the prevailing building heights in the immediate vicinity and would be shaped and oriented to minimize the downwashing and subsequent acceleration of deflected winds to the adjacent public sidewalks, the proposed project or project variant would not exceed the City's wind hazard criterion at any time throughout the year. Other streets along the perimeter of the site were considered, but because of the direction of the prevailing winds (from the west and northwest) these streets were not the focus of the analysis. Thus, the proposed development would not substantially alter the existing wind environment in public areas adjacent to or near the project site, resulting in a less-than-significant wind impact. As a result, mitigation measures would not be required under CEQA. The comments did not provide substantial evidence that would change the determination that the proposed project or project variant would have a less-than-significant wind impact.

### *COMMENT WS-2: SHADOW*

"The requested zoning between California and Laurel to 45 feet instead of the currently permitted 40 feet is an unacceptable denial of light and air and will create shading on the residents who share our perspective." *(Joe Catalano, California Street Homeowners Group, Draft EIR Hearing Transcript, p. 62, December 13, 2018 [O-CSHG2-6])*

"**5. The Project Could Have Significant Shadow Impacts on Existing Open Spaces that Have Been Used by the Public for Recreational Purposes, on Sidewalks on the East Side of Laurel Street, and on Publicly Accessible Open Space Proposed by the Project.**

The City's Shadow Analysis Procedures and Scope Requirements state that the proposed project is subject to review under CEQA if it "would potentially cast new shadow on a park or open space such that the use and enjoyment of that park or open space could be adversely affected," and such procedures describe potentially affected properties as including "parks, publicly-accessible open spaces, and community gardens." (Ex. Q) Also, the 2017 Notice of Preparation of an EIR for a mixed use project states that "the topic of shadow will include an evaluation of the potential for the proposed project to result in shadow impacts on nearby sidewalks." (Ex. P, Initial Study for 1629 Market Street Project, p. 19)

The Initial Study states that the "threshold for determining the significance of shadow impacts under CEQA is whether the proposed project or project variant would create new shadow in a manner that substantially affects the use and enjoyment of outdoor recreational facilities or other public areas." IS p. 156.

The San Francisco Planning Department Shadow Analysis Procedures and Scope Requirements provide that a shadow analysis would be required:

If the proposed project is subject to review under the California Environmental quality Act (CEQA) and would potentially cast new shadow on a park or open space such that the use of enjoyment of that park or open space could be adversely affected." Ex. Q, p. 1.

Those procedures further provide that:

"Potentially Affected Properties. Potentially affected properties including: parks, publicly-accessible open spaces, and community gardens identified in the graphical depictions should be listed and described. The description of these properties should include the physical features and uses of the affected property, including but not limited to: topography, vegetation, structures, activities, and programming. Each identified use should be characterized as 'active' or passive.' Aerial photographs should be included, along with other supporting photos or graphics. The programming for each property should be verified with the overseeing entity, such as the Port of San Francisco, the Recreation and Parks Department, etc. Any planned improvements should also be noted." Ex. Q, p. 2.

The Initial Study failed to analyze the significance of the shadow impact upon the entire open green spaces used by the public for recreational purposes on the project site.

The Initial Study inaccurately stated that "UCSF currently grants public access" to two existing open green spaces at the perimeter of the project site. In fact, these areas have been used by the public without the permission of the property owner for many years. At the time of issuance of the Initial Study, there were no signs posted indicating that use of the open space was under the permission of the property owner. As explained in the attached letter from attorney Fitzgerald, the public has acquired permanent recreational rights to the open space at the site; the rights were obtained by implied dedication prior to the enactment of Cal. Civil Code section 1009 in 1972. Ex. R) The public has also "acquired a prescriptive easement over the recreational open space. The recreational use has been continuous, uninterrupted for decades, open and notorious and hostile (in this context, hostile means without permission.) Every day, individuals and their dogs use the green space along Laurel, Euclid and along the back of the Site at Presidio. Individuals ignore the brick wall along Laurel and regularly use the green space behind the wall as a park for people and for their dogs. The use of the Site has not been permissive." *Ibid.*

The Initial Study failed to analyze the impact of shadows on the entire open green space along Laurel, and excluded the open green space along Presidio, because the project proponent seeks permission to build upon, or alter, some of those areas. This is not an of-right project. As explained by the City's Preliminary Project Assessment, the proposed project fails to comply with numerous requirements of the Planning Code, and rezonings and discretionary approvals would be required to be granted by the Planning Commission and Board of Supervisors. Under applicable discretionary review procedures, the Planning Commission could scale the project back to avoid construction on, or alteration of, the currently publicly-accessible open spaces, and/or make other modifications.

Under Public Resources Code section 21068, a "Significant effect on the environment" means a substantial, or potentially substantial, adverse change in the environment.

Under the CEQA Guidelines, 14 Cal. Code of Regulations section 15382, "Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." To assess the changes to the environment that will result from the project, the agency treats existing conditions as the environmental baseline against which the projects changes to the environment are measured. 14 Cal. Code of Regulations section 15152.

As established by the nomination of the property to the National Register of Historic Places, the "landscape design connects the outdoors with the indoors both functionally and conceptually." Ex. E, Nomination, p. 5. Among the character defining features of this historically significant resource, the nomination listed "Vegetation features that helps to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West parking Lots, (2) the lawns on the west, south and east sides of the property, and (3) the planted banks along laurel and masonic streets." The subject lawn areas and the Terrace are currently used as publicly-accessible open spaces, and it is possible that the approving agencies will retain them as open spaces. These areas would be significantly shaded by the proposed project, with the 2-3 floors proposed to be added to the top of the building. Thus, significantly shading these areas should be treated as a potentially significant impact on the environment in the EIR.

However, the Initial Study failed to analyze the significance of the shadow impact on the entire open green areas and merely analyzed the potential impact upon the portions of these areas that the project proponent proposes not to build upon. However, Figure 37, Extent of Net New Project Shadow Throughout the Day and Year, shows the entire open green spaces along Laurel Street and Presidio Avenue as in the "frequent shadow" zone. IS p. 158. The area in which the Terrace is located would also be frequently shadowed, and the project as proposed would remove the Terrace. The Initial Study shows that there would be a significant adverse shadow impact upon the areas along Laurel Street, Presidio Avenue and the Terrace which the project proponent proposes to build upon or alter, and the Initial Study failed to analyze the potentially significant impact of shadows on these publicly-accessible areas and failed to make a determination that impacts on these areas would not be significant. Thus, the EIR should analyze the potential shadow impacts on these areas as potentially significant impacts under CEQA. Approving authorities may retain some or all of these open spaces. The Initial Study failed to use the correct significance standard, which required it to analyze whether impacts on these areas could be "potentially significant." The Initial Study's exclusion of these areas because they would possibly be within part of the built project was erroneous. The Initial Study acknowledges that the decision-makers could modify the project to continue the usability of these spaces. IS p. 160.

Since the evidence shows that new shadows would be frequent on the publicly-accessible open spaces, the EIR should evaluate these shadows as a potentially significant impact on the environment. As acknowledged in the Initial Study for 1629 Market Street Project, the "designation of topics as 'Potentially Significant' in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant." Ex. P, p. 4.

Similarly, the Initial Study shows that the proposed project would cause frequent shadows on the sidewalks on the east side of Laurel Street. The Initial Study failed to specifically determine that the proposed project would not create new shadow on the sidewalks on the east side of Laurel Street in a manner that substantially affects public areas. Instead, it determined that impact would

not be significant by using a lesser standard, stating that "[o]verall, the proposed project or project variant would not increase the amount of shadow on the sidewalks above levels that are common and generally expected in developed urban environments." IS p. 160. Since the evidence shows that the new shadow would be frequent on sidewalks on the east side of Laurel Street, the EIR must evaluate this shadow as a potentially significant impact on the environment and make a determination of whether the impact would be significant under the correct significance standard.

As acknowledged in the Initial Study for 1629 Market Street Project, to determine the impact insignificant, a determination must be made under CEQA that the proposed project's net new shadows would not be anticipated to substantially affect the use of "any publicly-accessible areas, including nearby streets and sidewalks." Ex. P, p. 66.

In addition, the Initial Study shows that the proposed project would cause new shadows on the open space proposed to be used in the project, which would be open to the public. "The Initial Study admits that "the network of proposed new common open spaces, walkways, and plazas within the project site" "would be shaded mostly by proposed new buildings for much of the day and year." IS p. 161. Thus, the EIR must analyze shadow impacts on these publicly-accessible areas as significant impacts, but the IS improperly excluded them from analysis as significant impacts. Many of these areas are not now significantly shaded as part of the existing environment, but would be a result of the proposed project.

The EIR should follow the City's shadow analysis procedures and identify and describe all the potentially newly shadowed areas discussed above in graphic depictions together with aerial photographs and provide a quantitative analysis of the impacts that would result from the project. Ex. Q, p. 4.

In addition, it is inaccurate to state that under the proposed project, the Euclid Green "would be developed as common open space that would be open to the public." IS p. 160. That green open space is currently used as recreational open space by the public, as I have observed.

It should be noted that shadows are physical impacts, not aesthetic impacts exempt from CEQA in certain transit-served areas. The EIR on the Housing Element of the San Francisco General Plan clearly treats shadows as a physical effect along with wind impacts and analyzes aesthetic impacts in a separate section. Ex. C -Final EIR 2004 and 2009 Housing Element p. V.J-3, V.C-1. As further explained in that EIR:

> "Shadow is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed 'shadow sensitive.' (Ex. C -Final EIR 2004 and 2009 Housing Element p. V.J-3)

Thus, shadows are a physical impact and are not an aesthetic impact." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-8])*

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"I am concerned about…the increased height which will cut out sunlight." *(Sharon Esker, Email, January 5, 2019 [I-Esker-9])*

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"Summary of several concerns raised by nearby residents and citizens of San Francisco:…13. Wind and shadow impacts on public streets and sidewalks and on existing private open space and recreational facilities" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-14])*

"The proposed higher stories with heights to 86 feet or more will create shadows to neighboring residents and are out of proportion with the surrounding area." *(Ann Prato, Email, January 7, 2019 [I-Prato-3])*

"That [40-foot height limit/neighborhood full preservation alternative] avoids significant shadowing at sunrise and sunset on the east and the west sides of the site because the existing residences, apartments, neighborhoods, houses, will be affected by shadowing at the extreme ends and beginning of the day." *(Kelly Roberson, Draft EIR Hearing Transcript, pp. 49-50, December 13, 2018 [I-Roberson1-4])*

***RESPONSE WS-2: SHADOW***

Comments assert that the shadow analysis prepared for the proposed project and project variant did not adequately analyze shadow impacts pursuant to CEQA and the San Francisco Planning Department's shadow analysis procedures. Specifically, the comment asserts that the neighborhood residents' use of the on-site open spaces along Laurel Street and Presidio Avenue as well as the courtyard on the southeast corner of the existing building, without permission, has created "permanent recreational rights to the open space at the site"; and further asserts that these spaces must be analyzed as outdoor recreation facilities or other public areas for purposes of the CEQA shadow analysis. Comments also assert that the shadow analysis did not analyze shadow impacts to sidewalks. Comments state that the requested height increase to the allowed building heights along California Street and at the center of the site will create shadow and degrade the quality of the environment as it relates to air and light for residents on the north side of California Street.

No evidence was provided that would alter the approach to, or the outcome of, the shadow analysis which determined that the proposed project or project variant would not create new shadow that substantially affects existing outdoor facilities or other public areas and the impact would be less than significant. Thus, consideration of alternatives that would reduce shadow impacts is not required.

The shadow analysis presented in the initial study (see Section E.8 on initial study pp. 156-162) is based on the Shadow Analysis Report for the Proposed 3333 California Street Mixed-Use Project, which was conducted in accordance with the planning department's shadow analysis procedures. Consistent with the department's shadow analysis guidance, the department found that a qualitative analysis was appropriate to determine the shadow impacts of the proposed project or its variant. The threshold used in the shadow analysis is not whether the proposed project or project variant would create new shadow on sidewalks or public areas. The threshold for determining the significance of shadow impacts under CEQA used in the shadow analysis is whether the proposed project or project variant would create new shadow in a manner that

substantially affects the use and enjoyment of outdoor recreation facilities or other public areas. The shadow analysis evaluates the project shadow effects on outdoor recreational facilities and public areas that are under the control of a public agency such as the Recreation and Park Commission or are deemed designated publicly accessible, private open spaces. The findings in the initial study on p. 160 that overall, the proposed project or project variant would not increase the amount of shadow on the sidewalks above levels that are common and generally expected in developed urban environments, does not signify that a lesser threshold was applied.

The proposed new buildings (45 feet tall along California Street [67 feet tall for the Walnut Building under the variant] and vertical additions to the Center A and B buildings (80 and 92 feet, respectively) were modeled to determine the shadow effects on outdoor recreation facilities and other public areas including sidewalks. Thus, the shadow analysis addresses the effects of shading on public sidewalks including those on the north and south sides of California Street and those on Laurel Street. See Figure 37: Extent of Net New Project Shadow throughout the Day and Year (initial study p. 158) for an illustration of the shading that would occur along California Street between Laurel Street and Presidio Avenue. The shading of the public sidewalks adjacent to the project site would be transitory, would not reduce the usability of the sidewalks, and would be typical of that found in a developed urban setting.

As stated on initial study pp. 160-161, the analysis includes information on the existing and proposed on-site open spaces and the privately owned, accessible open spaces but:

> "…[T]hese spaces are not formally designated parks or open spaces although they are used informally as open space by the neighborhood. As open spaces within the proposed project or project variant, they are not considered environmental resources that are part of the existing environment for the purposes of CEQA. As such, no shadow analysis is required for the purpose of CEQA, but a description of how conditions within these spaces would change with the proposed project or project variant is provided for informational purposes."

The shadow analysis concluded that the proposed project or project variant would not substantially alter shadows on the proposed Euclid Green and the proposed Presidio Overlook and Pine Street Steps and Plaza compared to existing conditions. Other open spaces and pedestrian pathways developed as part of the proposed project or project variant would be frequently shaded due to the construction of new buildings on the project site and the vertical additions to the Center A and B buildings. As further stated with respect to the evaluation of shadow effects on proposed on-site open spaces, "Decision-makers may consider the usability and comfort of these spaces independent of the environmental review process under CEQA, as part of the decision to approve, modify, or disapprove the proposed project or project variant."

For a response to comments regarding the prescriptive easement and right to recreational use of on-site open spaces, see Response PD-5: Permanent Right of Recreational Use/Prescriptive Easement, on RTC pp. 5.B.31-5.B.32.

## RECREATION

The comment in this subsection relates to the topic of Recreation evaluated in initial study Section E.9. A corresponding response follows the comment.

### *COMMENT RE-1: RECREATION*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:…14. Lack of recreational open space in the neighborhood and how the loss of the grass lawns along Euclid Avenue and along Masonic Avenue near Presidio Avenue would contribute to demand on public parks and recreational facilities" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-15])*

### *RESPONSE RE-1: RECREATION*

The comment states that there is a lack of recreational open space in the neighborhood and expresses concern with increased demand on local park and recreational facilities due to loss of public access to the grass lawns on the project site along Euclid and Masonic avenues.

The thresholds for evaluating impacts on park and recreational facilities are detailed in the initial study in Section E.9, Recreation, pp. 163-172 (see EIR Appendix B). As discussed under Impact RE-1 (initial study pp. 166-170), implementation of the proposed project or project variant would increase the residential population by 1,261 residents or 1,681 residents, respectively. The project site is not located in a high-needs area identified by the City for high-priority park improvement or acquisition efforts. Based on the 2004 Recreational Assessment Report and the Fiscal Year 2015-2016 Park Maintenance Standards Report, the neighborhood is adequately served by existing recreational resources, and Laurel Hill Playground (the closest resource) is generally well maintained. Other nearby city parks and recreation facilities (including Presidio Heights Playground and Julius Kahn Playground) plus larger city and region-serving resources (including Golden Gate Park and the Presidio of San Francisco) provide a variety of recreation opportunities that allow demand to be distributed in a balanced manner.

Given the variety of parks available in the project vicinity and that project-related growth in demand would not be substantial, the analysis concluded on initial study pp. 169-170 that the proposed project or project variant would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Additionally, the recreation demand generated by the proposed project or project variant would not require the construction of new or expansion of existing recreational facilities. Finally, the proposed on-site open space (both common and private open space) would partially offset some of the project-generated demand for recreational facilities. Supporting documentation for the recreational analysis in the initial study is available

for review at the planning department offices as part of Case File No. 2015-014028ENV.[40] As detailed in Chapter 2, Project Description, on EIR p. 2.12, among the project sponsor's objectives (bulleted items 7 and 8) is the provision of an open space program within the project footprint that would be accessible to the neighborhood:

"• Provide substantial open space for project residents and surrounding community members by creating a green, welcoming, walkable environment that will encourage the use of the outdoors and community interaction.

"• Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use."

The proposed open space program is described in Chapter 2, Project Description, EIR pp. 2.83-2.86. The open space program is illustrated on Figure 2.29: Proposed Open Space, EIR p. 2.85. As described and illustrated, portions of the approximately 103,000 square feet of common open space listed in Table 2.4: Proposed Open Space, on EIR p. 2.84, would be publicly accessible. Portions of the open space illustrated in Figure 2.29 would be accessible to the public. The breakdown of the common open space program that would be exclusive to residents and other on-site users, and that would be available to the public, would be developed in coordination with the City as part of the project sponsor's development agreement. The development agreement's final open space program would adhere to Planning Code section 135, which sets forth the requirements for private and common usable open space, but with the flexibility to ensure that project objectives are achieved and benefits accrue to new residents and other on-site users as well as the existing neighborhood.

The grass lawns along Euclid Avenue and Masonic Avenue are privately owned open space that is currently accessible to the public. The proposed project or project variant would improve the grass lawns along Masonic Avenue west of Presidio Avenue (the proposed Pine Street Steps and Plaza) and along Euclid Avenue east of Laurel Street (the proposed Euclid Green). These proposed open spaces, described in the bulleted list on EIR pp. 2.83 and 2.86, would be part of the larger on-site open space program, some of which would be open to the public.

The proposed Pine Street Steps and Plaza would be designed in coordination with the streetscape changes at the intersection of Masonic Avenue, Pine Street and Presidio Avenue (see EIR p. 2.80 and Figure 2.28A: Existing Streetscape and Proposed Streetscape Changes – Presidio Avenue, on EIR p. 2.81) and would be accessible to the public. It would provide public access to the eastern terminus of the proposed Mayfair Walk (the proposed Presidio Overlook). The proposed Euclid Green (proposed project or project variant 18,760 square feet) would be slightly smaller than the grass lawn currently east of Laurel Street (existing 23,600 square feet). A rendering of Euclid

[40] The administrative record is also online at https://www.ab900record.com/3333cal.

Green is provided in Figure 2.12: View of Proposed Euclid Building and Euclid Green Along Euclid Avenue (Looking East), on EIR p. 2.32.

Subsequent to the publication of the draft EIR, the proposed project or project variant's open space program was modified slightly as shown in RTC Figure 2.29: Proposed Open Space Plan for Revised Project or Revised Variant, on RTC p. 2.23, in RTC Table 2.4a: Proposed Open Space for Revised Project, on RTC p. 2.21, and in RTC Table 2.4b: Proposed Open Space for Revised Variant, on RTC p. 2.22. For example, the open space program for the revised project or revised variant modified the area for Euclid Green from 18,760 square feet for the proposed project or project variant, to 18,004 square feet (a decrease in 756 square feet) for the revised project and revised variant. This modification to the open space program would not result in any substantial changes in the conclusions reached in the EIR. Additional details about locations of proposed publicly accessible open space can be found in the Planning Application Re-Submittal 2, Sheet L0.01 Site Diagram – Open Space Network, July 3, 2019.

## UTILITIES AND SERVICE SYSTEMS

The comments in this subsection relate to the topic of adequacy of water supply entitlements evaluated in initial study Section E.10. A corresponding response follows the comments.

### *COMMENT UT-1: ADEQUACY OF WATER SUPPLY ENTITLEMENTS*

"1. The DEIR Fails to Disclose the Uncertainty as to Whether the SFPUC Has Sufficient Water Supply Available to Serve the Project Site from Existing Entitlements and Resources and Whether SFPUC Would Require New or Expanded Water Supply Resources or Entitlements.

The July 27, 2018 letter from the San Francisco City Attorney to the State Water Resources Control Board (SWRCB) discloses that SFPUC would have to greatly increase water rationing in a sequential-year drought if SWRCB adopted proposed amendments to the Water Quality Control Board Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary that were then under consideration (Plan Amendment). (Ex. A, excerpts of letter from City Attorney to SWRCB, pp. 1-3) The letter states that if the Plan Amendments were adopted, if a sequential-year drought occurs, San Francisco's diversions from the Tuolumne River - on which the SFPUC relies to meet approximately 85% of demand for drinking water throughout the Bay Area - could be severely reduced. (Ex. A, p. 3) The letter discloses that if the Plan Amendments were implemented, SFPUC could have to increase water supply rationing over the 20% level allowed by the SFPUC's current drought management plan and indicates that it is uncertain that SFPUC will be able to develop sufficient replacement supplies in approximately four years before the SWRCB's intended implementation of the Plan Amendment in 2022. (Ex. A, p. 4)

In *Delta plan approved: cities face water cuts*, the San Francisco Chronicle reported that the SWRCB approved this Plan Amendment, which would require cuts to water supplies that could cause households in the Bay Area to curb water use by 20 percent or more. (Ex. B) Please state whether the SWRCB approved the Plan Amendments and explain the potential consequences of those Plan Amendments on SFPUC' water supply for San Francisco and the possibility of increased water rationing. (Ex. B) While agencies have an opportunity to propose alternative proposals, the passage of this Plan Amendment has created uncertainty as to San Francisco' water

supply which the DEIR for 3333 California Street fails to acknowledge. CEQA requires an agency to disclose uncertainty about water supply.

The water supply assessment performed for the proposed 3333 California Street project was performed before the Plan Amendment was passed. That water supply assessment was based on the SFPUC's urban water management plan which was based on estimations of water supplies that pre-dated the plan amendments.

The 3333 California Street Initial Study projects that the proposed project would use an estimated 73,000 gallons of water per day, which would result in a net increase of approximately 53,000 gallons per day. The net increase per year would be 19,345,000gallons (53,000 x 365). The Initial Study concludes that the increase could be accommodated "by the anticipated water supply for San Francisco." That anticipated water supply for San Francisco has now changed as a result of the Plan Amendments. Although the DEIR appears to have been released after the Plan Amendment was passed, it failed to disclose the uncertainty about changes in the anticipated SFPUC water supply." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi1-1])*

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"2. The DEIR Fails to Disclose the Uncertainty as to Whether the Proposed Project or Project Variant, in Combination With Past, Present and Reasonably Foreseeable Future Projects Could Result in a Cumulatively Considerable Contribution to Cumulative Impacts on Water Supply Systems.

Since the City Attorney's letter indicates that the SWRCB expects SFPUC to develop additional supplies of water, the DEIR should have disclosed the uncertainty about the cumulative impact of the proposed project's contribution to the demand for water supplies together with the water supply demand of other reasonably anticipated projects, in the current context that new projects to develop additional water supplies may be needed.

The DEIR should explain the potential cumulative impacts of developing potential additional water supplies to serve existing SFPUC customers and customers drawing on SFPUC water supplies in current and foreseeable developments in the context of significant water reductions in a sequential-year drought. The DEIR should disclose any uncertainty as to whether sufficient additional water supplies can be developed before 2022 to avoid SFPUC customer rationing above 20% in sequential-drought years and estimate the amount of water that could be used by SFPUC customers in current and reasonably foreseeable development and the amount of water that could be available in sequential-drought years." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi1-2])*

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"Summary of several concerns raised by nearby residents and citizens of San Francisco:…16. Demand on regional water supply and the potential for adverse effects on storm drain capacity or flow" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-17])*

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### *RESPONSE UT-1: ADEQUACY OF WATER SUPPLY ENTITLEMENTS*

The comments raise concerns about the availability of water supply to serve the proposed project. In particular, a comment states that the draft EIR is inadequate because it fails to disclose uncertainty as to whether the San Francisco Public Utilities Commission (SFPUC) has sufficient water supply available to serve the project from existing entitlements and resources and whether

the SFPUC requires new or expanded water supply facilities. The uncertainty relates to the State Water Resources Control Board (state water board) adoption of an amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) in December 2018. A comment also asserts that the draft EIR fails to disclose the uncertainty as to whether the project could result in a cumulatively considerable contribution to cumulative impacts on water supply systems.

The topic of Utilities and Service Systems was addressed in the initial study issued April 25, 2018. As discussed on initial study pp. 180-182, on June 13, 2017, the SFPUC approved a water supply assessment for the proposed project variant and determined that it has adequate supplies to meet project demand. The draft EIR was published on November 7, 2018 with a public comment period from November 8 to December 24, 2018. The draft EIR comment period was subsequently extended to January 8, 2019 by the planning commission. Since publication of the draft EIR, the project sponsor has modified the proposed project and its variant, as described in RTC Section 2, Project Description, on pp. 2.2-2.29 and summarized here. These revisions include: 1) retail uses in the Euclid Building are no longer proposed, and the amount of gross square footage to be devoted to ground-floor retail uses for commercial uses in the California Street buildings has also been reduced; 2) the number of vehicle parking spaces for commercial uses has been reduced; and 3) the parking garage access for the seven Laurel Duplexes has been consolidated into a single curb cut on Laurel Street with shared access to the Mayfair Building's garage, and six curb cuts on Laurel Street are no longer proposed. The project sponsor has also proposed minor changes regarding the size of the publicly accessible open space, the overall amount of excavation, the residential dwelling unit mix, the total number of dwelling units in some of the proposed buildings, the number of bicycle parking spaces, and design refinements. The total amount of retail space proposed under the proposed project has been reduced from 54,117 square feet to 40,261 square feet. The total amount of retail space proposed under the project variant has been reduced from 48,593 square feet to 34,496 square feet. The overall number of residential units proposed under the project (558) or variant (744) remains the same as in the EIR.

On December 12, 2018 (after draft EIR publication), the state water board adopted the Bay-Delta Plan Amendment, which establishes water quality objectives to maintain the health of the rivers and the Bay-Delta ecosystem.[41] Among the goals of the adopted Bay-Delta Plan Amendment is to increase salmonid populations in the San Joaquin River, its tributaries (including the Tuolumne River), and the Bay-Delta. Specifically, the plan amendment requires increasing flows in the Stanislaus, Tuolumne, and Merced rivers to 40 percent of unimpaired flow[42] from February

[41] State Water Resources Control Board Resolution No. 2018-0059, *Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document*, December 12, 2018, https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf, accessed August 20, 2019.

[42] "Unimpaired flow" represents the water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds.

through June every year, whether it is wet or dry. During dry years, this would result in a substantial reduction in the SFPUC's water supplies from the Tuolumne River watershed.

If this plan amendment is implemented, the SFPUC would be able to meet the projected retail water demands presented in the 2015 Urban Water Management Plan in normal years but would experience supply shortages in single dry years and multiple dry years. A "normal year" is based on historical hydrological conditions that allow the reservoirs to be filled by rainfall and snowmelt, allowing full deliveries to customers. A "wet year" and a "dry year" is based on historical hydrological conditions with above and below "normal" rainfall and snowmelt, respectively. Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year water supply shortfalls throughout the SFPUC's regional water system service area, including San Francisco. The state water board has stated that it intends to implement the plan amendment by the year 2022, assuming all required approvals are obtained by that time. However, at this time, there is a substantial degree of uncertainty associated with the Bay-Delta Plan Amendment and how these amendments will affect the SFPUC's water supply.

On June 11, 2019, the SFPUC approved a revised water supply assessment prepared for the modified project[43,44] that reflects the adopted Bay-Delta Plan Amendment and project revisions described above.[45] Unlike the original water supply assessment prepared in 2017, which only evaluated the project variant, the revised water supply assessment evaluates both the proposed project's and project variant's water demand estimates under three water supply scenarios. These scenarios are: 1) current water supply; 2) Bay-Delta Plan voluntary agreement; and 3) 2018 Bay-Delta Plan Amendment, as more fully described in the text that has been added to EIR Section 4.F, Initial Study Supplement below.

The revised water supply assessment found that the proposed project or its variant would represent a small fraction (approximately 0.09 percent) of the total projected retail water demand in San Francisco in 2040. Further, the revised water supply assessment found that sufficient water supplies would be available to serve the proposed project or its variant in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. If the Bay-Delta Plan

[43] The project variant was assessed for water supply as the proposed program under the project variant would result in the most conservative water demand estimate and would encompass the demand estimated for the proposed project. References to the "project variant" in Response UT-1: Adequacy of Water Supply Entitlements and Section 4.F of the EIR provide analysis for the proposed project as well.

[44] After the SFPUC approved the revised water supply assessment on June 11, 2019, SFPUC staff identified minor, errors related to non-residential square footages in the water demand estimates calculations. Subsequently, the project sponsor prepared updated water demand estimates calculations for SFPUC staff review. On July 26, 2019, Steven R. Ritchie, Assistant General Manager for the SFPUC Water Enterprise, confirmed that a revised WSA is not required because the Water Supply Assessment approved by the SFPUC on June 11, 2019 continues to apply to the project variant. The updated water demands are slightly lower than previously estimated, but the difference is not discernible when reported in units of million gallons per day (mgd).

[45] SFPUC, Revised Water Supply Assessment for the 3333 California Street Project, June 11, 2019.

Amendment is implemented, the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years, during which retail supply shortfalls of 15.6 to 49.8 percent could occur. Such new or expanded water supply facilities would occur with or without implementation of the proposed project or its variant.

The SFPUC would address supply shortfalls through increased rationing, which could result in significant cumulative effects. However, regardless of the level of rationing to be ultimately implemented, the proposed project or its variant would not make a considerable contribution to impacts from increased rationing because the proposed project and its variant would be expected to tolerate the levels of rationing imposed on them for the duration of the drought, and thus would not contribute to sprawl development caused by rationing under the Bay-Delta Plan Amendment. Thus, regardless of whether the Bay-Delta Plan Amendment is implemented, the conclusion in the initial study that the proposed project or its variant would result in less-than-significant water supply impacts, both individually and cumulatively, remains the same.

The comment states that based on the July 27, 2018 letter from the San Francisco city attorney to the state water board, if the Plan Amendments were implemented, SFPUC could have to increase water supply rationing over the 20% level "allowed" by the SFPUC's current drought management plan. The comment appears to characterize 20-percent rationing as the maximum allowable rationing level under the SFPUC's drought management plan. This characterization is incorrect. Twenty percent is the SFPUC's adopted level of service objective and not a rationing limit allowable under the SFPUC's drought plan.

The comments state that the EIR should have disclosed uncertainty related to future San Francisco water supply as a result of the Bay Delta Plan amendment and the potential for cumulative impacts related to development of new or expanded facilities to provide adequate water supply under multiple dry years in conjunction with requirements of the amendment. However, the Bay Delta Plan amendment was not adopted until after draft EIR publication. In addition, text changes to reflect the amendment are being made as part of this RTC which do not change the conclusions in the initial study. The comments do not present evidence that there would be any new significant impacts not identified in the initial study or a substantial increase in the severity of impacts identified in the initial study. Thus, the comments do not raise any issues that require additional analyses.

To provide information regarding the Bay-Delta Plan Amendment, the uncertainty that emerged after the publication of the draft EIR as to the availability of water supply sources due to the Bay-Delta Plan Amendment, and the plan amendment's ultimate outcome as related to the proposed project and its variant, the following text has been added at the end of EIR Section 4.F, Initial Study Supplement, beginning on p. 4.F.18, to supplement the initial study project- and cumulative-level impact analysis with respect to water supply under the new topic Utilities and Service Systems. Note that in the initial study the project variant's project-level and cumulative

water supply impacts are discussed in two separate impact sections. The project-level impacts are discussed under Impact UT-2, on initial study pp. 180-182. The cumulative impacts are discussed under Impact C-UT-1, on initial study pp. 187-188. As noted below, the impact is a cumulative impact. Also, please note that the additional discussion will be added as new text to EIR section 4.F, Initial Study Supplement, but is not shown with double underline for readability.

## *UTILITIES AND SERVICE SYSTEMS*

### BACKGROUND ON HETCH HETCHY REGIONAL WATER SYSTEM

San Francisco's Hetch Hetchy regional water system, operated by the SFPUC, supplies water to approximately 2.7 million people. The system supplies both retail customers – primarily in San Francisco – and 27 wholesale customers in Alameda, Santa Clara, and San Mateo counties. The system supplies an average of 85 percent of its water from the Tuolumne River watershed, stored in Hetch Hetchy Reservoir in Yosemite National Park, and the remaining 15 percent from local surface waters in the Alameda and Peninsula watersheds. The split between these resources varies from year to year depending on hydrological conditions and operational circumstances. Separate from the regional water system, the SFPUC owns and operates an in-city distribution system that serves retail customers in San Francisco.

Approximately 97 percent of the San Francisco retail water is supplied by the SFPUC regional water system. The remaining 3 percent is supplied by local water supplies, including recycled water, groundwater and non-potable water.[46]

The project site is currently served by this water delivery infrastructure. In 2015, the SFPUC provided an average of approximately 65.6 million gallons per day of water to its in-city retail customers.[47] The SFPUC considers water users within San Francisco to be its retail customers, served separately from its wholesale customers in Santa Clara, Alameda, San Mateo, San Joaquin, and Tuolumne counties. The SFPUC has a projected retail supply of 89.9 million gallons per day through the year 2040 from its regional water system and local water supply sources.[48]

### WATER SUPPLY RELIABILITY AND DROUGHT PLANNING

In 2008, the SFPUC adopted the Phased Water System Improvement Program (WSIP) to ensure the ability of the regional water system to meet certain level of service goals for water quality, seismic reliability, delivery reliability, and water supply through 2018.[49] The SFPUC's level of service goals for regional water supply are to meet customer water needs in non-drought and drought periods and to meet dry-year delivery needs while limiting rationing to a maximum of 20 percent system-wide. In approving the WSIP, the SFPUC established a supply limitation of up to 265 million gallons per day (mgd) to be delivered from its water

[46] SFPUC, 2015 Urban Water Management Plan for the City and County of San Francisco, June 2016 (hereinafter "2015 UWMP"), Section 6.2, p. 6-10, https://www.sfwater.org/modules/showdocument.aspx?documentid=9300, accessed August 10, 2019.

[47] Ibid, Section 4.1, Table 4-1, p. 4-5. This is the volume of water provided to San Francisco alone; note that there are a small number of additional retail customers outside of the City, including Groveland in the Sierra Nevada foothills.

[48] Ibid, Section 7.5, Table 7-4, p. 7-10.

[49] On December 11, 2018, the SFPUC Commission extended the timing of the WSIP water supply decision through 2028 in its Resolution No. 18-0212.

supply resources in the Tuolumne, Alameda, and Peninsula watersheds in years with normal (average) precipitation.[50] The SFPUC's water supply agreement with its wholesale customers provides that approximately two-thirds of this total (up to 184 mgd) is available to wholesale purchasers and the remaining one-third (up to 81 mgd) is available to retail customers. The total amount of water the SFPUC can deliver to retail and wholesale customers in any one year depends on several factors, including the amount of water that is available from natural runoff, the amount of water in reservoir storage, and the amount of that water that must be released from the system for purposes other than customer deliveries (e.g., required instream flow releases below reservoirs). A "normal year" is based on historical hydrological conditions that allow the reservoirs to be filled by rainfall and snowmelt, allowing full deliveries to customers; similarly, a "wet year" and a "dry year" is based on historical hydrological conditions with above and below "normal" rainfall and snowmelt, respectively.

For planning purposes, the SFPUC uses a hypothetical drought that is more severe than what has historically been experienced. This drought sequence is referred to as the "design drought" and serves as the basis for planning and modeling of future scenarios. The design drought sequence used by the SFPUC for water supply reliability planning is an 8.5-year period that combines the following elements to represent a drought sequence more severe than historical conditions:

- Historical Hydrology – a 6-year sequence of hydrology from the historical drought that occurred from July 1986 to June 1992
- Prospective Drought – a 2.5-year period which includes the hydrology from the 1976-77 drought
- System Recovery Period – The last six months of the design drought are the beginning of the system recovery period. The precipitation begins in the fall, and by approximately the month of December, inflow to reservoirs exceeds customer demands and SFPUC system storage begins to recover.

While the most recent drought (2012 through 2016) included some of the driest years on record for the SFPUC's watersheds, the design drought still represents a more severe drought in duration and overall water supply deficit. Based on historical records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully-implemented infrastructure under the WSIP, normal or wet years occurred 85 out of 97 years. This translates into roughly nine normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly one out of every 10 years. The frequency of dry years is expected to increase as climate change intensifies, potentially requiring greater levels of rationing, which may change the amount or frequency of rationing required. The exact level of rationing that the SFPUC will impose is not ascertainable at this time because the effect that climate change has on the SFPUC water supply systems are unknown.

## 2015 URBAN WATER MANAGEMENT PLAN

The California Urban Water Management Planning Act[51] requires urban water supply agencies to prepare *urban water management plans* to plan for the long-term reliability, conservation, and efficient use of California's water supplies to meet existing and future

[50] SFPUC Resolution No. 08-200, *Adoption of the Water System Improvement Program Phased WSIP Variant*, October 30, 2008.
[51] California Water Code, division 6, part 2.6, sections 10610 through 10656, as last amended in 2015.

demands. The act requires water suppliers to update their plans every five years based on projected growth for at least the next 20 years.

Accordingly, the current urban water management plan for the City and County of San Francisco is the 2015 Urban Water Management Plan update.[52] The 2015 plan update presents information on the SFPUC's retail and wholesale service areas, the regional water supply system and other water supply systems operated by the SFPUC, system supplies and demands, water supply reliability, Water Conservation Act of 2009 compliance, water shortage contingency planning, and water demand management.

The water demand projections in the 2015 plan reflect anticipated population and employment growth, socioeconomic factors, and the latest conservation forecasts. For San Francisco, housing and employment growth projections are based on the San Francisco Planning Department's Land Use Allocation 2012 (see 2015 Urban Water Management Plan, Appendix E, Table 5, p. 21), which in turn is based on the Association of Bay Area Governments (ABAG) growth projections through 2040.[53] The 2015 plan presents water demand projections in five-year increments over a 25-year planning horizon through 2040. Growth associated with the proposed project or its variant was encompassed within the Land Use Allocation 2012. The SFPUC will prepare the next update – the 2020 Urban Water Management Plan update – for adoption in 2021. The 2020 update will consider updated population and employment projections and anticipated water supply and demand through 2045.

The 2015 plan compares anticipated water supplies to projected demand through 2040 for normal, single-dry, and multiple-dry water years. Retail water supplies are comprised of regional water system supply, groundwater, recycled water, and non-potable water. Under normal hydrologic conditions, the total retail supply is projected to increase from 70.1 mgd in 2015 to 89.9 mgd in 2040. According to the plan, available and anticipated future water supplies would fully meet projected demand in San Francisco through 2040 during normal years.

On December 11, 2018, by Resolution No. 18-0212, the SFPUC amended its 2009 Water Supply Agreement between the SFPUC and its wholesale customers. That amendment revised the Tier 1 allocation in the Water Supply Allocation Plan to require a minimum reduction of 5 percent of the regional water system supply for San Francisco retail customers whenever system-wide reductions are required due to dry-year supply shortages.[54] When accounting for the requirements of this recently amended agreement, existing and planned supplies would meet projected retail water system demands in all years except for an approximately 3.6 to 6.1 mgd or 5.0 to 6.8 percent shortfall during dry years through the year 2040. The 6.8 percent shortfall is expected to occur during years seven and eight of the 8.5-year design drought based on 2040 demand levels. This relatively small shortfall is primarily due to implementation of the amended 2009 water supply agreement. In such an event, the SFPUC would implement the SFPUC's Retail Water Shortage Allocation Plan and could manage this relatively small shortfall by prohibiting certain discretionary outdoor water uses and/or calling for voluntary rationing among all retail customers. Based on experience in past droughts, retail customers could reduce water use to meet this projected level of

[52] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan for the City and County of San Francisco*, June 2016, https://sfwater.org/index.aspx?page=75, accessed August 20, 2019.
[53] Association of Bay Area Governments, *Jobs-Housing Connection Strategy*, May 2012.
[54] SFPUC, Resolution No. 18-0212, December 11, 2018.

shortfall. The required level of rationing is well below the SFPUC's regional water supply level of service goal of limiting rationing to no more than 20 percent on a system-wide basis.

Based on the 2015 Urban Water Management Plan, as modified by the 2018 amendment to the 2009 Water Supply Agreement, sufficient retail water supplies would be available to serve projected growth in San Francisco through 2040. While concluding supply is sufficient, the 2015 Urban Water Management Plan also identifies projects that are underway or planned to augment local supply. Projects that are underway or recently completed include the San Francisco Groundwater Supply Project and the Westside Recycled Water Project. A more current list of potential regional and local water supply projects that the SFPUC is considering is provided below under Additional Water Supplies.

In addition, the plan describes the SFPUC's ongoing efforts to improve dry-year water supplies, including participation in Bay Area regional efforts to improve water supply reliability through projects such as interagency interties, groundwater management and recharge, potable reuse, desalination, and water transfers. While no specific capacity or supply has been identified, this program may result in future supplies that would benefit SFPUC customers.

## 2018 BAY-DELTA PLAN AMENDMENT

In December 2018 the state water board adopted the Bay-Delta Plan Amendment, which establishes water quality objectives to maintain the health of the rivers and the Bay-Delta ecosystem.[55] Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year water supply shortfalls throughout the SFPUC's regional water system service area, including San Francisco. The 2015 Urban Water Management Plan assumes limited rationing for retail customers may be needed in multiple dry years to address an anticipated supply shortage by 2040; the 2018 amendment to the 2009 Water Supply Agreement with wholesale customers would slightly increase rationing levels indicated in the 2015 plan. By comparison, implementation of the Bay-Delta Plan Amendment would result in supply shortfalls in all single dry years and multiple dry years and rationing to a greater degree than previously anticipated to address supply shortages not accounted for in the 2015 Urban Water Management Plan or as a result of the 2018 amendment to the 2009 Water Supply Agreement.

The state water board has stated that it intends to implement the plan amendment by the year 2022, assuming all required approvals are obtained by that time. However, at this time, the implementation of the Bay-Delta Plan Amendment is uncertain for several reasons, as described below.

First, under the federal Clean Water Act, the United States Environmental Protection Agency (U.S. EPA) must approve the water quality standards identified in the plan amendment within 90 days from the date the approval request is received. By letter dated June 11, 2019, the U.S. EPA rejected the state water board's two-page submittal as inadequate under the requirements of the Clean Water Act. Pursuant to the U.S. EPA's letter, the state water board has 90 days to respond with a submittal that complies with the law. At this point, the U.S. EPA has neither approved, nor disapproved, any of the revised water quality objectives. It is

[55] State Water Resources Control Board Resolution No. 2018-0059, *Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document*, December 12, 2018, https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf, accessed August 20, 2019.

uncertain what determination the U.S. EPA will make regarding the water quality standards in the future and its decision could result in litigation.

Second, since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in state and federal court, challenging the water board's adoption of the plan amendment, including legal challenges filed by the federal government at the request of the U.S. Bureau of Reclamation. That litigation is in the early stages, and there have been no dispositive court rulings as of this date.

Third, the Bay-Delta Plan Amendment is not self-executing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the plan amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the Clean Water Act, section 401 certification process in the Federal Energy Regulatory Commission's relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-2023 timeframe. This process and other regulatory and/or adjudicatory proceeding would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility for the Tuolumne River than currently exists (and therefore a different water supply effect on the SFPUC).

Fourth, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, the water board directed its staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the [water board] as early as possible after December 1, 2019." In accordance with the water board's instruction, on March 1, 2019, the SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary agreement with the state water board that would serve as an alternative path to implementing the Bay-Delta Plan's objectives. On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. In a written progress report to the Voluntary Agreement Plenary Participants dated July 1, 2019, the California secretaries for Environmental Protection and for Natural Resources stated that the collective state agencies should be able "to determine the adequacy" of the various proposed voluntary agreements, including the proposed Tuolumne Voluntary Agreement, by October 15, 2019, and that if the state team recommends the voluntary agreements to the state water board, then (1) scientific peer review of the voluntary agreements would be completed by the spring of 2020, and (2) a draft CEQA document would be released for public comment in the summer of 2020, with a finalized CEQA document completed the following year.

For these reasons, whether, when, and the form in which the Bay-Delta Plan Amendment will be implemented, and how those amendments will affect the SFPUC's water supply, is currently unknown.

## Additional Water Supplies

In light of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitation to the SFPUC's regional water system supply during dry years, the SFPUC is expanding and accelerating its efforts to develop additional water supplies and explore other projects that would improve overall water supply resilience. Developing these supplies would

reduce water supply shortfalls and reduce rationing associated with such shortfalls. The SFPUC has taken action to fund the study of additional water supply projects, which are listed below:

- Daly City Recycled Water Expansion
- Alameda County Water District Transfer Partnership
- Brackish Water Desalination in Contra Costa County
- Alameda County Water District-Union Sanitary District Purified Water Partnership
- Crystal Springs Purified Water
- Eastside Purified Water
- San Francisco Eastside Satellite Recycled Water Facility
- Additional Storage Capacity in Los Vaqueros Reservoir from Expansion
- Calaveras Reservoir Expansion

The capital projects that are under consideration would be costly and are still in the early feasibility or conceptual planning stages. One or more of these projects may require additional environmental review. These projects would take 10 to 30 or more years to implement and would require environmental permitting negotiations, which may reduce the amount of water that can be developed. The yield from these projects is unknown and not currently incorporated into SFPUC's supply projections.

In addition to capital projects, the SFPUC is also considering developing related water demand management policies and ordinances, such as funding for innovative water supply and efficiency technologies and requiring potable water offsets for new developments.

## APPROACH TO ANALYSIS

Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the SFPUC must prepare water supply assessments for certain large projects, as defined in CEQA Guidelines section 15155.[56] Water supply assessments rely on information contained in the water supplier's urban water management plan and on the estimated water demand of both the proposed project and projected growth within the relevant portion of the water supplier's service area. As a residential development with 558 or 744 dwelling units, the project or its variant, meets the definition of a water demand project under CEQA and

[56] Pursuant to CEQA Guidelines section 15155(1), "a water-demand project" means:
(A) A residential development of more than 500 dwelling units.
(B) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(C) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area.
(D) A hotel or motel, or both, having more than 500 rooms, (e) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(F) a mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.
(G) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

requires a water supply assessment. The project-specific analysis of impacts on water supply facilities is provided below.

On June 13, 2017, the SFPUC approved a water supply assessment for the proposed project and determined that it has adequate supplies to meet project demand.[57] Due to the adoption of the Bay-Delta Plan Amendment in December 2018, the water supply assessment for the project has been updated and the analysis for Utilities and Service Systems has been supplemented to account for this action. In addition, the revised water supply assessment accounts for the project and variant revisions described in detail in RTC Section 2 on pp. 2.2-2.29. The water demand estimates for the proposed project and its variant increased from those provided in the water supply assessment approved by the SFPUC on June 13, 2017. On June 11, 2019, the SFPUC approved a revised water supply assessment prepared for the modified project.[58,59]

The analysis of water supply capacity is based on review of SFPUC data on water supply (principally the commission's current 2015 Urban Water Management Plan); demand is calculated largely based on SFPUC-generated demand factors (furnished by SFPUC's district-scale non-potable water calculator version 7.1). The water supply assessment for the proposed project and its variant identifies the total water demand under either scenario, including a breakdown of potable and non-potable water demands. The proposed project and its variant are subject to San Francisco's Non-potable Water Ordinance (article 12C of the San Francisco Health Code). The Non-potable Water Ordinance requires new commercial, mixed-use, and multi-family residential development projects with 250,000 square feet or more of gross floor area to install and operate an onsite non-potable water system. Such projects must meet their toilet and urinal flushing and irrigation demands through the collection, treatment, and use of available graywater, rainwater, and foundation drainage.

The proposed project and project variant would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by California State Building Code section 402.0(c); residential submetering, as required by California Water Code sections 537-537.5 as added in 2016 by Senate Bill No.7;[60,61] and a rainwater and graywater system, as required by San Francisco's Non-Potable Water Ordinance, that would supply up to 30 percent of the total water demand.[62] These measures have been included in the revised water supply assessment calculations.

[57] SFPUC, Water Supply Assessment for the 3333 California Street Project, June 13, 2017.

[58] SFPUC, Revised Water Supply Assessment for the 3333 California Street Project, June 11, 2019.

[59] After the SFPUC approved the revised water supply assessment on June 11, 2019, SFPUC staff identified minor discrepancies related to non-residential square footages in the water demand estimate calculations. Subsequently, the project sponsor prepared updated water demand estimate calculations for SFPUC staff review. On July 26, 2019, Steven R. Ritchie, Assistant General Manager for the SFPUC Water Enterprise, confirmed that a revised Water Supply Assessment is not required because the Water Supply Assessment approved by the SFPUC on June 11, 2019 continues to apply to the project variant. The updated water demands are slightly lower than previously estimated, but the difference is not discernible when reported in units of million gallons per day (mgd).

[60] SFPUC, Residential Water Submetering Webpage, 2019, https://sfwater.org/index.aspx?page=1186, accessed August 20, 2019.

[61] California Legislative Information, SB-7 Housing: water meters: multiunit structures, Chapter 623, 2016, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB7, accessed August 20, 2019.

[62] SFPUC, Non-Potable Water Program, https://sfwater.org/index.aspx?page=686, accessed August 20, 2019.

Because the project variant would have more residents and use more water than the proposed project, it would have the most conservative water demand estimate and would encompass the demands estimated for the proposed project because it includes additional residential units. Therefore, this discussion uses the water demand estimates for the project variant. The project variant's total water demand would be 0.084 mgd, (of which 0.020 mgd could be met by non-potable water). Accordingly, approximately 24.3 percent of the project variant's total water demand would be met by non-potable water in 2040.

**Impact UT-1: Sufficient water supplies are available to serve the proposed project or its variant in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented; in that event, the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years but this would occur with or without implementation of the proposed project or its variant. Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term; instead, the SFPUC would address supply shortfalls through increased rationing, which could result in significant cumulative effects, but the proposed project or its variant would not make a considerable contribution to impacts from increased rationing. (Less than Significant)**

## Construction Water

During construction, water would be required for dust control during grading and demolition, concrete curing, pressure washing, and other uses. The project sponsor and general contractor would minimize the use of potable water to the extent feasible, and would comply with Ordinance 175-91, which requires that non-potable water be used for dust-control activities when feasible.[63] Non-potable water may not be used for demolition, pressure washing, or dust control through aerial spraying. Water use during construction would be short term and temporary and would not require the SFPUC to develop new or expanded water supply resources or entitlements. This impact would be less than significant.

## Operational Water Demand Estimates

The project variant's anticipated potable water demand would contribute 0.07 percent to the projected total retail demand in 2040. Similarly, the project's total water demand, which does not account for savings anticipated through compliance with the non-potable water ordinance, would represent 0.09 percent of the total retail demand in 2040. Thus, the project variant represents a small fraction of the total projected water demand in San Francisco in 2040.

Future retail (citywide) water demand through 2040 is estimated based on the population and employment growth projections contained in the planning department's Land Use Allocation 2012. The proposed project or its variant represents a portion of the planned growth accounted for in Land Use Allocation 2012. Therefore, the proposed project's or its variant's demand is incorporated in the 2015 Urban Water Management Plan.

Due to the 2018 Bay Delta Plan Amendment, the project variant's water demand estimates are considered under three water supply scenarios. The following scenarios evaluate the ability of the water supply system to meet the demand of the project variant, in combination with both existing development and projected growth in San Francisco.

[63] City and County of San Francisco, San Francisco Public Works Code, Article 21: Restriction of Use of Potable Water for Soil Compaction and Dust Control Activities, 1991, https://www.sfwater.org/modules/showdocument.aspx?documentid=1295, accessed August 20, 2019.

- Scenario 1: Current Water Supply
- Scenario 2: Bay-Delta Plan Voluntary Agreement
- Scenario 3: 2018 Bay-Delta Plan Amendment

As discussed below, water supplies would be available to meet the demand of the project variant in combination with both existing development and projected growth in San Francisco through 2040 under each of these water supply scenarios with varying levels of rationing during dry years.

Scenario 1 – Current Water Supply

Scenario 1 assumes no change to the way in which water is supplied, and that neither the Bay-Delta Plan Amendment nor a Bay-Delta Plan Voluntary Agreement would be implemented. Thus, the water supply and demand assumptions contained in the 2015 Urban Water Management Plan and the 2009 Water Supply Agreement as amended would remain applicable for the proposed project and its variant. As stated above, the proposed project or its variant is accounted for in the demand projections in the 2015 Urban Water Management Plan.

Under Scenario 1, water supplies would be available to meet the demand of the project variant during normal, single dry, and multiple dry years.

Scenario 2 – Bay-Delta Plan Voluntary Agreement

Under Scenario 2, a voluntary agreement would be implemented as an alternative to the adopted Bay-Delta Plan Amendment. The March 1, 2019, proposed voluntary agreement submitted to the state water board has yet to be accepted, and the shortages that would occur with its implementation are not known. The voluntary agreement proposal contains a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the Bay-Delta Plan Amendment. The resulting regional water system supply shortfalls during dry years would be less than those under the Bay-Delta Plan Amendment and would require rationing of a lesser degree and closer in alignment to the SFPUC's adopted level of service goal for the regional water system of rationing of no more than 20 percent system-wide during dry years. The SFPUC Resolution No. 19-0057, which authorized the SFPUC staff to participate in voluntary agreement negotiations, stated its intention that any final voluntary agreement allow the SFPUC to maintain both the water supply and sustainability level of service goals and objectives adopted by the SFPUC when it approved the WSIP. Accordingly, it is reasonable to conclude that if the SFPUC enters into a voluntary agreement, the supply shortfall under such an agreement would be of a similar magnitude to those that would occur under Scenario 1. In any event, the supply shortfall of water supplies would be of a similar magnitude to those that would occur under Scenario 1. Rationing under Scenario 2, with implementation of the Voluntary Agreement, would be to a lesser degree than that under Scenario 3, with implementation of the Bay-Delta Plan Amendment.

Scenario 3 – Bay-Delta Plan Amendment

Under Scenario 3, the 2018 Bay-Delta Plan Amendment would be implemented as it was adopted by the state water board without modification. As discussed above, there is considerable uncertainty whether, when, and in what form the plan amendment will be implemented. However, because implementation of the plan amendment cannot be ruled out at this time, an analysis of the cumulative impact of projected growth on water supply resources under this scenario is included in this document to provide a worst-case impact analysis.

Under this scenario, which is assumed to be implemented after 2022, water supplies would be available to meet projected demands through 2040 in wet and normal years with no shortfalls. However, under Scenario 3 the entire regional water system—including both the wholesale and retail service areas—would experience significant shortfalls in single dry and multiple dry years, which over the past 97 years occur on average just over once every 10 years. Significant dry-year shortfalls would occur in San Francisco, regardless of whether the proposed project or its variant is approved. Except for the currently anticipated shortfall to retail customers of about 6.1 mgd (6.8 percent) that is expected to occur under Scenario 1 during years seven and eight of the 8.5-year design drought based on 2040 demand levels, these shortfalls to retail customers would exclusively result from supply reductions resulting from implementation of the Bay-Delta Plan Amendment. The retail supply shortfalls under Scenario 3 would not be attributed to the incremental demand associated with the proposed project or its variant, because this demand is incorporated already in the growth and water demand/supply projections contained in the 2015 Urban Water Management Plan.

Under the Bay-Delta Plan Amendment, existing and planned dry-year supplies would be insufficient for the SFPUC to satisfy its regional water system supply level of service goal of no more than 20 percent rationing system-wide. The Water Shortage Allocation Plan does not specify allocations to retail supply during system-wide shortages above 20 percent. However, the plan indicates that if a system-wide shortage greater than 20 percent were to occur, regional water system supply would be allocated between retail and wholesale customers per the rules corresponding to a 16 to 20 percent system-wide reduction, subject to consultation and negotiation between the SFPUC and its wholesale customers to modify the allocation rules. These allocation rules result in shortfalls of 15.6 to 49.8 percent across the retail service area as a whole under Scenario 3. Total shortfalls under Scenario 3 would range from 12.3 mgd (15.6 percent) in a single dry year to 36.1 mgd (45.7 percent) in years seven and eight of the 8.5-year design drought based on 2025 demand levels and from 21 mgd (23.4 percent) in a single dry year to 44.8 mgd (49.8 percent) in years seven and eight of the 8.5-year design drought based on 2040 demand.[64]

## Water Supply Impact Analysis

As described above, the supply capacity of the Hetch Hetchy regional water system that provides the majority of the city's drinking water far exceeds the potential demand of any single development project in San Francisco. No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the SFPUC to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project or its variant, in combination with both existing development and other projected growth through 2040 would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative

[64] Technical Memorandum from Steven Ritchie, SFPUC Water Enterprise to Lisa Gibson, San Francisco Planning Department, May 31, 2019, Table 3, p. 10.

impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Impacts Related to New or Expanded Water Supply Facilities

The SFPUC's adopted water supply level of service goal for the regional water system is to meet customer water needs in non-drought and drought periods. The system performance objective for drought periods is to meet dry-year delivery needs while limiting rationing to a maximum of 20 percent system-wide reduction in regional water service during extended droughts. As the SFPUC has designed its system to meet this goal, it is reasonable to assume that to the extent the SFPUC can achieve its service goals, sufficient supplies would be available to serve existing development and planned growth accounted for in the 2015 Urban Water Management Plan (which includes the proposed project or its variant) and that new or expanded water supply facilities are not needed to meet system-wide demand. While the focus of this analysis is on the SFPUC's retail service area and not the regional water system as a whole, this cumulative analysis considers the SFPUC's regional water supply level of service goal of rationing of not more than 20 percent in evaluating whether new or expanded water supply facilities would be required to meet the demands of existing development and projected growth in the retail area through 2040. If a shortfall would require rationing more than 20 percent to meet system-wide dry-year demand, the analysis evaluates whether as a result, the SFPUC would develop new or expanded water supply facilities that result in significant physical environmental impacts. It also considers whether such a shortfall would result in a level of rationing that could cause significant physical environmental impacts. If the analysis determines that there would be a significant cumulative impact, then per CEQA Guidelines section 15130, the analysis considers whether the project's incremental contribution to any such effect is "cumulatively considerable."

With the implementation of the proposed project or its variant, existing and planned dry-year supplies would meet projected retail demands through 2040 under Scenario 1 within the SFPUC's regional water system adopted water supply reliability level of service goal. Therefore, the SFPUC could meet the water supply needs for the proposed project or its variant, in combination with existing development and other projected growth in San Francisco through 2040 from the SFPUC's existing system. The SFPUC would not be expected to develop new or expanded water supply facilities for retail customers under Scenario 1 and there would be no significant cumulative environmental impact.

The effect of Scenario 2 cannot be quantified at this time, but as explained previously, if it can be designed to achieve the SFPUC's level of service goals and is adopted, it would be expected to have effects similar to Scenario 1. Given the SFPUC's stated goal of maintaining its level of service goals under Scenario 2, it is expected that Scenario 2 effects would be more similar to Scenario 1 than to Scenario 3. In any event, any shortfall effects under Scenario 2 that exceed the SFPUC's service goals would be expected to be less than those under Scenario 3. Therefore, the analysis of Scenario 3 would encompass any effects that would occur under Scenario 2 if it were to trigger the need for increased water supply or rationing in excess of the SFPUC's regional water system level of service goals.

Under Scenario 3, the SFPUC's existing and anticipated water supplies would be sufficient to meet the demands of existing development and projected growth in San Francisco, including the proposed project or its variant, through 2040 in wet and normal years, which have historically occurred in approximately nine out of 10 years on average. During dry and multiple dry years, retail supply shortfalls of 15.6 to 49.8 percent could occur.

As a result of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitations on supply to the regional water system during dry years, the SFPUC is increasing and accelerating its efforts to develop additional water supplies and explore other projects that would increase overall water supply resilience. The SFPUC is beginning to study water supply options, but it has not determined the feasibility of the possible projects, has not made any decision to pursue any particular supply projects, and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement. One or more of these projects may require additional environmental review.

There is also a substantial degree of uncertainty associated with the implementation of the Bay-Delta Plan Amendment and its ultimate outcome; and therefore, there is substantial uncertainty in the amount of additional water supply that may be needed, if any. Moreover, there is uncertainty and lack of knowledge as to the feasibility and parameters of the possible water supply projects the SFPUC is beginning to explore. Consequently, the physical environmental impacts that could result from future supply projects is quite speculative at this time and would not be expected to be reasonably determined for a period of time ranging from 10 to 30 years. Although it is not possible at this time to identify the specific environmental impacts that could result, this analysis assumes that if new or expanded water supply facilities, such as those listed above under "Additional Water Supplies," were developed, the construction and/or operation of such facilities could result in significant adverse environmental impacts, and that this would be a significant cumulative impact.

As discussed above, the project variant would represent 0.09 percent of total retail demand in San Francisco in 2040, whereas implementation of the Bay Delta Plan Amendment would result in a retail supply shortfall of up to 49.8 percent.

Thus, new or expanded dry-year water supplies would be needed under Scenario 3 regardless of whether the proposed project or its variant is approved or constructed, and regardless to which the frequency of dry years may increase due to climate change. As such, any physical environmental impacts related to the construction and/or operation of new or expanded water supplies would occur with or without the proposed project or its variant. Therefore, neither the proposed project, nor the project variant, would have a considerable contribution to any significant cumulative impacts that could result from the construction or operation of new or expanded water supply facilities developed in response to the Bay-Delta Plan Amendment.

Impacts Related to Rationing

Given the long lead times associated with developing additional water supplies, in the event the Bay-Delta Plan Amendment were to take effect sometime after 2022 and result in a dry-year shortfall, the expected action of the SFPUC for the next 10 to 30 years (or more) would be limited to requiring increased rationing. The remaining analysis therefore focuses on whether rationing at the levels that might be required under the Bay-Delta Plan Amendment could result in any cumulative impacts, and if so, whether the proposed project or its variant would make a considerable contribution to these impacts.

The SFPUC has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. Rationing at the level that might be required under the Bay-Delta Plan Amendment would require changes to how businesses operate, changes to water use behaviors (e.g., shorter and/or less-frequent showers), and restrictions on irrigation and other outdoor water uses (e.g., car washing), all of which could lead to undesirable socioeconomic effects. Any such effects would not constitute physical environmental impacts under CEQA.

High levels of rationing could however lead to adverse physical environmental effects, such as the loss of vegetation cover resulting from prolonged restrictions on irrigation. Prolonged high levels of rationing within the city could also make San Francisco a less desirable location for residential and commercial development compared to other areas of the state not subject to such substantial levels of rationing, which, depending on location, could lead in turn to increased urban sprawl. Sprawl development is associated with numerous environmental impacts, including, for example, increased greenhouse gas emissions and air pollution from longer commutes and lower density development, higher energy use, loss of farmland, and increased water use from less water-efficient suburban development.[65] In contrast, as discussed in the transportation section of the EIR, the project site is located in an area where VMT per capita is well below the regional average; development projects in San Francisco are required to comply with numerous regulations that would reduce greenhouse gas emissions, as discussed in the greenhouse gas section of this initial study, and San Francisco's per capita water use is among the lowest in the state. Thus, the higher levels of rationing on a citywide basis that could be required under the Bay-Delta Plan Amendment could lead directly or indirectly to significant cumulative impacts. The question, then, is whether the proposed project or its variant would make a considerable contribution to impacts that may be expected to occur in the event of high levels of rationing.

While the levels of rationing described above apply to the retail service area as a whole (i.e., 5.0 to 6.8 percent under Scenario 1, 15.6 to 49.8 percent under Scenario 3), the SFPUC may allocate different levels of rationing to individual retail customers based on customer type (e.g., dedicated irrigation, single-family residential, multi-family residential, commercial, etc.) to achieve the required level of retail (citywide) rationing. Allocation methods and processes that have been considered in the past and may be used in future droughts are described in the SFPUC's current Retail Water Shortage Allocation Plan.[66] However, additional allocation methods that reflect existing drought-related rules and regulations adopted by the SFPUC during the recent drought are more pertinent to current and foreseeable development and water use in San Francisco and may be included in the SFPUC's update to its Retail Water Shortage Allocation Plan.[67] The Retail Water Shortage Allocation Plan will be updated as part of the 2020 Urban Water Management Plan update in 2021. The SFPUC anticipates that the updated Retail Water Shortage Allocation Plan would include a tiered allocation approach that imposes lower levels of rationing on customers who use less water than other customers in the same customer class and would require higher levels of rationing by customers who use more water. This approach aligns with the state water board's statewide emergency conservation mandate imposed during the recent drought, in which urban water suppliers who used less water were subject to lower reductions than those who used more water. Imposing lower rationing requirements on customers who already conserve more water is also consistent with the implementation of prior rationing programs based on past water use in which more efficient customers were allocated more water.

The SFPUC anticipates that, as a worst-case scenario under Scenario 3, the multi-family mixed-use residential, commercial, and office land uses that would be developed under the

[65] Pursuant to the SFPUC 2015 Urban Water Management Plan, San Francisco's per capita water use is among the lowest in the state.

[66] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan for the City and County of San Francisco, Appendix L – Retail Water Shortage Allocation Plan*, June 2016, https://sfwater.org/index.aspx?page=75, accessed August 20, 2019.

[67] SFPUC, *2015-2016 Drought Program*, adopted by Resolution 15-0119, May 26, 2015.

proposed project or its variant could be subject to up to 38 percent rationing during a severe drought.[68] In accordance with the Retail Water Shortage Allocation Plan, the level of rationing that would be imposed on individual development projects/customers would be determined at the time of a drought or other water shortage and cannot be established with certainty prior to the shortage event. However, newly-constructed buildings, such as those that would be constructed as part of the proposed project or its variant, have water-efficient fixtures and non-potable water systems that comply with the latest regulations. Thus, if the proposed project or its variant demonstrates below-average water use, either of them would likely be subject to a lower level of rationing than other retail customers that meet or exceed the average water use for the same customer class.

While any substantial reduction in water use in a new, water efficient building likely would require behavioral changes by building occupants that are inconvenient, temporary rationing during a drought is expected to be achievable through actions that would not cause or contribute to significant environmental effects. The effect of such temporary rationing would likely cause occupants to change behaviors but would not cause the substantial loss of vegetation because vegetation on this urban infill site would be limited to ornamental landscaping, and non-potable water supplies would remain available for landscape irrigation in dry years. The proposed project or its variant would primarily consist of multi-family residential uses along with some institutional, commercial, and office use, and it is not anticipated to include uses that would be forced to relocate because of temporary water restrictions, such as a business that relies on significant volumes of water for its operations. While high levels of rationing that would occur under Scenario 3 could result in future development locating elsewhere, existing residents, office workers, and businesses within the project site would be expected to tolerate rationing for the temporary duration of a drought.

As discussed above, implementation of the Bay-Delta Plan Amendment would result in substantial system-wide water supply shortfalls in dry years. These shortfalls would occur with or without implementation of the proposed project or its variant. The proposed project's or its variant's incremental increase in potable water demand (0.09 percent of total retail demand) would have a negligible effect on the levels of rationing that would be required throughout San Francisco under Scenario 3 in dry years.

As such, temporary rationing that could be imposed on the proposed project or its variant would not cause or contribute to significant environmental effects associated with the high levels of rationing that may be required on a city-wide basis under Scenario 3, even if that rationing is more frequent due the effects of climate change. Thus, the proposed project or its variant would not make a considerable contribution to any significant cumulative impacts that may result from increased rationing that may be required with implementation of the Bay-Delta Plan Amendment, were it to occur.

## Conclusion

As stated above, there is considerable uncertainty as to whether the Bay-Delta Plan Amendment will be implemented. If the plan amendment is implemented, the SFPUC will

[68] This worst-case rationing level for San Francisco multi-family residential was estimated for the purpose of preparing comments on the Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan (SED), dated March 16, 2017. See comment letter Attachment 1, Appendix 3, Page 5, Table 3. The comment letter and attachments are available at https://www.waterboards.ca.gov/public_notices/comments/2016_baydelta_plan_amendment/docs/dennis_herrera.pdf, accessed August 20, 2019.

need to impose higher levels of rationing than its regional water system level of service goal of no more than 20 percent rationing during drought years by 2025 and for the next several decades. Implementation of the plan amendment would result in a shortfall beginning in years two and three of multiple dry-years in 2025 of 33.2 percent, and dry year shortfalls by 2040 ranging from 23.4 percent in a single dry year and year one of multiple dry years to up to 49.8 percent in years seven and eight of the 8.5-year design drought. While the SFPUC may seek new or expanded water supply facilities, it has not made any definitive decision to pursue particular actions and there is too much uncertainty associated with this potential future decision to identify environmental effects that would result. One or more of these projects may require additional environmental review. Such effects are therefore speculative at this time. In any case, the need to develop new or expanded water supplies in response to the Bay Delta Plan Amendment and any related environmental impacts would occur irrespective of the water demand associated with the proposed project or its variant. Given the long lead times associated with developing additional supplies, the SFPUC's expected response to implementation of the Bay-Delta Plan Amendment would be to ration in accordance with procedures in its Retail Water Shortage Allocation Plan.

Both direct and indirect environmental impacts could result from high levels of rationing. However, the proposed project and its variant would be expected to tolerate the levels of rationing imposed on them for the duration of the drought, and thus would not contribute to sprawl development caused by rationing under the Bay-Delta Plan Amendment.

The proposed project or its variant would be subject to the requirements of the Non-potable Water Ordinance. Thus, the proposed project or its variant would not be expected to contribute to a loss of vegetation because project-generated non-potable supplies would remain available for irrigation in dry years.

The small increase in potable water demand attributable to the proposed project or its variant compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be required throughout the city. Thus, the proposed project or its variant would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment. Therefore, for the reasons described above, under all three scenarios, this impact would be considered less than significant. No mitigation is required.

## PUBLIC SERVICES

The comments in this subsection relate to the topic of Public Services evaluated in initial study Section E.11. A corresponding response follows the comments.

### *COMMENT PS-1: DEMAND FOR POLICE, FIRE, AND LIBRARY SERVICES*

"7. I am concerned about safety of the residents in the project and the residents and visitors to the area as there are many proposed open spaces inside the project with public access." *(Tina Kwok, Email, December 4, 2018 [I-Kwok1-3])*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:…17. Project's effects on police and fire department services" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-18])*

"I have serious reservations about the develop as it stands.

While more residential housing is needed, I believe it must be done without straining current public neighborhood resources. Increasing dwellings by 744 units as proposed could DOUBLE our neighborhood population and the run on public parks, libraries, and other spaces can be overwhelmed. Currently, we do not even have a public meeting hall or a workable recreation center. The one in Laurel Heights park is a small shack - an unusable space for neighborhood and community meetings or deliberations.

If the developers will build that many residential buildings, it must be done by installing more usable public facilities such as libraries, reading rooms / mini-libraries, recreation center, and other spaces which will enhance all of our lives." *(Abe Lee, Email, December 13, 2018 [I-Lee-1])*

"Volume 2C: Page 267 on the sheet/Page 283 in "read mode" pdf: From the 5/11/2018 "BkF Letter" on a meeting with SFFD on 3333 California St. project.

How would the SFFD fight a fire at the building as it stands today for the main building where the access is and the division in half of the building is proposed for this project? Why would the change be needed if the fire can be extinguished with the whole building as is?

Below is a portion of text from the "BkF Letter" for the Euclid building portion. For whatever reason, there is a hand-written comment. Are these the final specs?

*(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-45]) (See Comment Letter I-Hillson2, p. 24 of 37, in RTC Attachment 2 for the excerpted text referred to in the comment.)*

***RESPONSE PS-1: DEMAND FOR POLICE, FIRE, AND LIBRARY SERVICES***

Comments raise concerns about the effects of increased demand on police and fire services, as well as parks and other community facilities, such as libraries; and about public safety for both residents and visitors with the development of an on-site network of paths, plazas, and open spaces. One comment requests clarification regarding existing and future emergency access for fire-fighting services and assumes access was the basis for splitting the building in half.

**Demand for Parks**

Given the variety of parks available in the project vicinity and that project-related growth in demand would not be substantial, the recreation demand generated by the proposed project or project variant would not accelerate the deterioration of existing parks or require the construction of new or expansion of existing recreational facilities; and impacts on parks would be less-than-significant impact. Further, the proposed on-site open space would partially offset some of the project-generated demand for recreational facilities. See Response RE-1: Recreation, RTC pp. 5.J.54-5.J.56, for further information regarding project-generated demand on parks.

**Demand for Police and Fire Protection Services and Other Community Facilities**

As noted under Impact PS-1, initial study pp. 191-192, the project-related increase in residents and employees would not be considered substantial or unplanned growth and would not result in a substantial increased demand for police services, fire protection, and emergency medical services. Police, fire protection, and emergency medical services are regularly assessed as part of the City's dynamic demand-based deployment of available resources and the need to maintain acceptable service ratios and response times. While demand might increase as a result of the implementation of the proposed project or project variant, the increased demand would not be substantial, nor would it require expansion of existing police or fire stations or construction of new facilities.

Therefore, no significant environmental impacts from construction or operation of new or expanded public service facilities would occur as a result of the proposed project or project variant. Thus, the incremental increase in the demand for police, fire protection, and emergency medical services would be a less-than-significant impact.

The proposed project's or project variant's impacts on public services are evaluated in initial study Section E.11, pp. 189-197 (see EIR Appendix B). As discussed under Impact PS-1, initial study pp. 191-193, implementation of the proposed project or project variant would add 1,261 or 1,681 residents to the neighborhood, an increase of 4.9 or 6.5 percent, respectively, compared with the population living within a quarter-mile radius of the project site (25,866 persons). This increase does not constitute a doubling of the neighborhood population as asserted by one comment. The proposed project or project variant would also add 395 or 206 employees, respectively, to the project site. For more information, see initial study Section E.2, Population and Housing, pp. 112-123.

With respect to libraries, the public services analysis in the initial study determined that the incremental increase in the residential population could be served by existing branch libraries in the vicinity, and would not be substantial enough to generate a need for a new library or result in a significant impact on existing library facilities (initial study pp. 195-196).

**Public Safety in Open Spaces**

One comment expressed concern for public safety in the open spaces to be constructed in the proposed project or project variant.

While public safety and crime issues are social issues that are not subject to CEQA analysis, insofar as the comment indirectly raises the issue of demand for police services a response is provided here. The proposed project or project variant's open space program is described in Chapter 2, Project Description, EIR pp. 2.83-2.86. The project site, including proposed open

spaces accessible to the public under existing conditions, would continue to be served by police services from the closest police station, the Richmond Police Station at 461 6th Avenue. The open spaces on the project site that would be accessible to the public would be used by future residents and by visitors to the proposed retail, office. and child care uses as well as by neighborhood residents. The increase in the number of persons on the site would contribute to "eyes on the street," which is one way to maintain safe public spaces. Furthermore, the proposed open space network would incorporate lighting and other features to promote the safe use of the proposed paths, plazas, and other publicly accessible open spaces. For information about project-related demand on police services, see initial study pp. 189-193 and the discussion above under "Demand for Police and Fire Protection Services and Other Community Facilities."

**Change to the Existing Building and Emergency Access**

The BKF letter cited in one of the comments does not state that the existing building must be divided to provide fire access; however, it requests, among other items, that access from the south along the proposed Walnut Walk be provided.[69]

In the July 14, 2016 Preliminary Project Assessment for 3333 California Street (see p. 25), the planning department recommended that the project sponsor further explore providing a meaningful north-south connection of the site to the existing street network. The department noted that, "This north/south pathway may meander through the site and does not need to be a straight axial pathway. Consider accommodating a portal through 'Building A' to support north-south public access." This suggestion was adopted by the project sponsor in an updated project design submitted on March 6, 2017.

Emergency access to the project site for firefighting would continue to be available from surrounding streets on the site's perimeter, as noted in the initial study Project Description on p. 59, as well as in EIR Chapter 2, Project Description on p. 2.75. New access would be provided to the center of the site on the extension of Walnut Street and Walnut Walk, as well as from the west end of Mayfair Walk; this access would be similar to that now available from the internal parking lots and circulation system. As explained on initial study pp. 70-71 and on EIR p. 2.88, water for firefighting would continue to be available from the three existing fire hydrants adjacent to the project site, as well as two new hydrants on the west side of Masonic Avenue and one new hydrant internal to the site near the intersection of the proposed Mayfair and Walnut walks. All new and adaptively reused buildings would include fire safety features required in the building code and fire code. Therefore, as concluded in the initial study, no new firefighting facilities would be necessary.

[69] The BKF letter is a summary of meeting notes between the project sponsor team and the San Francisco Fire Department as part of the pre-application consultation related to the fire department's review of the site and building fire access plan, water flows for firefighting, hydrant locations, etc.

The emergency access impacts analysis is presented in EIR Section 4.C, Transportation and Circulation, under Impact TR-11 (EIR pp. 4.C.99-4.C.101). The design and dimensions of the pedestrian pathways and other elements of the project relevant to emergency access are sufficiently detailed to conclude that the impact would be less than significant.

Supporting documentation for the public services analysis in the initial study and the EIR transportation analysis, including citations to code-required fire access road specifications, are available for review at the planning department offices as part of Case File No. 2015-014028ENV.

## BIOLOGICAL RESOURCES

The comments in this subsection relate to the topic of Biological Resources evaluated in initial study Section E.12. The comments are further grouped according to the following biological-resources-related issues that the comments raise:

- BR-1, Loss of Trees
- BR-2, Effects on Birds

A corresponding response follows each grouping of comments.

### *COMMENT BR-1: LOSS OF TREES*

"I -- among other things, removing the trees, almost 200 trees, and saying that they're going to plant more, those trees that are there now have been there for decades, and it will take many decades for new trees to grow. And we don't know if they'll grow. Who's studied what trees fit there? What if they tear up the sidewalk? And when will they be placed there? After the project is finished? During? Who knows? So we're going to be losing that resource which helps clear the air." *(Krisanthy Desby, Draft EIR Hearing Transcript, pp. 31-32, December 13, 2018 [I-Desby-4])*

"**2. The Proposed Project Would Have a Potentially Significant Impact on Biological Resources and Would Conflict With Local Policies or Ordinances Protecting Biological Resources.**

The proposed project would have a significant adverse impact on the environment because it would remove 185 onsite trees to allow for demolition, excavation and site preparation, including 19 onsite Significant Trees (i.e. trees within 10 feet of the public right-of-way that meet specific height, trunk, diameter, and canopy width requirements) and 15 protected street trees along California Street, and adequate mitigation is not included as a condition of approval of the proposed project. (IS p. 69)

The Initial Study failed to evaluate impacts of the proposed project against the applicable significance standards. Both CEQA Appendix G and the Housing Element EIR acknowledge that a proposed project would normally have a significant effect on the environment if it would:

> "Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
>
> Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
>
> Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
>
> Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
>
> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
>
> Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan." (Ex. B, excerpts from CEQA Appendix G; and Ex. C, excerpts from Housing Element EIR, p. V.N-29.

The Initial Study fails to analyze whether the proposed project would conflict with any local policies and only analyzes select provisions of one local ordinance, the San Francisco Urban Forestry Ordinance (SFUFO), which it misinterprets.

The Initial Study fails to analyze the proposed project's conflict with the stated purposes of the San Francisco Urban Forestry Ordinance, article 16, sections 801 et seq., of the San Francisco Public Works Code ("SF UFO") to "realize the optimum public benefits of trees on the City's streets and public places, abatement of air and noise pollution, enhancement of the visual environment and others;" to integrate street planting and maintenance with other urban elements and amenities, including but not limited to utilities, and enhancement of views and solar access; to recognize that "the removal of important trees should be addressed through appropriate public participation and dialogue, including the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.)", to "recognize that green spaces are vital to San Francisco's quality of life as they provide a range of environmental benefits, protect public safety, and limit conflicts with infrastructure." SF UFO section 801.

Under SF UFO section 807, removal of significant trees "shall be subject to the applicable rules and procedures for removal set forth in Sections 806, 810, or 810A" of the SF UFO. Also, protection of such trees during construction shall be required in accordance with Section 808( c) of the SF UFO.

Under SF UFO section 810A (b), removal of a significant trees) on privately-owned property shall be subject to the rules and procedures governing permits for removal of street trees as set forth in Section 806(b). Under those rules, the Department must give all Interested San Francisco organizations and, to the extent practical, all owners and occupants of properties that are on or across the from the block face where the affected Tree is located, 30 days notice of the proposed removal and also post a notice on the affected Tree 30 days before the proposed removal. SF UFO section 806 (a) (2). If during that notice period, any person files with the Department written objections to the Removal, the Director shall hold a hearing to consider public testimony

concerning the proposed Tree Removal. Under SF UFO section 806(a)(3)(A), seven days notice must be given of the hearing date in the manner provided in SF UFO section 806(a)(3(A). Under SFO section 806(a)(3)( C), the Director's decision is appealable to the Board of Appeals.

Also under SF UFO section 810A, as "part of the Director's determination to authorize removal of a significant tree, the Director shall consider the following factors related to the tree:

> (1) Size, age, and species;
>
> (2) Visual and aesthetic characteristics, including the tree's form and whether it is a prominent landscape feature or part of a streetscape;
>
> (3) Cultural or historic characteristics, including whether the tree has significant ethnic appreciation or historical association or whether the tree was part of a historic planting program that defines neighborhood character;
>
> (4) Ecological characteristics, including whether the tree provides important wildlife habitat, is part of a group of interdependent trees, provides erosion control, or acts as a wind or sound barrier;
>
> (5) Locational characteristics, including whether the tree is in a high traffic area or low tree density area, or provides shade or other public benefits;
>
> (6) Whether the tree constitutes a hazard tree as set forth in Section 802(0); and
>
> (7) Whether the tree has been maintained as set forth in Section 802(1)."

The standards for new street trees require, among other things, that the new street trees "be of a species suitable for the site conditions," and the Director may "waive or modify the number of and/or standards for Street Trees" if other pre-existing surface, sub-surface, or above-grade features render installation of the required Street Trees) in the required fashion impossible, impractical, and/or unsafe." SF UFO section 806 (d). For each required street tree that the Director waives, the applicant shall pay an in-lieu fee or provide alternative landscaping, including sidewalk landscaping.

Thus, decision to remove a tree is a discretionary one which is to be made with consideration of the policies and factors stated in the SF UFO. The Initial Study and Arborist Report (p. 4) prepared by SBCA Tree Consulting, amended 10-19-15, erroneously portray the decision to remove significant trees as automatically granted whenever they would be in the way of construction as long as some kind of replacement trees would be provided.

However, some of the onsite significant trees are prominent landscape features and others have significant historical association because they were present while the historically significant Laurel Hill cemetery was located on the site, so removal of the onsite significant trees would conflict with the policies stated above. The EIR should identify the trees which were present on the Laurel Hill cemetery. Due to this conflict, the proposed removal of Significant Trees is a significant impact that must be evaluated in the EIR.

In addition, the San Francisco Urban Forest Plan (SF UFP) recognizes that "trees and other vegetation clean our air and water, create greener neighborhoods, calm traffic, improve public health, provide wildlife habitat and absorb greenhouse gases." Ex. J, SF UFP p. 1. Among the strategies required to achieve the SF UFP, Strategy 2.2.2 to "Encourage developers to incorporate existing trees into building and site designs" provides that "[c]onsideration should be given during review of building plans to the existing trees on the site, especially 'significant' trees (20 feet or more in height, 15 feet or greater canopy width, and/or 12 inches or greater in trunk diameter." SF UFP pp. 39, 47. Also, Strategy 2.2.4 to ["r]equire contractors to carry Tree

Protection Bonds during construction projects" recognizes that "[c]onstruction activities frequently result in accidental damage or loss of trees-including street trees. Development projects with the potential to disturb existing trees should be required to carry Tree Protection Bonds as insurance. Such bonds would allow recourse in the event that significant damage to trees occurs during the development process through fines, tree replacement or other measures." SF UFP pp. 47. Strategy 2.2.5 to "[i]mprove process for approving Tree Protection Plans for construction projects" states that "[c]urrently Tree Protection Plans are collected by the Planning Department. Review of these plans should take place with appropriate urban forestry staff. The inspection and enforcement of plans should be carried out. These plans include important provisions to protect trees such as protective barriers, construction exclusion zones, and the restriction of material and equipment storage within tree drip zones." *Ibid.*

The SF UFP also recognizes that Public Works Code section 810A "describes trees that are automatically protected under Significant Tree designation and "additional consideration that will be taken into account for tree removal applications." SF UFP p. 73.

The proposed project would have a significant impact on the environment because it would require the removal of Significant Trees and would conflict with the above-described policies of the SF Urban Forestry Plan, including policies that support preserving significant trees on construction sites and require specific mitigation measures such as Tree Protection Bonds and improved process for approving Tree Protection Plans for construction projects by including appropriate urban forestry staff in the approval, inspection and enforcement of plans. In addition, the proposed project would conflict with the policies stated in the SF Urban Forestry Ordinance for consideration of the historical association, size, age, species and visual and aesthetic characteristics, including the tree's form and whether it is a prominent landscape feature or part of the streetscape. The EIR should analyze whether the project as proposed could be built without the removal of each of the Significant Trees.

The IS's reliance on regulatory compliance to prevent significant adverse impacts to these resources was not sufficient because it was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance. Such project specific analysis of potential impacts and the specific effect of regulatory compliance was not included in the Initial Study. The effect of regulatory compliance on these resources cannot be determined because the decision to remove a Significant Tree is discretionary. Also, the environmental evaluation did not commit the project sponsor to implementation of specific performance criteria as mitigation measures agreed as a condition of approval of the project or objective performance criteria for measuring whether the goals related to these resources would be achieved. Such specific measures were not provided or agreed to as mitigation measures adopted as a condition of approval of the proposed project.

Absent a binding agreement or approval decision which implements specific mitigation measures that contain objective performance criteria that would measure whether the policy goals for protection of these resources would be achieved, the substantial adverse impact from removal of 185 onsite trees, including 19 onsite Significant Trees and 15 protected street trees remains significant and must be analyzed as a significant impact in the EIR.

Mitigation measures imposed as a condition of approval of the proposed project should include the following:

> **MITIGATION MEASURE.** Project sponsor will be required to employ a contractor who maintains in effect during all excavation and/or construction performed while trees are present on the site Tree Protection Bonds which would allow recourse in the event that

significant damage to trees occurs during the development process through fines, tree replacement or other measures." Ex. J, SF UFP pp. 47.

**MITIGATION MEASURE.** Prior to their approval, all Tree Protection Plans will be reviewed by appropriate urban forestry staff, and urban forestry staff will be required to perform onsite inspection and enforcement of the Tree Protection plans." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-5])*

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"If and when any of the larger remnant trees reach the end of their lifespan or are killed by the development, it would be a good gesture to the community to have parts of it available for sale and to earmark the funds to go into the urban forestry fund so that tree plantings in this area where such large trees are removed will be increased for the benefit of the community since there are not many large mature trees and to combat future added pollution in this area where traffic is getting worse and as more pollution causing activity increases.

Also, it may be prudent to have not only other parts of the larger remnant trees donated to scientific study as the trunk of the larger trees will tell a story of the environment in the area since the Laurel Hill Cemetery days and the trunk slice at the largest diameter can be saved as a display somewhere. It would help with botanical genome study, too. This would be better than to just dump the remnants and mulch it with no scientific findings for the future. For the environmental study students, would this not be a great project?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-3])*

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"Information from these older growth trees would give scientists a lot of information about climate change and other things as they occurred in this area. Rather than toss out tree cuttings as mulch only, would that the mitigation measures also provide for people to obtain samples for future historic purposes and/or scientific studies? One may not know what they have and rather than do harm first, it may be prudent to study such matters as is done under the "Precautionary Principle."

In addition, since the Laurel Hill Cemetery contained various rare shrubs like manzanitas, it could be that the area still contains some dormant seeds which may be good to collect for biological study. The range of these rare manzanitas and the conditions could be studied by school children. These seeds accumulate in "seed banks" and would be good to preserve for scientific research." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-5])*

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"Summary of several concerns raised by nearby residents and citizens of San Francisco:…15. Concerns relating to the loss of mature onsite trees, the loss of landscaped space on the project site, and the potential loss of areas that could contain rare or endangered plant seeds or rare or endangered plants relevant to the historical significance of the site" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-16])*

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"The Project plans to cut down these beautiful street trees and remove all the sidewalk shrubbery as well as much of the other greenery that is now visible from the street. Trees and landscaping are the first items to be removed in construction and the last to be replaced. The California streetscape will be barren for a decade or more, and to be followed eventually by struggling trees on one side of the sidewalk and 4-story buildings with busy ground floor commercial on the other. The ability to walk beneath the trees or view the general greenery of the site will be gone forever.

The property also currently provides a swath of open grassy area along Euclid Avenue and part of Laurel Street, with views into the shrubbery and trees around the current building from Pine Street, Masonic Avenue and Presidio Avenue, as well as from Euclid and Laurel. The Project will remove most of this greenery, replacing it with 3 or 4 story buildings at street side, flanked by a few trees some of which will be planted on what is now public side walk and road. (The Project incorporates 2,000 sq ft of sidewalk and road for "street improvements" p. 176 and uses it to plant trees that otherwise should go on the property.)" *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-3])*

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"I have lived in the area for **26 years** at the same apartment on Sutter Street. In that time I have come to admire the beautiful trees as well as the open space at the 3333 California site. The open space and trees are extremely valuable not only for myself but for the residents of the area to provide a break from the mad whirlwind of activity that surrounds the site **on a daily basis**. And there are a pair of glorious pair of Coastal Oaks on Laurel that are probably 100 years old, as well as the towering Monterey Pine at Laurel and Euclid (that is one wise old tree.)" *(Steven C. Zeluck, Email, November 10, 2018 [I-Zeluck-1])*

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***RESPONSE BR-1: LOSS OF TREES***

The comments express concerns for the protection, removal, and replacement of trees on and around the project site; the timeline and details of the project sponsor's landscaping program considering the phased construction program and its length; and the quality of life effects that redevelopment of the site will have on the neighborhood. One comment asserts that the biological resources impact analysis failed to analyze the conflicts of the proposed project or project variant with relevant local policies and improperly assesses potential conflicts with the San Francisco Urban Forestry Ordinance. The comments also discuss the benefits of the existing trees, the historical significance of the trees from the Laurel Hill Cemetery period, and aesthetic enjoyment of the trees. One comment suggests that tree information or tree parts (such as cross-sections) be made available for interpretive programs, scientific investigations, or available for sale.

Effects on quality of life and the ability to enjoy the aesthetics of open spaces are not related to physical environmental impacts and are not required to be analyzed under CEQA. These comments are interpreted as comments on the merits of the project; therefore, the response below does not address these issues. For a response to comments expressing opinions regarding the merits of the proposed project or project variant see Response ME-1: Merits of the Proposed Project in RTC p. 5.L.6. For a response to comments related to aesthetics effects see Response CEQA-2: Aesthetics/CEQA Section 21099 starting on RTC p. 5.K.9.

**Consistency with Local Policies and Permits**

One comment states that there is a potential for the proposed project or project variant to conflict with local plans and policies such as the Urban Forestry Ordinance in San Francisco's Public Works Code. The comment notes the EIR does not identify other ordinances related to this topic.

The comment describes the tree removal permit process (including public notification, comment period, hearings, and appeals) under the Urban Forestry Ordinance, and the potential for discretionary actions. The comment states that the decision to remove a tree is discretionary, but states that the initial study portrays the decision to remove significant trees as automatically granted for construction projects, if replacement trees are provided.

The proposed project or project variant's consistency with applicable plans, policies, and regulations is detailed in initial study Section C, Compatibility with Existing Zoning and Plans, on initial study pp. 99-104, and in Chapter 3, Plans and Policies, on EIR pp. 3.1-3.14. The analysis found that there were no conflicts with local policies related to tree protection as detailed on EIR pp. 3.4-3.13 under the "San Francisco Planning Code" and "Other Local Plans and Policies" headings.

*The Urban Forestry Ordinance*

Comments contend that the removal of on-site significant trees proposed in the project or variant should be considered a significant impact under CEQA based on an asserted conflict with the Urban Forestry Ordinance. The Urban Forestry Ordinance is described on initial study pp. 202-203, and provides for the protection of landmark trees, significant trees, and street trees located on private or public property. A street tree is defined as any tree growing within the public right-of-way. A significant tree on private property is defined as a tree within 10 feet of the public right-of-way that meets at least one of the following criteria: 1) a diameter greater than 12 inches, 2) a height of greater than 20 feet, or 3) a canopy greater than 15 feet. A landmark tree is one that has been designated as such based on its age, size, shape, species, location, historical association, visual quality, and other contribution to the City's character. Nominations for landmark tree status are made by the property owner whose property contains the subject tree or by the Board of Supervisors, Planning Commission, or Historic Preservation Commission, or the director of any City agency. If a project would result in tree removal subject to the Urban Forestry Ordinance, the ordinance states in San Francisco Public Works Code section 806 that public works shall require that replacement trees be planted (at a one-to-one ratio) by the project sponsor or that an in-lieu fee be paid by the project sponsor. When a street tree removal permit is granted, public works posts a notice on the affected tree 30 days prior to the removal date and notifies neighbors (on the same side and across the street from the affected tree) and interested San Francisco organizations. If within 30 days after the notification, any person files a written objection to the removal with public works, then the Director of Public Works must hold a hearing to consider public testimony concerning the proposed tree removal. The Director's decision is appealable to the Board of Appeals.

For the proposed project or project variant, removal and replacement of street trees and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be part of the major encroachment permit recommended by public works after a noticed

public hearing with opportunity for public comment, and adopted by the board of supervisors by ordinance. Substantive standards and requirements for tree removal and replacement, including payment of in lieu fees if necessary, would remain the same as set forth in the Urban Forestry Ordinance.

Information about street trees, significant trees, trees to be protected, and tree planting under the proposed project or variant can be found in initial study Section A, Project Description, under the "Proposed Open Space and Landscaping" subheading on initial study pp. 66-70 and the "Proposed Sustainability Features" subheading on initial study pp. 73-74. The biological resources impact analysis is presented in Section E.12, Biological Resources, initial study pp. 197-203. This information is also presented in EIR Chapter 2, Project Description, on EIR pp. 2.80-2.87. As noted on EIR p. 2.87 the program for on-site trees to be retained would include protective measures during construction as well as other measures aimed at improving survivability during construction.

As noted on EIR pp. 2.86-2.87, there are 195 trees on the project site and 15 street trees along the California Street frontage. The project site does not contain any designated landmark trees, but it does have 19 significant trees as defined in the Urban Forestry Ordinance. As explained on initial study p. 69, the project sponsor intends to preserve 10 mature trees from the 195 existing trees on the project site. To replace 185 onsite trees, including the 19 significant trees, and the 15 street trees that would be removed, the project includes planting approximately 92 street trees along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street and approximately 270 trees (including 20 on each side of the proposed extension of Walnut Street) on the project site, for a net gain of 85 trees.

Additional details about locations of existing street trees, proposed new street trees, and key trees to be preserved can be found in the July 3, 2019 Planning Application Re-Submittal 2, Sheet L01.03 Site Diagram – Street Trees, and Sheets L2.00 to L2.06B. As noted on Sheet L2.01 of Planning Application Re-Submittal 2, the proposed tree species along California Street (olive trees) would be coordinated with the tree planting along California Street associated with the City's California Laurel Village Improvement Project.

The Urban Forestry Ordinance does not prohibit removal of protected trees; nor does it automatically allow for removal of trees based on a tree replacement program. The Urban Forestry Ordinance requires that a permit be issued by the public works department for removal of protected trees and that replacement trees be planted at a one-to-one ratio or that an in-lieu fee be paid by the project sponsor (see initial study pp. 202-203). For the proposed project or project variant, removal and replacement of street trees and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be part of the major encroachment permit recommended by public works after a noticed public hearing with opportunity for public comment, and adopted by the board of supervisors by ordinance. Substantive standards and

requirements for tree removal and replacement, including payment of in lieu fees if necessary, would remain the same as set forth in the Urban Forestry Ordinance. The removal of a significant tree in and of itself would not constitute a conflict with the Urban Forestry Ordinance requirements because it is not a prohibited action under the ordinance.

Removal of a significant tree is not in and of itself a significant impact on the environment. Furthermore, there is no requirement under CEQA to analyze whether or not the project could be built while preserving more of the significant trees, as requested in one comment. The analysis includes an evaluation of the effects of the removal of trees as habitat for birds under Impact BI-1; and, under Impact BI-2, as it relates to potential conflicts with an adopted plan or policy that protects biological resources. As stated there, impacts related to conflicts with an adopted plan or policy that protects biological resources such as the Urban Forestry Ordinance would be less than significant. As such, the mitigation measures suggested in one comment (on-site tree monitoring through construction and use of urban forestry staff for review and enforcement of tree protection plans) would not be required as mitigation can only be applied when a significant impact has been identified. Comments have not provided evidence that would change the conclusions of the initial study.

To further clarify that under the proposed project or project variant, removal and replacement of street trees and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be addressed as part of the major encroachment permit recommended by public works and adopted by the board of supervisors by ordinance, the following text has been added to the end of EIR Section 4.F, Initial Study Supplement, to supplement the initial study project- and cumulative-level impact analysis with respect to conflicts with local policies or ordinances protecting biological resources. New text is double-underlined.

## ***BIOLOGICAL RESOURCES***

The Urban Forestry Ordinance

As discussed in the initial study, pp. 202-204, the proposed project's or project variant's removal and replacement of street and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be part of the major encroachment permit recommended by public works after a noticed public hearing with opportunity for public comment, and adopted by the board of supervisors by ordinance. Substantive standards and requirements for tree removal and replacement, including payment of in lieu fees, if necessary, would remain the same as set forth in the Urban Forestry Ordinance. As a result, the proposed project or project variant would be consistent with Urban Forestry Ordinance requirements regarding protection of biological resources, replacement, and payment of any in-lieu fees. The proposed project or its variant would be consistent with all applicable city policies and ordinances regarding protected trees regarding protection of biological resources, replacement, and payment of any in-lieu fees.

**Landscaping and Construction Phasing**

The landscaping and tree planting specifications and schedule would be developed in compliance with the Urban Forestry Ordinance as part of the building permit application process. Phasing for the proposed project or project variant is described in initial study Section A, Project Description, on initial study pp. 74-85; the discussion begins under the heading "Construction Schedule and Phasing" on initial study pp. 74-85; the information can also be found on EIR pp. 2.91-2.96. For a response to comments that express concerns with the length of the construction program and the phasing see Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement, on RTC pp. 5.B.9-5.B.15.

**Trees as Character-Defining Features of the Historic Resource**

Comments suggest that because certain trees were identified as character-defining features of the historic resource at the site, the identified trees would require a higher level of protection. Comments further suggest that a required higher level of protection supports the claim that the project would conflict with the policies of the Urban Forestry Ordinance and result in a significant impact. The historic architectural resources analysis in Section 4.B of the EIR addresses the loss of trees in the context of the portfolio of character-defining features of the site and building and identifies a significant unavoidable impact as it relates to the loss of a historic resource, not because of a perceived conflicts with Urban Forestry Ordinance. As part of that analysis, the mature Monterey Cypress trees on the northern portion of the site are disclosed as possibly being from the period when the site was the Laurel Hill Cemetery (see Section 4.B, Historic Architectural Resources, EIR p. 4.B.5, and EIR Appendix C-2 [Historic Resource Evaluation]). However, those trees are not identified among the 19 on-site significant tees that would be removed, but rather as part of the group of mature trees that the project sponsor would retain with development of the proposed Cypress Square.

One comment suggests reuse and donation of removed trees. This comment is noted, but this is not an issue that is required to be analyzed under CEQA, and therefore is not addressed further in this RTC document. The topic of trees as character-defining features of the historic resource can be found in Section 4.B, Historic Architectural Resources, on EIR pp. 4.B.1-4.B.50 and in Response CR-1: Historic Significance of the Site, on RTC pp. 5.D.7-5.D.11. Suggestions related to components of historic architectural resource mitigation measures, such as the suggested incorporation of trees into the interpretive display, are discussed in Response CR-4: Mitigation Measures, on RTC pp. 5.D.21-5.D.25; for details about the interpretative program, see Mitigation Measure M-CR-1b: Interpretation of the Historical Resource, on EIR pp. 4.B.46-4.B.47.

**Special Status Plant Species**

A comment's assertion that the site is a potential seedbank source for protected plant species (i.e. candidate, sensitive, or special-status species) is not supported by the data available in the California Natural Diversity Database and the California Native Plant Society inventory used as the basis for the analysis. The California Natural Diversity Database is an inventory of the status and locations of rare plants and animals in California. The California Native Plant Society Inventory of Rare and Endangered Plants is a widely-recognized resource that directly guides rare plant protection, conservation planning, and land acquisition and management in California. These resources are typically used to determine the potential for impacts.

For a discussion of rare or endangered plant species, see initial study Section E.12, Biological Resources, on initial study pp. 197-204. The project site does not contain suitable habitat for any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service, and there is a very low likelihood of candidate, sensitive, or special-status species occurring on the project site. For a response related to the merits of the proposed project, see ME-1: Merits of the Proposed Project on RTC p. 5.L.6.

## *COMMENT BR-2: EFFECTS ON BIRDS*

"**3. The Proposed Project Would Have a Potentially Significant Adverse Effect, Either Directly or Through Habitat Modifications, on Resident or Migratory Birds.**

The proposed project would remove 185 onsite trees to allow for demolition, excavation and site preparation, including 19 onsite Significant Trees (i.e. trees within 10 feet of the public right-of-way that meet specific height, trunk, diameter, and canopy width requirements) and 15 protected street trees along California Street. (IS p. 69)

In addition to the significance standards stated in the preceding section, the Housing Element EIR acknowledges that "new construction could result in impacts related to biological resources if new housing would result in disturbance from construction activities, tree removal...interference with migration, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor...". (Ex. C, p. V.N-30, 46)

The Initial Study acknowledges that the proposed project "would result in the temporary loss of nesting and foraging habitat through the removal of onsite trees and vegetation during construction" and states that "after the approximately 7- to 15-year construction period and incorporation of site landscaping (including the planting of up to 250 new trees on the project site) birds would be expected to inhabit the project site." IS p. 199. The IS does not state how soon after the incorporation of site landscaping bird habitation would be expected to occur on site. The Initial Study also discloses that tree removal and construction-related activities associated with the proposed project could adversely affect bird breeding "at the project site and in the immediate vicinity." IS 199. "Construction activities that may cause visual disturbance or alter the ambient noise environment include vegetation removal, demolition of existing buildings, and construction of foundations and new buildings." IS p. 199-200. The Initial Study also acknowledges that "landscaped areas within the project site may provide suitable habitat for

resident and migratory birds covered under the Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711) and the California Fish and Game Code (sections 3503 and 3503.5). IS p. 199.

The information set forth above supports a fair argument that the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The information set forth above also provides a fair argument that the proposed project would interfere substantially with the movement of native resident or migratory wildlife species or impede the use of native wildlife nursery sites. This impact would be significant under the standards of Appendix G of the CEQA Guidelines and the Housing Element EIR set forth above. The impact on habitat interference would be substantial since it would last at least 7 years and possibly more than 15 years, given the need for the newly planted, unestablished trees to grow to sufficient size to support bird habitat. The Initial Study provides no mitigation for this potentially significant impact on biological resources, so the impact is significant and must be evaluated as a significant impact in the EIR, along with mitigation measures and alternatives that could reduce or avoid the impact. The Initial Study provides potential mitigation only for interference with onsite bird nests.

In addition, the Initial Study admits that the proposed project "would increase the number of new buildings at the project site and the heights of existing buildings, which could create potential obstacles for resident or migratory birds. This could result in an increase in bird injury or mortality in the event of a collision. The existing office building at the center of the site would be partially demolished and separated into two buildings connected by a bridge at the fourth floor. The separated buildings (i.e. Center Buildings A and B) would be adaptively reused as residential buildings and would include two- to three-story vertical additions, increasing the height from approximately 55.5 feet tall to up to 92 feet tall, and a connecting bridge at the fourth floor. In addition, the proposed project includes the construction of 3 new structures at the site ranging from 37 to 45 feet in height (37 to 67 feet for the project variant), some of which would include balconies. San Francisco Planning Code section 139 addresses 'feature-related hazards', which are defined as 'free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet and larger in size.' The proposed project or project variant would comply with the feature-related standards of planning code section 139 by using bird-safe glazing treatment on 100 percent of any feature-related hazards (e.g. balconies, free-standing glass walls, or skywalks). With planning code section 139 compliance and implementation of Mitigation Measure M-B1-1, the proposed project or project variant would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. This impact therefore, would be less than significant with mitigation." IS p. 201-202.

However Mitigation Measure M-B 1-1 pertains only to interference with onsite bird nests. The remainder of the discussion amounts only to an argument that regulatory compliance would be sufficient to mitigate significant impacts. However, Planning Code section 139 allows the Zoning Administrator to waive the requirements contained within Section 139(c)(2) or modify such requirements to allow equivalent Bird-Safe Glazing Treatments upon the recommendation of a qualified biologist. Also, Planning Code section 139(c)(2)(B) allows general exceptions for historic buildings and, pursuant to the Secretary of Interior Standards for Rehabilitation of Historic Properties, requires treatment methods such as netting, glass films, grates, and screens. Thus, compliance with Planning Code section 139 may not result in use of bird-safe glazing treatment on 100% of the feature-related hazards. Since regulators are allowed to use discretion in

applying the subject regulations, the specific effect of the application of the regulations cannot be determined.

The IS's determination that regulatory compliance will be sufficient to prevent significant adverse impacts was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance. Such project specific analysis of potential impacts and the effect of regulatory compliance was not included in the Initial Study. Also, the environmental evaluation did not commit the project sponsor to implementation of specific performance criteria as objective criteria for measuring whether the goal would be achieved. Such specific measures were not provided and adopted as a condition of approval of the proposed project. Further, under Planning Code section 139(a), structures that create a feature-related hazard "are required to treat all of the feature-related hazard." Mitigation Measure M-B 1-1 does not incorporate this measure. Absent an agreement to implement specific mitigation measures that contain specific performance criteria and objective criteria for measuring whether the goal would be achieved, the substantial adverse impact of interference with the movement of native resident or migratory birds remains significant and must be analyzed in the EIR as a significant impact.

In addition, the Initial Study's assertion that "the proposed project or project variant would comply with the feature-related standards of planning code section 139 by using bird-safe glazing treatment on 100 percent of any feature-related standards of planning code section 139 (e.g., balconies, free-standing glass walls, or skywalks" conflicts with the standards of Planning Commission Resolution 9212, which states that "clear, untinted glass should be used at and near the street level." Ex. C, excerpts from Housing Element EIR, p. V.A-35. The EIR should also analyze any and all conflicts between the bird-safe glazing treatment and the Planning Commission Resolution 9212 standards for clear, untinted glass at and near street level, because conflicts between applicable plans indicate that the impact may not be insignificant as a result of regulatory compliance.

Renderings of the proposed project show clear glass walls and do not depict frosted glass, permanent stencils, or the like. The EIR should identify specific mitigation measures that would be used to provide bird-safe glazing treatment and incorporate them as a condition of approval of the proposed project." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-6])*

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***RESPONSE BR-2: EFFECTS ON BIRDS***

The comment expresses concern for the proposed project's or project variant's effects on birds. The comment discusses information from the initial study pertaining to tree removal, tree planting, and biological resources, as well as information from the San Francisco 2004 and 2009 Housing Element EIR regarding impacts related to biological resources. The comment discusses bird safety, bird habitat, protected birds, and bird-safe buildings, as well as Planning Code Section 139, Standards for Bird-Safe Buildings, and Planning Commission Resolution 9212, Reflective Glass.

**Migratory Birds**

The proposed project or project variant may result in the displacement of nesting migratory birds and/or the abandonment of active nests should construction and vegetation removal occur during

the typical nesting season (January 15 through August 15). Implementation of Mitigation Measure M-BI-1: Preconstruction Nesting Bird Surveys and Buffer Areas (initial study pp. 200-201), would reduce this potentially significant impact on nesting birds covered under the Migratory Bird Treaty Act (MBTA)[70] and California fish and game code to a less-than-significant level by ensuring that project activities do not result in the loss of an active nest or disturb the nest's inhabitants. Migratory birds can be candidate, sensitive, or special status species, but not all migratory birds are in one of these protected categories.

The impact of the loss of habitat was not identified as an impact on candidate, sensitive or special status species because on-site habitat is not suitable for those species and none were identified on the project site based on a review of the California Natural Diversity or California Native Plant Society databases (see initial study p. 199). Therefore, mitigation is not required. Furthermore, the fact that new on-site landscaping would need to mature to provide suitable habitat is not a significant impact of the project; the identified impact is the effect on migratory birds due to the loss of existing habitat. This impact is mitigated to less-than-significant with implementation of Mitigation Measure M-BI-1. Comments did not provide evidence supporting their claim that the site includes suitable habitat for candidate, sensitive or special status species or the occurrence of such species on the site.

Landscaped areas within the project site may provide suitable habitat for resident and migratory birds covered under the MBTA and the fish and game code sections 3503 and 3503.5, as discussed on initial study pp. 199-204. The proposed project or project variant would result in the temporary loss of nesting and foraging habitat through the removal of on-site trees and vegetation during construction; however, nearby parks such as the Presidio of San Francisco and Golden Gate Park offer suitable nesting and foraging habitat for potentially displaced migratory birds. These nearby parks provide a more attractive environment for birds due to more expansive nesting and foraging habitat as well as lower levels of human-related disturbances. Additionally, after construction and incorporation of landscaping (including planting up to 250 new trees on the project site) birds would be expected to inhabit the project site again. The phased construction program would last for 7 years to up to 15 years. Although construction under a seven-year program would be continuous with overlapping phases, as each building or group of buildings is built and landscaping is installed during the buildout period, birds may return to some of the newly landscaped areas while construction occurs elsewhere on the site. Under a longer construction time frame there would be periods of dormancy between phases where birds may return to use on-site habitat for nesting and/or foraging. For more discussion regarding concerns expressed in comments about the length of construction see Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement, on RTC pp. 5.B.9-5.B.15.

[70] United States Code, Title 16-Conservation, Chapter 7-Protection of Migratory Game and Insectivorous Birds, Subchapter II-Migratory Bird Treaty, sections 703–712.

**Bird-Safe Buildings**

The project site is subject to planning code section 139(b)(2) Feature-Related Standards, and it is not subject to planning code section 139(b)(1) Location-Related Standards, because it is not an Urban Bird Refuge and is not located within 300 feet of an Urban Bird Refuge.[71] The proposed project or project variant would increase the number of new buildings at the project site and the heights of existing buildings, which could create potential obstacles for resident or migratory birds. Bird safety is discussed in initial study Section E.12 Biological Resources, on initial study pp. 197-204. The proposed project or project variant could result in an increase in bird injury or mortality in the event of a collision if no measures are taken to make the existing and future hazardous glass features "visible" to birds. San Francisco Planning Code section 139, discussed on initial study pp. 201-204, addresses "feature-related hazards," which are defined as "free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet and larger in size." As noted on EIR p. 2.26, the proposed project or project variant would use bird-safe glazing treatment on 100 percent of any feature-related hazards (e.g., balconies, free-standing glass walls, or skywalks) that complies with the feature-related standards of Planning Code section 139.

Flexibility is built into the planning code, as the comment states; however, the ability of the Zoning Administrator to waive or modify the requirements of section 139 must be based on the recommendation of a qualified biologist that equivalent bird-safe glazing treatments would be implemented in compliance with this code section. Thus, even if the Zoning Administrator waives or modifies any of the requirements, the proposed project or project variant would be required to implement equivalent treatments and would not result in a significant impact on bird species. Nonetheless, the project sponsor has committed to the use bird-safe glass required under planning code section 139.

The comment expresses concern with planning commission Resolution 9212, which includes the guideline that clear, untinted glass should be used at and near the street level, and the potential for conflict with Planning Code section 139 regarding bird-safe glazing treatments.

These competing directives were taken into account when section 139 of the planning code and the related planning department guidance were written. There are window treatments that comply with both Planning Commission Resolution 9212 and also with Planning Code section 139. For example, Planning Code section 139 allows up to 10 percent untreated glazing and encourages building owners to concentrate permitted transparent glazing on the ground floor and lobby entrances. Additionally, bird-safe glazing treatments may include frosted glass, fritting, or UV patterns visible to birds, for example, as described in the *Design Guide - Standards for Bird-Safe*

[71] San Francisco Planning Department, *Urban Bird Refuge* (Poster), 2014, available online at http://maps.sfplanning.org/Urban_Bird_Refuge_Poster.pdf, accessed July 25, 2019

*Buildings*, the planning department's simple design guide to implementing section 139,[72] and in the more detailed "Standards for Bird-Safe Buildings" adopted July 14, 2011.[73]

The comment states that renderings in the initial study appear to show clear glass walls, not walls with bird-safe treatments. These façade details would be further developed in the design and building permit phases to ensure that the chosen glazing treatments comply with Planning Code section 139 and implementation of Mitigation Measure M-BI-1. Therefore, no additional mitigation measures are required to mitigate effects on birds.

The significance determinations in the biological resources analysis were based on a project-specific analysis that included a review of the California Natural Diversity and California Native Plant Society databases. Legally required actions have enforcement mechanism that allow lead agencies to factor compliance into the impact analysis determinations. These requirements are considered when determining whether or not a project-related impact would have a significant impact

With the use of bird safe glass that complies with Planning Code section 139 and implementation of Mitigation Measure M-BI-1, the proposed project or project variant would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. This impact, therefore, would be less than significant with mitigation.

## GEOLOGY AND SOILS

The comments and corresponding responses in this subsection relate to the topic of Geology and Soils evaluated in initial study Section E.13. The comments are further grouped according to the following geology and soils-related issues that the comments raise:

- GEO-1, Construction and Geologic Constraints; Soil Settlement, Dewatering and Foundation Stability
- GEO-2, Erosion and Loss of Topsoil
- GEO-3, Loss of Unique Geological Features/Changes to Existing Topography

A corresponding response follows each grouping of comments.

[72] San Francisco Planning Department, *Design Guide - Standards for Bird-Safe Buildings*, available online at https://sfplanning.org/resource/standards-bird-safe-buildings-design-guide. Accessed on April 9, 2019.

[73] San Francisco Planning Department, *Standards for Bird-Safe Buildings*, adopted July 14, 2011, available online at https://sfplanning.org/project/standards-bird-safe-buildings. Accessed on April 09, 2019.

## *COMMENT GEO-1: CONSTRUCTION AND GEOLOGIC CONSTRAINTS; SOIL SETTLEMENT, DEWATERING & FOUNDATION STABILITY*

"Dewatering/Subsidence. Page 2.99. When the JCCSF building was constructed, it was necessary to pump a significant amount of water to draw down the water table to perform construction. We assume that the Project will face similar water tables issues. In fact, Page 2.99 indicates that groundwater or perched water could be encountered; however, the DEIR does not include any mitigation measures in the event of dewatering. We believe that the DEIR needs to include appropriate mitigation measures addressing potential subsidence in the event of dewatering." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, January 8, 2019 [O-JCCSF1-4])*

"When we built the JCCSF, we pumped a significant amount of water to draw down the water table to perform construction. Please study this issue to confirm if this issue will apply to this project and if so please study the impact on the JCCSF including potential settlement. *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, June 8, 2018 [O-JCCSF2-5])*

"Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft. The only area that isn't excavated is under a portion of the existing building! Not sure how they missed that opportunity!" *(Sal Ahani, Email, January 8, 2019 [I-Ahani-17])*

"As previously stated in my comments of June 8, 2018 on the Initial Study for 3333 California Street, which are incorporated by reference herein, the proposed project would excavate and remove substantial portions of the topography and existing slope of Laurel Hill (a scenic high point known for its scenic vistas,…" *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-9])*

"**C. The Proposed Project Would Expose People or Structures to Potential Substantial Adverse Effects Including the Risk of Loss, and/or Would Be Located on a Geologic Unit or Soil That is Unstable or Would Become Unstable as a Result of the Project and Potentially Result in On-Site or Off-Site Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse.**

The Langan Treadwell Rollo Preliminary Geotechnical Investigation dated 3 December 2014 (Ex. H "LTR") constitutes expert evidence supported by fact that all of the aforementioned potentially significant impacts could occur as a result of the proposed project. The Initial Study violates the requirements of CEQA because it fails to analyze these impacts a significant impacts and fails to require binding and enforceable mitigation measures to reduce or avoid these significant effects as a condition of approval of the project.

The Revised Environmental Evaluation explains that massive excavation would occur on the project site for below-grade parking garages, the basement levels of buildings and site terracing, as the project would excavate approximately 61 percent of the surface of the site (274,000/446,479 square feet) at depths of 7 to 40 feet. Revised Environmental Evaluation p. 28. The Initial Study estimates that 241,300 net cubic yards of soils would be excavated (which is 2,171,700 square feet of soils). IS p. 207. Approximately 288,300 cubic yards of demolition

debris and excavated soils would be removed from the project site, and approximately 3700 cubic yards of soil would be reused on the project site as fill. IS p. 78.

LTR advises that adverse effects could occur onsite that could result in damage from the following conditions that could result from project activities:

- the presence of fill and loose sand will affect foundation support and excavation support ~P. 9).

- the new building to be constructed adjacent to the parking garage may impose surcharge on the basement wall of the parking garage; to avoid surcharging the wall, the western perimeter wall of the new building may need to be supported on drilled piers that gain support in the bedrock below the elevation of the bottom of the parking garage. (LTR, p. 10).

- the proposed single basement will require an excavation of approximately 12 feet below the ground surface; the primary considerations related to the selection of the shoring system are the presence of fill and loose to medium-dense sand and the potential settlement of adjacent structures and improvements caused by movement of temporary shoring (LTR, p. 10).

- to retain the excavation sides for the multi-level basements, a retaining system with tiebacks may have been used; therefore, tiebacks may be encountered during basement excavation for new structure located east of the parking garage (LTR, p. 10).

- drilling of shafts for the soldier piles will likely require casing and/or use of drilling mud (slurry) to prevent caving; to prevent settlement of adjacent improvements, soldier piles should not be installed by driving or vibratory methods; a monitoring program should be established to evaluate the effects of the construction on the adjacent buildings and surrounding ground (LTR, p. 10-11).

- sand with low fines content was encountered within the zone of excavation.; to reduce caving, lagging boards should be placed with every foot of excavation to limit caving; voids that result from caving soil behind wood lagging should be grouted before proceeding to the next row of lagging (LTR, p. 11).

- the bottom of the excavation should be above the groundwater level; during drilling of the soldier-pile holes, groundwater or perched water may be encountered; to keep the holes from caving, casing and/or drilling slurry may be needed; alternatively, the soldier piles may be installed using auger-case method (LTR, p. 11).

- generally, soldier piles can be installed under the City’s sidewalk provided that the top 3 feet of the soldier piles are removed after the permanent basement wall is cast; if tiebacks are needed, it has been our experience that using hollow-stem augers to install tiebacks in sand will result in loss of ground; therefore, tiebacks, if required, should be installed using smooth-cased method (such as a Klemm rig) to reduce loss of ground (LTR, p. 11).

- the soil at subgrade should consist of stiff to very stiff clay, medium dense sand, and bedrock; therefore, the slabs may be supported on grade; if weak soil is present at subgrade level, the weak soil should be removed and replaced as engineered fill (LTR, p. 11).

- the near surface soil was determined to be moderately corrosive; the corrosive soil will adversely affect below grade improvements, such as foundations and utilities; recommendations for protection of buried structures presented in Appendix D are that all steel, iron, etc, should be properly protected against corrosion depending upon the critical nature of the structure; all buried metallic pressure piping should be protected against corrosion (LTR, p. 11).

- if the site grading is scheduled for the rainy season, the near-surface soil may be too wet to achieve adequate compaction during site preparation and fill placement and may deflect significantly under the weight of construction equipment; for these conditions, moisture conditioning of the material and the use of lightweight equipment may be required to lower the soil to a moisture level that will promote proper compaction; methods of moisture conditioning include mixing and turning (aerating) the soil to naturally dry the soil and lower the moisture content to an acceptable level; aeration typically requires at least a few days of warm, dry weather to effectively dry the material (LTR, p. 12).

- if localized soft or wet areas are encountered, it may be necessary to over-excavate to a depth of 18 to 24 inches, place a layer of stabilizing geo-synthetic, and backfill with granular material to stabilize the subgrade and bridge the soft material (LTR, p. 12)

- bedrock encountered in the borings consists of serpentinite and sandstone; serpentinite contains naturally occurring asbestos; therefore a Site Mitigation Plan may be needed to be prepared prior to construction; bedrock handling and disposal should be performed in accordance with the Site Mitigation Plan. (LTR, p. 12)

- inclinations of temporary slopes should not exceed those specified in local, state or federal safety regulations; at a minimum the requirements of the current OSHA Health and Safety Standards for Excavations (29 CFR Part 1926) should be followed; temporary slopes less than 10 feet high should be inclined no steeper than 1.5: 1 (horizontal to vertical); in addition, all vehicles and other surcharge loads should be kept at lease 10 feet away from the tops of temporary slopes (LTR, p. 13).

- all areas to receive improvements should be stripped of vegetation and organic topsoil; voids resulting from the demolition activities should be properly backfilled with lean concrete or engineered fill as described in the LTR recommendations (LTR, p. 14).

- prior to placement of any engineered fill, the onsite soil exposed by stripping should be scarified to a depth of at least 12 inches, moisture-conditioned to at least three percent above optimum moisture content, and compacted to at least 95 and 90 percent relative compaction for sand and clay, respectively; the soil subgrade should be kept moist until it covered by select fill (LTR, p. 14).

- if soft areas are encountered during site preparation and grading, the soft material should be removed and replaced with engineered fill; if the soft material is deeper than 24 inches, LTR recommends over-excavating to a depth of 18 to 24 inches, placing a geotextile fabric at the bottom of the excavation, and backfilling with granular material (LTR, p. 14).

- fill should consist of onsite or imported soil that is non-corrosive, free of organic matter or other deleterious material, contains no rocks or lumps larger than four inches in greatest dimension, has a liquid limit of less than 25 and a plasticity index lower than 8, and is approved by the geotechnical engineer (LTR, p. 14).

- fill should be placed in horizontal lifts not exceeding eight inches before compacted, moisture-conditioned to above optimum moisture content, and compacted to at least 90 percent relative compaction; fill thicker than five feet and-or consisting of clean sand or gravel should be compacted to at least 95 percent relative compaction (LTR, p. 14).

- LTR should be provided with samples of proposed fill at least three days before use at the site; the grading contractor should provide analytical test results or other suitable environmental documentation indicating the imported fill is free of hazardous materials at least

three days before use at the site; a bulk sample of approved fill should be provided to LTR at least three working days before use at the site so a compaction curve can be prepared (LTR, p. 14-15)

- where necessary, trench excavations should be shored and braced to prevent cave-ins and/or in accordance with safety regulations; if trenches extend below the groundwater level, it will be necessary to temporarily dewater them to allow for placement of the pipe and/or conduits and backfill (LTR, p. 15).

- if fill with less than 10 percent fines is used, the entire depth of the fill should be compacted to at least 95 percent relative compaction; jetting of trench backfill should not be permitted; special care should be taken when backfilling utility trenches in pavement areas; poor compaction may cause excessive settlements resulting in damage to the pavement section (LTR, p. 15).

- to reduce the potential for water to become trapped in trenches beneath the building or pavements, which trapped water can cause heaving of soils beneath slabs and softening of subgrade soil beneath pavements, an impermeable plug consisting of either native clay or lean concrete, at least five feet in length, should be installed where the trenches enter the building or cross planter areas and pass below asphalt or concrete pavements (LTR, p. 15).

- to reduce the potential for differential movement and cracking, exterior concrete slabs should be underlain by at least 4 inches of Class 2 aggregate base, and the upper 12 inches of the soil subgrade should be compacted to at least 95 and 90 percent relative compaction for sand and clay, respectively (LTR, p. 15).

- the foundation subgrade should be free of standing water, debris, and disturbed materials prior to placing concrete; if fill, soft, or loose soil is present at the foundation subgrade, it should be removed to expose competent material and be replaced by lean concrete (LTR, p. 17).

- to avoid surcharging the basement wall of the parking garage, the western perimeter wall of the new building may need to be supported on drilled piers that gain support in the bedrock below the elevation of the parking garage (LTR, p. 17).

- drilled piers should be installed by a qualified contractor with demonstrated experience in this type of foundation; loose material may potentially cave during drilling, thus casing and/or drilling fluid may be required (LTR, p. 18).

- where space does not permit a sloped excavation, shoring will be required, and a cantilever soldier pile and lagging shoring system is the most appropriate for the depth of the excavation planned and types of soil present; penetration of soldier piles should be sufficient to provide lateral stability (LTR, p. 18).

- a soldier pile and lagging system is relatively flexible, and movement should be anticipated; if the shoring system is properly designed and installed, movements at the top of the shoring should not exceed one inch (LTR, p. 19).

- because the site is in a seismically active region, the wall design should be checked for seismic condition; seismic design parameters recommended for areas in the northwest portion of the site where bedrock is relatively deep or in the eastern and southern portions of the site where bedrock is relatively shallow, should be followed (LTR, p. 21-22).

Significantly, LTR concludes by recommending in-person observation of various operations to check that the contractor's work conforms to the geotechnical aspects of the plans and specifications:

> "Prior to construction, we should review the project plans and specifications to check their conformance to the intent of our recommendations. During construction, we should observe excavation, temporary shoring and foundation installation, subgrade preparation and compaction of backfill. These observations will allow us to compare the actual with the anticipated subsurface conditions and check that the contractor's work conforms to the geotechnical aspects of the plans and specifications...Actual subsurface conditions may vary. If any variations or undesirable conditions are encountered during construction, or it the proposed construction will differ from that described in this report, Langan Treadwell Rollo should be notified to make supplemental recommendations, as necessary." (LTR, p. 22)

This recommendation is evidence that the existence of various Building Code provisions, the preparation of plans by a qualified geotechnical engineer, and the review of construction plans by the Department of Building Inspection cannot be relied upon as providing adequate or effective mitigation for the hazards described above, given the reality that the project proponent and/or contractor will focus on minimizing costs of construction and the fact that regulatory standards are subject to interpretation. LTR did not rely upon an expectation of regulatory compliance as mitigation for these potentially significant adverse effects of the project. Rather, LTR recommended that on-site monitoring of various excavation and construction activities by a licensed geotechnical professional would be required to mitigate the potential adverse impacts of this project. While LTR recommended that such on-site monitoring be performed, the project does not incorporate it as an enforceable, binding mitigation measure imposed as a condition of approval of the project.

In addition, the Initial Study recognizes that in the event of an earthquake that exhibits strong to very strong seismic ground shaking, "considerable damage could occur to buildings on the project site, potentially injuring building occupants and neighbors." IS p. 209.

In order to reduce the severity of the aforementioned significant impacts, the following mitigation measures should be imposed in the EIR as conditions of approval of the project:

> **MITIGATION MEASURE.** Prior to construction, Langton Treadwell Rollo (or an equivalently qualified geotechnical professional licensed in the State of California, herein "LTR")) should review the project plans and specifications to check their conformance to the intent of LTR's recommendations in its Preliminary Geotechnical Investigation, 3333 California Street dated December 3, 2014. At all times during construction, LTR should observe excavation, temporary shoring and foundation installation, subgrade preparation and compaction of backfill. These observations will allow LTR to compare the actual with the anticipated subsurface conditions and check that the contractor's work conforms to the geotechnical aspects of the plans and specifications...Actual subsurface conditions may vary. If any variations or undesirable conditions are encountered during construction, or if the proposed construction will differ from that described in this report, LTR should be notified to make supplemental recommendations, as necessary."
>
> **MITIGATION MEASURE.** Since bedrock encountered in the borings consists of serpentinite and sandstone and serpentinite contains naturally occurring asbestos, a Site Mitigation Plan to reduce or eliminate any exposures of workers or nearby residents to asbestos will be prepared prior to excavation by a qualified, licensed professional and reviewed by LTR prior to excavation; such Site Mitigation Plan will be included in the Draft EIR and will be released for public comment; bedrock handling and disposal must be performed in accordance with the Site Mitigation Plan.

**MITIGATION MEASURE.** Since up to 15 feet of loose to medium dense sand was encountered above the water table, and loose and medium dense sand may densify during an earthquake (IS p. 210), most of the soil susceptible to seismic densification must be removed during excavation; at the conclusion of excavation, LTR will perform any necessary or advisable investigation of the site and verify in writing that most of the soil subject to seismic densification has been removed from the site.

**MITIGATION MEASURE.** Project sponsor will be required to maintain a water truck on site during all excavation, demolition, filling and other activities that could cause dust and will wet down dust sufficiently to prevent its blowing onto residences across the street from the site on Laurel, Euclid, Presidio and California streets.

Residents are very concerned that the 7-10 year proposed duration of construction would be too impactful for this residential area, especially since there would be substantial excavation from 7 to 40 feet below grade to accommodate underground garages and foundations. Residents recently learned of this proposed duration, and the developers stated that they would seek a development agreement that would permit them to construct the project over a 15 year period so that "if conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability." (See Ex. I, October 12, 2017 email from Dan Safier) Since the Initial Study indicates that the developers would seek the right to apply for additional zoning changes after a certain period, the developers could seek approval for increases in the project from the Board of Supervisors, so the project could become more impactful. *Ibid.* The EIR must address all phases of the project, including foreseeable future expansion that could increase impacts of the project." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-4])*

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"- There is a concern in the community about excavation and the water table under the land -the water table survey was done during one the of the driest periods of SF and may not reflect the true measurement" *(Tina Kwok, Email, January 8, 2019 [I-Kwok3-4 and Tina Kwok, Email, January 9, 2019 [I-Kwok4-5])*

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"Summary of several concerns raised by nearby residents and citizens of San Francisco:…4. Effect of ground settlement on adjacent buildings" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-5])*

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"What is the impact on the…water-table while digging the foundation the foundations are dug and concrete poured?" *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-5])*

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"Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft. The only area that isn't excavated is under a portion of the existing building! Not sure how they missed that opportunity!" *(Laura Rubenstein, Email, January 2, 2019 [I-Rubenstein-12])*

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### *RESPONSE GEO-1: CONSTRUCTION AND GEOLOGIC CONSTRAINTS; SOIL SETTLEMENT, DEWATERING & FOUNDATION STABILITY*

**Ground Settlement**

One comment expresses concern over the effect of ground settlement as a result of the project on nearby buildings. One comment generally asserts that compliance with regulatory requirements such as those in the building code is not sufficient to determine that impacts are less than significant because it cannot be guaranteed, and thus mitigation measures must be imposed. The comment refers to the Langan Preliminary Geotechnical Investigation, quoting several geotechnical recommendations provided for the proposed site plan, such as foundation specifications, temporary shoring and retaining systems, replacement of loose soils with engineered fill, water and saturation controls, slope requirements, and project plan review and characterizes the geotechnical recommendations as mitigation measures.

As required by California Building Code Chapter 18, Soils and Foundations, the preliminary geotechnical investigation assessed geological and seismic hazards including the existing elevation of the water table, and potential for slope instability, liquefaction, total and differential settlement, and surface displacement due to faulting or seismically induced lateral spreading or lateral flow (see initial study pp. 209-210). The investigation includes recommendations for foundation type and design criteria; waterproofing, pumping, and drainage; stabilization and dewatering; and, if necessary, underpinning or protecting the structural integrity of adjacent structures. In addition, as required by California Building Code Chapter 18, the geotechnical investigation incorporates the results of exploration and testing, evaluation of site suitability for the development proposed, load criteria, method and material recommendations, and provides the qualifications of geotechnical engineering professionals that performed the investigation. A design-level geotechnical investigation would be performed as part of the building permit process to develop site- and building-specific recommendations to address the potential for geotechnical hazards during excavation, foundation installation, and shoring pursuant to building code requirements.

The project sponsor would work with Langan or other qualified geotechnical engineers on a design-level geotechnical report as part of the building permit process. The report would reflect the latest iteration of the proposed project, and would update geotechnical recommendations where necessary to comply with the building code. The building department staff would review the construction plans for conformance with the recommendations in the geotechnical report as part of the building permit review process. The project sponsor and the design team would be required to follow the geotechnical report recommendations as part of the building permit process. Thus, mitigation measures are not necessary to ensure compliance with the geotechnical recommendations.

Suggested mitigations in the comment letter include, among others, legally required actions such as the development of a site mitigation plan, which has been described in the initial study under the topic of Hazards and Hazardous Materials, initial study Section E.15, p. 230, and which is implemented not as part of the geotechnical investigation pursuant to California Building Code Chapter 18, but instead to comply with Article 22A of the San Francisco Health Code, the Maher Ordinance. Other mitigations suggested by the comments are not required, or would be implemented in compliance with applicable laws and regulations, such as the request for a Langan or equivalently qualified professional to observe excavation, temporary shoring, foundation installation. Thus, no mitigation measures are necessary to ensure compliance with the building code or other laws and ordinances.

One comment states that mitigation measures should be imposed pertaining to naturally occurring asbestos, and identify the legally required development of site mitigation, construction dust control, and asbestos dust control plans as mitigation. As discussed in Section 4.J, Initial Study Supplement, on EIR pp. 4.F.7-4.F.10, the project sponsor would be required to comply with the City's Construction Dust Control Ordinance as well as the Asbestos Airborne Toxic Control Measure with oversight from the regional air district,[74] which would ensure that significant exposure to airborne asbestos would not occur. Further discussion of concerns pertaining to compliance with applicable hazards and hazardous materials regulatory requirements is provided in Response HZ-1: Exposure to Hazardous Materials on RTC pp. 5.J.120-5.J.125.

One comment states that mitigation measures should be imposed to maintain a water truck to wet down construction areas to prevent dust. As discussed in EIR Section 3.E, Air Quality, on p. 4.E.39, the building department will not issue a building permit without written notification from the Director of Public Health that the applicant has an approved site-specific dust control plan pursuant to the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). As noted on initial study p. 182, Ordinance 175-91 requires that non-potable water be used for dust-control activities when feasible. Further discussion of concerns pertaining to compliance with applicable dust control regulatory requirements is provided in Response AQ-1 on pp. 5.G.3-5.G.11.

**Topography, Proposed On-Site Excavation, and Construction Duration**

Comments express concern that the project would significantly alter the topography of Laurel Hill. One comment expresses concern regarding the proposed duration of construction, stating that an extensive amount of excavation is proposed.

As discussed in the initial study under Section E.3, Cultural Resources, p. 127, the project area has been developed a number of times during modern and historic times. This development has

[74] Bay Area Air Quality Management District, Naturally Occurring Asbestos Program, available online at http://www.baaqmd.gov/permits/asbestos/naturally-occuring-asbestos, accessed July 19, 2019.

included importing fill and grading and excavation for new structures. As such, both the modern and the historic ground surface are and were highly disturbed. Laurel Hill encompasses a larger area than the project site. The highest point on the project site is located at Laurel Street and Euclid Avenue at approximately 320 feet SFVD13[75], and the hill continues to rise to approximately 340 feet SFVD13 on Lupine Avenue south of the project site toward Geary Boulevard. As discussed in the initial study under Impact GE-5, p. 212, although portions of the project site would be excavated and terraced, the general topography of the site would remain similar to existing conditions, and the presence of Laurel Hill as characterizing topography would remain evident. Comments have not provided any evidence that the proposed excavation would result in a significant environmental impact not already identified in the EIR and analyzed. For a general discussion of comments associated with the proposed construction duration and phasing, refer to Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement, on RTC pp. 5.B.9-5.B.15. Response GEO-3: Loss of Unique Geological Features/Changes to Existing Topography, pp. 5.J.108-5.J.109, discusses comments concerned with the geological significance of the project site and comments concerned with the project site topography.

**Groundwater Table**

One comment expresses concern regarding the existing groundwater table, stating that surveying occurred during drought conditions rather than normal-year conditions and resulted in a flawed analysis. Another comment expresses a desire to better understand the effect of construction on the groundwater table.

The groundwater conditions at the project site are sufficiently detailed in the initial study for the purposes of analyzing the proposed project's and project variant's geology and soils impacts under CEQA. The potential to encounter groundwater is expected to vary based on activities needed in particular locations within the project site, seasonal conditions, and multi-year climactic events. As stated on initial study p. 206, the information in Section E.13, Geology and Soils, is based on Langan's 2014 Preliminary Geotechnical Investigation prepared for the proposed project. This study is comprised of the best available information at the time the project

[75] SFVD13 is the new San Francisco Vertical Datum. Vertical Datum is a measure of vertical height of the ground above a specified zero point and is used to describe the topography of a site. Old San Francisco Datum in use until about 2014, was based on the National Geodetic Vertical Datum of 1929 (NGVD29). NGVD29 uses mean sea level as the zero point; the zero point for the old SF Datum was approximately 8.6 feet above mean sea level. The City began revising its database in 2013, and completed the new vertical datum in 2014. SFVD13 is based on the North American Vertical Datum of 1988 (NAVD88), and was established using more precise measurements than the Old San Francisco Datum. The draft EIR states that the highest point on the project site, at Laurel Street and Euclid Avenue, is at about 308 feet SF Datum (see EIR p. 2.13). The new SFVD13 was used in a revised topographic survey of the project site, and places the same location at 320 feet SFVD13. SFVD13 is approximately 11.35 feet above the old SF Datum: 320-11.25 = 308.65. Thus, both values reported in the EIR and the RTC are correct but have different zero points.

was initiated. As stated on initial study pp. 211-212, although portions of the proposed excavation (approximately 7 to 40 feet below ground surface) are expected to be above the identified groundwater level, dewatering may be needed during project construction in localized areas. Dewatering would be conducted in accordance with City requirements (such as San Francisco Public Utility Commission's batch wastewater discharge requirements) and the effects would be temporary. A design-level geotechnical investigation would be prepared as part of the building permit process and would include information regarding groundwater conditions at the site and requirements for excavation, foundations, and any necessary shoring, pursuant to building code requirements. Thus, the proposed project or its variant would result in a less-than-significant impact with respect to geology and soils.

**Other Topics**

Some comments oppose the proposed site plan excavation plan, building heights and topographical changes.

Comments pertaining to the merits of the proposed project do not raise issues concerning the adequacy or accuracy of the EIR's coverage of environmental impacts under CEQA. Such comments may be considered and weighed by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project or project variant independently of the environmental review process.

One comment expresses concern that the developers could seek approvals for additional changes to the project at a later time that could result in significant environmental impacts not identified in the EIR and initial study. Under the CEQA process, the EIR analyzes the environmental impacts of the project as applied for by the project sponsor. The analysis provided in the EIR is not required to consider speculative changes to the project description that have not been proposed. If substantial revisions to the project are proposed in the future after approval actions have been taken, those revisions would be reviewed by the planning department to determine whether additional environmental review is needed. Further discussion of issues pertaining to the project approvals is provided in Response PD-7: Project Approvals on pp. 5.B.38-5.B.39.

## *COMMENT GEO-2: EROSION AND LOSS OF TOPSOIL*

"**A. The Proposed Project Would Result in Substantial Soil Erosion or Loss of Topsoil.**

Construction of the proposed project or project variant would require earthwork activities across the entire project site. According to the Initial Study, the depths of excavation would range from 7 to 40 feet below the existing grade, with a total of approximately 241,300 net cubic yards of excavated soils generated during the approximately 7 to 15-year construction period. Only approximately 3,700 cubic yards of excavated soils would be reused on the project site as fill. IS p. 207. Evidence of the method used to calculate the amounts of excavated soils was not included

in the IS and must be provided in the Draft EIR to afford an opportunity for public comment on the accuracy of the calculation and severity of resulting impacts.

Many areas to be excavated are now covered by topsoil and extensively planted with grasses, shrubs, and various vegetation. The project's geotechnical consultant Langan Treadwell Rollo recommended that "all areas to receive improvements should be stripped of vegetation and organic topsoil." (LTR p. 14)

As explained in the EIR for the 2009 Housing Element:

> "New construction could result in impacts related to soil erosion and the loss of topsoil if new housing.... would result in grading activities, or if new development would require much more extensive grading. This exposure could result in erosion or loss of topsoil. The 2004 and 2009 Housing Element policies that promote increased density could result in heavier buildings on soil types or in proximity to slopes that are susceptible to erosion. Heavier buildings would require stronger and deeper foundations, involving more excavation than lighter buildings. Ex. C, San Francisco 2004 and 2009 Housing Element EIR. p. V.O-46.

As evidenced by the Langan Treadwell Rollo report and the Initial Study, substantial amounts of existing topsoil would be removed to construct underground parking garages in the Masonic Building, Mayfair Building, Plaza A and B Buildings and Walnut Building and new multi-unit buildings. Paved pathways and stairways would be constructed on areas which are now planted with vegetation and grasses. 37 percent of the site is now landscaping or landscaped open space. IS p. 210.

The Initial Study fails to analyze the impact of project excavation and construction on the substantial loss of topsoil and erroneously bases its determination that the impact would not be significant on operational conditions existing after the topsoil has been excavated. The Initial Study states that at buildout, the project site would be more intensely developed and landscaped with limited to no open areas susceptible to erosion or loss of topsoil. IS. p. 211. Since substantial existing topsoil will have been lost as a result of construction of the project, it is irrelevant to the loss of existing topsoil from construction and excavation that later operation on the paved and built areas would not expose the minimal topsoil that may be reused or replaced to erosion or loss. *Ibid.* An EIR must analyze the changes which the project would have to the existing environment.

The EIR must analyze the substantial loss of existing topsoil as a significant impact of the proposed project and analyze alternatives and mitigation measures that would avoid or reduce the impact." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-2])*

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### *RESPONSE GEO-2: EROSION AND LOSS OF TOPSOIL*

The comment expresses concern that the project would result in substantial soil erosion or loss of topsoil. In particular, the comment states that a substantial amount of topsoil would be removed to construct underground parking garages. Loss of topsoil as a resource is an environmental concern pertaining to the conservation of soils necessary to support habitat, open space, or agriculture, generally the most shallow strata of soil composition. As discussed in initial study in sections E.12, Biological Resources, and E.17, Agriculture and Forestry Resources, the site does not currently support sensitive habitat or any existing agricultural use. Existing on-site open

spaces and topsoil have been heavily modified to support ornamental landscaping and grass lawn areas. For these reasons, initial study Section E.13, Geology and Soils, correctly did not identify significant impacts associated with loss of topsoil.

Removal of vegetated or established topsoil may result in inadvertent erosion or instability of exposed subsurface soils without proper control measures. Under the proposed project or project variant, existing soils would be left in place where possible in areas with existing uses to be retained, as for portions of the existing office building and Euclid Green. However, much of the proposed site plan would require grading and installation of new landscaping features with replacement of soils suitable for ornamental plantings. The project is subject to regulatory requirements to prevent inadvertent loss of soils from erosion and sedimentation from storm events during project construction, the establishment of landscaping, and the ongoing maintenance of open space as described below.

As discussed in the initial study under Impact GE-2, pp. 210-211, construction effects on soil are regulated by the National Pollutant Discharge Elimination System requirement that the project sponsor would prepare an Erosion and Sediment Control Plan for construction, as set out in article 4.2 of the San Francisco Public Works Code. Operational stormwater controls are regulated by adherence to Stormwater Design Guidelines for on-site and off-site improvements discussed on initial study pp. 174-177. The proposed project or project variant would comply with these laws and regulations. As a result, the proposed project or project variant would not result in a significant impact with respect to soils erosion or loss of topsoil.

The comment expresses concern regarding the method used to calculate the amount of excavated soils analyzed in the initial study. Nonetheless, the comment does not provide any evidence indicating that the soil excavation calculations are inaccurate or inadequate.

The soils calculations of approximately 241,300 net cubic yards of excavated soils were generated based on the proposed site plan, in which approximately 274,000 square feet of the 446,479-square-foot project site would be modified at depths ranging from 7 to 40 feet below the existing grade (including the elevators and automobile stacker pits), as discussed on initial study p. 78 and illustrated in Figure 31: Preliminary Excavation Plan on initial study p. 79. This estimation remained consistent throughout the draft EIR. The excavation model generated by Webcor Builders is included in the project file. Subsequent to the publication of the draft EIR, the net amount of excavated soil that would be required to be exported from the site for the proposed project has been reduced slightly from 241,300 cubic yards to 241,000 cubic yards (a reduction of approximately 300 cubic yards). The reduction in the amount of excavated soil to be off-hauled was a result of the change to the parking program and changes to the Masonic and Euclid building's basement level for below-grade parking and off-street loading, as described in RTC Section 2, Revisions and Clarifications to the Project Description, p. 2.24, and a change in the amount of excavated soil that could be used as fill on other parts of the project site. This change

in the net amount of excavated soils to be exported would not result in any substantial changes in the conclusions reached in the EIR.

## *COMMENT GEO-3: LOSS OF UNIQUE GEOLOGICAL FEATURES/CHANGES TO EXISTING TOPOGRAPHY*

"Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft.

The only area that isn't excavated is under a portion of the existing building!

Not sure how they missed that opportunity!" *(Richard Frisbie, Letter, January 7, 2019 [I-FrisbieR1-14] and Tina Kwok, Letter, January 7, 2019 [I-Kwok4-20])*

"**B. The Proposed Project Would Substantially Alter the Existing Topography and Unique Geologic or Physical Features of the Site.**

The proposed project would have a significant impact because it would directly or indirectly destroy substantial portions of Laurel Hill, which is a unique geological or physical feature and embodies distinctive characteristics of local geologic principles. As explained in the Laurel Heights Improvement Association's nomination of the site for listing on the National Register of Historic Places, which was granted by the State of California Historic Resource Commission on May 17, 2018:

> "the site is part of a cluster of low hills associated with Lone Mountain whose several high points were developed as cemeteries in the nineteenth century. The Fireman's Fund site was previously a portion of the Laurel Hill Cemetery, and was long recognized for its views. Today there are distant views from the property to the southeast and downtown, to the northwest and a partial view of the Golden Gate Bridge, and to the west into the Richmond District." (Ex. E, excerpts from Nomination of Laurel Heights Improvement Association for listing of Fireman's Fund Insurance Company Home Office in the National Register of Historic Places, p. 6) *[Note that the copy of the nomination included in the City's reference materials was a draft version; although the final version of the nomination was provided to the San Francisco Planning Department, that Department has not included the final version of the nomination in the reference materials provided with the Initial Study.]*

The plaque previously placed on the site to commemorate the former site of Laurel Hill Cemetery 1854-1946, California Historical Landmark #760, recognized the site as "the most revered of San Francisco's hills." (Ex. F, excerpts from State Office of Historic Preservation file on California Historical Landmark #760) The remarks of Gardiner Johnson of the California Historical Society recognized that when the new cemetery grounds were located on Laurel Hill:

> "From the summit of this beautifully-shaped hill it was then possible to obtain one of the finest and most extensive views of both land and water." (Id. p. 1-2)

The existing Terrace on the 3333 California Street site, "as the 'centerpiece' of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco)" currently exists on the site and overlooks views of San Francisco. (Ex. E, Nomination p. 28)

The proposed project would have a significant impact on the environment because it would result in excavation of substantial portions of Laurel Hill and alter existing slopes, including the areas known for its views of the City. (See Ex. G, photographs of areas of Laurel Hill proposed for excavation)

The Initial Study recognizes that the topography exhibits a generally southwest-to-northeast downslope, with a grade change of approximately 65 feet. (IS p. 206) On the south and east portions of the site, bedrock is relatively shallow, at 7 to 17 feet below ground surface. IS p. 206.

The Masonic Building would be a four- to six-story, 40 foot-tall building. Due to the site's slope, the Masonic Building's first level would be a partially below-grade parking garage with a residential lobby at the northeast corner of the floor adjacent to the proposed garage entry. IS pp. 41-43. The Euclid Building would be a four- to six-story, 40-foot-tall building. Due to the site's slope, the Euclid Building would have a partially below-grade floor. IS pp. 44-45.

Construction of the Masonic and Euclid Buildings would excavate the existing slope of Laurel Hill along Masonic and Euclid. As a result of the proposed excavation and construction, the existing slopes of Laurel Hill along Masonic and Euclid would be substantially altered and their distinctive characteristics of providing views of San Francisco substantially degraded by the structures erected in these slopes. On the south and east portions of the site, bedrock is relatively shallow, at 7 to 17 feet below ground surface. IS p. 206. The excavations on the south and central portions of the project site would encounter bedrock. IS p. 207. The Mayfair building on Laurel Street would also have a below-grade garage with access from Laurel Street. IS p. 47.

The EIR must analyze the substantial alteration of the south, east and western slopes of Laurel Hill as a result of construction of the Euclid, Masonic and Mayfair buildings and underground garages as a significant impact and analyze alternatives and mitigation measures that would avoid or reduce the impact." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-3])*

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***RESPONSE GEO-3: LOSS OF UNIQUE GEOLOGICAL FEATURES/CHANGES TO EXISTING TOPOGRAPHY***

The comments state that Laurel Hill is a unique scenic, geological or physical feature, and that the project would substantially alter the existing slopes resulting in a significant environmental impact. The comment refers to the site's nomination for listing on the National Register of Historic Places which describes the site as being part of a cluster of low hills with distant views to various locations throughout the City, and the site's status as California Historical Landmark #760 (Former Site of Laurel Hill Cemetery).

As detailed on initial study pp. 212-215, a unique geologic or physical feature embodies distinctive characteristics of any regional or local geologic principles, provides a key piece of information important to geologic history, contains minerals not known to occur elsewhere in the county, and/or is used as a teaching tool. No unique geologic features exist at the project site; therefore, no impacts on unique geological features would occur. Although portions of the project site would be excavated and terraced, the general topography of the site would remain similar to existing conditions with minor changes at the site as part of the site grading and terracing for the

adaptive reuse of the existing building and development of the Masonic and Euclid buildings. Furthermore, the site would continue to provide open space with expansive views, as described on EIR pp. 2.83-2.86. Such features include the Presidio Overlook, which would be located at the eastern terminus of Mayfair Walk, and Euclid Green, as shown on Figure 2.10, EIR p. 2.30, and Figure 2.12, EIR p. 2.32.

To the extent that the proposed project or its variant would impact the project site's historic resources, those impacts are discussed in EIR Section 4.B, Historic Architectural Resources. As discussed on EIR pp. 4.B.17-4.B.18, the property was listed in the California Register of Historical Resources and was determined to be eligible for listing in the National Register of Historic Resources based on the site's embodiment of Midcentury Modern design principles and as the work of three master architects. As discussed on EIR p. 4.B.16, the California Registered Historical Landmark No. 760 refers to the former site of the Laurel Hill Cemetery for its historical significance. Although both the listing and the landmark note the site's topography and openness in its character-defining features, neither status pertained specifically to the site's geological significance. As discussed in initial study Section E.3, Cultural Resources, p. 127, the project area has been developed a number of times during modern and historic times. This development has included importing fill and grading and excavation for new structures. As such, both the modern and the historic ground surface are and were highly disturbed.

To the extent that this comment expresses concern with the proposed project's changes to the aesthetic, visual, or scenic quality, the project would meet each of the criteria provided by Public Resources Code section 21099(d), and thus the determination of significance of project impacts under CEQA does not consider aesthetics, as discussed in EIR Chapter 1, Introduction, pp. 1.11-1.12. To the extent that urban form may be reviewed during subsequent local design review processes, these approvals are separate from CEQA.

## HYDROLOGY AND WATER QUALITY

The comment in this subsection relates to the topic of Hydrology and Water Quality evaluated in initial study Section E.14. A corresponding response follows the comment.

### *COMMENT HWQ-1: ALTERATION OF EXISTING DRAINAGE PATTERNS*

"On page 216 of the Initial Study (IS), reference 1, the IS states that the project could have significant impact if it could:

c) 'Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?'

This is restated in Impact HY-3 on page 222 of reference 1.

An underground stream or flow of water is equally as relevant (and potentially more impactful) as a more visible surface stream. There is no indication in the Initial Study that this has been considered.

Planning nevertheless checked 'Less Than Significant Impact.'

d) 'Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increased the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?'

This is also restated In Impact HY-3 on page 222.

Again, as noted above, underground flow of water is equally as important and requires equal consideration.

Planning checked 'Less Than Significant Impact.'

As discussed below these conclusions are not supported by substantial evidence inasmuch as the factual data and analysis upon which they are based are insufficient to support the determination of 'no-significant impact.'

The City failed to use best efforts to investigate and disclose all that it reasonably can with respect to the project's potential adverse impacts.

The IS's analysis failed to consider the impact of the project on underground flows of water and did not make a finding as to whether the existing underground drainage patterns of the site or area could be affected.

DISCUSSION

The Preliminary Geotechnical Investigation conducted (FN40) by Langan Treadwell Rollo dated 3 Dec. 2014 (Reference 2), page 5, table 1 shows 5 borings with Depth to Groundwater varying from 18.8 feet to 38.8 feet.

However the Phase I Environmental Site Assessment (FN244) by Langan Treadwell Rollo dated 3 Dec. 2014 (Reference 3) page 8 states 'However, two borings at the Firemen's Credit Union site (northeast of the site) encountered groundwater levels as shallow as 13 feet bgs.'

The Firemen's Credit Union is immediately adjacent to 3333, and is part of the same block. It is not a separate site geologically or hydrologically.

Reference 3 further states 'The direction of groundwater flow is ***assumed*** (italics and underlining added) to be to the northeast, based on topography and the groundwater monitoring reports for 3201 California Street; ***however*** the site is located near the boundary between the Downtown and Westside Groundwater Basins, ***so it is possible*** that the groundwater flow direction ***varies*** across the site.' It is clear from the above that Langan Treadwell Rollo, as well as Planning, has not conducted an investigation that would be adequate to assess the hydrology of the site, including the direction to which the groundwater flows.

The IS states that dewatering the groundwater would likely be required during construction because the depth of excavation would be up as much as 40 feet below ground surface and the groundwater level at the project site is 'about 18 to 39 feet below ground surface (IS, page 219).

Actually the groundwater is almost certainly much closer to the surface as noted in reference 3 above as well as for reasons that will be discussed in this section.

There is clearly a subsurface flow of this groundwater. What is it, what is its flow rate and in what direction does it flow?

It would appear prudent to better understand the situation before beginning to excavate up to 40 feet bgs as well as essentially building a concrete dam in the form of underground garages that would stretch from Laurel St. to Presidio Ave., and completely block off any flow across the entire site.

At present there is only minimal obstruction, as the underground garage is a very small portion of the Laurel to Presidio distance and the buildings foundations present a minimal barrier to this subsurface flow.

What is the underground water going to do if this project is constructed?

We know the groundwater under the site will be diverted.

It is reasonable (if we had better data it would probably show with certainty) to conclude that the groundwater diverted by the below ground construction will have considerably higher flow velocities and energy at whatever points) it departs the site as the flow will be concentrated at the ends) of the underground concrete barrier (parking garages).

We know that these higher subsurface flow rates and energies will create higher erosion rates and could lead to flooding at a downstream location due to these higher flow rates.

What are these higher erosion rates going to do to the foundations of buildings exposed to an entirely new flow regime, none of which existed when they were constructed?

What analysis has been done concerning these potential impacts on the buildings along the lower portion of Laurel Stand Presidio Ave.?

Unfortunately these are not the only shortcomings of the data presented in the Initial Study.

Nor are they the most damaging to the conclusions reached as to Impact HY-3.

A review of the boring logs indicates the borings were carried out August 20-26, 2014 and generated the groundwater bgs data that appears in table 1, page 5 of FN40, reference 2.

The August 2014 date leaps out like a red flag; as it should have for everyone associated with FN 40 and the Initial Study.

California entered the most severe drought in its history in 2011 and did not exit it until 2017.

August 2014 is the approximate midpoint in this period so any of the FN40 groundwater levels quoted are those determined three years into a prolonged severe drought.

Essentially such data are irrelevant for a normal years) and consequentially egregiously understate the hydrological condition of the site.

According to Wikipedia (with additional support in the article's references), "2011-2017 California Drought" (reference 4) page 2: 'By February 1, 2014, Felicia Marcus, the chairwoman of the State Water Resources Control Board, claimed the 2014 drought is the most serious drought we've faced in modern times.'

On the same page; 'According to NASA, tests published in January 2014 have shown that the twelve months prior to January 2014 were the driest on record, since record-keeping began in 1885.'

The references included in this document further reinforce the historic shortfalls of rain during this drought.

Per weather.com/science/environment/news/california-drought-seconds-20141009 (reference 5) page 1: 'As a result, 2013 was California's **driest year ever recorded** (emphasis in the report).

San Francisco, which usually averages 23.65 inches of rain a year, only experienced 5.60.' This is approximately 24% of a normal year.

The map on page 16 of '275 California drought maps show deep drought and recovery' LA Times April 7, 2017 (reference 6), included at the end of this document, shows the extent and severity of the drought as of Aug.3, Aug. 12, Aug. 19, Aug. 26, Sept.2 —which is the precise period in which the borings took place.

So, in the midst of a record drought, one that was already three years in extent; after the driest year on record (2013); after a year that produced less than 24% of the normal rainfall; and then after five months of a normal zero rainfall dry season the developer commissioned Langan Treadwell and Rollo to carry out borings with one of the specific objectives to determine the depth of groundwater below surface!

It is inconceivable, literally, to conjure up a more perfect set of circumstances to produce a more misleading series of conclusions more amenable and favorable to the developers' plan.

It is also perplexing that Planning has accepted these results on face value, has done no analysis or research of its own to validate the reasonableness of these results; and has used these results as the basis for a finding of "Less Than Significant."

As a minimum, the conclusions of Impact HY-3 are inaccurate, inadequate, incomplete and invalid. Due to the total absence of relevant analysis and data, the IS failed to consider the impact on the existing underground drainage patterns of the site. The IS discusses impacts on surface runoff and fails to analyze the impact of the construction of the project on the alteration of the existing drainage pattern of the site, including through the alteration of the course of a subsurface stream or river. The EIR should analyze whether the project could alter the existing drainage pattern of groundwater or alter the course and/or characteristics of the underground water flows. It should also analyze the potential impact on existing buildings in the vicinity of the site as a result of the alterations to underground water flows.

**The Initial Study and the DEIR Lack Substantive Evidence that the "Less than Significant" finding for Hydrology and Water Quality, Section E-14 of the Initial Study, is correct, complete and accurate. In fact the evidence shows that there is no basis for this conclusion and it must be re-studied and re-concluded using credible evidence.**" *(Richard Frisbie, Letter and Attachments, January 8, 2019 [I-FrisbieR2-4])*

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### *RESPONSE HWQ-1: ALTERATION OF EXISTING DRAINAGE PATTERNS*

The comment states that the information in the initial study about groundwater depth is inaccurate because it relies on information developed during a severe drought year. The comment further asserts the inaccuracy of the underlying evidence based on information on page 8 of the Langan geotechnical investigation which states that "two borings at the Firemen's Credit Union site (northeast of the site) encountered groundwater levels as shallow as 13 feet bgs." The comment also expresses concern that altering groundwater flow patterns was not considered in the initial study, requesting information regarding the flow rate and direction of subsurface groundwater flow.

As stated on EIR p. 2.13, the highest elevation on the project site is 308 feet San Francisco City Datum[76] at the southwest corner (Euclid Avenue and Laurel Street), sloping downward to the north and east toward California Street and Presidio Avenue with a grade change of approximately 65 feet. Although not part of the project site, the SF Fire Credit Union building at the corner of California Street and Presidio Avenue is the lowest elevation of the project block. For these reasons, depth of groundwater at this location could be expected to be shallower than for the majority of the project site. The information included in the initial study, which is based on Langan's 2014 Preliminary Geotechnical Investigation prepared for the proposed project, is comprised of the best available information at the time the environmental review of the project was initiated.

Hydrology and water quality impacts were determined to be less than significant (see initial study Section E.14, Hydrology and Water Quality, pp. 216-227). The hydrology and water quality analysis concluded that hydrology and water quality impacts would be less than significant, contrary to what was asserted in the comment. As discussed on initial study p. 219 (as well as in Section E.13, Geology and Soils, on pp. 206 and 211), groundwater depths were determined to be relatively deep (between 18 to 39 feet below ground surface). The greatest depth of excavation expected to occur to accommodate the connection of the proposed California Street Garage to the retained portions of the existing three-level parking garage[77] would be up to 40 feet below the ground surface, which would be below the groundwater depths found during site investigations. Therefore, groundwater is likely to be encountered during excavation in this location and potentially other locations on the site as stated on initial study p. 219. Excavation on other portions of the site would range from 7 to 40 feet below the ground surface with more limited excavation on the western portion of the site along Laurel Street and Euclid Avenue. City requirements for discharging groundwater would be enforced. Groundwater levels typically fluctuate, depending on the amount of rainfall, the infiltration levels both on the project site and on other nearby soils, and for other reasons; however, the specific depths to groundwater would not affect how groundwater discharge is handled during excavation for the proposed project or project variant, and encountering groundwater at different depths than reported does not change the conclusions in the initial study. Similarly, the direction of groundwater flow from the site would not affect how groundwater discharge is handled during construction and does not change the analysis of impacts and the conclusions in the initial study. Additional testing of soils and groundwater would be done as part of the building permit process. The construction-related groundwater discharges would be temporary and, because they would meet applicable regulatory

[76] Old San Francisco City Datum established the City's zero point for surveying purposes at approximately 8.6 feet above the mean sea level established by the 1929 U.S. Geological Survey datum. New SF Vertical Datum 2013 (SFVD13) revised the zero point using updated measuring techniques, as explained above in footnote 75 in Response GEO-1 on p. 5.J.103. The amount of grade change discussed here would not change with use of SFVD13; only the elevation values would change.

[77] The northeast portion of the site, closest to the SF Fire Credit Union Building, was previously excavated to accommodate the parking garage under the north wing of the existing building.

requirements, would not result in impacts on water quality; impacts of the discharges would be less than significant.

The effects of redevelopment of the site with more underground parking garages and less pervious surface area would be a reduction in groundwater recharge, as discussed under Impacts HY-2 and HY-3 on initial study pp. 221-223. Based on borings, their review and understanding of site-specific conditions, and their professional expertise, Langan did not observe any underground streams or flows of water other than groundwater encountered in borings during the 2014 Preliminary Geotechnical Investigation.

As discussed on initial study pp. 219-224, the change to the project site would alter the amount of surface area available for infiltration of rainwater into groundwater due to the proposed development, but would not substantially interfere with groundwater recharge or groundwater flows within the project site, as some recharge would still occur with the proposed open space and additional recharge would occur with the proposed low-impact design features. Other stormwater would be metered and discharged to the combined sewer system and conveyed to the Southeast Water Pollution Control Plant. Proposed measures to control stormwater discharges to the combined sewer system would be designed to reduce the peak flow and volume for a 2-year, 24-hour design storm[78] event by at least 25 percent, as required in the Stormwater Management Ordinance. This would include the use of on-site cisterns to temporarily hold stormwater prior to releasing to the combined sewer system. The stormwater management system combined with infiltration from pervious open space and the low-impact design features would not substantially interfere with the existing patterns of groundwater recharge and redevelopment of the site would not alter any streams.

As discussed on initial study pp. 209-212, below-grade work related to the construction of the proposed buildings would be designed in accordance with recommendations in a site-specific design-level geotechnical investigation, as required by California Building Code Chapter 18. The geotechnical investigation would be prepared to assess geotechnical and seismic hazards. This is a required step in the building permit process and is intended to provide site- and building-specific recommendations for excavation, installation of foundations, and any necessary shoring, as well as groundwater conditions, pursuant to the building code requirements. This study would include information on the elevation of the water table and flood hazards in its recommendations for design, such as waterproofing, pumping and drainage; stabilization and dewatering; and, if necessary, underpinning or protecting the structural integrity of adjacent structures. See Response

[78] San Francisco Public Utilities Commission, San Francisco Stormwater Management Requirements and Design Guidelines, May 2016, Glossary. A design storm is a hypothetical storm defined by a given return period (which refers to the frequency of a storm) and the storm duration [in this case a frequency of once every 2 years and a duration of 24 hours]. Together, these characteristics yield the storm's rainfall depth. The rainfall depth is used in the analysis of existing drainage, design of new stormwater controls, or assessment of impacts of a proposed project on runoff flows and volumes.

GEO-1: Construction and Geologic Constraints; Soil Settlement; Dewatering and Foundation Stability on RTC pp. 5.J.101-5.J.104 for further discussion in response to comments regarding the effects of the proposed earthwork activities.

Development of the underground parking garages would not substantially alter the flow of groundwater across the entire site as no surface or below-surface rivers, streams, or other flows of water were identified other than the groundwater encountered in borings during the 2014 Preliminary Geotechnical Investigation, and stormwater would be managed to maximize infiltration to the groundwater basin. Erosion or siltation would not occur as a result of groundwater flows as these are surficial impacts. As stated on initial study pp. 222-213, the project site is not currently in an area that is prone to flooding, and the nearest block identified as an area of flooding interest is south of Geary Boulevard between Masonic Avenue and Lyon Street, over 1,000 feet south of the project site.[79]

The comment does not provide evidence indicating that the supporting information regarding groundwater depths or groundwater flow patterns is insufficient to use as the basis for determining the project would have less-than-significant impacts. Concerns expressed in the comments regarding reliance on the information at the time the project was initiated (i.e., the 2014 drought year) and the site studied would not result in a different conclusion related to water quality impacts related to dewatering during construction because the same regulations regarding controlling sediments and contaminants prior to discharge of any groundwater pumped from the site during excavation would apply regardless of any changes to groundwater depth during non-drought years. Differences in groundwater levels during drought years compared to "normal" rainfall years would primarily affect the amount of dewatering necessary during construction. Nor does the comment provide any support for claims regarding the presence of an underground stream or flow of water and the potential for erosion, siltation, or flooding on or off site. As stated above, the information used as supporting evidence for the geology and hydrology and water quality analysis was the best available information at the time that the environmental review process began, and the existing regulatory requirements would ensure that these impacts would be less than significant.

## HAZARDS AND HAZARDOUS MATERIALS

The comments in this subsection relate to the topic of Hazards and Hazardous Materials evaluated in initial study Section E.16. A corresponding response follows the comments.

### *COMMENT HZ-1: EXPOSURE TO HAZARDOUS MATERIALS*

[79] City and County of San Francisco, Bulletin No. 4, Review of Projects in Identified Areas Prone to Flooding, 2007, http://default.sfplanning.org/publications_reports/DB_04_Flood_Zones.pdf, accessed March 26, 2019.

"I am very, very concerned that when the building is taken down, when the UC is cleared – I'm extremely concerned about asbestos contamination. I do not know how that is going to be handled, but I just wanted to let you know." *(Donna Alschueler, Draft EIR Hearing Transcript, p. 72, December 13, 2018 [I-Alschueller-1])*

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"**6. The Proposed Project Could Have a Significant Hazard and Hazardous Materials Impact.**

The Initial Study states that hazards or hazardous material would be significant if the project would:

> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials,
>
> 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.
>
> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
>
> Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. IS p. 227-228.

The Initial Study acknowledges that during construction, particularly excavation and grading, construction workers would be exposed to chemicals in the soil and groundwater through skin contact, ingestion or inhalation of airborne dust or vapors, and the "public, including nearby offsite residents and future site occupants, could be exposed to these chemicals through inhalation of airborne dust or vapors or contact with accumulated dust if proper precautions were not implemented." IS p. 232.

Langan Treadwell Rollo evaluated the additional samples collected in August 2014 from the location of the former onsite USTs following removal of the waste oil UST against the environmental screening levels for commercial uses, but the San Francisco Health Department requested that the soil gas results for the site be compared to current environmental screening levels for residential uses. IS p. 229-230. Volatile organic compounds were detected in soil gas at concentrations exceeding residential environmental screening levels, at two of seven sampling locations. IS p. 230. 'The health department also requested that a site mitigation plan and a demolition and construction dust control plan be prepared for the site. The site mitigation plan would include soil and groundwater handling procedures, designs for minimization measures that control human exposure to remaining hazardous substances, an environmental contingency plan, and a health and safety p1an....A11 compliance documentation would be reviewed and approved by the health department.' IS p. 230.

However, the Housing Element EIR states that "redevelopment of former commercial and industrial sites to residential uses would be required to undergo remediation and cleanup under DTSC and the SFBRWQCB before construction activities could begin. If contamination at any specific project were to exceed regulatory action levels, the project proponent would be required to undertake remediation procedures prior to grading and development under the supervision of the City's SFDPH, HMUPA, or the SFBRWQCB (depending on the nature of any identified contamination). Ex. C, p. V.Q-42.

The Initial Study does not disclose the mitigation measures that the site mitigation plan would provide, including soil and groundwater handling procedures, designs for minimization measures that control human exposure to remaining hazardous substances, an environmental contingency plan, and a health and safety plan. An agency may not rely upon a corrective action plan to mitigate potential impacts of site contamination when the plan's mitigation measures are not disclosed in the record. *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Ca1.App.4th 327, 332. Since the Initial Study has not disclosed the mitigation measures that would be used, the EIR must analyze the project's impact from hazardous materials as a significant impact, and analyze mitigation measures. The Initial Study has not disclosed the soil and groundwater handling procedures, designs for minimization measures that control human exposure to remaining hazardous substances, an environmental contingency plan, or a health and safety plan, which the public health department would require.

Since specific mitigation measures have not been developed, disclosed and adopted as a condition of approval of the project, the potentially significant impacts from hazards and hazardous materials has not been mitigated to a level of insignificance. The IS's determination that regulatory compliance will prevent significant adverse impacts was not based on a project specific analysis of potential impacts, potential mitigation measures and the specific effect of regulatory compliance. The Initial Study has not explained the effect of regulatory compliance, identified methods the agencies will consider for mitigating the impact or indicated the expected outcome. By relying on a hope of compliance with regulations that apply to transitory conditions, such as excavation or construction activities that could release hazardous substances, and do not require onsite monitoring to determine compliance, the IS failed to perform a careful analysis that would be sufficient to find the impact not significant. Thus, the impact remains significant and must be fully analyzed in the EIR, with review and mitigation approved by all agencies with jurisdiction over the nature of any identified contaminants.

Since LTR compares soil gas results to the Environmental Screening levels published by the San Francisco Regional Water Quality Control Board, review and approval of mitigation plans by DTSC and the SFBRWQCB may be required in addition to review and approval by the San Francisco Department of Public Health. The EIR should analyze the whether the soil gas detections are under the jurisdiction of DTSC and the SFBRWQCB or other agencies besides the San Francisco Department of Public Health and whether the mitigation plan conforms with the supplemental vapor intrusion guidance document for conducting uniform vapor intrusion evaluations in California expected to be released in mid-2018 by the State Water Resources Control Board, the San Francisco Bay Regional Water Quality Control Board, and the Department of Toxic Substances Control. IS, FN302.

Moreover, the Initial Study evaluates only whether the low levels of volatile organic compounds which were detected in soil gas would pose a vapor intrusion concern for commercial or residential residents at the Plaza A building. However, the impact could be significant if a member of the public, such as a resident across the street from the project site, could be exposed to such soil gas released during construction. The EIR should analyze potential impacts on the public and nearby residents of release into the air of such soil gas and also analyze whether such emissions could be emitted within one-quarter mile of a school.

In addition to contamination from the USTs, the Initial Study discloses that "the site may contain onsite hazardous waste associated with medical uses, such as radioactive materials or other contaminants that may be contained within the existing onsite fume hoods, centrifuges, refrigerators, and waste storage containers. There is also the potential for contaminants, including minor radioactive contamination, in the facility plumbing system from disposal of secondary washes. Currently this hazardous waste is properly disposed of offsite under manifest." IS p. 233.

While UCSF would remove much of the chemicals and radioactive materials as part of their relocation, the date of their relocation is uncertain, as is the manner of disposal of the remaining materials. What is the date on which UCSF employees would be relocated from the site? The Initial Study states that any remaining medical hazardous waste would be disposed of in an approved facility during building demolition or reuse and would not pose a significant hazard to the public or the environment if applicable federal, state and local regulations are followed. IS 233. The Initial Study does not indicate the identified methods the agencies will consider for mitigating the impact, adopt specific mitigation measures, explain the effect of regulatory compliance or indicate the expected outcome. Thus, the potentially significant impact from medical hazardous waste, including radioactive contamination in the plumbing system from disposal of secondary washes, must be analyzed as a potentially significant effect in the EIR, together with all appropriate mitigation measures. The EIR should include as a mitigation measure the preclusion of connection of the piping system used for disposal of secondary washes containing minor radioactive contamination with the proposed graywater recycling system proposed to be installed and used on the property. Without such mitigation, water containing radioactive waste contamination could be used for irrigation onsite and the radioactive materials could be spread onsite.

> **MITIGATION MEASURE.** No piping onsite which was used for medical uses, including disposal of secondary washes containing radioactive material, may be connected with any piping used in the graywater recycling system proposed to be installed on the property and used for onsite irrigation and other uses. The project proponent will be required to execute a binding agreement to implement such mitigation measure as a condition of approval of the project.

In addition, the Initial Study states that the building may contain hazardous building materials such as asbestos, lead-based paint, electrical transformers containing PCBs, flourescent light ballasts containing PCBs or other contaminants, and flourescent light tubes containing mercury vapors, which could escape in the environment and pose concerns for construction workers and the public if not properly handled or disposed of in accordance with applicable regulations. Again, the impact must be evaluated as a significant impact in the EIR because the Initial Study does not indicate the identified methods the agencies will consider for mitigating the impact, adopt specific mitigation measures, explain the effect of regulatory compliance or indicate the expected outcome. The project proponent proposes to expose substantial amounts of such materials, as it proposes to demolish substantial portions of the existing building and cut a large hole in the building for a passageway.

Also, the Initial Study states that bedrock which would be encountered during site excavation includes serpentinite, which contains naturally occurring asbestos, and during project excavation, naturally occurring asbestos minerals may present a human health hazard if they become airborne and are inhaled. IS p. 235. The Initial Study states that the construction contractor would be required to prepare an asbestos dust mitigation plan specifying measures that would be taken to ensure that no “visible” dust crosses the property boundary during construction. However, the Initial Study indicates that the 17 California Code of Regulations section 93105 requires the use of best available dust mitigation measures to prevent the offsite migration of asbestos-containing dust. Again, the impact must be evaluated as a significant impact in the EIR because the Initial Study does not indicate the identified methods the agencies will consider for mitigating the impact, adopt specific mitigation measures, explain the effect of regulatory compliance or indicate the expected outcome.

Also, under Appendix G of the CEQA Guidelines project hazards and hazardous materials would be significant impact if the project would:

> 'Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.' Ex. B.

The Housing Element EIR uses the same significance standard Ex. C, p. V.Q-40.

The Initial Study identifies several schools/daycare centers are located within a quarter mile of the project site, that states that demolition and construction activities would require handling and transport of hazardous wastes. However, the IS improperly relies upon unspecified future regulatory compliance as the basis for a conclusion that 'there would be limited potential for such materials to affect the nearest school.' IS p. 237. The significance standard is triggered by a release within one-quarter mile of an existing school. For the reasons stated above, reliance upon unspecified future regulatory compliance is not sufficient to mitigate the adverse impact, and the potential that such materials could be emitted within one-quarter mile of a school requires the potentially significant impact to be analyzed in the EIR as a significant impact, together with specified mitigation measures that will be incorporated as conditions of approval of the proposed project.

The Initial Study admits that the project site is currently on the Leaking Underground Storage Tank Sites list maintained by the State Water Resources Control Board and 'is included on other lists of hazardous materials sites compiled pursuant to Government Code section 65962.5. The listings are related to public notice requirements for permitted activities such as air emissions reporting for onsite activities, small quantity generation of hazardous waste in the medical laboratories, and the former USTs discussed in Impact HZ-2.' IS p. 238. However, the Initial Study is incomplete and inadequate because it does not identify the other lists of hazardous materials sites compiled pursuant to Government Code section 65962.5 on which the project site is included. The EIR must disclose each such site which lists the project site and the nature of the listing so that potential impacts from hazards and hazardous materials can be evaluated.

Thus, the City has failed to comply with the procedures required by CEQA, because Public Resources Code section 21092.6 requires the agency to include in the draft EIR any information derived from consultation of Government Code section 65962.5 (the Cortese list), but the Initial Study states that it will not further address the issue of hazardous materials or waste. Ex. S, CEB, Practice Under CEQA, section 13.65 p. 13-74. The City has failed to include in the IS the information 'on other lists of hazardous materials sites compiled pursuant to Government Code section 65962.5. The listings are related to public notice requirements for permitted activities such as air emissions reporting for onsite activities, small quantity generation of hazardous waste in the medical laboratories, and the former USTs discussed in Impact HZ-2.' IS p. 238. The City must state all information contained in the listings on such other sites in the Draft EIR." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-9])*

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"Also, there is serpentine rock on this site which, if disturbed, can release asbestos dust, clearly a documented health hazard." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-7])*

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".Also, for HYDROLOGY/WATER, the DEIR does not have any mitigation measure for the potential groundwater contamination from disruption of found bodies which in past were embalmed in toxic chemicals toxic. What would be done if it gets into the aquifer or small underground stream that supposedly fed the Laurel Hill Cemetery and provided very clean drinkable water? It would be good for the city to ensure their "Precautionary Principle" is supported by not having anybody take action to contaminate potential clean drinking water sources for the residents of this city." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-65])*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:…2. Effects of construction of the project, including excavation of contaminated soils containing petroleum, polychlorinated biphenyls, and other contaminants; excavation and effects of undiscovered human remains and contaminated soils on public health" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-3])*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:…3. Potential for airborne contamination from office building demolition" *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-4])*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:…5. Potential for contamination from leaking underground storage tanks and the use of chemicals for water treatment," *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-6])*

"This proposal will destroy Laurel Hill with the excessive demolition and excavation including removal of serpentine rock which has asbestos. There have been no mention. Of plans of management of this toxic substance." *(Ann Prato, Email, January 7, 2019 [I-Prato-6])*

***RESPONSE HZ-1: EXPOSURE TO HAZARDOUS MATERIALS***

Comments express concern regarding hazardous materials potentially being released into air and water during project demolition activities, specifically naturally-occurring asbestos, asbestos-containing building materials, lead-based paint, PCBs, mercury from fluorescent lighting, petroleum and volatile organic compounds (VOCs) such as those from leaking underground storage tanks (LUSTs), remains from the Laurel Hill Cemetery, and wastes associated with prior medical uses.

Potential impacts associated with hazardous materials emissions are discussed in initial study Section E.15, Hazards and Hazardous Materials, on pp. 231-237. These impacts are discussed, as applicable, as they relate to emissions in soil, air, and water. Following publication of the initial study, comments were submitted relating to hazards and hazardous materials issues, as summarized in EIR Chapter 1, Introduction, pp. 1.5-1.17. Many of the comments received on the initial study either were addressed in initial study Section E.15, Hazards and Hazardous Materials; however, Section 4.F of the EIR was provided to clarify and supplement the initial study analysis.

The proposed project or project variant would comply with all applicable regulations intended to prevent or minimize hazardous materials from being released into air and water as discussed in the environmental analysis provided in initial study Sections E.12, Geology and Soils, E.14, Hydrology and Water Quality, and E.15, Hazards and Hazardous Materials and further explained in EIR Section 4.F, Initial Study Supplement. The lead agency may rely on these laws and

regulations in determining whether a project would result in a significant impact. Therefore, as concluded in the initial study, hazards and hazardous materials impacts on the environment (soil, air, and water) and people (construction workers, nearby residents, visitors, and workers) would be less than significant with the required adherence to all regulatory requirements.

**Regulatory Compliance Measures**

The comments generally assert that regulatory compliance measures are unspecified, and because specific mitigation measures have not been disclosed or adopted as a condition of approval for the proposed project, the potentially significant impacts from hazards and hazardous materials have not been mitigated. A comment asserts that the initial study has not explained the effect of regulatory compliance with respect to hazards and hazardous materials.

As discussed on initial study pp. 228-240 and in EIR Section 4.F, Initial Study Supplement, the proposed project or project variant would comply with the laws and regulations intended to prevent or minimize hazardous materials from being released into air and water. These laws and regulations would require the implementation of site mitigation, construction dust control, and asbestos dust mitigation plans to manage potentially contaminated soils and to control dust. The site mitigation, construction dust control, and asbestos dust control plans are available for review at the planning department offices as part of Case File 2015-014028ENV.[80] The San Francisco Department of Public Health has approved the site mitigation and construction dust plans. The lead agency may rely on these laws or regulations in determining whether a project would result in a significant impact. Because the initial study found that project would result in a less-than-significant impact, no mitigation measures are needed to supplement implementation of laws, ordinances, and regulations.

**Review by the Department of Toxic Substances Control and the San Francisco Bay Regional Water Quality Control Board, and Other Agencies**

A comment also states that review and approval of mitigation plans by the Department of Toxic Substances Control (DTSC) and the San Francisco Bay Regional Water Quality Control Board (regional water board) may be required in addition to review from the San Francisco Department of Public Health (health department).

Separate approval from the DTSC or regional water board would not be required. As explained on EIR pp. 4.F.6-4.F.7, the California Environmental Protection Agency certified the San Francisco Department of Public Health as a Certified Unified Program Agency, consolidating six state environmental programs (hazardous materials storage, hazardous waste generation,

[80] Langan, Site Mitigation Plan, 3333 California Street, San Francisco, California, May 20, 2019; Dust Monitoring Plan, 3333 California Street, San Francisco, California, May 20, 2019; and Asbestos Dust Monitoring Plan, 3333 California Street, San Francisco, California, May 20, 2019

hazardous waste treatment, underground tanks, above ground petroleum storage, and regulated substances) and two local programs (chlorofluorocarbon recycling and medical waste) to be implemented by the health department under the Hazardous Materials and Waste Program, which is the state-designated enforcement program in San Francisco for the Hazardous Materials Unified Program Agency (HMUPA). As explained on initial study pp. 218-219, SFPUC has review, approval, and enforcement authority of local and regional water quality requirements such as those provided by the regional water board.

In addition to the enforcement authority granted to these local agencies, EIR p. 2.108 lists required review and approval actions that are administered to ensure compliance with state and regional hazardous materials management requirements as follows:

- San Francisco Department of Public Health – Review and approval of a Site Mitigation Plan and Construction Dust Control Plan
- San Francisco Department of Building Inspection – Review and approval of demolition and excavation permits,
- San Francisco Public Utilities Commission – Review and approval of an Erosion and Sediment Control Plan
- Bay Area Air Quality Management District – Approval of asbestos dust mitigation plan

One comment asks whether soil gas detections are under the jurisdiction of agencies other than the San Francisco Department of Public Health (health department).

As explained above, the health department is the oversight agency responsible for enforcing regulatory requirements set forth by federal and state agencies including the California Environmental Protection Agency's Department of Toxic Substances Control. As discussed on EIR p 4.F.3, the health department facilitated soil gas evaluation conducted by Langan, reviewed the documentation of on-site contamination related to the current and past site uses, and, based on their assessment and the associated documentation, determined that a site mitigation plan would be required. The health department concurred with Langan's assessment that vapor intrusion related to the presence of volatile organic compounds in soil gas under the Plaza A Building footprint would not be a concern due to the proposed depth of the basement excavation (40 feet), with occupied residential uses on the upper floors above a podium and separated from the ground with a ventilated garage.[81] As part of the project sponsor's finalization of the required site mitigation plan, the health department requested that additional subsurface investigation be conducted to fill data gaps in areas where samples could not be collected previously due to site

[81] San Francisco Department of Public Health, Memorandum re: SFHC Article 22 Compliance, prepared by Stephanie Cushing, Director of Environmental Health, for Don Bragg, Prado Group, August 8, 2017.

access constraints and the presence of existing structures proposed for demolition.[82] The purpose of the additional subsurface investigation is to characterize the soil within the excavation areas for off-site disposal or reuse and to assess the quality of the groundwater for any potential dewatering. If the results of the additional subsurface investigation indicate that hazardous materials are present in soil and are anticipated to be encountered during site redevelopment, the health department will require that these materials be handled per the site mitigation plan. Because low levels of hazardous materials, including volatile organic compounds, have been detected on the project site, a health and safety plan will also be required by the health department.

**Hazardous Materials Sites Under Government Code Section 65962.5**

A comment expresses concern that the EIR does not properly list hazardous materials sites compiled pursuant to Government Code section 65962.5.

Government Code section 65962.5 requires agencies to compile, publish, and update hazard sites including the Department of Toxic Substances Control, the State Department of Health Services, and the State Water Resources Control Board. A complete list of databases reviewed in the Phase 1 Environmental Site Assessment is provided on EIR p. 4.F.6. As disclosed in the Notice of Preparation of an Environmental Impact Report distributed on September 20, 2017, and on initial study p. 238, the project site is currently on the Leaking Underground Storage Tank Sites list maintained by the State Water Resources Control Board List (Geotracker ID T0607501246) pursuant to Government Code section 659625. The comment does not specify which sites, uses, or materials, if any, are missing from the analysis in the initial study.

**Site Remediation**

One comment notes that the site would be required to undergo remediation and cleanup prior to initiation of construction. The comment asks when UCSF would relocate employees and dispose of remaining hazardous medical materials remaining on site. One comment also proposes a mitigation measure to ensure no existing onsite piping used for medical uses may be connected to proposed graywater recycling systems during adaptive reuse of the existing building.

Remediation and cleanup activities would commence prior to, and as part of, site preparation in anticipation of the demolition and excavation components of each of the four phases of the construction program. As discussed in EIR Section 4.F, Initial Study Supplement, on p. 4.F.13, construction of the proposed project or project variant would begin only after decommissioning and removal of hazardous materials and the move of all UCSF uses to other campuses. These

[82] San Francisco Department of Public Health, letter re: Article 22A Compliance, signed by Stephanie Cushing, Director of Environmental Health, to Laurel Heights Partners, LLC, c/o Don Bragg, June 10, 2019.

decommissioning and hazardous materials removal activities would occur prior to the start of Phase 1 for the proposed project or project variant. As discussed on EIR pp. 4.F.5-4.F.6, the University of California Office of Environmental Health and Safety is required to decommission the laboratories and other portions of the premises where hazardous materials have been used or stored prior to vacating the site. Closure of all hazardous materials licenses and use permits would include inspections and approvals from applicable regulatory agencies, as well as transportation and disposal of all hazardous chemical, radioactive, and biohazardous materials in accordance with regulations that minimize the potential for releases and off-site exposure. All closure protocols related to the laboratory uses would be completed prior to any site disturbance. As described on EIR p. 2.93, all equipment, including fume hoods, centrifuges, sinks, pipes, and storage containers associated with laboratory uses (which could contain residual radioactive substances) would be decommissioned or removed in accordance with these regulations.

**Vaporized Volatile Organic Compounds**

One comment states that vaporized volatile organic compounds could pose a concern for residents across the street from the project site, asserting that the initial study did not analyze the proposed project's and project variant's potential impacts on the public and off-site receptors. A comment also posits that the CEQA Guidelines use a standard of significance based specifically on whether release of hazardous emissions would occur, including within one-quarter mile of schools.

As explained on EIR p. 4.F.13, demolition, excavation and construction would be performed in accordance with the site mitigation, construction dust control, and asbestos dust mitigation plans that have been reviewed and approved by the responsible regulatory agencies. Compliance with regulations ensure that materials are handled safely and would not be released offsite. These measures would reduce the impact on construction workers, neighbors, and sensitive receptors (such as residents, daycare facilities, schools), as well as future occupants of the project site. During operation of proposed on-site land uses, the project would involve the use of minor amounts of routine household and commercial hazardous materials but would not result in emission of hazardous waste or handling of hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.

**Groundwater Contamination**

A comment expresses specific concern regarding groundwater contamination from disruption of existing subsurface contamination such as remains from the Laurel Hill Cemetery.

As detailed in the initial study, the risk of encountering infectious disease is low as existing remains are nearly 70 years old or more, and disease causative agents are unable to survive long in the human body following death. As described on initial study p. 232, the site mitigation plan

would require any excavated soils found to be contaminated to be removed from the project site and transported to a regulated hazardous waste disposal site under the oversight of the health department. Contaminated groundwater encountered from this construction site would be handled in accordance with the requirements of an approved batch wastewater discharge permit under oversight of the San Francisco Public Utilities Commission.

**Conclusion**

In summary, conformance with regulations are assumed as part of the project as they are legal requirements and are discussed, where applicable, in the environmental analysis provided in initial study Sections E.12, Geology and Soils, E.14, Hydrology and Water Quality, and E.15, Hazards and Hazardous Materials and further explained in Section 4.F, Initial Study Supplement, of the EIR. Therefore, as concluded in the initial study, hazards and hazardous materials impacts on the environment (soil, air, and water) and people (construction workers, nearby residents, visitors, and workers) would be less than significant with the required adherence to all regulatory requirements.

## ENERGY RESOURCES

The comment in this section relates to the topic of Energy Resources evaluated in initial study Section E.16. A corresponding response follows the comment.

### *COMMENT EN-1: ENERGY RESOURCES*

"Summary of several concerns raised by nearby residents and citizens of San Francisco:…18. Concerns about the project's demand on energy supplies and potential effects on utility service in the project vicinity." *(Ian Lawlor, Email, December 13, 2018 [I-Lawlor-19])*

### *RESPONSE EN-1: ENERGY RESOURCES*

The comment raises a general concern about the proposed project or project variant's energy demand and effects on utility services.

As described in Section E.16, Mineral and Energy Resources, initial study pp. 240-246, the proposed project or project variant would not encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. An energy assessment with calculations for the proposed project's or project variant's estimated contribution to regional energy demand was prepared to support the analysis in the initial study. The report, titled 3333 California Street Mixed-Use Project Energy Assessment and Calculations, Case No. 2015-014028ENV, is available for review at the planning department offices as part of Case File No.

2015-014028ENV.[83] Minor revisions to the 3333 California Street Mixed-Use Project Energy Assessment and Calculations were provided and disclosed in the EIR in Section 4.F, Initial Study Supplement (EIR p. 4.F.17). The updated 3333 California Street Mixed-Use Project Energy Assessment and Calculations, Case No. 2015-014028ENV is available in the project file.

While statewide efforts are being made to increase power supply and to encourage energy conservation, the project-generated demand for energy would be negligible in the context of overall demand within San Francisco, the greater Bay Area, and the state, and would not in and of itself require any expansion of power facilities. The proposed project's or project variant's demand for energy resources would not result in a significant energy impact. The proposed project or project variant, combined with past, present, and reasonably foreseeable future projects in the project vicinity, would not result in a significant cumulative impact on mineral and energy resources.

Additionally, the proposed project or project variant would be required to comply with the energy efficiency requirements of the City's Green Building Code, Stormwater Management Ordinance, Water Efficient Irrigation Ordinance, Residential Water Conservation Ordinance, Commercial Water Conservation Ordinance, and Residential Energy Conservation Ordinance, which would promote energy and water use efficiency (see Section E.7, Greenhouse Gas Emissions, initial study p. 149). Additionally, the proposed project and project variant would be required to meet the renewable energy criteria of the Green Building Code, including renewable energy generation or green roof installation. As discussed in the Project Description (initial study pp. 70-74; EIR pp. 2.88-2.89), the project sponsor would incorporate non-potable rainwater and graywater systems into the proposed development; and would develop the majority of the rooftops of the proposed new buildings and the adaptively reused office building at the center of the site with a mix of green roofs, solar photovoltaic systems, and/or roof-mounted solar thermal hot water systems.

The San Francisco Public Utilities Commission has accounted for demand growth resulting from the proposed project or its variant in its water demand and wastewater service projections, and the City has implemented various programs to achieve its zero waste goals by 2020, as stated in Section E.10 Utilities and Service Systems, initial study pp. 173-188. Additional detail regarding water supply is provided in Response UT-1: Adequacy of Water Supply Entitlements on RTC pp. 5.J.57-5.J.75, above, and in RTC Section 6, Draft EIR Revisions in text to be added to EIR Section 4.F, Initial Study Supplement. See also initial study Appendix A: Water Supply Assessment for the 3333 California Street Project. Nearby cumulative development projects would be subject to the same water conservation, wastewater discharge, recycling and composting, and construction demolition and debris ordinances applicable to the proposed project and project variant. The proposed project and project variant would have less-than-significant impacts on utilities and service systems.

[83] The administrative record is also online at https://www.ab900record.com/3333cal.

# 5.K CEQA PROCESS

The comments and corresponding responses in this section relate to the California Environmental Quality Act (CEQA) Process. The comments are grouped according to the following CEQA process issues that the comments raise:

- CEQA-1, Public Outreach
- CEQA-2, Aesthetics/CEQA Section 21099
- CEQA-3, AB 900 Process
- CEQA-4, CEQA Process

A corresponding response follows each grouping of comments.

## COMMENT CEQA-1: PUBLIC OUTREACH

"So I guess on the process, scoping document goes out, shows what the project sponsor's programming needs or programming desires are for the site, it has the layout and the map proposed. That's what we have here." *(Commissioner Dennis Richards, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 84, December 13, 2018 [A-CPC-Richards-1])*

"So we've worked successfully with the Lucky Penny and the CPMC, and we had a role there. But despite all the meetings with this developer, when we asked him in the supervisor's office what the project was before he went public with it, he said, "This is not a negotiation." And the community is supposed to have a role in planning when there is a major rezoning asked for." *(Kathryn Devincenzi, President, Laurel Heights Improvement Association of San Francisco, Inc., Draft EIR Hearing Transcript, p. 45, December 13, 2018 [O-LHIA3-3])*

"And what disturbs me, and it was said again by the developer earlier this afternoon, that they've had some 140 meetings from some kind of count they keep with the neighborhood. That has just not been our experience, for many people.

In fact, it's just the opposite. I don't believe the developers have engaged with the neighborhood in a meaningful way to come to agreement and not delay this housing we so desperately need." *(Joe Scaroni, Draft EIR Hearing Transcript, pp. 41-42, December 13, 2018 [I-Speaker2-4])*

"I should note that I provided some details on these concerns to Julie Moore (see thread included below) in the summer -- although some of my notes are new -- so even though I'm late on the comment period, I want to register that I had already provided the input -- and don't feel like I've heard it addressed in this report." *(Nathan Stoll, Email, January 18, 2019 [I-Stoll-4])*

"The Notice of Public Hearing was posted at the corners of the 3333 California location, but both pages failed to be posted providing informative and critical information to the public.

1. Your name and email contact address and phone number
2. The Planning Department's website address in order to download the Draft EIR document assessment

3. The Notice of a Public Hearing before the Historic Preservation Commission on Wednesday December 5th at12:30 p.m. at which the Historic Commission is to make its comments on the Draft EIR.
4. Notice to the Public that public comments to the Historic Preservations will be accepted from 11/8/2018 –12/24/2018."

*(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-1])*

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"I wanted to reach out in hopes that I can get a status update on this project. I believe it had an environmental meeting last year but I was wondering if this project have move forward at all since then. Just trying to get a grasp on how the application process is for these type of projects."
*(Tony Vega, Email, January 8, 2019 [I-Vega-1])*

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**RESPONSE CEQA-1: PUBLIC OUTREACH**

The comments describe concerns about the public outreach process for the project, including meetings held by the project sponsor and also outreach and noticing conducted by the planning department for the environmental review process pursuant to CEQA. One comment raises specific issues related to the adequacy of the site poster noticing the availability of the draft EIR, asserting that the notice was missing contact information, the planning department's website address, information regarding the public hearing before the Historic Preservation Commission, and the duration of the public review period. Another comment asks about the status of the project and application process. The comments also describe general concerns with the role of neighborhoods in planning a major project with a developer prior to, and during, the public review process. Some state that the public outreach efforts carried out by the project sponsor were not adequate.

**Public Outreach and Notice Requirements under CEQA**

As discussed in Chapter 1, Introduction, on EIR pp. 1.4-1.17, the environmental review process for the proposed project is comprised of the following required notices, publications, and public review periods under CEQA and chapter 31 of the San Francisco Administrative Code: (1) a Notice of Preparation (NOP) of an EIR and Notice of Public Scoping Meeting, published on September 20, 2017, for which the 30-day public review and comment period ended on October 20, 2017, and a public scoping meeting was held on October 16, 2017; (2) a Notice of Availability of an Initial Study, published on April 25, 2018, and circulated for public comment for 30 days, on which a total of 15 comment letters and e-mails were received; (3) a Notice of Public Hearing and Availability of a Draft EIR, published on November 7, 2018, with an original public comment period ending December 24, 2018, extended to January 8, 2019, resulting in a 62-day public review and comment period, and a public hearing was held on December 13, 2018; and (4) this Responses to Comments document, which will be issued two weeks prior to consideration by the planning commission in a public meeting on September 5, 2019, and then certified as a Final EIR, if deemed adequate.

In addition, the planning department mailed Notices of Availability at the time of publication of the NOP, the initial study, and the EIR to the State Clearinghouse and relevant state and regional agencies; owners and occupants of the site and properties within 300 feet of the project site; and other potentially interested parties, including neighborhood organizations that have requested such notice. Legal notices in a newspaper of general circulation were also published. Each of these notices, publications, and public review periods satisfies the requirements of CEQA Guidelines sections 15082 through 15088, as well as chapter 31 of the San Francisco Administrative Code. Thus, the environmental review process for the proposed project has met all applicable public notice and public comment requirements under CEQA, the CEQA Guidelines, and chapter 31 of the administrative code. The project sponsor's community outreach process is a separate matter from the environmental review process and is not required as part of the CEQA process.

None of the information asserted by a comment to be missing from the posted notices was missing. The notice contained the following information: a brief description of the project; the dates of the public review period; information about how to submit comments, including the phone number and email address of the planning department's assigned staff person and the department's street address; the dates for the scheduled public meetings at the Historic Preservation Commission and the Planning Commission; a list of significant environmental effects anticipated; and the website address and physical address where copies of the EIR and documents referenced in the EIR are available. The comment identified the Historic Preservation Commission as the receiver of comments on the draft EIR. That is not correct. As stated on the notice that was mailed and posted on the site on November 7, 2018, public comments on the draft EIR are to be submitted to the planning department's EIR coordinator for the project not to members of the Historic Preservation Commission.

As required under CEQA Guidelines section 15087(a)(2) and (c) and chapter 31 of the administrative code, notices were timely posted on the project site and vicinity in accordance with the required posting period and checked throughout the public review period to ensure that they were still in place. The affidavit of posting indicates that nine locations (six 36-by-48-inch posters mounted on the perimeter of the site and three 24-by-36-inch laminated posters placed at primary building entrances) were posted at the beginning of the public review process (November 7, 2018), and the posters remained at these locations throughout the public review period as required by the planning department pursuant to chapter 31 of the administrative code. Copies of the "Notice of a Public Hearing and Availability of a Draft Environmental Impact Report" and the signed Affidavit of Posting are available for review at the planning department offices as part of Case File No. 2015-014028ENV.

Because the proposed project or variant would result in a significant historic resource impact and preservation alternatives were proposed to reduce or eliminate this impact, the Historic Preservation Commission received the draft EIR for review and comment to the planning department and the

planning commission. The Historic Preservation Commission practice is to formulate its comments on EIRs at one of its regular public hearings and notice of such hearing is provided by publication of the preservation commission agenda. These hearings are not required by CEQA and there is no noticing requirement under CEQA, the CEQA Guidelines, or chapter 31 of the administrative code for this hearing. As noted in Chapter 1, Introduction, on EIR p. 1.18, "public comments at the historic preservation commission hearing will not be treated as comments on the Draft EIR and will not be responded to in the Responses to Comments document." However, the comments made by the Historic Preservation Commission on the draft EIR are part of the CEQA environmental review process for historic architectural resources impacts and for alternatives to the proposed project or project variant developed to reduce or eliminate the identified significant historic architectural resource impact, i.e., two full and two partial preservation alternatives. The Historic Preservation Commission's comments on the draft EIR have been submitted by Historic Preservation Commission President Andrew Wolfram as an official comment (see Comment Letter A-HPC in RTC Attachment B). For a response to public comments regarding the range of alternatives and the selection process, see Response AL-1: Range of Project Alternatives, on RTC pp. 5.H.8-5.H.10.

One comment states that their input has not been addressed in the EIR. The referenced comment pertains to concerns regarding existing and project-generated traffic volumes on traffic hazards and pedestrian safety, and the loss of existing open space. Comments in response to the Notice of Preparation and initial study are available for review at the planning department offices as part of Case File No. 2015-014028ENV. A summary of comments received on the Notice of Preparation was provided in the initial study in Section G, Public Notice and Comment, on pp. 256-259 (see EIR Appendix B). Comments received on the initial study are also summarized in EIR Chapter 1, Introduction, on pp. 1.13-1.17. The environmental analysis in the initial study and EIR considered public comments made during the public scoping process as well as those received on the initial study, and was conducted consistent with planning department guidelines and approaches for analysis depending on topic.

**Neighborhood Participation**

The environmental review process and entitlement process have separate community engagement requirements. To the extent that meetings between the project sponsor and the public have occurred, the project sponsor has indicated that it has considered issues identified in those meetings in the development of the proposed project and project variant. However, community outreach outside of the environmental review process is not required under CEQA. Requirements for community outreach during the entitlement process are specified in the planning code and may include neighborhood notifications, opportunities to request discretionary review, and an appeals process. In addition, other outreach may be conducted as community meetings or informational hearings before the planning commission or other agencies. The number and results of community meetings

between the project sponsor and the public that are required for the entitlement process will be summarized in the planning department's staff report as part of the review for project entitlements. On the other hand, the analysis of environmental impacts is based on the proposed project and project variant as submitted to the City in applications for environmental review and consideration of project approvals, and, as explained above, does not include a summary of the project sponsor's community outreach efforts outside of the environmental review process.

**Conclusion**

The comments do not identify any inadequacies or errors in the environmental analysis. As such the comments do not require any further response in this RTC document. To the extent that the topics raised in the comment letters pertain to physical environmental impacts, these issues are addressed either in the initial study or the EIR. Information about the existing circulation surrounding the project site is discussed in EIR Chapter 2 on pp. 2.15-2.17 and proposed streetscape improvements of the proposed project or project variant are described on EIR pp. 2.61-2.77. An analysis of impacts associated with project and cumulative traffic hazard and pedestrian and bicycle safety impacts is provided in EIR Section 4.C under Impacts TR-3 and C-TR-3 on pp. 4.C.81-4.C.83 and 4.C.104-105 (traffic hazards), Impacts TR-7 and C-TR-7 on pp. 4.C.92-4.C.94 and 4.C.112 (pedestrian safety), Impacts TR-8 and C-TR-8 on pp. 4.C.94-4.C.96 and 4.C.112-4.C.113 (bicycle safety), Impacts TR-10 and C-TR-10 on pp. 4.C.98-4.C.99 and 4.C.114 (pedestrian loading safety).

Comments raised during the public comment period for the EIR are addressed in this RTC document. Responses to comments pertaining to concerns about traffic hazards and pedestrian safety are provided in RTC Section 5.E, Transportation and Circulation, under Response TR-7: Traffic Hazards, on RTC pp. 5.E.64-5.E.69, Response TR-8: Pedestrian/Bicycle Hazards, on RTC pp. 5.E.74-5.E.80, and Response TR-10: Loading, on RTC pp. 5.E.91-5.E.96. A response to comments pertaining to the loss of existing open space is provided in RTC Section 5.B, Project Description, under Response PD-3: Project Characteristics, on pp. 5.B.19-5.B.24.

## COMMENT CEQA-2: AESTHETICS/CEQA SECTION 21099

"**LOSS OF OPEN SPACE AND OBSTRUCTION OF HORIZON**

Our neighborhood will also lose the existing open space in front of our homes and the entire view of the horizon that many in our neighborhood enjoy. The Developer takes this open space from us and sequesters it inside the Project's walls.

The open space we now enjoy is framed by 100 year old cypress trees, and our horizon extends more than a mile away. (See view below taken from 3320 California St.)" *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-14]) [See Comment Letter O-CSHG1, p. 5, in RTC Attachment B for the photograph referenced in this comment excerpt.])*

"The Draft EIR does not address, nor does it adequately mitigate because it doesn't address, the effect of taking the streetscape away and taking the view you see in the overhead and putting it behind the project's walls." *(Joe Catalano, California Street Homeowners Group, Draft EIR Hearing Transcript, p. 62, December 13, 2018 [O-CSHG2-5])*

"Architecture is not in line with existing neighborhood character." *(Barbara and Jim Brenner, Email, January 3, 2019 [I-Brenner-2])*

"The Draft EIR does not mention, much less adequately address, the loss of horizon the Project will create." *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-5])*

**"2. The DEIR Is Inadequate Because It Fails to Analyze and Mitigate the Proposed Project's Significant Adverse Impact on a Scenic Vista, Substantial Damage to Scenic Resources and Substantial Degradation of the Existing Visual Character or Quality of the Site and Its Surroundings.**

Page V.C-11 of the Final EIR for the 2004 and 2009 Housing Element states that a project would have a significant effect on the environment is it would:

1. Have a substantial adverse effect on a scenic vista;

2. Substantially damage scenic resources, including, but not limited to, trees, rock outcropping, and other features of the built or natural environment which contribute to a scenic public setting;

3. Substantially degrade the existing visual character or quality of the site and its surroundings, or

4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties.

Since the project site was determined eligible for the National Register of Historic Places and has been listed in the California Register of Historical Resources, its aesthetic qualities are protected by CEQA and are not exempt from CEQA review. Both the existing office building and its integrated landscaping are historically significant resources. (Ex. A, final version of nomination that was approved by State Historical Resources Commission)

**A. The Proposed Project Would Have a Substantial Impact on Scenic Vistas.**

The project site is atop Laurel Hill and commands valued scenic vistas of the downtown and eastern portion of the City and also of the Golden Gate Bridge and other neighborhoods of the City to the northwest. During my years living in the neighborhood, I have seen innumerable members of the public enjoy these views during daytime as well as during nighttime. I have seen jubilant crowds of people view lunar eclipses from the sidewalks atop Laurel Hill at the corner of Laurel Street and Euclid Avenue and from the landscaped green spaces surrounding the main office building. Some photographs I have taken which show the existing condition of some of these views are attached hereto. (Ex. B, photographs taken on October 24, 2017 and January 7, 2019) These photographs show that the portions of the Bank of America Building, Transamerica Pyramid, Salesforce Building and Golden Gate Bridge can be seen from the high ground at Laurel Street and Euclid Avenue, from the landscaped green spaces surrounding the main office building

and from public sidewalks along Laurel Street and Euclid Avenue." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-2])*

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"The proposed project would construct new buildings on the south site of the site near Euclid Avenue and Masonic Avenue and on the western portion of the site near Laurel Street that would obstruct these public scenic vistas and obstruct the public view of the historically significant main building as viewed from the surrounding landscaping. Also, the proposed new buildings constructed on the landscaped areas surrounding the site would block public access to such vistas. In addition, the project proposes to add new trees/shrubs near the perimeter of the south side of the site and also street trees at this location that would also impair and/or obstruct these scenic vistas. (Ex. E, developer's renderings)

The Final EIR for the 2004 and 2009 Housing Element acknowledges that new residential housing could result in an impact related to scenic vistas if it would be developed in a manner that obstructs views from a scenic vista from a public area or introduces a visual element that would dominate or upset the quality of a view. (Ex. F. p. V.C-11) Figure V.C-1 shows street views of an important building in the area of the 3333 California site. Does this Figure describe a streetview of the main building at 3333 California Street as an important building?" *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-5])*

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"**B. The Proposed Project Would Substantially Damage Scenic Resources, Including but not Limited to Trees, Slopes of Laurel Hill and other Features of the Built or Natural Environment Which Contribute to a Scenic Public Setting.**

The Final EIR for the 2004 and 2009 Housing Element acknowledges that: "New construction could result in impacts related to damaging scenic resources if new housing would directly affect environmental features, such as topographic features, landscaping, or a built landmark that contributes to a scenic public setting," and that "2009 Housing Element Policy 11.6 preserves landmark buildings, some of which could be considered a scenic resource of the built environment." Ex. F, p. V.C-24-25." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-8])*

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"**C. The Proposed Project Would Substantially Degrade the Existing Visual Character or Quality of the Site and Its Surroundings.**

The Final EIR for the 2004 and 2009 Housing Element acknowledges that new construction could result in impacts related to visual character if new housing would be developed with greater densities or heights than surrounding land uses or introduce incompatible uses in such a way as to substantially degrade the character or quality of the site. (Ex., p. 25.)

The proposed density of the project would be over twice the predominant density of the surrounding residential areas (which are predominantly RH-2 areas) and would add two-three stories to the main building to increase its height to 80 and 92 feet, which would be over twice the scale of the existing neighborhood, which has a predominant 40-foot height limit. The proposed project would fail to comply with 2009 Housing Element Policy 1.1, that requires housing projects to respect existing neighborhood character. (See, for example, Ex. G, photographs of residences along western side of Laurel Street). For the reasons stated above, the proposed project would develop the site with densities and heights that are substantially greater than the densities and heights of the surrounding land uses and would construct new buildings where historically significant landscaping integrated with the main building now exists, thereby substantially

degrading the connection between the building and the existing landscaping. The Mitigation Measure set forth above would avoid this significant impact on the environment. [The "mitigation measure" referenced in this comment is one suggested earlier in the comment letter and involves preserving the existing landscaped areas to the south and west of the existing building]

**D. The Proposed Project Could Create a New Source of Glare or Substantial Light Which Could Adversely Affect Day or Nighttime Views in the Area or Which Could Substantially Impact Other People or Properties.**

The Final EIR for the 2004 and 2009 Housing Element acknowledges that new housing could result in impacts related to glare and light if new housing would introduce new sources of glare or light that are unusual for an urban area, and that new housing could introduce new sources of glare and glare if reflective glass or if bright, decorative or security lighting is used. Renderings of the project show a predominant glass-design, and security lighting would be needed along the proposed pathways and other areas on site. Since the exact type of materials and lighting is not known, the project has the potential to produce significant impacts on light and glare, which the DEIR failed to address. The following mitigation measures would reduce the potential impacts if incorporated as conditions of approval of the proposed project.

> **MITIGATION MEASURE.** The project must comply with City Resolution 9212 (or any successor or similar regulation adopted to reduce glare), which prohibits the use of highly reflective or mirrored glass in new construction.
>
> **MITIGATION MEASURE.** The project will not use bright, decorative or security lighting." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-11])*

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"Unfortunately, since the new finished materials and details have not yet been told to the public, and since they are lacking in the DEIR, we cannot comment on them as affecting any of the CEQA categories." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-52])*

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"Many mature trees are not only HISTORIC RESOURCES. They are also part of the AESTHETICS of the site – the building structures *and* the landscaping go hand-in-glove. The trees are rated in the arborist report as poor, fair or good for relocation. Yet, some of the good condition trees are potentially slated for removal. A couple of the trees were from the original Laurel Hill Cemetery and were incorporated into the Firemen's Fund Building landscaping that went with the building structure." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-69])*

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"The Firemen's Fund Building is aesthetically pleasing due to its lines that appear to hug the hill. In fact, over four decades ago in The Chronicle, the reason the building is not so jarring on the slope may have to do with its "low lines":

*[See Comment Letter I-Hillson2, p. 33 of 37, in RTC Attachment B for the excerpt from the Chronicle article that follows this comment.]*

*(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-71])*

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**RESPONSE CEQA-2: AESTHETICS/CEQA SECTION 21099**

Comments express concern about development of the project site and state that it would change existing views of and from the site; would block access to existing views from the project site; would degrade the existing visual character of the project site with new construction and removal of existing trees; and would not conform to the existing neighborhood character, resulting in significant impacts and failing to conform with Housing Element policies regarding neighborhood character.

Comments also state that the exemption from aesthetics analysis allowed under CEQA section 21099 is not the proper application of CEQA when a project includes a historic resource identified in the California Register of Historical Resources. In particular, another comment states that because the existing building and its landscaping were determined to be eligible for the National Register and the California Register, aesthetics are not exempt from review under CEQA. Some comments state that because visual impacts were discussed in the planning department's EIR for the 2004 and 2009 Housing Element, listing the significance criteria used in that EIR, similar analysis should have been presented regarding the proposed project's or project variant's impact on neighborhood character and regarding the loss of scenic vistas from a public area (suggesting that a portion of the project site is a public property). A comment states that the Housing Element EIR found that new housing could introduce new sources of light and glare, and that the proposed new housing may also produce significant light and glare impacts, and presents potential measures to mitigate this alleged significant impact. A comment states that the mature trees on the site are part of the aesthetic qualities of the site.

**Aesthetics and CEQA Section 21099**

A discussion of aesthetics impacts is required in some EIRs but not in all EIRs. For the proposed project or project variant, a discussion of aesthetics impacts is not required under CEQA based on CEQA section 21099: Modernization of Transportation Analysis for Transit-Oriented Projects as stated in the initial study (see Section D, Summary of Environmental Effects, pp. 105-106), reiterated in Chapter 1, Introduction, on EIR p. 1.3, and Section 4.A, Introduction to Chapter 4, on EIR pp. 4.A.4-4.A.5, and summarized below.

On December 18, 2017, the planning department completed an "Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis" for the proposed project. The cited document (Footnote 71 of the initial study and Footnote 3 of EIR Chapter 1, Introduction) is available for review at the planning department offices as part of Case File No. 2015-014028ENV. The planning department determined that the project and variant meet the definition of a mixed-use residential project and that the site is located in a transit priority area on an urban infill site. For these reasons and pursuant to section 21099(d), this EIR does not include a discussion and analysis of the topic of aesthetics, such as effects on scenic vistas and visual character of the site within its

surroundings or effects of light and glare. Likewise, this RTC document construes comments related to aesthetics to be comments on the merits of the proposed project.

CEQA section 21099(d) applies to all qualifying residential, mixed-use residential, or employment center projects that meet the defined criteria for an infill site within a transit priority area. It eliminates the environmental topic of aesthetics from impacts that can be considered in determining the significance of physical environmental effects of such projects under CEQA. Further, CEQA section 21099(d)(2)(A) states that a lead agency maintains the authority to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers, and CEQA section 21099(d)(2)(B) states that aesthetics impacts do not include impacts on historical or cultural resources.

Contrary to the assertion in the comment, the fact that the existing building and its landscape have been determined eligible for the National Register, and therefore listed on the California Register, does not alter the applicability of the above-noted CEQA statute and require a discussion of aesthetics impacts. Thus, the analysis of the project-related changes to the identified character-defining features of the site is properly limited to the cultural resources section of the EIR. As described under Impact CR-1 the material changes to the site and building were determined to be adverse changes to the historic architectural resource and a significant and unavoidable impact even with mitigation (see EIR Section 4.B, Historic Architectural Resources).

For informational purposes, project elevations and renderings are included in the project description. EIR Chapter 2, Project Description, presents seven renderings (see Figure 2.7 through Figure 2.13, EIR pp. 2.27-2.33) that show views of the proposed project's buildings and open spaces. Further, the proposed project would be required to comply with Planning Commission Resolution 9212 regarding the use of reflective or mirrored glass and would include outdoor lighting typical of residential, retail, office, and child care uses in the project vicinity. Furthermore, the proposed lighting would not be unusual or atypical for an urban infill project in a residential neighborhood. As explained above, the topic of aesthetics is no longer considered in determining the significance of physical environmental effects of eligible projects under CEQA. For purposes of CEQA, mandatory compliance with code provisions and other required actions are not identified as "mitigation measures." Required actions are disclosed in the impact analyses and adherence is mandatory and is overseen by responsible departments and agencies. Thus, the measures suggested as mitigation for asserted aesthetics impacts are not CEQA mitigation because there is no identified significant aesthetics impact that would be addressed. For the analysis of impacts on historic architectural resources, see EIR Section 4.B, Historic Architectural Resources, pp. 4.B.41-4.B.50.

For information on existing trees, the proposed tree retention program, and the trees that were part of the Laurel Hill Cemetery and would be retained, see EIR Chapter 2, Project Description, pp. 2.18 and 2.86-2.87, and EIR Section 4.B, Historic Architectural Resources, pp. 4.B.5 and 4.B.40. For

responses to comments related to trees, see Response CR-1: Historic Significance of Site, on RTC pp. 5.D.7-5.D.11, and Response BR-1: Loss of Trees, starting on RTC p. 5.J.84.

**Aesthetics and the San Francisco Housing Element EIR**

An analysis of aesthetics impacts could not be and was not eliminated from the Housing Element EIR because neither the 2004 nor 2009 Housing Element was qualified as a residential, mixed-use residential or employment center project meeting the criteria for an infill site within a transit priority area. The 2004 and 2009 Housing Elements are planning documents, not development proposals with specific development sites. Furthermore, development of the Housing Element and the Housing Element EIR in 2011 predates the adoption of section 21099 and changes to the CEQA analysis of aesthetics impacts in 2013. The 2004 and 2009 Housing Element EIR included an analysis of aesthetics using the questions from Appendix G of the CEQA Guidelines and acknowledged that some development consistent with the Housing Element could have a substantial adverse effect on a scenic vista, substantially damage scenic resources, substantially degrade the existing visual character or quality of the site, or create a new source of substantial light or glare, and identified a significant impact. However, these criteria do not apply to projects that qualify under section 21099. Thus, the statement does not apply to the proposed project or its variant, which meet the criteria under section 21099, and, as a result, an analysis of aesthetics impacts is not required in this EIR.

For a discussion of issues raised by comments related to the historic significance of the site or the historic architectural resources impacts on character-defining features of the site, e.g., the large trees in a designed landscape, see Response CR-1: Historic Significance of the Site, and Response CR-2: Impacts on Historic Architectural Resources, on RTC pp. 5.D.7-5.D.11 and RTC pp. 5.D.14-5.D.16, respectively.

As discussed in EIR Chapter 3, Plans and Policies, the analysis considered all applicable Elements in the San Francisco General Plan, including the 2014 Housing Element. The analysis did not find that the proposed project or project variant would obviously conflict with the policies contained therein. It found that the proposed project or project variant would further policies of the Housing Element aimed at the production of housing, including affordable housing. Height increases up to 92 feet on the easternmost portion of the adaptively reused building and to 45 feet along California Street (67 feet for the Walnut Building under the project variant) would not substantially alter the existing neighborhood character.

The topography of the project site and nearby area affects how building heights are perceived in relation to the existing neighborhood character and the heights of surrounding buildings, e.g., the 65-foot-tall Jewish Community Center and 40-foot-tall buildings along the north side of California Street are similar to the proposed heights of the new buildings proposed along California Street and Laurel Street, Under the proposed project the Plaza A, Plaza B, and Walnut buildings along

California Street would be 45 feet tall and the Laurel Duplexes and Mayfair Building along Laurel Street would be up to 40 feet tall. Under the project variant the only difference would be the increased height for the Walnut Building (67 feet). At the center of the site, the existing building (approximately 55 feet tall) would be adaptively reused as two separate residential buildings (80 feet tall for Center Building A and 80 to 92 feet tall for Center Building B). Additionally, Laurel Hill encompasses a larger area than the project site and continues to rise to the south and west. The approximately 20-foot rise in elevation of the ground to the south of the project site across Euclid Avenue toward Geary Boulevard (approximately 340 feet in elevation in the new San Francisco Vertical Datum 2013 on Lupine Avenue directly south of the project site, approximately 20 feet above the 320-foot elevation at the corner of Laurel Street and Euclid Avenue on the project site)[1] creates a backdrop where proposed heights of buildings on the project site would not be substantially out of character with the surrounding buildings to the south and west. The development of new residential land uses at the proposed density which is allowed under the planning code, i.e., 558 units under the RM-1 zoning controls and up to 744 residential units with the project variant using a conditional use/planned unit development authorization, would not be considered a substantial change to the prevailing residential character of the neighborhood even if the proposed densities of approximately 56 units per acre would be slightly greater than the existing residential densities in the neighborhood. The disclosure of any potential inconsistencies with Housing Element Policy 11.7 (incorrectly identified in the comment as 2009 Housing Element Policy 11.6) related to the preservation of landmark buildings is covered in the EIR. See EIR pp. 3.11-3.12 for a discussion of San Francisco Priority Policy 7 (preservation of landmark and historic building) and EIR Section 4.B, Historic Architectural Resources, for the historic resources analysis.

**Conclusion**

Although aesthetics impacts are not required to be analyzed under section 21099(d), comments about the design of the proposed project or variant continue to be issues that may be considered by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process. As stated above, section 21099(d)(2) acknowledges the lead agency's design review authority over the proposed project with respect to the design of all structures and open space areas. Thus, the planning department and City decision-makers will consider the aesthetics of the proposed project pursuant to applicable design review ordinances and urban design standards and guidelines, including the Urban Design Element and the Residential Design Guidelines, as part of the design review

[1] The new San Francisco Vertical Datum 2013 (SFVD13) established an updated zero point for measuring topography in the City in 2013-2014, as explained in footnote 75 in RTC Section 5.J, Initial Study, p. 5.J.103]. The relative heights and the difference between the corner of Laurel Street/Euclid Avenue and the top of the hill to the south and southwest of the project site described here do not change, only the value assigned to each elevation changes, compared to the old San Francisco Datum.

approvals. These comments are acknowledged and, as discussed above, are appropriately not considered in the EIR analysis.

## COMMENT CEQA-3: AB 900 PROCESS

"The developer is trying the same challenge path as the Chase Center stadium. The difference is huge here though - this is in the middle of a residential area effectively, versus the Chase center surrounded by high rise buildings mostly." *(Ankur Luthra, Email, January 2, 2019 [I-Luthra-2])*

## RESPONSE CEQA-3: AB 900 PROCESS

The comment correctly notes that the project sponsor, Laurel Heights Partners, LLC, applied to the Governor of California for certification of the 3333 California Street Mixed-Use Project as an Environmental Leadership Development Project (ELDP), pursuant to Assembly Bill 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code section 21178 et. seq. The comment asserts that the neighborhood surrounding the 3333 California Street site is predominantly residential and thus qualitatively different from the high-rise neighborhood (Mission Bay) in which the Golden State Warriors Event Center and Mixed-Use Development project (also known as the Chase Center) is located.

As described in Chapter 1, Introduction, EIR pp. 1.19-1.21, the project sponsor submitted their ELDP application for the 3333 California Street Mixed-Use Project on August 23, 2018, with public review commencing on August 24, 2018. The AB900 process included a public comment period from August 24, 2018, to September 24, 2018. The ELDP application is available at http://opr.ca.gov/ceqa/california-jobs.html (see "2017092053 – 3333 California Street Project"). The AB 900 Record of Proceedings is available at https://www.ab900record.com/3333cal. On January 30, 2019, the California Air Resources Board (CARB) issued Executive Order G-18-101 determining that the proposed project or project variant would not result in any net additional GHGs with payment of offsets for purposes of certification under AB 900. On June 7, 2019, Governor Gavin Newsom, with assistance from the Governor's Office of Planning and Research, certified the proposed project or project variant as an eligible project under AB 900, and the Governor's Office of Planning and Research forwarded the Governor's determination to the Joint Legislative Budget Committee. On June 13, 2019 the San Francisco Planning Department published a notice in a local newspaper of record, mailed a public notice of certification of an environmental leadership development project to owners and occupants within 300 feet of the project site and other interested parties including an e-mail notice to all interested persons requesting such a communication. In addition, the site was posted as required with copies of the notice. The State Legislative Analyst's Office indicated that the project aligns with the intent of AB 900, and recommended to the Joint Legislative Budget Committee that they concur with the Governor's

determination. On July 8, 2019, the Joint Legislative Budget Committee concurred with the Governor's determination that the project is an eligible project under AB 900.

Although codified within CEQA, the process for certification of the proposed project as an ELDP is separate from the environmental review process. The planning department's environmental review process is not affected by the Governor's decision to designate the project an ELDP. The comment does not identify any inadequacies or errors in the environmental analysis. As such the comment does not require any further response in this RTC document.

## COMMENT CEQA-4: CEQA PROCESS

"And I will repeat what I have said in different circumstances. I think projects of this size have been recommended to be introduced to the public and to the commission in public hearings with soft presentations and introductions of the project which, in this particular case, again, has not occurred.

I'd like to remind the commission and the public how smoothly 1 Oak, the Goodwill site, India Basin, Shipyard 2, Schlage Lock, Lucky Penny and CPMC ultimately were in these huge EIRs because they were properly introduced to this commission and to the public who were interested in a manner that let public dialogue, commissioners' feedback of questions shape alternatives in a manner that they are not as clashing sitting here as today's comments indicate.

While many of the comments are not necessarily in response to the customary questions that DEIR hearings require, it was quite obvious that the community has comments and concerns that should have been fleshed out in meetings where the commission themselves would have participated in hearing them." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp. 75-76, December 13, 2018 [A-CPC-Moore-2])*

"Moving on -- sounds like a negative comment – I'd like to speak about process and encourage people in the future with large projects to bring these projects as they develop, because this is the most futile ground to get what you ultimately need to go through the EIR and the environmental process, which is complicated. This department knows how to do that, except they cannot fully respond to the community's feelings that you so very much brought to the table today." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 77, December 13, 2018 [A-CPC-Moore-5])*

"I spoke…generally about process. But that is not as much a specific DEIR comment, but is an invitation for you to invite that as we move into the future and hear other EIRs." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 80, December 13, 2018 [A-CPC-Moore-15])*

"The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 24, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

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

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

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

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process." *(Scott Morgan, Director, State Clearinghouse, State of California Office of Planning and Research, Letter, December 26, 2018 [A-OPR1-1])*

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"These preliminary comments are submitted as to the Initial Study but are not required by June 8, 2018, because the Planning Department has confirmed that the City will not issue a negative declaration after the public comment period on the Initial Study and the City will prepare an Environmental Impact Report (EIR) under the California Environmental Quality Act, Public Resources Code sections 21000 *et seq.* (CEQA) as to this proposed project. The EIR on the project has not yet been released, and under applicable law, comments on the potentially significant environmental impacts and other analyses required by CEQA are not due until the end of the public review period on the draft EIR or hearing held by the decisionmaker on the proposed project. Ex. A, e-mails dated March 22 and 28, 2018 with Planning Department.

Also, the Initial Study ("IS") does not provide the complete CEQA analyses of significant impacts on traffic, air quality, noise and historical resources, and those analyses may contain information pertinent to the IS's evaluations of impacts the City proposes to treat as not significant under CEQA. Based on the additional information provided in the Draft EIR, comments as to significant impacts and nonsignificant impacts may be provided after the Draft EIR is released.

In addition, pertinent information is missing from the Initial Study, and complete copies of all the reference materials cited in the Initial Study were not provided as of June 4, 2018. Further, the Initial Study is incomplete, inaccurate and/or inadequate to support determinations that certain impacts of the proposed project would not be significant. Under CEQA Guidelines section 15063(d)(3), an Initial Study must include sufficient information to support its conclusions, but the IS does not include such sufficient information.

**Governing Principles**

It is important to recognize that a significant effect on the environment is defined in CEQA as a substantial or potentially substantial adverse change in the environment. Public Resources Code sections 21068, 21100(d). 14 California Code of Regulations ("CCR") section 15382 defines a "significant effect on the environment" as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." Under 14 CCR section 15064(a)(1), if there is substantial evidence in light of the whole record before an agency that a project may have a significant effect on the environment, the agency must prepare a draft EIR.

In preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project irrespective of whether an established threshold of significance has been met with respect to any given effect. *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1106-07. As used in this submission, "project" will mean the proposed project as well as the proposed project variant, unless otherwi1e indicated." *(Kathryn Devincenzi, Letter and Attachments, June 6, 2018 [I-Devincenzi4-1])*

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**RESPONSE CEQA-4: CEQA PROCESS**

A comment states that a project the size of 3333 California Street should have been introduced to the Planning Commission and the neighborhood similar to other large projects to (1) solicit constructive feedback on project details, (2) allow the Planning Commission to opine on project alternatives, and (3) allow the community to raise concerns in front of the Planning Commission ahead of the CEQA process.

There is no requirement for informational hearings before the planning commission to occur as part of the CEQA process, including informational hearings on alternatives development, which is informed by consideration of significant and unavoidable environmental impacts. The planning commission comments that an informational hearing on this project should have been held are noted.

EIR Chapter 1, Introduction, pp. 1.4-1.15, details the environmental review process starting with the submission of the environmental evaluation application on March 29, 2016, and its subsequent revision and resubmission on March 6, 2017 following the planning department's preliminary project assessment. The summary includes the publication of the Notice of Preparation on September 20, 2017; the Public Scoping Meeting at the Jewish Community Center of San Francisco, held on October 16, 2017; the publication of the initial study on April 25, 2018; and the publication of the draft EIR on November 7, 2018 with a Section 4.F, Initial Study Supplement, to respond to public comments on the initial study and clarify information.

Early public consultation prior to the Notice of Preparation of an EIR is not required under CEQA. For further discussion regarding the scoping process for alternatives to the proposed project or project variant, see Chapter 6, Alternatives (EIR pp. 6.5-6.10). For responses to public comments on the draft EIR regarding the range of alternatives, see Response AL-1: Range of Project Alternatives, on RTC pp. 5.H.6-5.H.17.

Another comment states that pertinent information, such as reference materials, were not provided as of June 4, 2018, and that the initial study is incomplete, inaccurate, and/or inadequate to support impact determinations.

As stated in the Notice of Availability of an Initial Study, published April 25, 2018, referenced materials are available for review at the planning department's office on the fourth floor of 1650 Mission Street. Additionally, planning department staff responded to requests for information following publication of the initial study on April 25, 2018. Since then, as described on EIR pp. 1.19-1.21, the planning department has provided a record of proceedings for the proposed project and project variant that can be accessed and downloaded from the following website: www.ab900record.com/3333cal. The record of proceedings includes the EIR and all other documents and materials submitted to, or relied upon by, the lead agency in the preparation of the EIR and initial study, or the approval of the project.

One comment cites various sections of the Public Resources Code that define a significant effect on the environment, when an agency must prepare a draft EIR, and when an agency must resolve fair arguments regarding possible significant environmental effects. Significant environmental impacts, as defined under the Public Resources Code, have been disclosed and analyzed for historic architectural resources, transportation and circulation, and noise and vibration in Chapter 4 of the EIR. In addition, the proposed project and its variant would result in less-than-significant impacts or impacts that would be less than significant with mitigation with respect to the other topics listed in the initial study, and these impacts have been disclosed in the initial study and EIR. Comments presenting information regarding potentially significant environmental impacts have been received through the public comment processes described above, and each of those comments has been considered when developing the scope of analysis in the initial study and EIR. Comments received on the draft EIR have been addressed in their respective environmental issue areas of this RTC document.

The planning department acknowledges receipt of the Governor's Office of Planning and Research (State Clearinghouse) letter (Comment Letter A-OPR1 in RTC Attachment B) confirming receipt of the draft EIR for public agency review and its attached comment letter, which duplicates the official agency comment letter from the Native American Heritage Commission (Comment Letter A-NAHC in RTC Attachment B). The comments in the letter from the Native American Heritage Commission are responded to in Response CR-3: Impacts on Archaeological and Tribal Cultural Resources (RTC pp. 5.D.17-5.D.19).

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# 5.L MERITS OF THE PROPOSED PROJECT

The comments and corresponding response in this section relate to the merits of the proposed project or project variant.

## COMMENT ME-1: MERITS OF THE PROPOSED PROJECT

Many comments express support for, or opposition to, the proposed project or project variant, or particular aspects of it. Many of those expressing opposition also express support for the LHIA Alternative described in a comment letter (see Letter O-LHIA4 in RTC Attachment B). Listed below are the names of the organizations and individuals who provided such comments. For the full text of these comments, please use the comment code provided after each name to locate the corresponding set of comments in RTC Attachments A and B and refer to comments therein labeled "ME-1." A response follows the list.

A number of written comments regarding only the merits of the project were submitted after the close of the public comment period. The names of the organizations and individuals who provided such comments are provided on RTC p. 5.L.5. For the full text of these comments, please see RTC Attachment C. Two comment letters received after the close of the public comment period, from Richard Frisbie and from the San Francisco Bay Area Planning and Urban Research Association, also included comments on environmental issues covered in the EIR; these comments are already addressed in the RTC Section 4 and Section 5 responses and they do not raise any new points not already addressed.

***Draft EIR Public Hearing Transcript (December 13, 2018 [in order of speakers])***

- Roger Miles (I-Miles1-3, p. 20)
- Eileen Boken (I-Boken-3, p. 24)
- Bill Cutler (I-Cutler1-2, pp. 25-26)
- Judy Doane (I-Doane-2, p. 29)
- Krisanthy Desby (I-Desby-3, p. 31)
- David Goldbrenner (I-Goldbrenner1-1, p. 32)
- Adam McMichael (I-McMichael-1-2, pp. 33-34)
- Laura Clark, SF YIMBY Action (O-YIMBY1-1, p. 35)
- Alex Yuen (I-Yuen-1, pp. 36-37)
- Colleen Ryan (I-RyanC-1, -3, and -4, pp. 38-39)
- Unidentified Speaker (I-Speaker1-1, p. 40)
- Unidentified Speaker (I-Speaker2-3, p. 41)
- Chris Johnson (I-JohnsonCh-1, p. 42)

- Joanna Thomson (I-Thomson-1 and -3, pp. 42-43)
- Kathryn Devincenzi, President, Laurel Heights Improvement Association (O-LHIA3-2, pp. 44-45)
- Rose Hillson (I-Hillson1-4, p. 48)
- Rose Hillson (I-Hillson1-6, Draft EIR Transcript Handout)
- Kelly Roberson (I-Roberson1-5, p. 50)
- M. J. Thomas, Laurel Heights Improvement Association of San Francisco, Inc. (O-LHIA7-4, p. 51)
- Sonja Dolan (I-Dolan-3, p. 52)
- Tina Kwok (I-Kwok2-2, p. 53; -7, p. 54)
- Debra Seglund (I-Seglund-3, pp. 57-58)
- Ann Harvey (I-Harvey2-1 and -2, pp. 58-59; -4, pp. 59-60)
- Arielle Mouller (I-Mouller-1, p. 60)
- Ed Munnich, SF YIMBY Action (O-YIMBY2-2, pp. 63-64; -5, p. 65)
- Maryann Massenberg (I-Massenberg-1, pp. 65-66)
- Cory Smith, San Francisco Housing Action Coalition (O-SFHAC-1, pp. 67-68; -3, p. 69)

***Written Comments***

- Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group (O-CSHG1-11)
- Craig Salgado, JCCSF Chief Operating Officer (O-JCCSF2-7)
- Craig Salgado, JCCSF Chief Operating Officer (O-JCCSF3-10)
- Craig Salgado, JCCSF Chief Operating Officer (O-JCCSF4-7)
- Sal Ahani (I-Ahani-3, -5, and -12)
- James Bassuk (I-Bassuk-3)
- David Bercovich (I-Bercovich-1)
- Daniel Berkley (I-Berkley-1)
- Gail Boyer (I-Boyer-3)
- Robert Bransten (I-Bransten-1)
- Barbara Brenner (I-Brenner-1)
- Michael Coholan (I-Coholan-1)
- Michael Coholan (I-Coholan-3)
- Adam Cole (I-Cole-1)
- Bill Cutler and Judy Doane (I-Cutler2-1, -2, and -7)

- Evelyn Davidson (I-Davidson-1, -4, -6, and -8)
- Linda Day (I-Day-1)
- Shanan Delp (I-Delp-1)
- Jon Dishotsy (I-Dishotsky1-1)
- Jane Drake (I-Drake-1 and -3)
- Sharon Esker (I-Esker-3)
- Zhubin Fardis (I-Fardis-3)
- Arlene Filippi (I-Filippi2-1)
- Shannon Fong (I-Fong-3)
- Jane Fridlyand (I-Fridyland-8)
- Janet Frisbie (I-FrisbieJ2-2)
- Robert Frisbie (I-FrisbieR1-4 and -9)
- Holly Galbrecht (I-Galbrecht2-2 and -4)
- Ron Giampaoli (I-Giampaoli-2 and -4)
- Linda Glick (I-Glick2-3)
- David Goldbrenner (I-Goldbrenner2-3)
- David Goldbrenner (I-Goldbrenner3-7)
- Theodore Gordon (I-Gordon-1 and -3)
- M. E. Gwynn (I-Gwynn-4, -6, and -9)
- Anne Harvey (I-Harvey3-2)
- Rose Hillson, (I-Hillson2-33)
- William Holleran (I-Holleran-1)
- Corey Johnson (I-JohnsonCo-1)
- Henry N. Kuechler IV (I-Kuechler IV-1, -4, and -6)
- Tina Kwok (I-Kwok1-2)
- Tina Kwok (I-Kwok3-6)
- Tina Kwok (I-Kwok4-7, -10, and -15)
- Gary Laufman (I-Laufman-2)
- Ankur Luthra (I-Luthra-1 and -4)
- Larry Mathews (I- Mathews1-1, -4, and -6 )
- Larry Mathews (I-Mathews2-1 and -3)
- Adam McDonough (I-McDonough2-1 and -10)

- Marie McNulty (I-McNulty-4)
- Kevin M. Meehan (I-Meehan-1)
- Ellen Miller (I-MillerE-2)
- Liz Miller (I-MillerL-1)
- Cristina Morris (I-Morris1-2 and -4)
- Ed Munnich (I-Munnich-2 and -5)
- Anne Neill (I-Neill-1)
- Marsha and Wolfgang Nonn (I-Nonn2-2)
- Phillip H. Paul (I-Paul-3 and -5)
- Donald Piombo (I-Piombo1-1)
- Donald Piombo (I-Piombo2-1)
- Gilda Poliakin (I-Poliakin-10)
- Cornelia Powers (I-Powers-1)
- Ann Prato (I-Prato-2)
- Sandra Price (I-Price-2)
- Zarin E. Randeria (I-Randeria1-4)
- Kelly Roberson (I-Roberson2-2)
- Stefanie Rosenberg (I-Rosenberg-1)
- Laura Rubenstein (I-Rubenstein-3 and -8)
- Jim Ryan (I-RyanJ-2)
- Rita Sater (I-Sater-1 and -4)
- Sebastiano Scarampi (I-Scarampi-3 and -5)
- Nathan Stoll (I-Stoll-2, -6, and -9)
- Andrew Sullivan (I-Sullivan-1)
- Zachary Thomas (I-ThomasZ-1)
- Adrienne Underwood (I-UnderwoodA-1)
- Victoria Underwood (I-UnderwoodV1-9 and -11)
- Victoria Underwood (I-UnderwoodV2-5 and -7)
- Victoria Underwood (I-UnderwoodV3-1)
- Steven C. Zeluck (I-Zeluck-2 and -4)

***Written Comments Received After the Close of the Public Comment Period on the Draft EIR***

- Terry McGuire, President, Pacific Heights Residents Association
- Charles Ferguson, President, Presidio Heights Association of Neighbors
- Kristy Wang, Community Planning Policy Director, San Francisco Bay Area Planning and Urban Research Association (SPUR), for Charmaine Curtis and Diane Filippi, Co-Chairs, SPUR Project Review Advisory Board
- William Bartlett
- Suzanne Blumenthal
- Lynn Burrows Bunim
- Ryan Chatley
- Richard Frisbie
- Bella Shen Garnett
- Massimiliana Boyer Glynn
- Shanon Delp
- Jeremiah Hallisey
- William Holleran
- Dennis Hong
- Martine Krumholz
- David Levine
- Daniel S. Mason
- Anna Morfit
- David L. Morse
- Tyler Norsworthy
- Marie Que
- Francis Scarpulla
- Karen Scarpulla
- Kristina Scarpulla
- Stephen Scarpulla
- Jeff Schlarb
- Frances Stark
- Zachary Thomas

**RESPONSE ME-1: MERITS OF THE PROPOSED PROJECT**

Comments express support for, opposition to, or concern about particular aspects of the proposed project or project variant based on its merits. Comments include suggestions for modifying the project and express support for the LHIA Alternative presented in a comment letter (see Letter O-LHIA4 in RTC Attachment B) as a better choice for achieving the project objectives and completing construction within a shorter timeframe. Comments also include general statements about environmental issues such as traffic congestion, construction noise, dirt, pollution, and parking loss, but did not provide specific details or substantial evidence regarding asserted deficiencies in the environmental analysis. For a response to comments to specific concerns related to those environmental topics, see RTC Section 4, Master Response – Transportation and Circulation; RTC Section 5.E, Transportation; RTC Section 5.F, Noise; and RTC Section 5.G, Air Quality. For a response to comments regarding the LHIA Alternative, see RTC Section 5.H in Response AL-2. Also see the relevant analyses/findings in EIR Section 4.C, Transportation and Circulation; EIR Section 4.D, Noise and Vibration; and EIR Section 4.E, Air Quality.

These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. CEQA directs public agencies to treat EIRs as "full disclosure" documents to ensure that the public is aware that public agencies have considered potential adverse environmental effects in their decision-making processes. In addition to the physical environmental effects disclosed in the EIR, all comments provided to the planning department on the proposed project or project variant through the CEQA process, whether on the EIR analysis or the merits of the proposed project or project variant, are included in their entirety in this RTC document. Although general comments in opposition to, or in support of, the proposed project or project variant do not raise specific issues concerning the adequacy or accuracy of the EIR under CEQA, such comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project or project variant. This consideration is carried out independent of the environmental review process.

# 5.M GENERAL COMMENTS

The comments and corresponding responses in this section relate to general comments on the draft EIR. The general comments are grouped according to the following issues they raise:

- GC-1, Disclosure of Impacts and Mitigation Measures/Adequacy of EIR Analysis
- GC-2, Request for Economic Feasibility Study for Retail
- GC-3, Request for Draft EIR Public Comment Period Extension
- GC-4, General Comments

A corresponding response follows each grouping of comments.

Documents and other information cited in this RTC section are available at the planning department offices as part of Case File No. 2015-014028ENV and electronically on the project's AB900 Record of Proceedings at https://www.ab900record.com/3333cal.

## COMMENT GC-1: DISCLOSURE OF IMPACTS AND MITIGATION MEASURES/ADEQUACY OF EIR ANALYSIS

"Just on the -- I mean, one, on the EIR, I hope folks know the EIR is a tool for us and you to help evaluate this project. I think this EIR is one of the better ones we've seen. Any issue anybody brought up here is addressed in an alternative of the EIR. From no preservation to historic preservation, to partial historic preservation, it really gives us the flexibility to do almost anything as a result of this. And it analyzes the impacts, and it's meant as a tool to tell us and you what these impacts are going to be. So I wouldn't get too hung up on the EIR. I know Ms. Devincenzi's an expert on it and she can guide you, but the EIR works. I mean, the EIR is complete." *(Commissioner Rich Hillis, President, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp. 86-87, December 13, 2018 [A-CPC-Hillis-1])*

"There are some things about the proposed project that I do like, you know. I know that we're commenting now on the accuracy of the EIR and the adequacy. I do think it's adequate and it's thorough." *(Commissioner Myrna Melgar, Vice-President, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 82, December 13, 2018 [A-CPC-Melgar-4])*

"The document as constructed is accurate and well set up. It follows pretty much of what the department has done. I think it is thorough, except where it comes to process." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, p. 75, December 13, 2018 [A-CPC-Moore-1])*

"While we agree with some of the comments provided by others, the most severe, proximate and prolonged adverse environmental impact from this Project falls uniquely and disproportionately on our neighborhood, and the EIR fails to address or provide adequate mitigation for them." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-2])*

"As the immediate "neighbors" of this Project, this unfairly imposes the construction noise, dirt, disruption, personal risk and displacement on us for as many extra years." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-7])*

"Nor does it assess the environmental impact of changing our streetscape from a walkway in front of open space to a 45-foot high wall the Developer seeks to build through a zoning change. The Developer's plan has an unmitigated and severe environmental impact on our neighborhood." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-10])*

"As the State Legislature noted in enacting the California Environmental Quality Act, it is the Policy of the state to: "...take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise..." CEQA Section 21001.

Each of the above environmental impacts directly across from our front doors violates state policy, and any one of them would compel us to challenge the Draft EIR. Together, they threaten a significant loss of the peaceful enjoyment of our homes." *(Joseph J. Catalano and Joan M. Varrone, California Street Homeowners Group, Letter, December 11, 2018 [O-CSHG1-15])*

"My wife and I represent a group of 40 homeowners and residents who live on that block between Laurel and Walnut, on California Street.

The Draft EIR fails completely to recognize the impact of this project on our group. The developer has been attentive to our interests. We have met with him on several occasions. They have listened to us. Now is the time for the developer, the commission, the department, and the city to recognize the specific and unaddressed impacts that this project, in its current form, will have on our neighborhood." *(Joe Catalano, California Street Homeowners Group, Draft EIR Hearing Transcript, p. 61, December 13, 2018 [O-CSHG2-1])*

"As a result, our primary concerns relate to safety - e.g., traffic, air quality, construction and noise - and our continued ability to use our outdoor areas (roof and courtyards) for programming. Your scope likely already includes these general issues, so this letter explains the specifics as they pertain to the JCCSF." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017[O-JCCSF3-1])*

"B. **Shadow, Wind and Noise** - The EIR should examine Project shadow, wind and noise impacts on outdoor program use of the JCCSF roof and courtyard spaces. We understand that a project of this scale and magnitude has a longer than typical construction period and, therefore, we anticipate that you will be examining the impacts of the seven-year construction period on such issues as air quality, toxic waste removal, ingress and egress, staging, traffic and noise." *(Craig Salgado, Chief Operating Officer, Jewish Community Center of San Francisco, Letter, October 20, 2017[O-JCCSF3-9])*

"What I understand of the EIR, I think it's a very thorough process. There's been much public comment on the EIR,…"*(Ed Munnich, SF YIMBY Action, Draft EIR Hearing Transcript, p. 63, December 13, 2018 [O-YIMBY2-1])*

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"The draft EIR is insufficient in identifying the environmental impacts of the Project and the impacts identified are largely unmitigated." *(Jim and Jessica Bassuk, Email, January 7, 2019 [I-Bassuk-1])*

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"The Draft EIR fails to recognize the disproportionate adverse impact the addition of 750 residential units on a 10 acre site will have on the site's immediate neighbors. The Draft EIR only adopts a citywide density metric, and fails to incorporate mitigation for the more local adverse impact. The Draft EIR disregards the immediate adversity such a massive influx of units will have on property owners who chose their homes based on the neighborhood's characteristics." *(Joe Catalano and Joan Varrone, Email, January 8, 2019 [I-Catalano-1])*

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"The high density of the proposed project as described in the Draft Environmental Impact Report, will increase traffic flow and congestion, increase noise and pollution,…" *(Bill Cutler and Judy Doane, Email, January 5, 2019 [I-Cutler2-3])*

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"Apart from the incredibly drawn out length of such a project, the negative effects (such as dust, noise, diminished parking, danger to children, seniors and others), such a development does not fit within the natural, historic, familial, social and aesthetic contours of our community. Not to mention the environmental risks." *(Evelyn Davidson, Email, January 8, 2019 [I-Davidson-3])*

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"The DEIR must be revised to correct the inadequacies described herein, and the revised EIR circulated for public comment." *(Kathryn Devincenzi, Letter and Attachments, January 8, 2019 [I-Devincenzi3-25])*

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"I would like to voice my concerns regarding this development which will affect myself, the neighborhood, and future generations." *(Sharon Esker, Email, January 5, 2019 [I-Esker-1])*

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"I have very strong concerns about the impacts to the neighborhood mentioned in the draft EIR.

The huge increase in traffic, the impact on parking, the ridiculous length of time to complete this project, and environmental/pollution impact are all MAJOR concerns." *(Zhubin Fardis, Email, January 8, 2019 [I-Fardis-1])*

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"The environmental report is very concerning. This has been for the most part a quite, residential neighborhood with a lot of families. Pollution, traffic, noise, etc....all have huge, negative impacts on our community." *(Zhubin Fardis, Email, January 8, 2019 [I-Fardis-5])*

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"I have strong concerns about the impacts to the neighborhood mentioned in the draft EIR." *(Shannon Fong, Email, January 8, 2019 [I-Fong-1])*

"I am writing to express my deep concerns over the current proposal for 3333 California,…" *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-1])*

"We are concerned that the proposed project would affect us in numerous ways, the most important of which I outline below:…" *(Jane Fridlyand, Email, January 7, 2019 [I-Fridlyand-3])*

"The amount of dirt, dust, noise and congestion is unimaginable." *(Janet Frisbie, Email, December 12, 2018 [I-FrisbieJ1-6])*

"In general the DEIR is rife with inaccuracies, incorrectness and incompleteness." *(Richard Frisbie, Letter, January 7, 2019 [I-FrisbieR1-1])*

"I live about 6 blocks from the site with my wife and daughter, and I am deeply concerned about the size and scale of the project. It looks like the creation of a mini-city in our neighborhood." *(David Goldbrenner, Email, December 18, 2018 [I-Goldbrenner2-1])*

"I am writing to express my deep concerns over the current proposal for 3333 California,…" *(David Goldbrenner and Zhenya Fridlyand, Email, January 4, 2019 [I-Goldbrenner3-1])*

"**The DEIR does not address the impact on the neighborhood of a 15 year construction project and all the resulting affects on the surrounding neighborhoods and thus it is incomplete and inaccurate.**" *(Mary Gwynn, Email, January 7, 2019 [I-Gwynn-2])*

"One can imagine the noise, traffic, congestion, dirt, pollution in the air and on the ground that this would make the neighborhood go through." *(Tina Kwok, Draft EIR Hearing Transcript, p. 53, December 13, 2018 [I-Kwok2-4])*

"The amount of excavation of earth, generating air, noise pollution is unimaginable for this long period of construction." *(Tina Kwok, Email, January 8, 2019 [I-Kwok3-1] and Tina Kwok, Email, January 9, 2019 [I-Kwok4-2])*

"Turning now to the EIR, I share the concerns about the construction noise, the air pollution…" *(Maryann Massenburg, Draft EIR Hearing Transcript, p. 66, December 13, 2018 [I-Massenburg-2])*

"I believe the DEIR is inadequate in a number of ways,…" *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-3])*

"It underestimates the negative impacts of retail, office and commercial space to the local community (traffic, pollution, noise, etc.);…" *(Adam McDonough, Email, January 7, 2019 [I-McDonough2-5])*

"**Environmental impact**: Noise level, increased traffic and pollution." *(Gilda Poliakin, Email, December 30, 2018 [I-Poliakin-3])*

"…the negative effects (such as dust, noise, parking, danger to children, seniors and others), such a development does not fit within the natural, historic, familial, social and aesthetic contours of our community. Not to mention the environmental risks." *(Rita Sater, Email, January 8, 2019 [I-Sater-3])*

"…the negative effects (such as dust, noise, parking, danger to children, seniors and others), such a development does not fit within the natural, historic, familial, social and aesthetic contours of our community. Not to mention the environmental risks." *(Sebastiano Scarampi, Email, January 8, 2019 [I-Scarampi-2])*

"I have read the EIR and find that almost nowhere does it address the effect on people. People make their homes in the neighborhood, they raise children or retire in the area, they work nearby, and they are ignored in this report. Further, the EIR does not address the cumulative effect on people's everyday lives of all the incremental changes from construction and operation of the Project on their general wellbeing. There is a tipping point when a little more of everything—noise, air pollution, traffic, general congestion and crowding—makes a place substantially less livable. I live 1 ½ blocks east of the Project on the north side of California Street." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-1])*

"D. **Conclusion.** The EIR is inadequate with many flawed assumptions and analyses.

This Project will bring a more of everything—noise, air pollution, traffic, general congestion and crowding, will reduce street side greenery and open space, and will make the area substantially less livable. The only way to reduce the negative impacts of the Project is to reduce its size, maintain more street side and street view open space, and eliminate most of the office and commercial uses with their related traffic." *(Michele D. Stratton, Letter, January 8, 2019 [I-Stratton-14])*

"The DEIR claims that project impacts on air quality, geology, hydrology, vegetation and other matters would be less than significant." *(Victoria Underwood, Letter, December 4, 2018 [I-UnderwoodV1-7])*

"However, I also believe that the Draft EIR sufficiently studies the potential environmental impacts to the neighborhood while providing housing for a city sorely lacking it, while also providing an urban amenity that would be of use for the adjacent neighborhoods and the city at large." *(Alex Yuen, Draft EIR Hearing Transcript, p. 37, December 13, 2018 [I-Yuen-3])*

## RESPONSE GC-1: DISCLOSURE OF IMPACTS AND MITIGATION MEASURES/ADEQUACY OF EIR ANALYSIS

### General Comments

Several comments pose general concerns or opinions about the project. Some comments state that the EIR's impact analysis and range of alternatives is thorough, complete, adequate, and accurate. Many comments assert that the EIR's impact analysis is inaccurate, incorrect, or incomplete, and that the EIR fails to impose all feasible mitigation measures to reduce the proposed project's impacts; responses addressing more specific comments pertaining to the same CEQA issues are provided elsewhere in this RTC document.

The comments are general in nature and do not present new information that would require changes or updates to the analysis provided in the EIR. Pursuant to CEQA Guidelines section 15088(c)) general comments that do not contain or specifically reference readily available information may receive a general response. The impacts and mitigation measures identified in EIR Chapter 4 and in the initial study are summarized in two tables in the EIR Summary chapter: Table S.1: Summary of Impacts of Proposed Project or Project Variant Identified in the EIR, beginning on EIR p. S.6, and Table S.2: Summary of Significant Impacts of Proposed Project or Project Variant Identified in the initial study (EIR Appendix B), beginning on EIR p. S.26. Tables S.1 and S.2 provide an overview of (1) the environmental impacts that could occur as a result of the proposed project or project variant; (2) the level of significance of the environmental impacts before implementation of any applicable mitigation measures; (3) mitigation measures that would avoid or reduce significant environmental impacts; (4) improvement measures that would reduce less-than-significant impacts; and (5) the level of significance for each impact after implementation of the mitigation measures.

The significant environmental impacts of the proposed project or project variant have been fully evaluated and presented in the 3333 California Street Mixed-Use Project EIR. CEQA requires public agencies to identify all potential direct or indirect effects on the environment that could result from a project. Therefore, the EIR addresses both the direct physical effects of the project as well as the indirect physical effects. Direct effects are effects that are caused by a project and occur in the same time and place. An indirect environmental effect is a change in the physical environment that is caused by the project but occurs later in time or further away from the project site and is still reasonably foreseeable.

Many comments express general concern about the magnitude and duration of construction-related project impacts on traffic and safety, noise, and pollution. A response to concerns regarding the duration of proposed construction and the burden of environmental impacts on the neighborhood is provided in RTC Section 5.B, Project Description, under Response PD-1: Construction Duration, Phasing and Staging, and Development Agreement on RTC pp. 5.B.9-5.B.15. A response to

concerns with construction-related transportation impacts is provided in RTC Section 5.E, Transportation and Circulation, under Response TR-6: Construction Impacts starting on RTC p. 5.E.57.

**Environmental Impact Report Topics**

Comments raise issues pertaining to historic resources, transportation and circulation, noise, and air quality. To the extent that physical environmental impacts would occur under the proposed project or project variant, these impacts are addressed in Chapter 4, Environmental Setting and Impacts, of the EIR. Commenters are directed to this EIR chapter for a detailed description of the environmental setting, regulatory framework, significance thresholds, methodological approaches to impact analyses, and the impact analyses and findings for each of these topics. The transportation, noise, and air quality analyses compare the future conditions after full implementation of the proposed project or project variant with existing or baseline conditions without the proposed project. As appropriate and recommended by planning department practice, the noise and air quality analyses in the EIR also evaluate the effects of the phased construction on off-site and on-site receptors. The EIR identifies three significant and unavoidable impacts with mitigation related to historic architectural resources (Impact CR-1, on pp. 4.B.41-4.B.47), transportation and circulation (Impact TR-4, on pp. 4.C.83-4.C.88), and construction noise (Impact NO-1, on pp. 4.D.36-4.D.-4.D.51). No significant air quality impacts were identified.

**Initial Study Topics**

Comments also call out concerns regarding public hazards, water quality, and biological resources. These impacts are analyzed in initial study Sections E.12, Biological Resources; E.14, Hydrology and Water Quality; and E.15, Hazards and Hazardous Materials. No significant and unavoidable direct or indirect environmental impacts were identified for these impact areas. Information in the initial study regarding Hazards and Hazardous Materials was clarified in the EIR in Section 4.F, Initial Study Supplement.

One comment states that the project's residential units would increase local density and create a local population and housing impact. As discussed in initial study Section E.2, Population and Housing, the project site, at approximately 10.25 acres (or 446,490 square feet), would allow for up to 558 units by lot area. The proposed project would conform to the residential unit limitation provided by the RM-1 Zoning District. For the project variant, the project sponsor would seek approval of a conditional use authorization/planned unit development to allow for more units than principally permitted in the RM-1 Zoning District. For these reasons, the residential component of the proposed project is within the existing allowable density of the project site and would be comparable to the existing allowable density of other parcels zoned RM-1 in the project vicinity. The proposed project or project variant would increase the local residential population on the project site by approximately 1,260 to 1,680 persons, as discussed on initial study pp. 113-114. To

assess growth-inducing impacts of adding housing, a city-wide approach is appropriate, as presented on initial study pp.115-116. The analysis there shows that the additional residents on the project site would represent about 0.6 or 0.9 percent of the projected citywide growth between 2020 and 2040 for the proposed project or project variant, respectively. An analysis of population growth within a quarter-mile radius of the project site was also prepared, and presented on initial study pp. 116-117. As explained there, the project site residents would result in an increase of 4.9 or 6.5 percent of the residential population in the census tracts near the project site. In both cases, the analysis supports the finding in the initial study that the increase in residents would not constitute unplanned growth and would not result in a significant impact.

**Open Space**

Comments also express concern over the changes to existing on-site open space and the displacement of existing public parking facilities. A response to concerns regarding the proposed project's open space and the use of existing on-site open space is provided in RTC Section 5.B, Project Description, under Response PD-3: Project Characteristics, and Response PD-4: Site Access, on RTC pp. 5.B.19-5.B.24 and RTC pp. 5.B.25-5.B.28, respectively. With respect to parking, as stated in EIR Section 4.C, Transportation and Circulation, p. 4.C.115, the proposed project and project variant would meet the CEQA section 21099 criteria as a residential mixed-use infill project in a transit priority area, and therefore parking is not an environmental impact for the purposes of CEQA. However, issues associated with parking are discussed on EIR pp. 4.C.115-4.C.120 for informational purposes.

**Height, Bulk and Massing**

One comment states that the EIR does not address the impact of the height and bulk of the project as compared to existing open space, or impacts related to shadow, wind, scenic resources, and aesthetics. As stated in EIR Chapter 2, Project Description, on pp. 2.105-2.108, the project would involve actions by the Planning Commission, including an amendment to the Planning Code Height and Bulk Map to increase height limits along California Street from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses, and at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building. In addition, the project would require a conditional use/planned unit development authorization to permit development of buildings with heights in excess of 50 feet (under the amended height and bulk map) and provide for minor deviations from the planning code provision for measurement of height. Under the project variant, the proposed height and bulk map amendment would result in increased height limits along California Street from 40 to 67 feet to accommodate the height of the proposed Walnut Building. All other height changes under the project variant would be the same as those for the proposed project and, like the proposed project, a conditional use/planned unit development authorization would be required to permit development of buildings with heights in

excess of 50 feet (under the amended height and bulk map) and provide for minor deviations from the planning code provision for measurement of height.

To the extent that the height and massing of the proposed new buildings and vertical additions to existing buildings under the proposed project or project variant could result in physical environmental impacts associated with wind and shadow, these impacts have been fully analyzed in initial study Section E.8, Wind and Shadow, on IS pp. 151-162. In regard to aesthetics, as discussed in EIR Section 4.A, Introduction, pp. 4.A.4-4.A.5 and Response CEQA-2: Aesthetics/CEQA Section 21099, RTC pp. 5.K.9-5.K.13, the proposed project or project variant meet the criteria in CEQA section 21099 for infill sites within a transit priority area which removes the environmental topic of aesthetics as well as the transportation and circulation subtopic of parking from the impact analysis.

**Impacts Analysis, Mitigation Measures, and Public Comment in the CEQA Document**

As required under CEQA Guidelines section 15126.4(a)(1), all feasible measures that could minimize the significant adverse impacts of the proposed project or project variant are detailed in the EIR. As provided by CEQA Guidelines section 15097, the Mitigation Monitoring and Reporting Program for the proposed project or project variant is required to identify each mitigation measure that is included in the project or imposed as a condition of approval and the parties responsible for its implementation; the schedule for implementation of the measures; the parties responsible for monitoring and reporting on the implemented mitigation measures; and the monitoring actions schedule and verification of compliance. The final Mitigation Monitoring and Reporting Program will be included in the packet of materials submitted to the Planning Commission for consideration as part of the project's approvals.

CEQA directs public agencies to treat EIRs as "full disclosure" documents to ensure that the public is aware that public agencies have considered potential adverse environmental effects in their decision-making processes. In addition to the physical environmental effects disclosed in the EIR, all comments provided to the planning department on the proposed project or project variant through the CEQA process, whether on the draft EIR analysis or the merits of the proposed project or project variant, are included in their entirety in this RTC document, and will be considered by the decision makers prior to certifying the EIR or rendering a final decision on the project.

For a response to comments regarding the environmental review process under CEQA, see Response CEQA-4: CEQA Process on RTC pp. 5.K.16-5.K.17.

## COMMENT GC-2: REQUEST FOR ECONOMIC FEASIBILITY STUDY FOR RETAIL

"I believe that single-sided retail on, for example, the Euclid Street side -- on the Euclid Avenue side, is very questionable. The site itself is more or less a freeway. I'm sorry to use that word, but

that's just what it is. And single-sided retail on very busy commercial corridors have a very small survival factor.

I see Commissioner Fong nod. And I like to use that empirical experience of where retail is strategically placed. That goes all around the site with a decline in retail corridors. Putting that much retail on all street frontages in this block is a question to me that I think creates a risk, a front end risk of retail of not succeeding.

So there should be a backup strategy, where we really want to support retail. Do we like to support retail intensification in Laurel shopping center, which is in front of this commission frequently? And do we expect more successful retail to be in the Sacramento and Presidio Avenue corridor? I'm just raising it as questions. I've spent quite a bit of time there. But the way at this moment the site is bordered in areas where it doesn't work, I would like the EIR to take a closer look at the realities of how we look at retail." *(Commissioner Kathrin Moore, San Francisco Planning Commission, Draft EIR Hearing Transcript, pp. 79-80, December 13, 2018 [A-CPC-Moore-10])*

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"Finally, a detailed economic study should be conducted to see:

1. The impact on existing commercial areas (Sacramento Street, California Street and Masonic Street, if commercial development is allowed at 3333 California Street. The study should take into account the number of current empty commercial properties in those areas. This neighborhood may not support any further commercial development, especially given the congested corridor of Masonic and Geary (Trader Joes, Target, etc.)" *(Cristina Morris, Email, December 10, 2018 [I-Morris1-5])*

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**RESPONSE GC-2: REQUEST FOR ECONOMIC FEASIBILITY STUDY FOR RETAIL**

Some comments request an economic feasibility study regarding retail-market-related concerns. Comments request additional analysis regarding the economic viability of retail proposed by the project, particularly on Euclid Avenue; the effects of the project on existing retail and commercial areas nearby (Sacramento and California streets and Masonic Avenue); and the seeming trend of declining retail corridors.

CEQA does not require analysis of socioeconomic issues such as real estate market conditions; thus, these issues are typically not addressed in environmental review documents. The focus of CEQA is to address whether and how a proposed project's physical changes to the environment could result in adverse physical impacts on the environment, such as impacts of a project on air quality, water quality, or wildlife habitat. CEQA Guidelines section 15360 defines "environment" for the purposes of CEQA as "the *physical* conditions which exist within the area which will be affected by the proposed project…" (emphasis added). As stated in CEQA Guidelines section 15131(a),

> Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by economic or social changes.

> The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.

Thus, the CEQA Guidelines provide that social or economic impacts may not themselves be treated as significant effects on the environment.

Evidence of economic impacts (e.g., retail vacancy) that do not contribute to, or are not caused by, adverse physical changes to the environment is not substantial evidence of a significant effect on the environment. However, a social or economic change related to a physical change may be considered in determining whether the physical change is a significant environmental impact. Additionally, an EIR or other CEQA document must consider the reasonably foreseeable indirect environmental consequences or physical changes resulting from a project's economic or social changes. In short, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment.

These comments, in themselves, do not raise specific issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this RTC document under CEQA Guidelines section 15088. To the extent that physical environmental impacts would occur as a result of construction and operation of the proposed project, these impacts have been analyzed in detail in the EIR. The comments do not present any evidence that the construction and operation of the proposed project would result in any significant environmental impacts not disclosed in the EIR or lead to any economic or social changes that would in turn result in a significant adverse physical environmental impact.

To the extent that the comments express opposition to the proposed project site plan and to the proposed retail uses on the site, such comments, including recommendations for modifications to the project, may be considered and weighed by the decision-makers prior to rendering a final decision to approve, modify, or disapprove the proposed project or project variant. This consideration is carried out independent of the environmental review process. These merit-related comments are included in their entirety in this document in RTC Attachments A and B. It is also noted that the proposed project and its variant have been revised such that the amount of retail under the revised project or revised variant is reduced including the elimination of retail in the proposed Euclid Building near the corner of Euclid Avenue and Masonic Avenue. This change would not result in any changes to the conclusions presented in the EIR. See RTC Section 2, Revisions and Clarifications to the Project Description, for further detail.

## COMMENT GC-3: REQUEST FOR DRAFT EIR PUBLIC COMMENT PERIOD EXTENSION

The following commenters expressed an interest in having the public comment period on the draft EIR extended. For the full text of these comments, please use the commenter code provided after

each name to locate the corresponding set of comments in RTC Attachment A: Draft EIR Hearing Transcript or RTC Attachment B: Draft EIR Comment Letters and Emails and refer to comments therein labeled "GC-3."

***Public Hearing Transcript Comments (in order of speakers)***

- Roger Miles (I-Miles1-1, pp. 19-20)
- Adam McDonough (I-McDonough1-1, p. 22)
- Eileen Boken (I-Boken-1, p. 24)
- Bill Cutler (I-Cutler1-1 and I-Cutler1-4, pp. 25 and 27, respectively)
- Richard Frisbie, Laurel Heights Improvement Association (O-LHIA5-1, p. 27)
- Judy Doane (I-Doane-1, p. 29)
- Krisanthy Desby (I-Desby-1, pp. 30-31)
- David Goldbrenner (I-Goldbrenner1-4, p. 33)
- Laura Clark, SF YIMBY Action (O-YIMBY1-2, pp. 35-36)[1]
- Alex Yuen (I-Yuen-2, p. 37)
- Colleen Ryan (I-RyanC-2, p. 38)
- Perviz Randeria, Laurel Heights Improvement Association (O-LHIA6-1, p. 39)
- Susan McConkey (I-McConkey, p. 40)
- Joe Scaroni (I-Scaroni, p. 41)
- Chris Johnson (I-JohnsonCh-2, p. 42)
- Joanna Thomson (I-Thomson-2 and I-Thomson-4, pp. 43 and 44, respectively)
- Kathryn Devincenzi, President, Laurel Heights Improvement Association (O-LHIA3-1 and O-LHIA3-10, pp. 44 and 46, respectively)
- Holly Galbrecht (I-Galbrecht1-1, pp. 46-47)
- Rose Hillson (I-Hillson1-1, p. 47)
- Kelly Roberson (I-Roberson1-1, pp. 48-49)
- M. J. Thomas, Laurel Heights Improvement Association (O-LHIA7-1, p. 51)
- Sonja Dolan (I-Dolan-1, p. 52)
- Tina Kwok (I-Kwok2-1 and -8, pp. 53 and 55, respectively)
- Linda Glick (I-Glick1-1, p. 55)
- Debra Seglund (I-Seglund-1, p. 57)
- Ann Harvey (I-Harvey2-3, p. 59)
- Joseph J. Catalano, California Street Homeowners Group (O-CSHG2-7, p. 63)

[1] This commenter expressed a desire to not extend the public comment period.

- Ed Munnich, SF YIMBY Action (O-YIMBY2-6, p. 65)

***Written Comments***

- Kathryn Devincenzi, Laurel Heights Improvement Association of San Francisco, Inc. (O-LHIA1-2)
- Arlene Filippi (I-Filippi1-2)
- Ann Harvey (I-Harvey1-1)
- Cristine Morris (I-Morris2-1)
- Anne Neill (I-Neill-2)
- Marsha and Wolfgang Nonn (I-Nonn1-1)
- Victoria Underwood (I-UnderwoodV2-11)

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**RESPONSE GC-3: REQUEST FOR DRAFT EIR PUBLIC COMMENT PERIOD EXTENSION**

Many of the organizations and individuals who provided oral testimony at the public hearing about the draft EIR, held by the San Francisco Planning Commission on December 13, 2018, as well as organizations and individuals who provided written comments, requested an extension of the public comment period for the draft EIR, although there were also a few people who did not support the extension.

The planning commission, in consultation with the Environmental Review Officer, agreed to the request as allowed under the CEQA Guidelines and chapter 31 of the administrative code and, at the hearing, extended the comment period for 15 days. The close of the public comment was therefore extended from December 24, 2018, to January 8, 2019 (see Draft EIR Hearing Transcript pp. 91-93 in RTC Attachment A).

## COMMENT GC-4: GENERAL COMMENTS

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"Page 4.E.17: Under the AIR QUALITY part of the DEIR is this statement: "…The closest nonresidential sensitive receptors include Laurel Hill Nursery School, San Francisco University High School – South Campus, Little School, Havurah Youth Center, the Helen Diller Family Preschool at the Jewish Community Center of San Francisco, the Menorah Park Assisted Living Senior Housing Complex, and the Chibi Chan Preschool at the Booker T. Washington Community Center…." What are the comments from these groups on this project?" *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-42])*

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"Table NO-8, Page 12 by RAMBOLL should say "Bush Street" rather than "Bust (sic) Street." Please correct." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-46])*

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"Page 546 of 776 (pdf page count – would help if the document had page numbers *on* the document) has a DBI violations letter dated 6/19/62 to Edwin & Joanna Roberts, 1149 Dolores St., for the location 3515-1/2 – 3519 24th St. but I do not see the connection to 3333 California St. in this DEIR. I do not understand why it is included. This should have been and be stricken from the DEIR as being irrelevant to 3333 California." *(Rose Hillson, Letter, January 8, 2019 [I-Hillson2-53])*

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"2. Whether the San Francisco economy supports the number of units being proposed by the developer, as it current trends indicate that there is an over supply of housing units, young working people leaving San Francisco (and California) and an eventual downturn in the tech bubble, on which San Francisco over-relies for its economy at present." *(Cristina Morris, Email, December 10, 2018 [I-Morris1-6])*

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**RESPONSE GC-4: GENERAL COMMENTS**

One comment asks if comments were received from nonresidential sensitive receptors identified in EIR Section 4.E, Air Quality – local schools and preschools, a youth center, and a senior housing facility.

All comments received on the draft EIR are presented in RTC Attachment A: Public Hearing Transcript Comments, RTC Attachment B: Draft EIR Comment Letters and Emails, and Attachment C: Comment Letters and E-mails Received After Close of Public Comment Period. Among them are letters from Craig Salgado representing the Jewish Community Center of San Francisco, which operates the Hellen Diller Family Preschool and Havurah Youth Center (see Letters O-JCCSF-1, 2, 3, and 4 in RTC Attachment B). No other comments were received from representatives of the facilities listed in the comment.

One comment presents an editorial text correction on Table NO-8 of Appendix E, Noise Measurement and Calculation Data prepared by Ramboll, and another questions the relevance of a building permit record in Appendix C, Historic Architectural Resources Evaluations, pertaining to 1149 Dolores Street. These comments do not pertain to the factual accuracy and adequacy of the environmental impact analysis presented in the EIR.

One comment requests an analysis of whether the city's economy would support the number of units being proposed by the developer, asserting that current trends indicate there is an oversupply of housing units, young workers are leaving the city, and economic downturns may happen in the future. The comment does not present any evidence in support of the assertion that the city has an oversupply of housing units. As stated, in the initial study on p. 118, the City's projected housing need from 2014 to 2022 is 28,869 residential units according to the ABAG's Regional Housing Needs Plan for the San Francisco Bay Area: 2014-2022. The proposed project would contribute 558 units and the project variant would contribute 744 units, fulfilling a portion of the City's overall Regional Housing Needs Allocation goal.

# 6. DEIR REVISIONS

## A. INTRODUCTION

This section presents text changes for the 3333 California Street Mixed-Use Project Draft Environmental Impact Report initiated by planning department staff. Some of these changes are specific revisions identified in the responses in Section 4: Master Response – Transportation and Circulation and in Section 5: Comments and Responses. Other text changes are minor modifications identified in Responses to Comments Section 2: Revisions and Clarifications to the Project Description that clarify material in EIR Chapter 2, Project Description. The remainder are staff-initiated text changes that add minor information or clarification related to the proposed project or project variant and correct minor inconsistencies and errors. The text revisions clarify, expand, or update the information presented in the draft EIR. The revised text does not provide new information that would result in any new significant impact not already identified in the EIR and initial study or any substantial increase in the severity of an impact identified in the EIR and initial study. In addition to the changes called out below, minor changes may be made to the Final EIR to correct typographical errors and small inconsistencies.

In the revisions shown below, new text is double-underlined and deletions are shown in ~~strikethrough~~. Staff-initiated text changes are distinguished from changes called out in the RTC sections by an asterisk (*) in the left margin. EIR figures and tables are marked with "(New)" or "(Revised)" before their title.

## B. REVISIONS TO THE SUMMARY CHAPTER

In Table S.1: Summary of Impacts of Proposed Project or Project Variant Identified in the EIR, the last paragraph of Mitigation Measure M-CR-1a: Documentation of Historical Resource, shown on the top of p. S.8, has been revised, as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**(Revised) Table S.1: Summary of Impacts of Proposed Project Identified in the EIR [Excerpt]**

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| **Section 4.B, Cultural Resources (Historic Architectural Resources) [EXCERPT]** | | | |
| **CR-1:** The proposed project or project variant would cause a substantial adverse change | S | **Mitigation Measure M-CR-1a: Documentation of Historical Resource**<br>…<br>The project sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, San Francisco Architectural Heritage, the | SUM |

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| in the significance of a historical resource as defined in section 15064.5 of the CEQA Guidelines. | | Planning Department, and the Northwest Information Center. The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested ~~groups~~ repositories. All documentation will be reviewed and approved by the Planning Department's Preservation staff before any demolition or site permit is granted for the affected historical resource. | |

***** In Table S.1, a new sentence has been added on p. S.12 after the second complete paragraph of Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity, as follows (new text is double-underlined):

**(Revised) Table S.1: Summary of Impacts of Proposed Project Identified in the EIR [Excerpt]**

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| **Section 4.C, Transportation and Circulation [EXCERPT]** | | | |
| **TR-4:** The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a.m. peak hour under baseline conditions. | S | **Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity**<br><br>The fair share contribution as documented in EIR Appendix D shall not exceed the following amounts across all phases. Payment of the following fair share contribution levels would mitigate the impacts of the estimated transit ridership added by full development of the proposed project or project variant.<br>• Proposed Project – $182,227<br>• Project Variant – $218,390<br><br>These amounts shall be increased by consumer price index per year plus a one-time escalation of 0.5 percent. | SUM |

In Table S.1, the first sentence of the first bullet on p. S.19 (the seventh bullet of Mitigation Measure M-NO-1: Construction Noise Control Measures) has been revised, as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**(Revised) Table S.1: Summary of Impacts of Proposed Project Identified in the EIR [Excerpt]**

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| **Section 4.D, Noise and Vibration [EXCERPT]** | | | |
| **NO-1:** Construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels. | S | **Mitigation Measure M-NO-1: Construction Noise Control Measures**<br>…<br>• During the excavation component of all construction phases and during building construction (framing of structure and major exterior work) of the Euclid and Masonic buildings, the Laurel Duplexes, and the Mayfair Building, prepare and implement a ~~daytime~~ construction-noise monitoring program (e.g., 7 a.m. to 7 p.m. during weekdays, and 7 a.m. to 3 p.m. on Saturdays and all other times that excavation or major exterior construction of the identified buildings occurs). … | SUM |

In Table S.1, the first sentence in the first paragraph under "Plan Review, Implementation, and Reporting" on p. S.20 under Mitigation Measure M-NO-1: Construction Noise Control Measures has been revised, as follows (new text is double-underlined):

**(Revised) Table S.1: Summary of Impacts of Proposed Project Identified in the EIR [Excerpt]**

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| **Section 4.D, Noise and Vibration [EXCERPT]** | | | |
| **NO-1:** Construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial | S | **Mitigation Measure M-NO-1: Construction Noise Control Measures**<br><br>Plan Review, Implementation, and Reporting<br>The Noise Control Plan shall be reviewed and approved by the San Francisco Department of Public Health and Planning Department prior to implementation. Noise monitoring shall be completed by a qualified noise consultant. | SUM |

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|

*Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable

| | | | |
|---|---|---|---|
| temporary or periodic increase in ambient noise levels. | | | |

In Table S.1, a new paragraph has been added to the end of Mitigation Measure M-NO-3: Stationary Equipment Noise Controls, on pp. S.22-S-23, as follows (new text is <u>double-underlined</u>):

**(Revised) Table S.1: Summary of Impacts of Proposed Project Identified in the EIR [Excerpt]**

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|

*Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable

| **Section 4.D, Noise and Vibration [EXCERPT]** | | | |
|---|---|---|---|
| **NO-3:** Operation of the proposed project or project variant would not result in a substantial permanent increase in ambient noise levels in the immediate project vicinity, or permanently expose persons to noise levels in excess of standards in the San Francisco General Plan and the San Francisco Noise Ordinance. | S | **Mitigation Measure M-NO-3: Stationary Equipment Noise Controls**<br>• Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered vent openings, and location of vent openings away from adjacent residential uses.<br><br><u>After completing installation of the HVAC equipment but before receipt of the Final Certificate of Occupancy for each building, the project sponsor shall conduct noise measurements to ensure that the noise generated by stationary equipment complies with section 2909 (a) and (d) of the San Francisco Noise Ordinance. No Final Certificate of Occupancy shall be issued for any building until the standards in the Noise Ordinance are shown to be met for that building.</u> | SM |

* In Table S.2: Summary of Significant Impacts of Proposed Project or Project Variant Identified in the Initial Study, the paragraph under "Human Remains and Associated or Unassociated Funerary Objects" on pp. S.32-S.33 under Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting has been revised, as follows, to clarify existing procedures and requirements (new text is double-underlined and deletions are shown in ~~strikethrough~~):

**(Revised) Table S.2: Summary of Significant Impacts of Proposed Project or Project Variant Identified in the Initial Study [Excerpt]**

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| **Cultural Resources [EXCERPT]** | | | |
| **CR-2:** Construction activities of the proposed project or project variant could cause a substantial adverse change in the significance of an archaeological resource. | S | **Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting**<br>…<br>Human Remains and Associated or Unassociated Funerary Objects<br>The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the ERO and the Medical Examiner of the City and County of San Francisco, and in the event of the Medical Examiner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC), ~~who~~ which shall appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98). The ~~archaeological consultant,~~ project sponsor~~,~~ and ERO~~, and MLD~~ shall make all reasonable efforts to develop a burial agreement with the MLD, as expeditiously as possible, for the treatment and disposition ~~of~~, with appropriate dignity, of human remains and associated or unassociated funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). The agreement shall take into consideration the appropriate excavation, removal, recordation, scientific analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. If the MLD agrees to scientific analyses of the remains and/or associated or unassociated funerary objects, the archaeological consultant shall retain possession of the remains and associated or unassociated funerary objects until completion of any such analyses, after which the | SM |

| Impact | Level of Significance before Mitigation | Mitigation and Improvement Measures | Level of Significance after Mitigation |
|---|---|---|---|
| *Legend*: NI = No Impact; LTS = Less than significant or negligible impact, no mitigation required; S = Significant; SM = Significant but mitigable; SU = Significant and unavoidable adverse impact, no feasible mitigation; SUM = Significant and unavoidable impact after mitigation; NA = Not Applicable | | | |
| | | remains and associated and unassociated funerary objects shall be reinterred or curated as specified in the agreement. Nothing in existing State regulations or in this mitigation measure compels the project sponsor and the ERO to accept recommendations of an MLD. However, if the ERO, project sponsor and MLD are unable to reach an agreement on scientific treatment of the remains and associated and unassociated funerary objects, the ERO, with cooperation of the project sponsor, shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance.<br><br>Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity will additionally follow protocols laid out in the Archaeological Research Design and Treatment Plan, the ATP, and any agreement established between the project sponsor, Medical Examiner and the ERO. | |

## C. REVISIONS TO CHAPTER 1, INTRODUCTION

***** To clarify that the descriptions of the proposed project and project variant have been modified a summary paragraph has been added to EIR Chapter 1, Introduction, after the last paragraph under subsection A. Project Summary on p. 1.2, as follows with new text double-underlined.

> Since publication of the draft EIR, the proposed project and project variant have been revised. The primary changes relate to the reduction in the amount of gross square footage devoted to ground-floor retail uses in the California Street buildings, the elimination of retail uses in the Euclid Building, a reduction in the number of vehicle parking spaces for commercial uses; and the reduction in the number of proposed curb cuts on Laurel Street. The project sponsor has also proposed minor changes regarding the size of the publicly accessible open space, the overall amount of excavation and soils to be exported from the project site, the residential dwelling unit mix, the total number of dwelling units in some of the proposed buildings, the number of bicycle parking spaces, and other minor design refinements. Overall the scope of the revised project and revised project variant would be slightly less than the proposed project and its variant analyzed in the draft EIR. Details regarding the revised project and revised variant are provided in RTC Section 2, Revisions and Clarifications to the Project Description. As described in that section, these minor revisions do not result in new significant impacts nor do they increase the severity of any significant impacts identified in the EIR.

## D. REVISIONS TO CHAPTER 2, PROJECT DESCRIPTION

***** To clarify the information in the EIR regarding the fact that the site is not listed on the California Register as part of the larger Laurel Hill Cemetery, the third sentence in the first full paragraph on EIR p. 2.2 has been modified as follows (new text is double-underlined):

> Although the Laurel Hill Cemetery is California Historical Landmark 760, it is not listed in the California Register of Historical Resources as California Historical Landmark 760.[4]
>
> [*Footnote 4 on EIR p. 2.2*]
>
> [4] Per California Public Resources Code section 5031(a): "All landmark registrations up to and including Register No. 769, which were approved without the benefit of criteria, shall be approved only if the landmark site conforms to the existing criteria as determined by the California Historical Landmarks Advisory Committee or as to approvals on or after January 1, 1975, by the State Historical Resources Commission."

***** To clarify that the descriptions of the proposed project and project variant have been modified a summary paragraph has been added to EIR Chapter 2, Project Description, after the first partial paragraph under subsection A. Project Overview, Introduction, on p. 2.6, as follows with new text double-underlined.

> Since publication of the draft EIR, the proposed project and project variant have been revised. The primary changes relate to the reduction in the amount of gross square footage devoted to ground-floor retail uses in the California Street buildings, the elimination of retail uses in the Euclid Building, a reduction in the number of vehicle parking spaces for commercial uses; and the reduction in the number of proposed curb cuts on Laurel Street. The project sponsor has also proposed minor changes regarding the size of the publicly accessible open space, the overall amount of excavation and soils to be exported from the project site, the residential dwelling unit mix, the total number of dwelling units in some of the proposed buildings, the number of bicycle parking spaces, and other minor design refinements. Overall the scope of the revised project and revised project variant would be slightly less than the proposed project and its variant analyzed in the draft EIR. Details regarding the revised project and revised variant are provided in RTC Section 2, Revisions and Clarifications to the Project Description. As described in that section, these minor revisions do not result in new significant impacts nor do they increase the severity of any significant impacts identified in the EIR.

* The second bullet under the description of circulation changes at the end of p. 2.74, which continues to EIR p. 2.75, has been revised to correct the width of the existing curb cut on Presidio Avenue as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

- The existing ~~28~~ 29-foot-wide curb cut on Presidio Avenue would remain, but would be adjusted slightly to follow the proposed modification to the alignment of the west curb on Presidio Avenue, to be parallel to the existing east curb. The driveway would provide in and out access for the off-street freight loading area and separate in-only access to the California Street Garage for office, retail, child care, and residential parking uses as well as commercial parking.

* New text has been added after the first sentence under "Anticipated Approvals" on p. 2.105 to clarify that the project variant would request a different amendment to the height map than the proposed project as follows (new text is double-underlined):

> Implementation of the proposed project or project variant would require changes to existing development controls for the project site through planning code, and zoning map amendments including changes to allow office and retail as permitted uses and changes to allow increased heights along California Street (increasing from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses), and at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building. The height map amendment under the project variant would include a request for increased heights along California Street (increasing from 40 to 67 feet to accommodate the proposed Walnut Building). The project sponsor would seek to create a new Special Use District (SUD), which would require a recommendation by the Planning Commission and approval by the Board of Supervisors….

* To clarify that under the project variant, a different amendment to the height map than that requested under the proposed project would be requested the third bullet under the "Actions by the City Planning Commission" on p. 2.106 has been modified as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

> Recommendation to the Board of Supervisors of an amendment to the Height and Bulk Map to increase height limits along California Street from 40 to 45 feet to accommodate higher ceilings for ground-floor retail uses, ~~and~~ at the center of the site (from 40 feet to 80 and 92 feet) for the renovated buildings resulting from the adaptive reuse of the existing office building, and, for the project variant only, along California Street at the location of the Walnut Building east of Walnut Street (from 40 to 67 feet).

* To clarify that under the proposed project or project variant, removal and replacement of street and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be addressed as part of the major encroachment permit recommended by public works and adopted by the board of supervisors by ordinance, a new bullet has been added at the end of the list of approval actions under the "Actions by the San Francisco Board of Supervisors" on p. 2.107 as follows (new text is double-underlined):

- Adoption of an ordinance approving a major encroachment permit that would include sidewalk improvements along with the removal and replacement of street and significant trees

## E. REVISIONS TO CHAPTER 4, ENVIRONMENTAL SETTING AND IMPACTS

### SECTION 4.A, INTRODUCTION TO ENVIRONMENTAL SETTING AND IMPACTS

The second sentence of the last paragraph on p. 4.A.15 has been revised to include the One Fifty Parker Avenue School site as follows (new text is double-underlined):

The nearby daycare facilities include the Hellen Diller Family Preschool at the JCCSF,[18] the Laurel Hill Nursery School and Pre-K at 401 Euclid Avenue, the One Fifty Parker Avenue School at 150 Parker Avenue, and the Chibi Chan Preschool at the Booker T. Washington Community Center.[19]

[*Footnotes 18 and 19 on EIR p. 4.A.15*]

[18] Salgado, Craig, Chief Operating Officer, Jewish Community Center of San Francisco, e-mail correspondence with SWCA Environmental Consultants, October 27, 2017. The preschool serves children under the age of five and has a licensed capacity for 175. Actual enrollment may be greater as not all children are at the center at the same time.

[19] Information available at http://www.jcyc.org/chibichanpreschool.htm, accessed May 25, 2018.

**SECTION 4.B, CULTURAL RESOURCES (HISTORIC ARCHITECTURAL)**

To clarify the outreach component of Mitigation Measure M-CR-1a: Documentation of Historical Resource, the text of the second sentence in the second paragraph under "Softcover Book" on EIR p. 4.B.46 has been modified as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

The HABS/HALS documentation scope will determine the requested documentation type for each facility, and the project sponsor will conduct outreach to identify other interested ~~groups~~ repositories.

**SECTION 4.C, TRANSPORTATION AND CIRCULATION**

Two minor discrepancies between the weekday a.m. peak hour vehicle trips for the proposed project and project variant reported in Table 4.C.14 and in the associated text on EIR p. 4.C.58 exist. To correct the discrepancy related to the proposed project's weekday a.m. peak hour vehicle-trips, the last sentence of the last paragraph on EIR p. 4.C.57, which continues to EIR p. 4.C.58, has been modified as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

…Based on the expected mode share and average vehicle occupancy, the proposed project would generate ~~807~~ 691 vehicle-trips during the weekday a.m. peak hour, and 752 vehicle-trips during the weekday p.m. peak hour.

To correct the discrepancy related to the project variant's weekday a.m. peak hour vehicle-trips, the last sentence of the first full paragraph on EIR p. 4.C.58 has been modified as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

…Based on the expected mode share and average vehicle occupancy, the project variant would generate ~~847~~ 726 vehicle-trips during the weekday a.m. peak hour, and 804 vehicle-trips during the weekday p.m. peak hour.

One minor discrepancy was identified between the parking rate identified for the project transportation analysis zone (TAZ 709) and reported on EIR p. 4.C.77 and the actual parking rate. To correct the discrepancy related to the reported parking rate, in Footnote 82 on EIR p. 4.C.77,

the second sentence has been revised to correct this minor discrepancy. This revision is shown below (new text is double-underlined and deletions are shown in ~~strikethrough~~):

> [82] The TDM Program assigns points for PKG-4 Parking Supply based upon the multi-unit residential neighborhood parking rate because the residential projects subject to the TDM Program are multi-unit buildings. For TAZ 709, that multi-unit residential neighborhood parking rate is approximately ~~0.90~~ 0.70. For CEQA, the residential neighborhood parking rate accounts for both the single-family and multi-family buildings. Single-family residential buildings tend to have more parking spaces per unit, and TAZ 709 and the surrounding area contain numerous single-family residential buildings. Thus, the CEQA analysis reports a higher residential parking number for TAZ 709 than that used in the TDM Program for assignment of PKG-4 Parking supply points.

* The second sentence under Impact TR-3 on EIR p. 4.C.81 has been modified to clarify the nature of the potential traffic hazard as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

> …Based on a review of existing conditions, the addition of project-generated traffic could result in queues and potential conflicts with existing traffic operations in the vicinity of the proposed Laurel Street driveway between California Street and Mayfair Drive (see Figure 2.22, p. 2.61). ~~with p~~Potential conflicts ~~would be~~ between vehicles entering/exiting the Laurel Village Shopping Center surface parking lot and vehicles accessing the proposed project's or project variant's below-grade parking garage from the Laurel Street northernmost driveway could arise. Because of the layout of the Laurel Village Shopping Center surface parking lot, which has a single-lane one-way drive aisle, there is not sufficient room for drivers to bypass queued vehicles waiting to park.

* To clarify the fair share contribution information in Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity, a new sentence has been added after the two bullets in the third paragraph of the mitigation measure on EIR p. 4.C.87 (new text is shown in double-underline):

> The fair share contribution as documented in EIR Appendix D shall not exceed the following amounts across all phases. Payment of the following fair share contribution levels would mitigate the impacts of the estimated transit ridership added by full development of the proposed project or project variant.
>
> - Proposed Project – $182,227
> - Project Variant – $218,390
>
> These amounts shall be increased by consumer price index per year plus a one-time escalation of 0.5 percent.

**SECTION 4.D, NOISE AND VIBRATION**

The second sentence of the second paragraph on p. 4.D.11 has been revised to correctly identify the One Fifty Parker Avenue School site as follows (new text is double-underlined):

> Although most nearby and adjacent sensitive receptors are residences, there are also several schools/daycare centers within 1,000 feet of the project site, including Laurel Hill Nursery School, San Francisco University High School - South Campus, Little School, Helen Diller

Preschool at the Jewish Community Center of San Francisco, the One Fifty Parker Avenue School, and the Chibi Chan Preschool at the Booker T. Washington Community Center.

To clarify the timing of construction noise monitoring, the text in the seventh bullet in Mitigation Measure M-NO-1: Construction Noise Control Measures, at the end of EIR p. 4.D.42, which continues to EIR p. 4.D.43, has been modified as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

- ...During the excavation component of all construction phases and during building construction (framing of structure and major exterior work) of the Euclid and Masonic buildings, the Laurel Duplexes, and the Mayfair Building, prepare and implement a ~~daytime~~ construction-noise monitoring program (e.g., 7 a.m. to 7 p.m. during weekdays, and 7 a.m. to 3 p.m. on Saturdays and all other times that excavation or major exterior construction of the identified buildings occurs).

To clarify that the Noise Control Plan would be reviewed by both the San Francisco Department of Public Health and Planning Department under Mitigation Measure M-NO-1: Construction Noise Control Measures, the first sentence in the first paragraph under "Plan Review, Implementation, and Reporting" on p. 4.D.43 has been revised, as follows (new text is double-underlined):

Plan Review, Implementation, and Reporting

The Noise Control Plan shall be reviewed and approved by the San Francisco Department of Public Health and Planning Department prior to implementation. Noise monitoring shall be completed by a qualified noise consultant.

To clarify the requirements for implementation of Mitigation Measure M-NO-3: Stationary Equipment Noise Controls, on EIR p. 4.D.60, a new second paragraph has been added to the measure as follows (new text is double-underlined):

Noise attenuation measures shall be incorporated into all stationary equipment (including HVAC equipment) installed on all buildings that include such stationary equipment as necessary to meet noise limits specified in Section 2909 of the Police Code. Interior noise limits shall be met under both existing and future noise conditions. Noise attenuation measures could include provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of louvered vent openings, and location of vent openings away from adjacent residential uses.

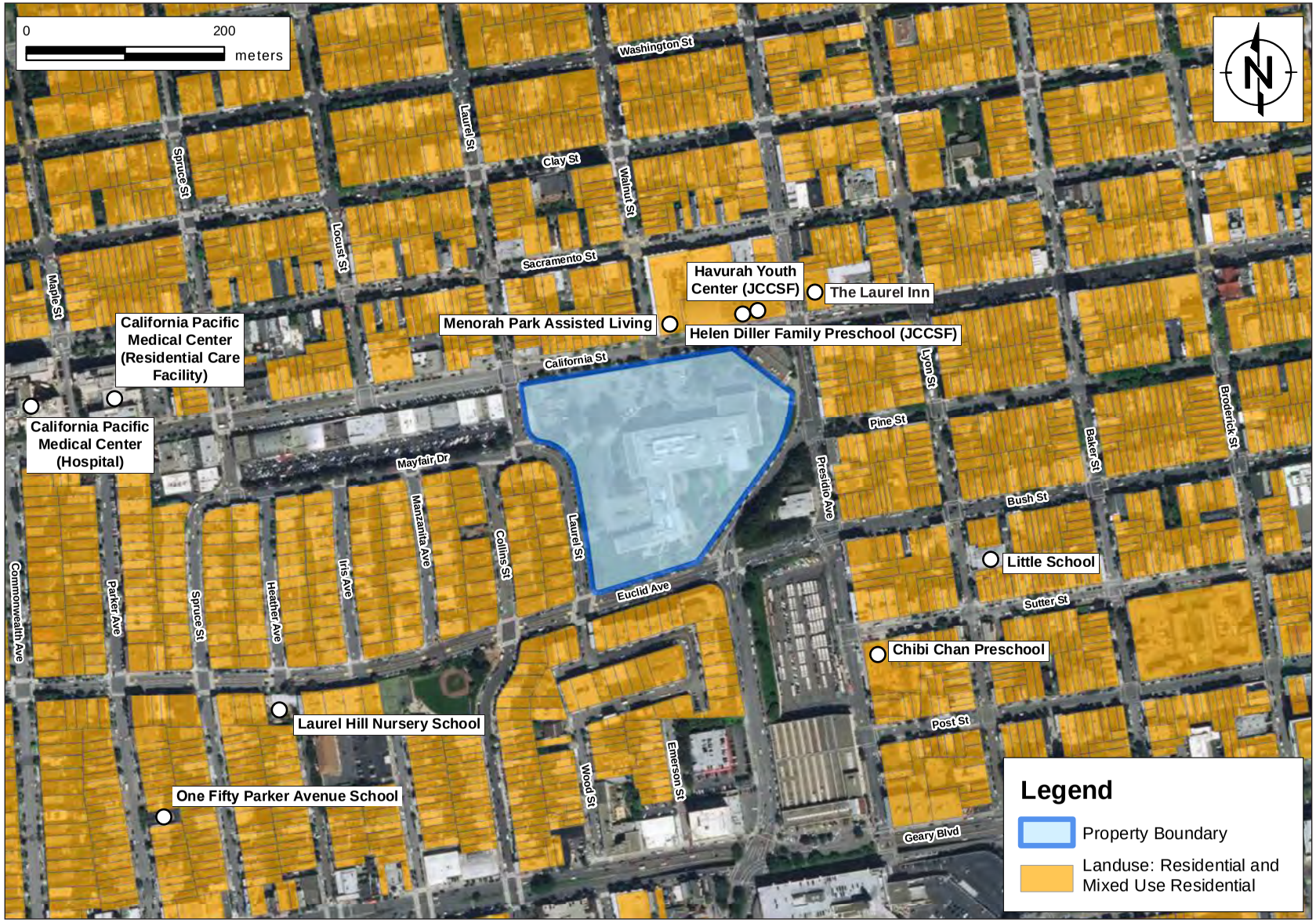
After completing installation of the HVAC equipment but before receipt of the Final Certificate of Occupancy for each building, the project sponsor shall conduct noise measurements to ensure that the noise generated by stationary equipment complies with section 2909 (a) and (d) of the San Francisco Noise Ordinance. No Final Certificate of Occupancy shall be issued for any building until the standards in the Noise Ordinance are shown to be met for that building.

## SECTION 4.E, AIR QUALITY

Figure 4.E.2: Sensitive Receptor Parcels in the Immediate Vicinity of the Project Site, on EIR p. 4.E.30, has been revised to include a label for the One Fifty Parker Avenue School site. The revised figure is shown on the following page.

The fourth sentence of the third paragraph under "Sensitive Receptors" on p. 4.E.17 has been revised to include the One Fifty Parker Avenue School as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

> The closest non-residential sensitive receptors include Laurel Hill Nursery School, San Francisco University High School - South Campus, Little School, Havurah Youth Center, the Helen Diller Family Preschool at the Jewish Community Center of San Francisco, the Menorah Park Assisted Living Senior Housing Complex, the One Fifty Parker Avenue School, and the Chibi Chan Preschool at the Booker T. Washington Community Center.




SOURCE: Ramboll

3333 CALIFORNIA STREET MIXED-USE PROJECT

2015-014028ENV

(REVISED) FIGURE 4.E.2: SENSITIVE RECEPTOR PARCELS IN THE IMMEDIATE VICINITY OF THE PROJECT SITE

**SECTION 4.F, INITIAL STUDY SUPPLEMENT**

**Utilities and Service Systems**

To provide information regarding the Bay-Delta Plan Amendment, the uncertainty that emerged after the publication of the draft EIR as to the availability of water supply sources due to the Bay-Delta Plan Amendment, and the plan amendment's ultimate outcome as related to the proposed project and its variant, the following text has been added to the end of EIR Section 4.F, Initial Study Supplement, beginning on p. 4.F.18, to supplement the initial study project- and cumulative-level impact analysis with respect to water supply under the new topic Utilities and Service Systems. Note that in the initial study the project variant's project-level and cumulative water supply impacts are discussed in two separate impact sections. The project-level impacts are discussed under Impact UT-2, on initial study pp. 180-182. The cumulative impacts are discussed under Impact C-UT-1, on initial study pp. 187-188. As noted below, the impact is a cumulative impact. Also, please note that the additional discussion will be added as new text to EIR Section 4.F, Initial Study Supplement, but is not shown with double underline for readability. This text includes new footnotes, which will be renumbered in the final EIR as part of the section.

## *UTILITIES AND SERVICE SYSTEMS*

### BACKGROUND ON HETCH HETCHY REGIONAL WATER SYSTEM

San Francisco's Hetch Hetchy regional water system, operated by the SFPUC, supplies water to approximately 2.7 million people. The system supplies both retail customers – primarily in San Francisco – and 27 wholesale customers in Alameda, Santa Clara, and San Mateo counties. The system supplies an average of 85 percent of its water from the Tuolumne River watershed, stored in Hetch Hetchy Reservoir in Yosemite National Park, and the remaining 15 percent from local surface waters in the Alameda and Peninsula watersheds. The split between these resources varies from year to year depending on hydrological conditions and operational circumstances. Separate from the regional water system, the SFPUC owns and operates an in-city distribution system that serves retail customers in San Francisco.

Approximately 97 percent of the San Francisco retail water is supplied by the SFPUC regional water system. The remaining 3 percent is supplied by local water supplies, including recycled water, groundwater and non-potable water.[1]

The project site is currently served by this water delivery infrastructure. In 2015, the SFPUC provided an average of approximately 65.6 million gallons per day of water to its in-city retail customers.[2] The SFPUC considers water users within San Francisco to be its retail customers, served separately from its wholesale customers in Santa Clara, Alameda, San

[1] SFPUC, 2015 Urban Water Management Plan for the City and County of San Francisco, June 2016 (hereinafter "2015 UWMP"), Section 6.2, p. 6-10, https://www.sfwater.org/modules/showdocument.aspx?documentid=9300, accessed August 10, 2019.

[2] Ibid, Section 4.1, Table 4-1, p. 4-5. This is the volume of water provided to San Francisco alone; note that there are a small number of additional retail customers outside of the City, including Groveland in the Sierra Nevada foothills.

Mateo, San Joaquin, and Tuolumne counties. The SFPUC has a projected retail supply of 89.9 million gallons per day through the year 2040 from its regional water system and local water supply sources.[3]

## WATER SUPPLY RELIABILITY AND DROUGHT PLANNING

In 2008, the SFPUC adopted the Phased Water System Improvement Program (WSIP) to ensure the ability of the regional water system to meet certain level of service goals for water quality, seismic reliability, delivery reliability, and water supply through 2018.[4] The SFPUC's level of service goals for regional water supply are to meet customer water needs in non-drought and drought periods and to meet dry-year delivery needs while limiting rationing to a maximum of 20 percent system-wide. In approving the WSIP, the SFPUC established a supply limitation of up to 265 million gallons per day (mgd) to be delivered from its water supply resources in the Tuolumne, Alameda, and Peninsula watersheds in years with normal (average) precipitation.[5] The SFPUC's water supply agreement with its wholesale customers provides that approximately two-thirds of this total (up to 184 mgd) is available to wholesale purchasers and the remaining one-third (up to 81 mgd) is available to retail customers. The total amount of water the SFPUC can deliver to retail and wholesale customers in any one year depends on several factors, including the amount of water that is available from natural runoff, the amount of water in reservoir storage, and the amount of that water that must be released from the system for purposes other than customer deliveries (e.g., required instream flow releases below reservoirs). A "normal year" is based on historical hydrological conditions that allow the reservoirs to be filled by rainfall and snowmelt, allowing full deliveries to customers; similarly, a "wet year" and a "dry year" is based on historical hydrological conditions with above and below "normal" rainfall and snowmelt, respectively.

For planning purposes, the SFPUC uses a hypothetical drought that is more severe than what has historically been experienced. This drought sequence is referred to as the "design drought" and serves as the basis for planning and modeling of future scenarios. The design drought sequence used by the SFPUC for water supply reliability planning is an 8.5-year period that combines the following elements to represent a drought sequence more severe than historical conditions:

- Historical Hydrology – a 6-year sequence of hydrology from the historical drought that occurred from July 1986 to June 1992
- Prospective Drought – a 2.5-year period which includes the hydrology from the 1976-77 drought
- System Recovery Period – The last six months of the design drought are the beginning of the system recovery period. The precipitation begins in the fall, and by approximately the month of December, inflow to reservoirs exceeds customer demands and SFPUC system storage begins to recover.

While the most recent drought (2012 through 2016) included some of the driest years on record for the SFPUC's watersheds, the design drought still represents a more severe drought

[3] Ibid, Section 7.5, Table 7-4, p. 7-10.

[4] On December 11, 2018, the SFPUC Commission extended the timing of the WSIP water supply decision through 2028 in its Resolution No. 18-0212.

[5] SFPUC Resolution No. 08-200, *Adoption of the Water System Improvement Program Phased WSIP Variant*, October 30, 2008.

in duration and overall water supply deficit. Based on historical records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully-implemented infrastructure under the WSIP, normal or wet years occurred 85 out of 97 years. This translates into roughly nine normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly one out of every 10 years. The frequency of dry years is expected to increase as climate change intensifies, potentially requiring greater levels of rationing, which may change the amount or frequency of rationing required. The exact level of rationing that the SFPUC will impose is not ascertainable at this time because the effect that climate change has on the SFPUC water supply systems are unknown.

## 2015 URBAN WATER MANAGEMENT PLAN

The California Urban Water Management Planning Act[6] requires urban water supply agencies to prepare *urban water management plans* to plan for the long-term reliability, conservation, and efficient use of California's water supplies to meet existing and future demands. The act requires water suppliers to update their plans every five years based on projected growth for at least the next 20 years.

Accordingly, the current urban water management plan for the City and County of San Francisco is the 2015 Urban Water Management Plan update.[7] The 2015 plan update presents information on the SFPUC's retail and wholesale service areas, the regional water supply system and other water supply systems operated by the SFPUC, system supplies and demands, water supply reliability, Water Conservation Act of 2009 compliance, water shortage contingency planning, and water demand management.

The water demand projections in the 2015 plan reflect anticipated population and employment growth, socioeconomic factors, and the latest conservation forecasts. For San Francisco, housing and employment growth projections are based on the San Francisco Planning Department's Land Use Allocation 2012 (see 2015 Urban Water Management Plan, Appendix E, Table 5, p. 21), which in turn is based on the Association of Bay Area Governments (ABAG) growth projections through 2040.[8] The 2015 plan presents water demand projections in five-year increments over a 25-year planning horizon through 2040. Growth associated with the proposed project or its variant was encompassed within the Land Use Allocation 2012. The SFPUC will prepare the next update – the 2020 Urban Water Management Plan update – for adoption in 2021. The 2020 update will consider updated population and employment projections and anticipated water supply and demand through 2045.

The 2015 plan compares anticipated water supplies to projected demand through 2040 for normal, single-dry, and multiple-dry water years. Retail water supplies are comprised of regional water system supply, groundwater, recycled water, and non-potable water. Under normal hydrologic conditions, the total retail supply is projected to increase from 70.1 mgd in 2015 to 89.9 mgd in 2040. According to the plan, available and anticipated future water supplies would fully meet projected demand in San Francisco through 2040 during normal years.

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[6] California Water Code, division 6, part 2.6, sections 10610 through 10656, as last amended in 2015.

[7] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan for the City and County of San Francisco*, June 2016, https://sfwater.org/index.aspx?page=75, accessed August 20, 2019.

[8] Association of Bay Area Governments, *Jobs-Housing Connection Strategy,* May 2012.

On December 11, 2018, by Resolution No. 18-0212, the SFPUC amended its 2009 Water Supply Agreement between the SFPUC and its wholesale customers. That amendment revised the Tier 1 allocation in the Water Supply Allocation Plan to require a minimum reduction of 5 percent of the regional water system supply for San Francisco retail customers whenever system-wide reductions are required due to dry-year supply shortages.[9] When accounting for the requirements of this recently amended agreement, existing and planned supplies would meet projected retail water system demands in all years except for an approximately 3.6 to 6.1 mgd or 5.0 to 6.8 percent shortfall during dry years through the year 2040. The 6.8 percent shortfall is expected to occur during years seven and eight of the 8.5-year design drought based on 2040 demand levels. This relatively small shortfall is primarily due to implementation of the amended 2009 water supply agreement. In such an event, the SFPUC would implement the SFPUC's Retail Water Shortage Allocation Plan and could manage this relatively small shortfall by prohibiting certain discretionary outdoor water uses and/or calling for voluntary rationing among all retail customers. Based on experience in past droughts, retail customers could reduce water use to meet this projected level of shortfall. The required level of rationing is well below the SFPUC's regional water supply level of service goal of limiting rationing to no more than 20 percent on a system-wide basis.

Based on the 2015 Urban Water Management Plan, as modified by the 2018 amendment to the 2009 Water Supply Agreement, sufficient retail water supplies would be available to serve projected growth in San Francisco through 2040. While concluding supply is sufficient, the 2015 Urban Water Management Plan also identifies projects that are underway or planned to augment local supply. Projects that are underway or recently completed include the San Francisco Groundwater Supply Project and the Westside Recycled Water Project. A more current list of potential regional and local water supply projects that the SFPUC is considering is provided below under Additional Water Supplies.

In addition, the plan describes the SFPUC's ongoing efforts to improve dry-year water supplies, including participation in Bay Area regional efforts to improve water supply reliability through projects such as interagency interties, groundwater management and recharge, potable reuse, desalination, and water transfers. While no specific capacity or supply has been identified, this program may result in future supplies that would benefit SFPUC customers.

## 2018 BAY-DELTA PLAN AMENDMENT

In December 2018 the state water board adopted the Bay-Delta Plan Amendment, which establishes water quality objectives to maintain the health of the rivers and the Bay-Delta ecosystem.[10] Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year water supply shortfalls throughout the SFPUC's regional water system service area, including San Francisco. The 2015 Urban Water Management Plan assumes limited rationing for retail customers may be needed in multiple dry years to address an anticipated supply shortage by 2040; the 2018 amendment to the 2009 Water Supply Agreement with wholesale customers would slightly increase rationing levels indicated in the 2015 plan. By comparison, implementation of the Bay-Delta Plan Amendment would result in supply shortfalls in all

[9] SFPUC, Resolution No. 18-0212, December 11, 2018.

[10] State Water Resources Control Board Resolution No. 2018-0059, *Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document*, December 12, 2018, https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf, accessed August 20, 2019.

single dry years and multiple dry years and rationing to a greater degree than previously anticipated to address supply shortages not accounted for in the 2015 Urban Water Management Plan or as a result of the 2018 amendment to the 2009 Water Supply Agreement.

The state water board has stated that it intends to implement the plan amendment by the year 2022, assuming all required approvals are obtained by that time. However, at this time, the implementation of the Bay-Delta Plan Amendment is uncertain for several reasons, as described below.

First, under the federal Clean Water Act, the United States Environmental Protection Agency (U.S. EPA) must approve the water quality standards identified in the plan amendment within 90 days from the date the approval request is received. By letter dated June 11, 2019, the U.S. EPA rejected the state water board's two-page submittal as inadequate under the requirements of the Clean Water Act. Pursuant to the U.S. EPA's letter, the state water board has 90 days to respond with a submittal that complies with the law. At this point, the U.S. EPA has neither approved, nor disapproved, any of the revised water quality objectives. It is uncertain what determination the U.S. EPA will make regarding the water quality standards in the future and its decision could result in litigation.

Second, since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in state and federal court, challenging the water board's adoption of the plan amendment, including legal challenges filed by the federal government at the request of the U.S. Bureau of Reclamation. That litigation is in the early stages, and there have been no dispositive court rulings as of this date.

Third, the Bay-Delta Plan Amendment is not self-executing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the plan amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the Clean Water Act, section 401 certification process in the Federal Energy Regulatory Commission's relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-2023 timeframe. This process and other regulatory and/or adjudicatory proceeding would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility for the Tuolumne River than currently exists (and therefore a different water supply effect on the SFPUC).

Fourth, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, the water board directed its staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the [water board] as early as possible after December 1, 2019." In accordance with the water board's instruction, on March 1, 2019, the SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary agreement with the state water board that would serve as an alternative path to implementing the Bay-Delta Plan's objectives. On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. In a written progress report to the Voluntary Agreement Plenary Participants dated July 1, 2019, the California secretaries for Environmental Protection and for Natural Resources stated that the collective state agencies should be able

"to determine the adequacy" of the various proposed voluntary agreements, including the proposed Tuolumne Voluntary Agreement, by October 15, 2019, and that if the state team recommends the voluntary agreements to the state water board, then (1) scientific peer review of the voluntary agreements would be completed by the spring of 2020, and (2) a draft CEQA document would be released for public comment in the summer of 2020, with a finalized CEQA document completed the following year.

For these reasons, whether, when, and the form in which the Bay-Delta Plan Amendment will be implemented, and how those amendments will affect the SFPUC's water supply, is currently unknown.

### Additional Water Supplies

In light of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitation to the SFPUC's regional water system supply during dry years, the SFPUC is expanding and accelerating its efforts to develop additional water supplies and explore other projects that would improve overall water supply resilience. Developing these supplies would reduce water supply shortfalls and reduce rationing associated with such shortfalls. The SFPUC has taken action to fund the study of additional water supply projects, which are listed below:

- Daly City Recycled Water Expansion
- Alameda County Water District Transfer Partnership
- Brackish Water Desalination in Contra Costa County
- Alameda County Water District-Union Sanitary District Purified Water Partnership
- Crystal Springs Purified Water
- Eastside Purified Water
- San Francisco Eastside Satellite Recycled Water Facility
- Additional Storage Capacity in Los Vaqueros Reservoir from Expansion
- Calaveras Reservoir Expansion

The capital projects that are under consideration would be costly and are still in the early feasibility or conceptual planning stages. One or more of these projects may require additional environmental review. These projects would take 10 to 30 or more years to implement and would require environmental permitting negotiations, which may reduce the amount of water that can be developed. The yield from these projects is unknown and not currently incorporated into SFPUC's supply projections.

In addition to capital projects, the SFPUC is also considering developing related water demand management policies and ordinances, such as funding for innovative water supply and efficiency technologies and requiring potable water offsets for new developments.

## APPROACH TO ANALYSIS

Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the SFPUC must prepare water supply assessments for certain large projects, as defined in

CEQA Guidelines section 15155.[11] Water supply assessments rely on information contained in the water supplier's urban water management plan and on the estimated water demand of both the proposed project and projected growth within the relevant portion of the water supplier's service area. As a residential development with 558 or 744 dwelling units, the project or its variant, meets the definition of a water demand project under CEQA and requires a water supply assessment. The project-specific analysis of impacts on water supply facilities is provided below.

On June 13, 2017, the SFPUC approved a water supply assessment for the proposed project and determined that it has adequate supplies to meet project demand.[12] Due to the adoption of the Bay-Delta Plan Amendment in December 2018, the water supply assessment for the project has been updated and the analysis for Utilities and Service Systems has been supplemented to account for this action. In addition, the revised water supply assessment accounts for the project and variant revisions described in detail in RTC Section 2 on pp. 2.2-2.29. The water demand estimates for the proposed project and its variant increased from those provided in the water supply assessment approved by the SFPUC on June 13, 2017. On June 11, 2019, the SFPUC approved a revised water supply assessment prepared for the modified project.[13,14]

The analysis of water supply capacity is based on review of SFPUC data on water supply (principally the commission's current 2015 Urban Water Management Plan); demand is calculated largely based on SFPUC-generated demand factors (furnished by SFPUC's district-scale non-potable water calculator version 7.1). The water supply assessment for the proposed project and its variant identifies the total water demand under either scenario, including a breakdown of potable and non-potable water demands. The proposed project and its variant are subject to San Francisco's Non-potable Water Ordinance (article 12C of the San Francisco Health Code). The Non-potable Water Ordinance requires new commercial, mixed-use, and multi-family residential development projects with 250,000 square feet or

[11] Pursuant to CEQA Guidelines section 15155(1), "a water-demand project" means:
(A) A residential development of more than 500 dwelling units.
(B) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(C) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area.
(D) A hotel or motel, or both, having more than 500 rooms, (e) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(F) a mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.
(G) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

[12] SFPUC, Water Supply Assessment for the 3333 California Street Project, June 13, 2017.

[13] SFPUC, Revised Water Supply Assessment for the 3333 California Street Project, June 11, 2019.

[14] After the SFPUC approved the revised water supply assessment on June 11, 2019, SFPUC staff identified minor discrepancies related to non-residential square footages in the water demand estimate calculations. Subsequently, the project sponsor prepared updated water demand estimate calculations for SFPUC staff review. On July 26, 2019, Steven R. Ritchie, Assistant General Manager for the SFPUC Water Enterprise, confirmed that a revised Water Supply Assessment is not required because the Water Supply Assessment approved by the SFPUC on June 11, 2019 continues to apply to the project variant. The updated water demands are slightly lower than previously estimated, but the difference is not discernible when reported in units of million gallons per day (mgd).

more of gross floor area to install and operate an onsite non-potable water system. Such projects must meet their toilet and urinal flushing and irrigation demands through the collection, treatment, and use of available graywater, rainwater, and foundation drainage.

The proposed project and project variant would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by California State Building Code section 402.0(c); residential submetering, as required by California Water Code sections 537-537.5 as added in 2016 by Senate Bill No.7;[15,16] and a rainwater and graywater system, as required by San Francisco's Non-Potable Water Ordinance, that would supply up to 30 percent of the total water demand.[17] These measures have been included in the revised water supply assessment calculations.

Because the project variant would have more residents and use more water than the proposed project, it would have the most conservative water demand estimate and would encompass the demands estimated for the proposed project because it includes additional residential units. Therefore, this discussion uses the water demand estimates for the project variant. The project variant's total water demand would be 0.084 mgd, (of which 0.020 mgd could be met by non-potable water). Accordingly, approximately 24.3 percent of the project variant's total water demand would be met by non-potable water in 2040.

**Impact UT-1: Sufficient water supplies are available to serve the proposed project or its variant in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented; in that event, the SFPUC may develop new or expanded water supply facilities to address shortfalls in single and multiple dry years but this would occur with or without implementation of the proposed project or its variant. Impacts related to new or expanded water supply facilities cannot be identified at this time or implemented in the near term; instead, the SFPUC would address supply shortfalls through increased rationing, which could result in significant cumulative effects, but the proposed project or its variant would not make a considerable contribution to impacts from increased rationing. (Less than Significant)**

## Construction Water

During construction, water would be required for dust control during grading and demolition, concrete curing, pressure washing, and other uses. The project sponsor and general contractor would minimize the use of potable water to the extent feasible, and would comply with Ordinance 175-91, which requires that non-potable water be used for dust-control activities when feasible.[18] Non-potable water may not be used for demolition, pressure washing, or dust control through aerial spraying. Water use during construction would be short term and temporary and would not require the SFPUC to develop new or expanded water supply resources or entitlements. This impact would be less than significant.

[15] SFPUC, Residential Water Submetering Webpage, 2019, https://sfwater.org/index.aspx?page=1186, accessed August 20, 2019.

[16] California Legislative Information, SB-7 Housing: water meters: multiunit structures, Chapter 623, 2016, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB7, accessed August 20, 2019.

[17] SFPUC, Non-Potable Water Program, https://sfwater.org/index.aspx?page=686, accessed August 20, 2019.

[18] City and County of San Francisco, San Francisco Public Works Code, Article 21: Restriction of Use of Potable Water for Soil Compaction and Dust Control Activities, 1991, https://www.sfwater.org/modules/showdocument.aspx?documentid=1295, accessed August 20, 2019.

## Operational Water Demand Estimates

The project variant's anticipated potable water demand would contribute 0.07 percent to the projected total retail demand in 2040. Similarly, the project's total water demand, which does not account for savings anticipated through compliance with the non-potable water ordinance, would represent 0.09 percent of the total retail demand in 2040. Thus, the project variant represents a small fraction of the total projected water demand in San Francisco in 2040.

Future retail (citywide) water demand through 2040 is estimated based on the population and employment growth projections contained in the planning department's Land Use Allocation 2012. The proposed project or its variant represents a portion of the planned growth accounted for in Land Use Allocation 2012. Therefore, the proposed project's or its variant's demand is incorporated in the 2015 Urban Water Management Plan.

Due to the 2018 Bay Delta Plan Amendment, the project variant's water demand estimates are considered under three water supply scenarios. The following scenarios evaluate the ability of the water supply system to meet the demand of the project variant, in combination with both existing development and projected growth in San Francisco.

- Scenario 1: Current Water Supply
- Scenario 2: Bay-Delta Plan Voluntary Agreement
- Scenario 3: 2018 Bay-Delta Plan Amendment

As discussed below, water supplies would be available to meet the demand of the project variant in combination with both existing development and projected growth in San Francisco through 2040 under each of these water supply scenarios with varying levels of rationing during dry years.

Scenario 1 – Current Water Supply

Scenario 1 assumes no change to the way in which water is supplied, and that neither the Bay-Delta Plan Amendment nor a Bay-Delta Plan Voluntary Agreement would be implemented. Thus, the water supply and demand assumptions contained in the 2015 Urban Water Management Plan and the 2009 Water Supply Agreement as amended would remain applicable for the proposed project and its variant. As stated above, the proposed project or its variant is accounted for in the demand projections in the 2015 Urban Water Management Plan.

Under Scenario 1, water supplies would be available to meet the demand of the project variant during normal, single dry, and multiple dry years.

Scenario 2 – Bay-Delta Plan Voluntary Agreement

Under Scenario 2, a voluntary agreement would be implemented as an alternative to the adopted Bay-Delta Plan Amendment. The March 1, 2019, proposed voluntary agreement submitted to the state water board has yet to be accepted, and the shortages that would occur with its implementation are not known. The voluntary agreement proposal contains a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the Bay-Delta Plan Amendment. The resulting regional water system supply shortfalls during dry years would be less than those under the Bay-Delta Plan Amendment and would require rationing of a lesser degree and closer in alignment to the SFPUC's adopted level of service goal for the regional water system of rationing of no more than 20 percent system-wide during dry years. The SFPUC Resolution No. 19-0057, which authorized the SFPUC staff to participate in

voluntary agreement negotiations, stated its intention that any final voluntary agreement allow the SFPUC to maintain both the water supply and sustainability level of service goals and objectives adopted by the SFPUC when it approved the WSIP. Accordingly, it is reasonable to conclude that if the SFPUC enters into a voluntary agreement, the supply shortfall under such an agreement would be of a similar magnitude to those that would occur under Scenario 1. In any event, the supply shortfall of water supplies would be of a similar magnitude to those that would occur under Scenario 1. Rationing under Scenario 2, with implementation of the Voluntary Agreement, would be to a lesser degree than that under Scenario 3, with implementation of the Bay-Delta Plan Amendment.

Scenario 3 – Bay-Delta Plan Amendment

Under Scenario 3, the 2018 Bay-Delta Plan Amendment would be implemented as it was adopted by the state water board without modification. As discussed above, there is considerable uncertainty whether, when, and in what form the plan amendment will be implemented. However, because implementation of the plan amendment cannot be ruled out at this time, an analysis of the cumulative impact of projected growth on water supply resources under this scenario is included in this document to provide a worst-case impact analysis.

Under this scenario, which is assumed to be implemented after 2022, water supplies would be available to meet projected demands through 2040 in wet and normal years with no shortfalls. However, under Scenario 3 the entire regional water system—including both the wholesale and retail service areas—would experience significant shortfalls in single dry and multiple dry years, which over the past 97 years occur on average just over once every 10 years. Significant dry-year shortfalls would occur in San Francisco, regardless of whether the proposed project or its variant is approved. Except for the currently anticipated shortfall to retail customers of about 6.1 mgd (6.8 percent) that is expected to occur under Scenario 1 during years seven and eight of the 8.5-year design drought based on 2040 demand levels, these shortfalls to retail customers would exclusively result from supply reductions resulting from implementation of the Bay-Delta Plan Amendment. The retail supply shortfalls under Scenario 3 would not be attributed to the incremental demand associated with the proposed project or its variant, because this demand is incorporated already in the growth and water demand/supply projections contained in the 2015 Urban Water Management Plan.

Under the Bay-Delta Plan Amendment, existing and planned dry-year supplies would be insufficient for the SFPUC to satisfy its regional water system supply level of service goal of no more than 20 percent rationing system-wide. The Water Shortage Allocation Plan does not specify allocations to retail supply during system-wide shortages above 20 percent. However, the plan indicates that if a system-wide shortage greater than 20 percent were to occur, regional water system supply would be allocated between retail and wholesale customers per the rules corresponding to a 16 to 20 percent system-wide reduction, subject to consultation and negotiation between the SFPUC and its wholesale customers to modify the allocation rules. These allocation rules result in shortfalls of 15.6 to 49.8 percent across the retail service area as a whole under Scenario 3. Total shortfalls under Scenario 3 would range from 12.3 mgd (15.6 percent) in a single dry year to 36.1 mgd (45.7 percent) in years seven and eight of the 8.5-year design drought based on 2025 demand levels and from 21 mgd (23.4 percent) in

a single dry year to 44.8 mgd (49.8 percent) in years seven and eight of the 8.5-year design drought based on 2040 demand.[19]

## Water Supply Impact Analysis

As described above, the supply capacity of the Hetch Hetchy regional water system that provides the majority of the city's drinking water far exceeds the potential demand of any single development project in San Francisco. No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the SFPUC to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project or its variant, in combination with both existing development and other projected growth through 2040 would require new or expanded water supply facilities, the construction or relocation of which could have significant cumulative impacts on the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Impacts Related to New or Expanded Water Supply Facilities

The SFPUC's adopted water supply level of service goal for the regional water system is to meet customer water needs in non-drought and drought periods. The system performance objective for drought periods is to meet dry-year delivery needs while limiting rationing to a maximum of 20 percent system-wide reduction in regional water service during extended droughts. As the SFPUC has designed its system to meet this goal, it is reasonable to assume that to the extent the SFPUC can achieve its service goals, sufficient supplies would be available to serve existing development and planned growth accounted for in the 2015 Urban Water Management Plan (which includes the proposed project or its variant) and that new or expanded water supply facilities are not needed to meet system-wide demand. While the focus of this analysis is on the SFPUC's retail service area and not the regional water system as a whole, this cumulative analysis considers the SFPUC's regional water supply level of service goal of rationing of not more than 20 percent in evaluating whether new or expanded water supply facilities would be required to meet the demands of existing development and projected growth in the retail area through 2040. If a shortfall would require rationing more than 20 percent to meet system-wide dry-year demand, the analysis evaluates whether as a result, the SFPUC would develop new or expanded water supply facilities that result in significant physical environmental impacts. It also considers whether such a shortfall would result in a level of rationing that could cause significant physical environmental impacts. If the analysis determines that there would be a significant cumulative impact, then per CEQA Guidelines section 15130, the analysis considers whether the project's incremental contribution to any such effect is "cumulatively considerable."

[19] Technical Memorandum from Steven Ritchie, SFPUC Water Enterprise to Lisa Gibson, San Francisco Planning Department, May 31, 2019, Table 3, p. 10.

With the implementation of the proposed project or its variant, existing and planned dry-year supplies would meet projected retail demands through 2040 under Scenario 1 within the SFPUC's regional water system adopted water supply reliability level of service goal. Therefore, the SFPUC could meet the water supply needs for the proposed project or its variant, in combination with existing development and other projected growth in San Francisco through 2040 from the SFPUC's existing system. The SFPUC would not be expected to develop new or expanded water supply facilities for retail customers under Scenario 1 and there would be no significant cumulative environmental impact.

The effect of Scenario 2 cannot be quantified at this time, but as explained previously, if it can be designed to achieve the SFPUC's level of service goals and is adopted, it would be expected to have effects similar to Scenario 1. Given the SFPUC's stated goal of maintaining its level of service goals under Scenario 2, it is expected that Scenario 2 effects would be more similar to Scenario 1 than to Scenario 3. In any event, any shortfall effects under Scenario 2 that exceed the SFPUC's service goals would be expected to be less than those under Scenario 3. Therefore, the analysis of Scenario 3 would encompass any effects that would occur under Scenario 2 if it were to trigger the need for increased water supply or rationing in excess of the SFPUC's regional water system level of service goals.

Under Scenario 3, the SFPUC's existing and anticipated water supplies would be sufficient to meet the demands of existing development and projected growth in San Francisco, including the proposed project or its variant, through 2040 in wet and normal years, which have historically occurred in approximately nine out of 10 years on average. During dry and multiple dry years, retail supply shortfalls of 15.6 to 49.8 percent could occur.

As a result of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitations on supply to the regional water system during dry years, the SFPUC is increasing and accelerating its efforts to develop additional water supplies and explore other projects that would increase overall water supply resilience. The SFPUC is beginning to study water supply options, but it has not determined the feasibility of the possible projects, has not made any decision to pursue any particular supply projects, and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement. One or more of these projects may require additional environmental review.

There is also a substantial degree of uncertainty associated with the implementation of the Bay-Delta Plan Amendment and its ultimate outcome; and therefore, there is substantial uncertainty in the amount of additional water supply that may be needed, if any. Moreover, there is uncertainty and lack of knowledge as to the feasibility and parameters of the possible water supply projects the SFPUC is beginning to explore. Consequently, the physical environmental impacts that could result from future supply projects is quite speculative at this time and would not be expected to be reasonably determined for a period of time ranging from 10 to 30 years. Although it is not possible at this time to identify the specific environmental impacts that could result, this analysis assumes that if new or expanded water supply facilities, such as those listed above under "Additional Water Supplies," were developed, the construction and/or operation of such facilities could result in significant adverse environmental impacts, and that this would be a significant cumulative impact.

As discussed above, the project variant would represent 0.09 percent of total retail demand in San Francisco in 2040, whereas implementation of the Bay Delta Plan Amendment would result in a retail supply shortfall of up to 49.8 percent.

Thus, new or expanded dry-year water supplies would be needed under Scenario 3 regardless of whether the proposed project or its variant is approved or constructed, and regardless to

which the frequency of dry years may increase due to climate change. As such, any physical environmental impacts related to the construction and/or operation of new or expanded water supplies would occur with or without the proposed project or its variant. Therefore, neither the proposed project, nor the project variant, would have a considerable contribution to any significant cumulative impacts that could result from the construction or operation of new or expanded water supply facilities developed in response to the Bay-Delta Plan Amendment.

Impacts Related to Rationing

Given the long lead times associated with developing additional water supplies, in the event the Bay-Delta Plan Amendment were to take effect sometime after 2022 and result in a dry-year shortfall, the expected action of the SFPUC for the next 10 to 30 years (or more) would be limited to requiring increased rationing. The remaining analysis therefore focuses on whether rationing at the levels that might be required under the Bay-Delta Plan Amendment could result in any cumulative impacts, and if so, whether the proposed project or its variant would make a considerable contribution to these impacts.

The SFPUC has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. Rationing at the level that might be required under the Bay-Delta Plan Amendment would require changes to how businesses operate, changes to water use behaviors (e.g., shorter and/or less-frequent showers), and restrictions on irrigation and other outdoor water uses (e.g., car washing), all of which could lead to undesirable socioeconomic effects. Any such effects would not constitute physical environmental impacts under CEQA.

High levels of rationing could however lead to adverse physical environmental effects, such as the loss of vegetation cover resulting from prolonged restrictions on irrigation. Prolonged high levels of rationing within the city could also make San Francisco a less desirable location for residential and commercial development compared to other areas of the state not subject to such substantial levels of rationing, which, depending on location, could lead in turn to increased urban sprawl. Sprawl development is associated with numerous environmental impacts, including, for example, increased greenhouse gas emissions and air pollution from longer commutes and lower density development, higher energy use, loss of farmland, and increased water use from less water-efficient suburban development.[20] In contrast, as discussed in the transportation section of the EIR, the project site is located in an area where VMT per capita is well below the regional average; development projects in San Francisco are required to comply with numerous regulations that would reduce greenhouse gas emissions, as discussed in the greenhouse gas section of this initial study, and San Francisco's per capita water use is among the lowest in the state. Thus, the higher levels of rationing on a citywide basis that could be required under the Bay-Delta Plan Amendment could lead directly or indirectly to significant cumulative impacts. The question, then, is whether the proposed project or its variant would make a considerable contribution to impacts that may be expected to occur in the event of high levels of rationing.

While the levels of rationing described above apply to the retail service area as a whole (i.e., 5.0 to 6.8 percent under Scenario 1, 15.6 to 49.8 percent under Scenario 3), the SFPUC may allocate different levels of rationing to individual retail customers based on customer type (e.g., dedicated irrigation, single-family residential, multi-family residential, commercial,

[20] Pursuant to the SFPUC 2015 Urban Water Management Plan, San Francisco's per capita water use is among the lowest in the state.

etc.) to achieve the required level of retail (citywide) rationing. Allocation methods and processes that have been considered in the past and may be used in future droughts are described in the SFPUC's current Retail Water Shortage Allocation Plan.[21] However, additional allocation methods that reflect existing drought-related rules and regulations adopted by the SFPUC during the recent drought are more pertinent to current and foreseeable development and water use in San Francisco and may be included in the SFPUC's update to its Retail Water Shortage Allocation Plan.[22] The Retail Water Shortage Allocation Plan will be updated as part of the 2020 Urban Water Management Plan update in 2021. The SFPUC anticipates that the updated Retail Water Shortage Allocation Plan would include a tiered allocation approach that imposes lower levels of rationing on customers who use less water than other customers in the same customer class and would require higher levels of rationing by customers who use more water. This approach aligns with the state water board's statewide emergency conservation mandate imposed during the recent drought, in which urban water suppliers who used less water were subject to lower reductions than those who used more water. Imposing lower rationing requirements on customers who already conserve more water is also consistent with the implementation of prior rationing programs based on past water use in which more efficient customers were allocated more water.

The SFPUC anticipates that, as a worst-case scenario under Scenario 3, the multi-family mixed-use residential, commercial, and office land uses that would be developed under the proposed project or its variant could be subject to up to 38 percent rationing during a severe drought.[23] In accordance with the Retail Water Shortage Allocation Plan, the level of rationing that would be imposed on individual development projects/customers would be determined at the time of a drought or other water shortage and cannot be established with certainty prior to the shortage event. However, newly-constructed buildings, such as those that would be constructed as part of the proposed project or its variant, have water-efficient fixtures and non-potable water systems that comply with the latest regulations. Thus, if the proposed project or its variant demonstrates below-average water use, either of them would likely be subject to a lower level of rationing than other retail customers that meet or exceed the average water use for the same customer class.

While any substantial reduction in water use in a new, water efficient building likely would require behavioral changes by building occupants that are inconvenient, temporary rationing during a drought is expected to be achievable through actions that would not cause or contribute to significant environmental effects. The effect of such temporary rationing would likely cause occupants to change behaviors but would not cause the substantial loss of vegetation because vegetation on this urban infill site would be limited to ornamental landscaping, and non-potable water supplies would remain available for landscape irrigation

[21] San Francisco Public Utilities Commission, *2015 Urban Water Management Plan for the City and County of San Francisco, Appendix L – Retail Water Shortage Allocation Plan,* June 2016, https://sfwater.org/index.aspx?page=75, accessed August 20, 2019.

[22] SFPUC, *2015-2016 Drought Program*, adopted by Resolution 15-0119, May 26, 2015.

[23] This worst-case rationing level for San Francisco multi-family residential was estimated for the purpose of preparing comments on the Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan (SED), dated March 16, 2017. See comment letter Attachment 1, Appendix 3, Page 5, Table 3. The comment letter and attachments are available at https://www.waterboards.ca.gov/public_notices/comments/2016_baydelta_plan_amendment/docs/dennis_herrera.pdf, accessed August 20, 2019.

in dry years. The proposed project or its variant would primarily consist of multi-family residential uses along with some institutional, commercial, and office use, and it is not anticipated to include uses that would be forced to relocate because of temporary water restrictions, such as a business that relies on significant volumes of water for its operations. While high levels of rationing that would occur under Scenario 3 could result in future development locating elsewhere, existing residents, office workers, and businesses within the project site would be expected to tolerate rationing for the temporary duration of a drought.

As discussed above, implementation of the Bay-Delta Plan Amendment would result in substantial system-wide water supply shortfalls in dry years. These shortfalls would occur with or without implementation of the proposed project or its variant. The proposed project's or its variant's incremental increase in potable water demand (0.09 percent of total retail demand) would have a negligible effect on the levels of rationing that would be required throughout San Francisco under Scenario 3 in dry years.

As such, temporary rationing that could be imposed on the proposed project or its variant would not cause or contribute to significant environmental effects associated with the high levels of rationing that may be required on a city-wide basis under Scenario 3, even if that rationing is more frequent due the effects of climate change. Thus, the proposed project or its variant would not make a considerable contribution to any significant cumulative impacts that may result from increased rationing that may be required with implementation of the Bay-Delta Plan Amendment, were it to occur.

## Conclusion

As stated above, there is considerable uncertainty as to whether the Bay-Delta Plan Amendment will be implemented. If the plan amendment is implemented, the SFPUC will need to impose higher levels of rationing than its regional water system level of service goal of no more than 20 percent rationing during drought years by 2025 and for the next several decades. Implementation of the plan amendment would result in a shortfall beginning in years two and three of multiple dry-years in 2025 of 33.2 percent, and dry year shortfalls by 2040 ranging from 23.4 percent in a single dry year and year one of multiple dry years to up to 49.8 percent in years seven and eight of the 8.5-year design drought. While the SFPUC may seek new or expanded water supply facilities, it has not made any definitive decision to pursue particular actions and there is too much uncertainty associated with this potential future decision to identify environmental effects that would result. One or more of these projects may require additional environmental review. Such effects are therefore speculative at this time. In any case, the need to develop new or expanded water supplies in response to the Bay Delta Plan Amendment and any related environmental impacts would occur irrespective of the water demand associated with the proposed project or its variant. Given the long lead times associated with developing additional supplies, the SFPUC's expected response to implementation of the Bay-Delta Plan Amendment would be to ration in accordance with procedures in its Retail Water Shortage Allocation Plan.

Both direct and indirect environmental impacts could result from high levels of rationing. However, the proposed project and its variant would be expected to tolerate the levels of rationing imposed on them for the duration of the drought, and thus would not contribute to sprawl development caused by rationing under the Bay-Delta Plan Amendment.

The proposed project or its variant would be subject to the requirements of the Non-potable Water Ordinance. Thus, the proposed project or its variant would not be expected to

contribute to a loss of vegetation because project-generated non-potable supplies would remain available for irrigation in dry years.

The small increase in potable water demand attributable to the proposed project or its variant compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be required throughout the city. Thus, the proposed project or its variant would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment. Therefore, for the reasons described above, under all three scenarios, this impact would be considered less than significant. No mitigation is required.

**Biological Resources**

To further clarify that under the proposed project or project variant, removal and replacement of street trees and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be addressed as part of the major encroachment permit recommended by public works and adopted by the board of supervisors by ordinance, the following text has been added to the end of EIR Section 4.F, Initial Study Supplement, to supplement the initial study project- and cumulative-level impact analysis with respect to conflicts with local policies or ordinances protecting biological resources (because all is new text, it is not shown in double underlining for readability) .

## *BIOLOGICAL RESOURCES*

The Urban Forestry Ordinance

As discussed in the initial study, pp. 202-204, the proposed project or project variant removal and replacement of street and significant trees would be consistent with the standards in the Urban Forestry Ordinance and would be part of the major encroachment permit recommended by public works after a noticed public hearing with opportunity for public comment, and adopted by the board of supervisors by ordinance. Substantive standards and requirements for tree removal and replacement, including payment of in lieu fees if necessary, would remain the same as set forth in the Urban Forestry Ordinance. As a result, the proposed project or project variant would be consistent with ordinance requirements with Urban Forestry Ordinance requirements regarding protection of biological resources, replacement, and payment of any in-lieu fees. The proposed project would be consistent with all applicable city policies and ordinances regarding protected trees regarding protection of biological resources, replacement, and payment of any in-lieu fees.

## F. REVISIONS TO CHAPTER 6, ALTERNATIVES

The last paragraph on EIR p. 6.78 incorrectly identifies a two-story vertical addition. This paragraph has been corrected as follows (new text is double-underlined and deletions are shown in ~~strikethrough~~):

Rehabilitation Standard 1 states that the "property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." As described above, the glass curtain wall system would be replaced with a system compatible with the historic resource. Other changes to the building's historic

features would be minimal, i.e., ~~two~~ one-story, stepped vertical addition and removal of the northerly extension of the east wing.

# 3333 CALIFORNIA STREET MIXED-USE PROJECT




# RESPONSES TO COMMENTS ON DRAFT EIR VOLUME 2 (ATTACHMENTS A-E, PART 1)

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - JANUARY 8, 2019
FINAL EIR CERTIFICATION HEARING: SEPTEMBER 5, 2019

SAN FRANCISCO
PLANNING
DEPARTMENT

# 3333 CALIFORNIA STREET MIXED-USE PROJECT

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SAN FRANCISCO
PLANNING
DEPARTMENT

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# ATTACHMENT A

## Draft EIR Public Hearing Transcript

**In The Matter Of:**

*S.F. PLANNING COMMISSION*

*HEARING IN RE:*

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*3333 CALIFORNIA STREET*

*December 13, 2018*

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*CLARK REPORTING & VIDEO CONFERENCING*

*2140 SHATTUCK AVE. STE. 405*

*BERKELEY, CA 94704*

*510.486.0700*

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SAN FRANCISCO PLANNING COMMISSION

CITY AND COUNTY OF SAN FRANCISCO

RE: 3333 CALIFORNIA STREET

THURSDAY, DECEMBER 13, 2018

COMMISSION CHAMBERS - Room 400

CITY HALL, 1 DR. CARLTON B. GOODLETT PLACE

SAN FRANCISCO, CALIFORNIA

TRANSCRIPT OF PROCEEDINGS

CLARK REPORTING & VIDEO CONFERENCING

2140 SHATTUCK AVENUE, SUITE 407

BERKELEY, CALIFORNIA, 94704

510.486.0700

BY JESSICA STONE AND JILL STEPHENSON

A P P E A R A N C E S

SAN FRANCISCO PLANNING COMMISSION:

Commissioner Rich Hillis, President

Commissioner Myrna Melgar, Vice President

Commissioner Rodney Fong

Commissioner Milicent Johnson

Commissioner Joel Koppel

Commissioner Kathrin Moore

Commissioner Dennis Richards

**********

Jonas Ionin, Commission Secretary

P R O C E E D I N G S

SECRETARY IONIN: Very good, Commissioners. That will place us on Item 11 for Case No. 2015-014028ENV, 3333 California Street. This is a Draft Environmental Impact Report.

MS. GIBSON: President Hillis, Commissioners, Lisa Gibson, Environmental Review Officer. I'd like to introduce to you the planner who's going to be presenting on this item. This is Kei Zushi. He's a senior planner in our Environmental Planning Division.

Kei has over 10 years of land use and environmental planning experience, having worked as a city planner in Oregon, Washington, and California. Notably, Kei worked as an environmental planner at the planning department for two years back in 2012 through `14, and after that he went off to law school at UC Hastings.

During law school, Kei interned at the city attorney's office with our land use team, and he worked on CEQA litigation, and he also clerked for administrative law judges at the California Public Utilities Commission.

And, most recently, Kei worked as a law clerk at the Thomas Law Group. He worked on some challenging CEQA cases, including the Golden State

Warriors Arena in San Francisco -- you might have heard of that project -- the Newhall Ranch project in Santa Clarita Valley, and also the City Place project in Santa Clara.

Luckily, for us, CEQA and land use planning continue to be Kei's main career focus. We're very fortunate to have him working for us again at the planning department where he rejoined us in September. Thank you very much, Kei.

MR. ZUSHI: Thank you, Lisa. I have slides to show.

PRESIDENT HILLIS: Okay. There you go.

MR. ZUSHI: Good afternoon, President Hillis and members of the commission, Kei Zushi. As Lisa mentioned, planning staff and environmental review coordinator for the 3333 California Street mixed-use project. The purpose of the hearing today is to receive comments on the Draft Environmental Impact Report, or EIR, for the 3333 California Street mixed-use project.

Joining me today are my colleagues, Debra Dwyer, principal environmental planner, Justin Greving, senior preservation planner, and Nick Foster, senior current planner. Leigh Lutenski of the Mayor's Office of Senior Economic and Workforce Development is also here, and Dan Safier, Prado Group and SKS Partners and other

members of the project sponsor team are present.

The commission secretary is providing you with a handout of my presentation and letter from the historic preservation. Copies of these are available for members of the public on the table to my left.

I would like to note that we have a stenographer present to create a transcript of today's proceedings, so I would encourage all speakers to speak slowly and clearly in order to assist the process.

So the 10 -- sorry about that. So the 10.25 acre site is located on the south side of California Street between Laurel Street and Presidio Avenue, and is currently occupied by the University of California San Francisco Laurel Heights Campus.

In order to facilitate the receipt of comments and inform the Commission and members of the public, Leigh Lutenski of the Mayor's Office of Economic Workforce Development and the project sponsor will provide a brief overview of the project.

MS. LUTENSKI: Hello, Commissioners, my name is Leigh Lutenski, with the Office of Economic and Workforce Development. I have a few brief remarks today. The proposed project would create 558 or 744 units of housing under the base project and variant, respectively, in addition to child care and new public

open space and neighborhood retail, all while adaptively reusing portions of the existing building.

OEWD is working with the project sponsor to negotiate a development agreement for this project which would include commitments to specified community benefits. The DA will be limited to a set of benefits that are contextual with the neighborhood and in scale with the project, particularly focusing on open space and affordable housing.

Mayor Breed has named housing, and particularly affordable housing, a top priority of her administration. The Mayor has continued the work of late Mayor Lee, and has initiated new policies aimed at more quickly entitling projects and increasing the pace at which housing is built. This project would be an important contribution to these initiatives, as well as the effort to create new housing in all parts of the city.

I thank you for your attention to this project.

MR. SAFIER: Can I use this over here?

SECRETARY IONIN: Sure.

PRESIDENT HILLIS: Yeah, either one.

MR. SAFIER: Okay. Happy holidays, President Hillis, Commissioners, Director Rahaim and staff. I'm Dan Safier, project sponsor with --

PRESIDENT HILLIS: Just pull that up closer to you.

MR. SAFIER: How's that?

PRESIDENT HILLIS: That's good.

MR. SAFIER: Okay. We've been working on this project for close to four years, and today we have a brief overview of the project as context for the Draft EIR. We anticipate returning in the Spring of this year to provide additional project detail, including specific plans for the architecture and design.

This is the site today.

PRESIDENT HILLIS: Can we go to the computer, please? There you go.

MR. SAFIER: There we go. The 10-plus acre site is bounded by California Street to the north, Presidio to the east, Euclid to the south, and Laurel to the west. Our project began with a question: How do you evolve a 10.3 acre suburban park-centric office campus into a place for people that is connected with the neighborhoods around it?

The site has a significant grade change of almost 65 feet from one end of the site to the next, so about six-and-a-half stories from the corner of California and Presidio to the high point at Euclid and Laurel.

The proposed project includes 558 residential units, approximately 50,000 square feet of office space, 54,000 square feet of small scale retail on California Street, and on-site child care. This plan is consistent with the existing RM-1 zoning, which the planning code defines as residential mixed district at low density. And in the upper right corner, you'll see the Walnut Building which contains office in the base project.

Planning also requested, as was mentioned, that we develop a variant at the PUD density. This allows the site to go up to the RM-2 zoning minus one unit for residential mixed district at moderate density, which equates to 744 residential units.

To achieve this density, the Walnut Building has two additional stories, which is the same height as the Jewish Community Center across the street, and the 50,000 square feet of office space is eliminated and replaced with 186 residential units. Apart from the Walnut Building change, the rest of the site is the same as the base project.

In order to create design diversity across this large site, our project team includes three building design architects and two landscape architects. The team was selected for their award-winning track records, design-forward thinking, community orientation, and

commitment to quality architecture and planning. With over five acres of usable open space, our team prioritized design of the pedestrian experience and open space with the idea of creating buildings within a park.

Over the past four years, we've also had over 140 meetings with the community, including large community meetings, neighborhood associations and individual neighbor meetings, and we're continuing that outreach today.

At a high level, here are some of the key design elements of the project. The city and the project sponsor team established a goal to weave this site back into the city's urban fabric through the creation of north/south and east/west pedestrian connectors. As you can see, the existing site is not pedestrian or public friendly. The main access is through these driveway entrances, which are gated and walled.

The current site is physically disconnected from the surrounding neighborhood context both through the brick walls on the perimeter and the topography which steeply berms up along Masonic Avenue. With the walls, berms and surface parking lots, the site does not currently invite pedestrians through the site. You can see that the existing condition is also somewhat like an island, isolated and walled off from the

existing neighborhoods.

The project design reconnects the site to the existing neighborhood grid through the north/south and east/west connector, effectively turning the site into four well-scaled blocks. We are also retaining and adaptively reusing the main portion of the existing building while also cutting a 40-foot wide pedestrian connection through the existing building, aligned with the Walnut Street to the north to create a north/south access.

Our Draft EIR acknowledges the presence of a historic resource, and our plan includes converting the retained building from its grandfathered office use to residential.

Our plan also increases the pedestrian access points around the perimeter of the site. They make the project more porous, encouraging walkability and accessibility. The proposed project and north/south and east/west connectors will be designed to be ADA accessible, which is an important feature, given the steep grade change of the site.

This is a view of the Mayfair walk connector looking east, the overlook, which is actually where there's an existing portion of the building right now that hangs over this area that would be removed, but

this would provide the public with scenic views of the city and then ADA access and stairs to Presidio Avenue below.

To help reconnect, activate, and integrate the site into the existing neighborhood fabric, we're proposing small scale ground floor retail along California Street, connecting with the Laurel Village shopping center to the west and extending to the Fire Credit Building and Ellas restaurant to the east. You can see on this image the pink shaded element includes Laurel Village shopping center, and then the small scale retail proposed on our project.

We believe that providing mixed use will make for a more convenient and whole neighborhood, promote walkability, eyes on the street, and safety. Importantly, it will provide us with the opportunity to curate uses that are currently missing from the neighborhood for existing and future residents.

Our approach has always been to complement Laurel Village shopping center. We've met with the Laurel Village and Sacramento Street merchants many times, and will continue to work with the community and the merchants to identify future retailers to complement and not compete with the existing retail.

The proposed project is also proposing over

five acres of generous open space, over half of which will be publicly accessible space. The project aims to create a wide variety of landscaped open spaces that are inspired by the California landscapes.

The existing open space is primarily asphalt, designed for cars, and includes over 3.2 acres of surface parking. This is in addition to the lawn at Euclid and Laurel, and the space on Presidio. By contrast, our project proposes to put all the parking underground, freeing up the ground plane for the network of usable and welcoming open spaces.

Additionally, the project is on a transit corridor and is actually between two of the main transit corridors in the city, the Geary line and the California line, and it's extremely well served by Muni with a number of buses adjacent to the site.

The primary project open spaces include Cypress Square, which is accessed off a grand staircase and ADA access on California Street. It will be a beautiful south-facing plaza centered around the mature cypress trees. We'll also be enhancing Euclid Green at the corner of Laurel and Euclid, and retaining the view corridor to downtown.

We're proposing to increase the number of street trees around the site to 613 percent of the

current count, and the number of on-site trees will be 146 percent of their current count, all to improve the urban canopy.

As part of the landscape plan, we worked with our arborist and landscape architect to identify key trees to be preserved and celebrated. Some of our open spaces, including Cypress Square, Oak Meadow, and Pine Street steps are designed around these trees and enhanced with additional trees.

The proposed project and the variant also include on-site child care of approximately 14,600 square feet with capacity for about 175 children. We understand that this is a major priority for the city, and we believe that this amenity will encourage young families to join and stay in the neighborhood. To complement this family-friendly approach, approximately 60 percent of the total residences proposed are two, three, and four-bedroom units.

Finally, this project has been designed with the city's important housing policies and objectives in mind. It will bring new homes to San Francisco's west side and District 2, where very little new housing has been built over the past 40 years.

It will provide affordable housing units that will help preserve the diversity of our city and the

equity of our neighborhoods. It will also provide millions of dollars in new annual tax revenue due to conversion from a public tax exempt use to residential mixed use, in addition to contributing substantial community benefit fees toward open space, jobs, housing, schools, transportation, and child care.

In short, this project is a significant housing and mixed use opportunity for District 2 and for the future of our city.

Thank you very much. And our team will also be available to answer any questions you might have, and also Gregg Miller is here from Coblentz.

PRESIDENT HILLIS: All right. Thank you.

MR. ZUSHI: Thank you. Again, the purpose of today's hearing is to take public comments on the draft EIR on the accuracy, adequacy and completeness of the Draft EIR for this project pursuant to the California Environmental Quality Act, or CEQA, and San Francisco's local procedures for implementing CEQA. This is not a hearing to consider approval or disapproval of the project. That hearing will follow the Final EIR certification.

In addition, there will be future opportunities to comment on the merits of the proposed project or project variant.

I'd like to make a few comments to further facilitate the receipt of comments today. I'll briefly summarize the significant impacts of the project.

PRESIDENT HILLIS: Yeah, can we go to the computer, please? There you go.

MR. ZUSHI: The Draft EIR finds that the project or project variant, even with mitigation, would result in significant and unavoidable impacts with respect to historic resources for the 3333 California Street property, transit capacity on the 43 Masonic route, and construction noise.

The Draft EIR also finds that other significant impacts to transportation, construction vibration and operational noise, archaeological resources, human remains, and tribal cultural resources, biological resources, and paleontological resources can be mitigated to a less than significant level.

The Draft EIR analyzes six alternatives to the project to address significant and unavoidable impacts. In addition to the no project alternative required by CEQA, the EIR includes two full preservation alternatives, two partial preservation alternatives, and a code conforming alternative. The details regarding the alternatives are provided in Chapter 6 of the EIR. I will also note that the preservation alternatives were

informed by input from the architectural review committee of the Historic Preservation Commission.

With respect to the significant and unavoidable impacts of the proposed project or project's variant, the full preservation alternatives would result in less than significant impacts on historical architectural resources and reduce but not avoid the transit capacity and construction noise impacts. The partial preservation alternatives would reduce the significant impacts on historic architectural resources, but not to a less than significant level and would still have significant impacts to transit capacity and construction noise.

A code conforming alternative would result in significant and unavoidable historic resource and construction noise impacts similar to those of the project and project variant, and it would also result in a significant transit capacity impact, but it would be reduced compared to the project or project variant.

A public hearing before the Historic Preservation Commission was held on December 5th, 2018 in order for the commissioners to provide comments to the planning commission and the department on the Draft EIR. Subsequent to the hearing, the HPC issued a comment letter on the Draft EIR which the commission

secretary has provided to you.

HPC found that the analysis of historic resources in the Draft EIR was adequate and accurate and agreed that the Draft EIR analyzed a reasonable and appropriate range of preservation alternatives. The HPC also suggested refinements to some of the preservation alternatives and expressed interest in understanding more about the neighborhood alternative that was discussed by the public at the hearing.

As I mentioned, there's a stenographer present to create a transcript of today's proceedings, so I would encourage all speakers to speak slowly and clearly.

While we would appreciate if members of the public would state their name for the record, members of the public are not required to provide personal identifying information when they communicate with the commission or the department. In this case, the information from the hearing today will be made available to the public on the website as part of the proposed project's record of proceedings.

Staff is not here to answer comments today. Again, the purpose of the hearing is to receive comments on the information and analysis in the Draft EIR. There will be future opportunity to comment on the project

itself. The comments made will be transcribed and then responded to in writing in the Responses To Comments document, or RTC. The RTC will respond to all verbal and written comments received and make revisions to the Draft EIR, as appropriate.

Before I conclude, I would like to remind members of the public that the Draft EIR was published on November 7th, 2018. The public comment period for this project began on November 8th, 2018 and closes at 5:00 p.m. December 24th, 2018. Comments on the draft EIR must be submitted orally at today's hearing or in writing to the project email shown here or planning department by 5:00 p.m. on December 24th for them to be responded to in the Final EIR.

There have been several requests to extend the public comment period to January 8th, 2019. The environmental review officer has opined that an extension is not warranted in this case. After hearing comments from the members of the public, we'll receive comments on the Draft EIR by the planning commission.

This ends my presentation. City staff and members of the project sponsor team are available to answer any questions you may have. Unless the commission members have questions, I would respectfully request that the public hearing be opened. Thank you.

PRESIDENT HILLIS: Okay. Great. Thank you very much. So we'll open this up for public comment. Again, I want to reiterate this is comments on the draft EIR and its adequacy. We'll have the project before us, I imagine, sometime next year. We won't answer necessarily the comments made today. We may make some of our own on the EIR, but it's a tool to help us analyze the project in view in the future.

So I'll call names. Roger Miles, Eileen Boken, Adam McDonough, Judy Doane, Bill Cutler, Ms. Desby, Richard Frisbie. So if I've called your name, you can speak in any order. Line up on the screen side of the room.

Go ahead if you want to start, sir. Sir, go ahead. Go ahead. You can speak in any order. If I've called your name, you are welcome to come up and speak and tell us about the EIR. No?

All right, next speaker, if you want to come up. There's no order, necessarily. So if your name's been called, line up on the screen side of the room and you can approach in any order. Now's the time. Welcome.

I-Miles1

MR. MILES: Good afternoon. My name is Roger Miles. And, firstly, I would like to urge you to increase a 15-day extension to the DEIR. It seems the holidays

1 (GC-3)

might be better used for friends and family than dealing with this. 1 (GC-3) cont'd

I live in the neighborhood, have for a long time, right across the street. And I understand why it's considered historic, and it would be a shame to destroy it. It was designed a bit like a college campus, even though it was a business. And it was designed so that the people in the building could enjoy the dramatic outside that was created by some wonderful planners, and it just melds in and doesn't stand out and wave at you and say, "I don't belong here," even though it was commercial establishment. 2 (CR-2)

The developer's proposal would destroy this. The existing buildings and grounds fit so well in the neighborhood now, it just nestles right in. And we don't need anymore commercial. It would just provide a lot of extra traffic, parking issues, and also wouldn't necessarily be very good for extra competition for the existing small stores up and down Sacramento and right adjacent. The Laurel Village Association sort of agrees with that. 3 (ME-1)

So I would urge you to look -- support the neighborhood full preservation measure. That will leave everything basically as it is. It currently provides access all over the place, unlike what they're 4 (AL-2)

telling you; there is no north/south access. But there isn't hardly any place you can't walk up and enjoy the campus. And even though they have separations, it's always been open to the public and family. And dogs, pets, everybody uses it all the time, and has for years, and it's always been welcomed. And if they get away with this mess, you'll have no more housing in comparison to what you can get with the existing premises.

4 (AL-1) cont'd

And, therefore, that's what I urge you do to. It will give you 100 percent of the characteristics, and the historic site would remain the same. It provides up to 744 units of housing. It doesn't provide any commercial. It builds them in three years instead of seven to fifteen --

SECRETARY IONIN: Thank you, sir. Your time is up.

MR. MILES: Thank you.

PRESIDENT HILLIS: Thank you. Next speaker, please.

SECRETARY IONIN: And I will remind members of the public that we are accepting comment on the adequacy and accuracy of the Environmental Impact Report, not the project itself.

MR. MCDONOUGH: Hello, members of the -- sorry, commissioners.

PRESIDENT HILLIS: Overhead, please. Go ahead.

MR. MCDONOUGH: Thank you. My name is Adam McDonough. I'm a resident of Laurel Heights. First thing I want to ask is that you strongly consider the granting of the 15-day extension, the due date. It's a very lengthy and complex document. It came out right before the holidays. We're being asked to respond by Christmas Eve. A few more weeks won't kill the project. I-McDonough1 1 (GC-3)

Secondly, I just wanted to show you some pictures. You've seen some of these already. Not much really needs to be said about them. These pictures and the listing on the California Register of Historical Resources, after the unanimous support of the State Historic Resources Commission at their May hearing, speak for themselves. San Francisco Historic Preservation Commissioner further reinforced these comments at their recent December 5th hearing. 2 (CR-2)

Again, not much needs to be said. The commissioners in Palo Alto spoke more eloquently and with considerably more authority than I can about the master status of the three principals associated with 3333 California Street. The developer proposes the virtual total destruction of this historically listed site.

The black areas indicate the extent to which 50

percent of the historic main building will be demolished. The red indicates the bulldozing and total destruction of more than 80 percent of the historically listed landscaping. It is unimaginable that anyone responsible for San Francisco's future could countenance such a mindless destruction of such an iconic and important part of San Francisco's past.

So what will be the future of 3333? Will we preserve it or destroy it? A great deal of this decision lies in your hands. I will not restate the first five items in red.

2 (CR-2) cont'd

Please take note that the community alternative builds the same number of housing units as the developers propose, but we do so in three years, not in seven to 15 years, as proposed by the developer. It took less than five years to build the Salesforce Tower, after all.

3 (AL-2)

Clearly, the developers and planning don't appreciate the fact that San Francisco has a housing crisis and needs housing now, not in 2030 or beyond. Housing activists, NIMBYs and others should pay careful attention to this glaring discrepancy.

Finally, anyone concerned about eliminating climate change should pay special attention to the greenhouse gases that will be released by the two

4 (GHG-3)

solutions. The developer's plan generates three times that of the community alternative. Thank you. 4 (GHG-3) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please.

MS. BOKEN: I'll be using the overhead.

PRESIDENT HILLIS: Okay.

I-Boken

MS. BOKEN: I'm Eileen Boken, San Francisco Coalition for Neighborhoods, here on my own behalf. I strongly urge the commission to grant a 15-day extension to the due date for comments for this DEIR. It is a lengthy and complex document. 1 (GC-3)

On the overhead is a coalition resolution urging the historic designation of the site. 2 (CR-1) I am here in support of Laurel Heights Improvement Association, as they have a proven track record of working with project sponsors to achieve successful outcomes such as the CPMC California Street site and the Lucky Penny site. 3 (ME-1)

That being said, it is my understanding that this project sponsor has been challenging. It is my understanding that, because of ongoing challenges, that the neighborhood decided to develop the community alternative. Besides maintaining the historical and architectural integrity of this site, the community option alternative achieves the following: Meets the city's housing goals, does not a contain retail component 4 (AL-2)

which would compete with existing neighborhood serving businesses, maintains a portion of the office space which is consistent with the original purpose of the buildings.

I would urge the department and the commission to seriously consider the community alternative.

4 (AL-2) cont'd

PRESIDENT HILLIS: All right. Thank you. Next speaker, please.

I-Cutler1

MR. CUTLER: Good afternoon. My name is Bill Cutler. My wife and I have lived in Laurel Heights on California Street, one block from the site of the proposed real estate development, for over 45 years.

1 (GC-3)

Over the decades, we've seen many big changes to our neighborhood, some positive and some negative. But this proposal which violates the zoning laws and the character of the district is, by far, the most disturbing to date.

2 (ME-1)

Everyone recognizes the need for affordable housing in San Francisco, and we support construction of housing on this site. But the current proposal which Prado wants seven to 15 years to complete includes unnecessary retail space, creates major traffic problems, and includes a plan to mar the beauty of Laurel Hill by destroying the majority of 185 old growth

trees that we cannot afford to lose in an era of toxic air and climate change.

The high density of the proposed project will increase traffic flow and congestion, increase noise and pollution and contribute to the loss of parking in a neighborhood where it's already almost impossible to find adequate street parking, even for those of us who have G stickers as residents.

2 (ME-1) cont'd

Fortunately, there's a much better way to address the need for a development at Laurel Hill that both meets the housing demands and still protects the historic building as well as the beautiful landscaping that surrounds it. It's called the neighborhood full preservation alternative. It provides the same number of residential housing units as the Prado project, 558 with a 744 variant, protects the majority of the 185 mature trees, and does not include major retail that would only negatively compete with Laurel Village shopping center which borders the site and already has two supermarkets, Starbucks and Pete's Coffee, Ace Hardware, three restaurants, three banks, several boutiques, a Gap store, and a variety of other shops -- not to mention Sacramento Street, where there are many others.

3 (AL-2)

We don't need new retail in Laurel Heights. We

need affordable housing, built without changing the existing zoning laws, without 10-story buildings, and using the available space primarily for housing which allows for some units big enough for middle class families. The neighborhood alternative does all that and can be built in about three years, not seven-and-a-half to 15.

3 (AL-2) cont'd

Please consider supporting our plan, and please grant a 15-day extension of the due date for comments on the Draft EIR. Thank you.

4 (GC-3)

PRESIDENT HILLIS: Thank you. Next speaker, please.

O-LHIA5

MR. FRISBIE: Can I have the overhead, please? Hi. I'm Richard Frisbie. I live in the neighborhood. December 24th, what does this mean to you? It should mean Christmas Eve. But, no, it doesn't. As it was pointed out very, very boldly, 5:00 p.m. December 24th is the due date of the DEIR, no exceptions.

1 (GC-3)

I brought a book I'm going to leave. You can give it to Toys for Tots. Was this an accident? Did no one in planning actually notice this date? It begs the question as to why management, why didn't the director of planning, who I noticed has left, do something? Why didn't he step in and say, "No, this isn't right; this isn't proper; this isn't what we do to

the citizens of San Francisco who pay our salaries."

It gives a new meaning to the word "public servant." Anyone who stands by silently, that is just an unconscionable act for Christmas Eve. I'm personally offended. And I think I speak for everyone in the room? Raise your hand. I hope I speak for each of you, actually.

So, what's so special about Christmas Eve? It's many things to many people, all the way from deeply spiritual to totally secular, across a wide spectrum of society. The week leading up to Christmas, however, you celebrate it, is a time for peace, for family, for reflection. It's a time when family and friends travel across California, across the country, across the globe to be with loved ones. It's a time for grandmothers to teach granddaughters how to bake Christmas cookies and prepare a meal for Santa and his reindeer. It's a time for grandfathers to teach grandsons how to hang up outside Christmas lights without getting electrocuted.

It's not a time when the community should be forced by some arbitrary day, totally arbitrary day, to give up their involvement in this special season.

On December 24th, 1968 -- this year is the 50th anniversary of that date -- James Lovell, Bill Anders, and Frank Borman circled the moon, the first humans ever to

1 (GC-3) cont'd

adventure to another planetary body. And they shared these photos and a message of joy, peace, and humanity with all the people of Planet Earth. This is what Christmas Eve is all about. So my question is, where do you stand? We request an extension. 1 (GC-1) cont'd

PRESIDENT HILLIS: All right. Thank you. Next speaker, please.

I-Doane

MS. DOANE: Good afternoon. My name is Judy Doane. I have lived near the 3333 California Project site since early in the 1970s. I strongly urge the planning commission to grant a 15-day extension of the due date for comments on this Draft EIR because it is a long, complex document. 1 (GC-3)

I support building more housing in our neighborhood, and specifically at the 3333 California Street site, but it needs to be the right development plan. After examining available plans, including the plan proposed by the developer, Prado, and an alternative the neighbors themselves have produced, I am supporting the neighborhood full preservation alternative for the following reasons: One, we do not need more retail in this area. We have plenty of shops serving the neighborhood now. Adding more will make 3333 California not just a residence, but also a retail destination, guaranteeing an unacceptable amount of 2 (ME-1) 3 (AL-2) 4 (TR-11)

extra traffic and exacerbating an already stressed on-street parking problem.

4 (TR-11) cont'd

In addition, increasing the traffic will make it more hazardous for a large number of seniors using walkers, as well as endanger mothers with baby carriages trying to cross these already very busy intersections.

5 (TR-8)

Two, the neighborhood full preservation alternative will retain the same number of units, 558 or the variant of 744, as the Prado plan.

Three, a neighborhood plan will also keep the unique features of the original historically significant building and landscaping. That means some of the old growth trees on the lot can be retained, protecting the important ecological aspects of this space for our beautiful, green city.

Four, the three to five years of construction of the neighborhood plan will be much more tolerable than Prado's proposed seven to 15 years.

Please consider the neighborhood full preservation plan. Thank you.

6 (AL-2)

PRESIDENT HILLIS: Thank you. Next speaker, please.

I-Desby

MS. DESBY: Hi. My name is Krisanthy Desby. I live in Presidio Heights, two and-a-half, three blocks from the proposed project. First of all, I do request

1 (GC-3)

that the planning commission grants a 15-day extension for comments on the DEIR. I personally come from a very large extended family. I don't have time to read it. An extra two weeks would really be helpful. 1 (GC-3) cont'd

I also support the community full preservation residential alternative for 3333. I feel that the Prado Group proposal is akin to building a mini city three blocks from my house. There will be many, many years, no matter which way you slice it, at least seven, possibly ten, maybe with extensions more, of noise pollution, traffic, congestion, all the things that we deal with downtown. And then it's going to be permanent. It will just turn our neighborhood into another Civic Center. 2 (AL-2) 3 (ME-1)

The project is completely out of scale for the surrounding neighborhoods. There are four neighborhoods immediately surrounding, and I feel that it's a mini city that's just going to be plunked down in the middle of us.

I -- among other things, removing the trees, almost 200 trees, and saying that they're going to plant more, those trees that are there now have been there for decades, and it will take many decades for new trees to grow. And we don't know if they'll grow. Who's studied what trees fit there? What if they tear up the 4 (BR-1)

sidewalk? And when will they be placed there? After the project is finished? During? Who knows? So we're going to be losing that resource which helps clear the air. 4 (BR-1) cont'd

Anyway, I ask that you reject the Prado proposal and accept the community full preservation residential alternative in its place. Thank you very much. 5 (AL-2)

PRESIDENT HILLIS: All right. Thank you. Next speaker, please.

MR. GOLDBRENNER: Hi. My name is David Goldbrenner. I live about six blocks from the site. My family and I find ourselves at this intersection all the time. I have a young daughter. We use the JCC regularly.

I-Goldbrenner1

I found out about this relatively recently. I don't know much about real estate development, but my gut instincts is that this is going to be an incredibly huge imposition on the neighborhood, the idea of seven to 15 years of construction at this intersection that we rely on constantly to get where we're going. We rely on the 1 Bus on the 43 Bus, driving past there, and the thoughts of construction, dumpsters, and board walls and backhoes backing up, and trucks beeping for seven to 15 years is just really kind of soul-crushing. 1 (ME-1) 2 (TR-6)

And so from what I've heard, I would really support the proposed neighborhood alternative, which apparently provides the same housing, but with a much shorter period and with much less impact on the neighborhood both during the construction and afterwards. 3 (AL-2)

I'd also like to request, respectfully, the 15-day extension. It seems like a reasonable thing to do, given that this came out just before the Thanksgiving and the Christmas and Hanukkah holidays. So I'd like to ask for that extension, as well. Thank you. 4 (GC-3)

PRESIDENT HILLIS: Thank you. Next speaker, please.

I-McMichael

MR. McMICHAEL: Hi, folks. My name is Adam McMichael. I'm here out of work today as a concerned citizen of San Francisco to urge you to support the proposed project at 3333 California Street. This project's a critical step forward in addressing San Francisco's housing crisis by providing much needed housing for families in a transit-friendly neighborhood. 1 (ME-1)

As a long-time resident of this neighborhood, I've seen neighbors and friends move out of the city due to the housing shortage and housing affordability challenges. The combined effects of job creation and slow housing production have created difficult

situations for families like mine.

The west side of San Francisco needs more housing. The residents in this area have benefited from the city's job creation, property values have soared, but these same residents have skated by and deepened the housing crisis by maintaining current local zoning. This is much change for the long-term sustainability of the city for families like mine.

This underused parcel is an awesome opportunity to build more housing in the city, and this project is exactly what the city needs. The proposed project creates a family-friendly community in a city that has seen rapid flight of young families like mine.

San Francisco is an innovative city that values inclusion, diversity and community, and in this moment of crisis, we hope that you will support this project and ensure the residents of San Francisco have access to more housing.

In addition to this letter that my wife and I wrote, I would just like to say that if I had to make a few changes to the project, I would triple the size of it, in coordination with a lot of the buildings that surround the area, and do as much as we can to add more housing to the city in general. Thank you for your time.

1 (ME-1) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please.

O-YIMBY1

MS. CLARK: Hi. Laura Clark, MB Action. I think mixed use is good. We're talking about adding a lot of housing that this neighborhood desperately needs. The area is way too expensive, and we need to add as many units as possible. It's great that the city is exploring a higher option for even more housing.

1 (ME-1)

Could we reduce some of the retail? Sure. The reason why projects end up with retail and office is because the fees that we put on housing and the delay and the risk means that they need to mitigate that by adding in jobs. And so if you want to see better balanced projects that have a better jobs-to-housing ratio, you need to think creatively about how our policies are creating this output. We can see less retail and less office, if we make these projects easier to build, if we do modular, if we bring down costs. Those are all things that this body can pursue.

Additionally, I would like to say that I celebrate New Years more than I celebrate Christmas. And so, therefore, I would strongly oppose the delay tactics that interfere with my right to celebrate New Years, because I think that it's very important. New Years is actually something everyone celebrates,

2 (GC-3)

not just Christians, and so it's much broader.

We just had hearings all through the Hanukkah holiday, and I actually didn't see anybody demanding any delays based on the celebration, a much longer event, of Hanukkah. I didn't see anybody demanding delays. I think that these delay tactics are silly. These people have a lot of time on their hands. We see that they are spending hours at these hearings, reading the EIRs, and we can, in fact, move quickly. Thank you. 2 (GC-3) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please. And I'll call a couple more names. Zarin Randeria, Perviz Randeria, Kathy Devincenzi, Holly Galbrecht, Joe Scaroni, Rose Hillson, Susan McConkey.

MR. YUEN: Good afternoon. My name is Alex Yuen. Personally, I'm a nearby resident who grew up not far from this site, and I've passed the site countless times in my life. Professionally, I'm an architect and urban designer. In this role I've always wondered what was going on in this existing building and how this site's position within the city has never been fully taken advantage of, due to its silent nature. I-Yuen 1 (ME-1)

I believe that the proposed plan on the site serves two main purposes: Primarily it provides housing for a city in desperate need for it, but that is clear.

Secondly, I believe that the proposal creates the opportunity for an urban node that attracts users from adjacent neighborhoods and has the ability to draw residents from one neighborhood to another in a way that it currently does not.

All cities need housing, but healthy, usable open space like the team is suggesting separate the best cities from the rest. If anything, I encourage the development team to maximize the potential of this site as an urban amenity in an environmentally beneficial manner that includes preserving existing trees and offsetting impacts of parking.

In conclusion, I would like to echo other speakers' requests to extend the window for public comment. However, I also believe that the Draft EIR sufficiently studies the potential environmental impacts to the neighborhood while providing housing for a city sorely lacking it, while also providing an urban amenity that would be of use for the adjacent neighborhoods and the city at large. Thank you.

1 (ME-1) cont'd

2 (GC-3)

3 (GC-1)

PRESIDENT HILLIS: Thank you. Next speaker, please.

MS. RYAN: Good afternoon. I had the pleasure of being here last year for the Lucky Penny, and that project went through. And I think it went through, in a

way, because of neighborhood consensus. I'm a neighbor. I've lived in the area for over 30 years. I was born in the city. And we're looking forward to the 95 units that Lucky Penny is building. We're also looking forward to the housing that this project brings.

I-RyanC 1 (ME-1)

What we request, though, is an extension for this Draft EIR. To put it out Thanksgiving and then ask for something by the end of the year, it's a busy time for a lot of people. So two weeks, we're respectfully hoping, is reasonable.

2 (GC-3)

My name is Colleen Ryan, and I appreciate this opportunity to be heard. I hope that you'll hear our concerns and that they'll resonate with you, with this commission.

We support the housing, as I've said. We welcome the change. We're concerned, though, the amount of retail, the developer making the profits. And also I know, having been here last year, that I think there are people at this event to speak who are being paid, who are not part of the neighborhood, and whose only skin in the game is to create certain -- I don't even know the word.

3 (ME-1)

As mentioned today during Agenda Item 9, one of the goals of the city staff was to keep what makes a neighborhood special. And,

4 (ME-1)

frankly, our neighborhood is special. We feel that this site is very iconic. I walk my dog there. My kids have played on the lawn. My mom runs around there and loves the views, and just walking around and greeting her neighbors. So we really hope that that sense of community and neighborhood specialness can be kept. 4 (ME-1) cont'd

We appreciate your time and look forward to hopefully the community preservation idea going through since it keeps the housing, drops the retail, and lessens the impacts of seven to 15 years of construction. Thank you for your time. 5 (AL-2)

PRESIDENT HILLIS: Thank you. Next speaker, please.

SECRETARY IONIN: I would like to take this opportunity to remind members of the public that this is the Draft Environmental Impact Report and we are here to review the -- accept comments on the adequacy and accuracy of that document, not the project itself. O-LHIA6

MS. RANDERIA: I am Perviz Randeria and I also want to strongly urge that you, as a commission, to grant the 15-day extension for the Draft Environmental Report because it is quite complex and it's a lengthy document. 1 (GC-3)

I also fully support the community full preservation residential alternative for 3333 California 2 (AL-2)

because it takes into consideration the need for housing more than anything related to retail space, and also that it preserves the historic significance and characteristics of the neighborhood. Thank you. 2 (AL-2) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please.

I-McConkey

SPEAKER: Hello. Thank you for giving us the opportunity to talk to you. I also live in the neighborhood, like a lot of the people here, and I support increasing housing in San Francisco very much. 1 (ME-1)

The only thing that I do not want is more retail, because we have a lot of it on Sacramento, Masonic, Geary. People can just walk to that. Right now as I was coming to city hall there was already congestion on Euclid with ten cars trying to get through to Laurel and Euclid intersection. And this was at noon. Can you imagine what it's going to be like when you increase retail and more apartments there?

I strongly urge the planning commission to grant us a 15-day extension due to the complexity of the document, and hopefully we will grant that. Thank you very much. 2 (GC-3)

PRESIDENT HILLIS: Thank you. Next speaker, please.

SPEAKER: Thank you, commissioners. Good

afternoon. I really appreciate your time and listening to us on 3333 California Street. I have four points I'll make in just quick succession here. I-Scaroni

I am a 40-year resident of Laurel Heights, very near the project. I also want to strongly encourage the commission to grant a 15-day extension for this DEIR review. It is a lengthy and complex document, and ending it right in the middle of the holidays is difficult for everyone. 1 (GC-3)

Number two, I fully support the community full preservation residential alternative for this site, unlike the speaker three or four before me who is constantly here at these hearings, suggesting that we're all NIMBYs; that is just not the case. 2 (AL-2)

Like one of my neighbors, I was involved in the Lucky Penny project a year ago, and it was really due to that developer listening to the neighbors that we got that through. And 95 units are now going up. I'm happy to report, as I walked by the site just a day or so ago, that construction has begun a year later for that. 3 (ME-1)

And what disturbs me, and it was said again by the developer earlier this afternoon, that they've had some 140 meetings from some kind of count they keep with the neighborhood. That has just not been our experience, for many people. 4 (CEQA-1)

In fact, it's just the opposite. I don't believe the developers have engaged with the neighborhood in a meaningful way to come to agreement and not delay this housing we so desperately need. 4 (CEQA-1) cont'd

We are in support of the same amount of 550 -- 552, is it -- 558 units or the 744 alternatives. We want that to happen. And it can happen in the three years instead of perhaps a lengthy delay of seven to 10 years to get this done. So I appreciate your time and consideration. 5 (AL-2)

PRESIDENT HILLIS: Thank you. Next speaker, please.

I-JohnsonCh

MS. JOHNSON: Hi, my name is Chris Johnson. And I'd first like to say I support what my neighbor just said entirely. And I won't take the time to repeat what he just said, but I would like to ask for the commission to grant an extension for the comments on the DEIR. I'm a homeowner, along with my husband, in Jordan Park, and it is a humongous project with lots of legs and things to study and I would appreciate additional time. Thank you. 1 (ME-1) 2 (GC-3)

PRESIDENT HILLIS: Thank you.

MS. THOMSON: Hi, and thank you. I'm Joanna Thomson. I'm also a resident of the neighborhood that will be, hopefully, positively impacted by the addition I-Thomson 1 (ME-1)

of housing. My family and I live within blocks, and I've lived in the neighborhood for almost 20 years. 1 (ME-1) cont'd

I would really appreciate an extension. Having book-ended the time period between Thanksgiving and the Christmas holiday, it is a very complicated, complex document, and we have tried to read it and need more time to make comments. We hope that you will grant that. Not withstanding anybody's personal preference about holidays, it's a busy time of year, and it would be great to have more time. 2 (GC-3)

I also want to echo what a couple of other speakers have indicated, which is that, as a proud homeowner in this neighborhood, we are desperate for more housing, for all different income housing. We would love for friends and people from across the city to join us in this neighborhood; we just would like to see it done in a way that benefits the neighborhood. 3 (ME-1)

We listened closely today to the Mission, outer Mission and Excelsior conversations about how important it is to be able to maintain some character that draws and keeps people there. And at the moment, we are concerned about the small business owners that will absolutely get pushed out.

After a multi-decade career in sales marketing and business development, myself, I

want to applaud the Prado Group for their excellent presentation, but I don't think that augmenting what the small business owners are doing is actually an accurate depiction.

We do hope that you will give us a couple of more weeks, and we really look forward to coming to closure and bringing more housing in. Thank you. 4 (GC-3)

PRESIDENT HILLIS: Thank you, Ms. Thompson. Next speaker, please.

MS. DEVINCENZI: Please.

PRESIDENT HILLIS: Overhead, please. All right. There it is.

O-LHIA3

MS. DEVINCENZI: President Hillis and commissioners, I'm Kathy Devincenzi, President of the Laurel Heights Improvement Association. This commission, as the decision-maker that's responsible for preparing and certifying the EIR, is authorized to grant a 60-day comment period to January 7th, but the department has only given a 45-day period. And you don't need special circumstances for a 60-day. 45 is the minimum required because this had to go to the state clearinghouse as an area-wide significance project with over 500 housing units. So they only gave us the minimum. 1 (GC-3)

And it's not fair to the public to release a 2 (ME-1)

Draft EIR on a 10-acre project with a seven to 15-year construction period during this time of the year, especially in view of the community opposition to the developer's concept. Over 800 residents have signed a petition against his concept but supporting the housing component. 2 (ME-1) cont'd

So we've worked successfully with the Lucky Penny and the CPMC, and we had a role there. But despite all the meetings with this developer, when we asked him in the supervisor's office what the project was before he went public with it, he said, "This is not a negotiation." And the community is supposed to have a role in planning when there is a major rezoning asked for. 3 (CEQA-1)

Now, the EIR admits that the project would have a significant impact on the historical resource by destroying most of the landscaping, half of the building, and cutting a hole in it. 4 (CR-2) It would also have a significant construction noise impact that's unmitigable 5 (NO-1) and significant traffic impact which they say they'd mitigate by cutting the retail parking. We think that is bogus. 6 (TR-4)

I attended all of the public meetings, and UC and the developer concealed the historic significance of the site from the public. Our association nominated 7 (CR-1)

it as soon as we learned, and it's now listed on the California Register. Last week the San Francisco Historic Commission expressed strong support for the resource, and also wanted to know more about our alternative.

The Fireman's Fund corporate headquarters and landscaping and building are an integrated composition that was designed to complement each other and promote the seamless integration between indoor and outdoor spaces. No employee was to be more than 40 feet from a window. 7 (CR-1) cont'd

Our community preservation alternative is better because it would have the same number of housing units and it would preserve the landscaping, the 115-foot cypress tree that's a holdover from the cemetery. And we ask that it be evaluated in the same degree of detail as the other alternatives in the EIR. 8 (AL-2)

Alternative C, their preservation alternative, has 26 less housing units and it's unreasonably configured to have less. 9 (AL-3)

So we hope for the extension. And I have a handout. 10 (GC-3)

PRESIDENT HILLIS: All right. Thank you very much. Next speaker, please.

I-Galbrecht1

MS. GALBRECHT: My name is Holly Galbrecht. I ↓ 1 (GC-3)

live one block from 3333 California, on Presidio Avenue. I would like to request a 15-day extension. And I fully support the community full preservation alternative, and I support everything the last speaker, that Kathy said. Thank you. 1 (GC-3) cont'd 2 (AL-2)

PRESIDENT HILLIS: Thank you. Next speaker, please. Ms. Hillson. And I'll call some more names. MJ Thomas, Sonya Dolan, Tina Kwok, Abe Lee, Kelly Roberson, Debra Seglund, and Anne Harvey.

MS. HILLSON: Hi. I'm just waiting for a reset.

PRESIDENT HILLIS: Go ahead. You'll get extra time. Keep going.

MS. HILLSON: Good afternoon, commissioners. In regards to the adequacy, completeness and accuracy of the DEIR, getting back to the subject of the matter -- however, I do have to throw this line in: I urge that the 12-24 DEIR deadline be extended 15 days. I-Hillson1 1 (GC-3)

I would like the overhead, please. As you can see from -- thank you so much to the planning department for providing this picture. It is the site of the existing property. Over four decades ago, the Chronicle described the site as having "pleasant green lawns and plantings that enhance the handsome low lines of the simple building designed by Edward B. Paige," unquote.

The DEIR does not mention that the cultural 2 (GHG-1)

resource of remnant large mature trees from Laurel Hill Cemetery that were incorporated into the Fireman's Fund building site as historic character-defining features are work horses in mitigating greenhouse gas emissions. Planting small trees over a span of 15 years, as if that would provide equivalent or reduced greenhouse gases from thousands of vehicle miles traveled associated with the new retail uses to negatively impact everyone's health is very concerning. 2 (GHG-1) cont'd

As you can see from this diagram, you'll see Masonic Avenue here and Pine Street from downtown. Three lanes one way will be heading pretty quickly up that hill towards Euclid Avenue. There's already a lot of vehicles that go through there, and I don't think this has been adequately studied along what I just said. 3 (TR-3)

Historically, the site was designed to have commercial on California only. I have some records from Chronicle. The Jordan Park Improvement Association Board opposes the retail on the Euclid side. I would submit this less than 150-word summary according to Sunshine 67.16 for the minutes. Thank you so much. 4 (ME-1)

PRESIDENT HILLIS: Thank you. Next speaker, please.

I-Roberson1

MS. ROBERSON: Hello. I'm Kelly Roberson and I strongly urge the commission to grant a 15-day extension 1 (GC-3)

of the due date for comments on the DEIR. It's a lengthy document, and we need some time to process it. 1 (GC-3) cont'd

I specifically wanted to speak to the point of construction duration. Fifteen years, seven years, seems crazy to me. So I did a few things. I just looked up a few other buildings that had similar unit counts. This is the NEMA Building. It's at 10th and Market. It has 754 units. Construction started in November 2011 and completed in March 2014. So that's less than three years. 2 (PD-1)

The two towers at Rincon near the Embarcadero were 709 units, started in July 2012, finished August 2014. Less than three years.

The Paramount Building, Mission and 3rd, 495 units, started in 2002 -- sorry, started in 2000, completed in 2002. That's less than three years. All of these projects, soup to nuts, done. Obviously, we have very competent construction companies in San Francisco; I'm sure they can manage it.

Okay. So, in addition, most people in our neighborhood would very much like to maintain the height limits in the existing zoning. There's a 40-foot height limit, and in the neighborhood full preservation alternative, these height limits would be maintained. That avoids significant shadowing at sunrise and sunset 3 (AL-2)

4 (WS-2)

on the east and the west sides of the site because the existing residences, apartments, neighborhoods, houses, will be affected by shadowing at the extreme ends and beginning of the day. 4 (WS-2) cont'd

The Victorian character of our neighborhood should be maintained. And we prize it small scale residential qualities, but, you know, we can embrace new housing too. I think we can all work together. 5 (ME-1)

If the proposed retail component is added, we're subjected to many additional car trips resulting in additional traffic congestion on already narrow streets. This is kind of problematic. And our neighborhood already has one large residential -- or one retail shopping center at Geary and Masonic. And the Target store, I think, really has our big-box needs, retail needs, covered.

So thank you for your time. I appreciate it. I hope you have a good afternoon.

PRESIDENT HILLIS: All right. Thank you, Ms. Roberson. Next speaker, please.

MS. THOMAS: Good afternoon. My name is M.J. Thomas. I have lived in San Francisco all my life, except for ten years. I have lived within half a mile to a mile and-a-half the entire time during that period. Right now it's closer to less than half a mile.

O-LHIA7

I strongly urge the planning commission to grant a 15-day extension for the DEIR. I am in favor of retaining zoning as residential only. That was the intention originally by the gentleman who developed Laurel Heights as well as Antivista Heights. He was going to develop this area; unfortunately, he died before that happened. 1 (GC-3) 2 (PP-1)

I am not in favor of seven to 15 years of ongoing construction, 50,000 square feet of commercial space, 50,000 square feet of retail, and carving under much of the hill for a three to four-story garage with exits onto Presidio and California, which is already a 3-ring circus, or out towards -- on Laurel, which is opposite one of two exits of the Laurel Village parking lot. 3 (PD-1) 4 (ME-1) 5 (TR-7)

I am against chopping the building in half. And this building is part of the California historic site. And I am -- the plan was to raise the sections, the other two sections, by two or three stories, so I do not concur with that. 6 (CR-1)

The present plans are ludicrous and, to my mind, will be San Francisco's great urban real estate tragedy of the 21st century. Please consider the same alternative plan. 7 (AL-2)

Also, to point out, we're going to have a lot 8 (CU-1)

of action in that particular neighborhood because two blocks away in 2019 Children's Hospital will be torn down and there will be 307 units developed there. So that's something to consider, that we are not without new housing. Thank you. 8 (CU-1) cont'd

PRESIDENT HILLIS: Thank you, Ms. Thomas. Next speaker, please.

I-Dolan

MS. DOLAN: Hello. My name is Sonya Dolan, and I strongly urge the planning commission to grant a 15-day extension to the due date for the comments on this DEIR. 1 (GC-3)

In addition, I'd like to say that the community full preservation alternative will protect the retail in Laurel Village and on Sacramento Street where I live. 2 (AL-2)

More retail is unneeded, unwanted, and will compete directly with the small businesses already in place. 3 (ME-1)

The addition of a large retail area will add an immense amount of traffic and congestion. Both California and Pine and Masonic Streets are used to get across the city. The proposed project would put a huge snarl into these thoroughfares. That's not to mention noise, light, and air pollution it will add to the very lengthy construction period and after. 4 (TR-3) 5 (NO-1) 6 (AQ-1)

If you have not visited the area, it is truly a neighborhood in the traditional sense, and the proposed 7 (AL-2)

construction would destroy that aspect. My husband and I have lived across from the proposed site -- we can see it from our window -- for eight years, and we fully support the community full preservation residential alternative for 3333 California. Thank you. 7 (AL-2) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please.

I-Kwok2

MS. KWOK: Good afternoon, my name is Tina Kwok. I live in Laurel Heights, and I strongly urge the planning commission to please grant the 15-day extension for the due date of the comments of the DEIR. It is a lengthy, complex document and we're in full force into the holidays. Thank you. 1 (GC-3)

I support additional housing and the Laurel Heights community alternative plan for the development of 3333 California Street, a 10-acre site. It projects a three-year plan build-out rather than the seven to 15 year planned construction time. One can imagine the noise, traffic, congestion, dirt, pollution in the air and on the ground that this would make the neighborhood go through. 2 (ME-1) 3 (AL-2) 4 (GC-1)

Millions of tons of dirt to be excavated. The construction takes almost half of a generation, assuming the 15-year build-out proposal. If you have a toddler in your household, similar to the gentleman earlier here 5 (PD-1)

who was supporting the site, this toddler will be in college by the end of this project. 5 (PD-1) cont'd

And San Francisco needs housing right now, not to wait for 15 years. San Francisco has a need for housing now. Please consider that. I'm sure that people don't want to wait that long.

The construction period also brings congestion and chaos to the major commute route which is California Street, Pine Street, Bush, Euclid, to and from the Richmond area, not just for the Laurel Heights, Jordan Park, Presidio Heights area. 6 (TR-6)

The segment of Euclid Avenue on this site that is planned for retail is hilly and windy, and, you know, I'm sure you've driven past it. People with dogs have walked past it. And in my personal opinion, it's not conducive to a leisurely casual, strolling shopping afternoon. 7 (ME-1)

I support the preservation of this site for significant historical architectural reasons as well as preservation of the 180-plus rare species of trees.

My husband and I call the houses on this 500 block of Laurel Street across from the site "The mid-century ladies," fondly, just as others fondly refer to "The painted ladies" on Alamo -- across from Alamo Park.

I urge the commission to, again, please consider the time extension. Thank you very much. 8 (GC-3)

PRESIDENT HILLIS: Thank you. Next speaker, please.

MS. GLICK: Good afternoon, Commissioners. My name is Linda Glick. I'm a resident --

PRESIDENT HILLIS: Just pull the mic over to you so we can hear.

MS. GLICK: I'm a resident of San Francisco for 49 years and a resident of Laurel Heights for the past 15 years. Before I begin, I, too, urge you to consider a 15-day extension of the due date for comments of this DEIR due to its length and complexity. I-Glick1 1 (GC-3)

Today I'd like to explain the history of the restrictions placed on the site by the planning commission and the community use of green space as a park. The same developer who built Laurel Heights residential tract in Antivista, was going to build a residential tract on this site, but he died. The school district acquired the property for a possible site for Laurel High School, but decided to locate that elsewhere and sell the site. The district could get 50 percent more money from the sale of it if it could rezone it from first residential to commercial. 2 (PP-1)

The district went through its first attempt at

rezoning due to community opposition, as can be seen here. Finally, a deal was struck with the community that resulted in restrictions stated in Resolution 4109 that include 100-foot landscape setbacks along Laurel and Euclid Streets and a ban on retail uses of this site.

Under Planning Code Section 174, such stipulations as to character of improvements become provisions of the planning code and can only be changed by the board of supervisors. The EIR identifies the concrete pergola atop a terrace planting feature facing Laurel Street as a character-defining resource -- defining feature of the resource. The EIR explains that it's characteristic of mid-century modern design. The use of patios, pergolas, and interior courtyards created a welcoming transition area where the inside and outside merged.

Through the years, the community has used the green landscape spaces for recreational purposes, and a lawyer has stated that the public has acquired permanent recreational rights on the green spaces.

There's a lot of talk about preserving neighborhood character. Laurel Hill has always been a place where neighbors gather, children learn sports from their parents, and a community is formed. These community bonds will not be formed along meandering concrete

2 (PP-1) cont'd

3 (CR-1)

4 (PD-5)

5 (PD-3)

pathways. 5 (PD-3) cont'd

I and the entire community strongly support our full preservation alternative that protects these cherished historic features of this important and iconic site. Thank you. 6 (AL-2)

PRESIDENT HILLIS: Thank you. Next speaker, please.

MS. SEGLUND: Hi. My name is Debra Seglund. I'm a -- I live about one block from the new proposed site. I-Seglund And I, like everyone else, would strongly urge the planning commission to grant a 15-day extension of the due date for comments on the Draft EIR. It is a lengthy and complex document. 1 (GC-3)

My concern environmentally has been regarding traffic. I would like to ask that retail and the office sections of the plan be eliminated. The traffic estimates by our neighborhood group has said that there will be 12 to 15,000 visits in our neighborhood to use those services a day. And, to me, 12 to 15,000 sounds enormous. 2 (TR-3)

And living already in that area, we already have a lot of traffic problems and parking problems, and I just can't envision more retail and office use. So -- and in regard to retail, we have the Laurel Village. We have so much. There's not a service that we don't have. 3 (ME-1)

There's not a restaurant or anything of that type that we need. It's all in our neighborhood. So I can't -- I think we'll have open areas. Already Mayor Breed is trying to help in our city people finding ways to use brick and mortar places because they're not being utilized, so would we add more square footage to that problem?

3 (ME-1) cont'd

So, anyway, I do support our neighborhood alternative plan, and I hope you will consider removing the retail and office areas. Thank you.

4 (AL-2)

PRESIDENT HILLIS: Thank you. Next speaker, please. And I'll call a couple more names. Arielle Mouller, Michael Coholan, Adam McMichael, Joe Catalano. Go ahead.

MS. HARVEY: Good afternoon. My name is Ann Harvey. My senior citizen husband and I have lived in San Francisco since 1976 both as renters and homeowners. Our two sons were born here, raised here, grade school, primary school, high school, on to college and grad school. They're both young professionals. They both want to live in the city and have their homes here. We've had -- our home's multi-generational too, was taking care of my parents, and we also take in students.

I-Harvey2

We were very excited to hear that this property was going to be developed. I know intimately I don't

1 (ME-1)

live right near there; I live down the way in Cow Hollow right now. But we've lived in the Western addition; we've lived on Lake Street. I'm totally familiar with this area, and I think there's real opportunity here where we can plan something nice and wonderful for the city. What I'm seeing proposed is, frankly, awful. 1 (ME-1) cont'd

One son's a physician, one's an economist. They want to raise their families here. They want -- they're upset about prices in the city and they want a place where they can raise their family. We always thought about moving out of the city for a while, but we stayed here. We raised our family here. They went to nursery school. They could walk home, and they were safe.

And when I'm seeing what's being proposed here, I'm sick. And I listened to what Mr. Safier said about not being walkable. I walk that area all the time. I'm 70 years old and I walk up that hill and down the hill. I walk home. 2 (ME-1)

What was I going to say? I support the extension to, if you want, written comments. It's worth the time to be able to digest the draft -- Draft EIR, whatever it is. Anyways, people talk about architecture. Well, this is not just buildings, it's landscape, one ball of what's together. 3 (GC-3) 4 (ME-1)

And I thought -- I don't know who designed this

thing, but they should -- I was here when the preservation commission was considering this project and what about the history and the landscape, and I thought Mr. Pearlman really listened closely to what was going on. And they need real help and designs, what really works. And take into consideration some of this stuff about walkability. Maybe they should consult with him. Thank you very much. 4 (ME-1) cont'd

PRESIDENT HILLIS: All right, thank you, Ms. Harvey. Next speaker, please. And I've called all the names I have with cards, so if others would like to speak, please line up on the screen side of the room. Welcome.

I-Moulller

MS. MOULLER: Hi. I'm Arielle Moulller. I live On Euclid, and I'm really much in support of more housing as much and fast as possible. So I'm here in support of the Prado Project. 1 (ME-1)

That said, I had never heard of the community project before. I don't know if it's in the documentation, and I'm sorry if I missed it in the EIR. 2 (AL-2)

If that's the fastest way to build, sure, I would be very much in support of the community program. I don't know if they have secured a developer yet, and I know it's really hard to secure one without retail attached to the project, but if that's the case, that

might be a faster way. Otherwise, if that's not possible, the fastest way may be to accept retail on site. 2 (AL-2) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please.

MR. CATALANO: Could we possibly get that activated?

PRESIDENT HILLIS: Yeah, it will come up. Go ahead. Just start speaking.

MR. CATALANO: Hi. My name is Joe Catalano. I live at 3320 California Street, directly across the street from the project's proposed retail. O-CSHG2 My wife and I represent a group of 40 homeowners and residents who live on that block between Laurel and Walnut, on California Street. 1 (GC-1)

The Draft EIR fails completely to recognize the impact of this project on our group. The developer has been attentive to our interests. We have met with him on several occasions. They have listened to us. Now is the time for the developer, the commission, the department, and the city to recognize the specific and unaddressed impacts that this project, in its current form, will have on our neighborhood.

We are 40 residents. In addition, there are 11 other neighborhood occupants whose garages enter by 2 (TR-7)

backing into California Street between Laurel and Walnut. Right now, that's a hazardous proposition with the construction proposed, with the development proposed. It will be become basically untenable. The Draft EIR does not address this. It obviously, then, can't mitigate something it hasn't addressed. 2 (TR-7) cont'd

The proposed intrusion of a lane for construction purposes on California between Laurel and Walnut will constitute a taking of available parking currently, which would last for years. 3 (TR-6)

The proposed imposition of a commercial loading zone on the street side of California Street, rather than putting construction staging and construction loading and commercial loading within the confines of the project is unacceptable, an intrusion, and taking of existing property interests. 4 (TR-10)

The Draft EIR does not address, nor does it adequately mitigate because it doesn't address, the effect of taking the streetscape away and taking the view you see in the overhead and putting it behind the project's walls. 5 (CEQA-2)

The requested zoning between California and Laurel to 45 feet instead of the currently permitted 40 feet is an unacceptable denial of light and air and will create shading on the residents who share our perspective. 6 (WS-2)

So I want to join those who have asked to get an additional 15 days, not just for the reasons stated, but also to continue the dialogue that has existed with supervisor Stefani and with the developers. 7 (GC-3)

PRESIDENT HILLIS: Thank you very much. Next speaker, please.

MR. MUNNICH: I'm just using your handout. Thank you.

My name is Ed Munnich. I don't live in the neighborhood. I live in the Richmond at 568 Balboa. And we very much wanted to live in this neighborhood. My wife was working at Mt. Zion Hospital -- or Mt. Zion campus of UCSF at the time. I work at USF. We don't own a car. We walk and use transit. And this was an area, as many of the neighbors have pointed out, where there were a lot of -- all the stores we needed were within walking distance. There was transit available. And what was really frustrating was that, even with a physician and a professor's salary, we weren't able to afford to live in that area.

What I understand of the EIR, I think it's a very thorough process. There's been much public comment on the EIR, and I would just like to say we really need this housing. We live in the Richmond because we couldn't afford this area. And I hear the neighbors

O-YIMBY2
1 (GC-1)
2 (ME-1)

talking about how much they love their community. But, honestly, when I look at this picture, this campus doesn't look anything like the community around it. When I walk by there, there's a street grid everywhere around it except here.

This was a mid-century architectural development in the same way that -- the mid-century they were planning to put freeways through Golden Gate Park. Thankfully, our city didn't take that direction.

And I really hope that you consider the overall effects on the city. And I would just assure the neighbors from the neighborhood -- you're probably pissed off at me for saying what I'm saying; I don't live in your neighborhood. But when it's time to build in the Richmond, especially on the Geary, Balboa and Fulton corridors, I'll be here speaking for those projects as well.

And I understand the environmental impacts of the noise, and we're all going to have to do that, because I'm committed to the people of San Francisco. I'm committed to the people who made this city what it is, the creative people, the people who are being displaced from their housing. And the environmental impact that this is not having -- it's not displacing anyone. There's no housing being lost to build this.

2 (ME-1) cont'd

3 (NO-1)

4 (PH-1)

There's no rent controlled or affordable housing being taken out to build this, unlike many projects around the city. 4 (PH-1) cont'd

So I would just urge you, please, to move forward on this. 5 (ME-1) If you do give extra time for comment, I'd like to hear specific concerns with the EIR. I haven't heard that many today, except that we're all going to have to deal with some construction noise if we want the city to be the vibrant city that it is. Thank you. 6 (GC-3)

PRESIDENT HILLIS: Thank you. Next speaker, please.

MS. MASSENBERG: Good afternoon, commissioners and staff. I'm Maryann Massenberg. And I have lived a hundred feet from the proposed site for -- since 1972. We've lived in one of the small houses that was on the outskirts of the city cemetery when this was the cemetery site. And the row of houses on Laurel were actually built for low-income cemetery workers, just to give you a little historical perspective.

I-Massenburg

I'm going to address the EIR in a moment, but I also want to remind us that we absolutely need more housing; we're in support of more housing. But we need and need to stress affordable housing. We don't need more housing for rich people. So we very much are looking forward to hearing from the development group 1 (ME-1)

about affordable housing.

Turning now to the EIR, I share the concerns about the construction noise, the air pollution and the duration of the construction of the currently proposed project. I have concerns, too, about the open space, but mostly I want to address parking and the parking deficit and traffic congestion we already have in the neighborhood.

Having lived in the neighborhood for 46 years, we've seen increasing congestion, even those of us with residential parking permits. Many of these homes were built before any parking requirements were made by the city, so many of them don't have garages or garages large enough, so most of us are looking for parking all the time on the street. And it requires -- over all these years, it requires many trips around many blocks. And often times we end up parking, even at night, three or four blocks away and then walking home from there.

If you go through the neighborhood, you see many people and homeowners and renters illegally parking across the sidewalk, for which we often are ticketed, and that's simply because we can't find parking. So we already have a significant parking problem.

And the EIR has a section which talks about a study in New York and New Jersey that proposes the

1 (ME-1) cont'd
2 (GC-1)
3 (PD-1)
4 (PD-3)
5 (TR-11)

premise that if you have fewer parking spaces and fewer garages, than people will have fewer cars and drive less. In the development of the neighborhood, the neighborhood has been built out over the last several years. There used to be lots of vacant lots.

There's been significant additional buildings on California Street across from the proposed site. That did not, in my experience, reduce the number of cars; it's only increased the congestion.

So I would ask you to consider, in the EIR, looking more closely at the number of parking spaces proposed. If there are that many housing units, we need more parking. I don't think it really bears out that there have been fewer cars, because we have fewer garages. And, you know, with all due respect, we choose to live in San Francisco, not in New York City. Thank you. 5 (TR-11) cont'd

PRESIDENT HILLIS: Thank you. Next speaker, please.

MR. SMITH: Good afternoon, commissioners. Cory Smith, on behalf of the San Francisco Housing Action Coalition. We have not formally reviewed this project yet, so we do not have a position. I do look forward to diving into the details when we have that opportunity ahead of the next hearing. O-SFHAC

So speaking more generally, there are a couple 1 (ME-1)

of alternatives there. We will encourage to you, we will encourage the project team as well, to maximize the amount of housing on this. We're talking about 744 total new homes for San Francisco families, for San Francisco young folks, people like me. And I think that's a really exciting opportunity. 1 (ME-1) cont'd

This is kind of nestled between Sacramento and California, but we're also a couple blocks away from Geary Boulevard. For people like me who are going to continuously advocate for a Muni expansion, either below ground -- I'm a big fan of the 15 feet above ground. It's a much easier and less expensive way to do light rail service across San Francisco. I realize we're not there yet, and it's really tough for a lot of people to kind of envision what that would look like. 2 (TR-9)

I plan on riding that subway, that Muni line at some point in my life right now on Geary Boulevard. And this will literally be about a block and-a-half away, and folks will be able to get downtown, and it's all kind of part of the longer vision of everything that we're going for.

A comment, I guess, on retail use. I live down on Masonic towards the other end, towards the Haight Ashbury, so I'm actually at this corner all the time. For those of us that drive up north on Masonic and then

you're right down Bush, that is the quickest way to get downtown.

Everything happening around the area is really, really cool. The Lucky Penny has been mentioned a number of times. So this is -- yeah it's going to be a new neighborhood. It's going to be a new community. And for all of the shops and businesses along that area, there's also going to be customers. So all the small business owners are really going to benefit from the increased amount of traffic, foot traffic that's going to be coming up and down in the area and, again, spending money at these small businesses. 3 (ME-1)

From the EIR itself and the environmental impact, it can't be stated enough that the number one threat to our planet right now is global warming, from a 30,000 foot big picture perspective. And if we don't build these 744 homes here, they are going to be built out in Modesto and Merced and Fresno, and those people are going to be commuting into the San Francisco Bay Area because this is a fantastic place to be, and that will end up putting more CO2 into the air. It will slowly, slowly, slowly continue to kill our planet, and that's what we're all trying to avoid. 4 (GHG-3)

We love the fact that all the neighbors are advocating for the streamline construction process. I 5 (PD-1)

hope that that can also apply to the permitting and approval process. So I echo all of them, and make this go faster. Let's build this faster. I think that's commendable, because everybody does understand that we do need more homes for people to live in. 5 (PD-1) cont'd

And, of course, to close, in reference to the Draft EIR itself, I ask you to look at it through the lens of the quality of the EIR and not the project itself, which we will have a hearing on in the future. Thank you.

PRESIDENT HILLIS: Thank you. Next speaker, please. And if there is anybody else that would like to speak, now is your time. Please line up on the screen side of the room.

I-Varrone

MS. VARRONE: Yeah, hi. My name is Joan Varrone and I live directly across the street from the project at 3320 California Street, between Laurel and Walnut. And we are actually a residential neighborhood. I think no one has really acknowledged that, particularly when I read the Draft EIR and I look at what is being proposed. 1 (PD-2)

We are 40 different residential units. We have over 100 people living directly across the street, including probably 30 children or more, and elderly. And if you are elderly, you will die before this project is finished. You "may" die. Sorry. Not you "will" die.

The proposed time frame of seven to 15 years, not only will have a negative impact on our neighborhood, the neighborhood with the 100 residents. Let's not forget about those people that are directly across the street. But everyone here has mentioned how unconscionable it is that this neighborhood will be held hostage to a seven to 15-year construction period when, in fact, many people have recognized here -- because I've been here during the whole time -- that this does not have to take that long, and that the residential alternative which we support could be done in far fewer years. In fact, people have talked about three years. 2 (PD-1)

When we -- We've had many discussions with the developers, and we really appreciate that they have had those discussions. However, in those discussions when we asked how long will the development take, we were told two to three years, many times. So when I looked at the draft EIR, I almost dropped my teeth. Seven to 15 years, that is so unconscionable.

The other two things that are unique to our concerns that were not addressed in the EIR is the fact that the developers are proposing a commercial loading zone directly across the street from where these hundred people live and, all along, again, in discussions with the developer, they asserted that all commercial loading 3 (TR-10)

would be underground. Again, when we read the draft EIR, we were shocked to find that. And that loading zone would be there after the project is over. So this is not a temporary thing.

There was a mitigation suggested in the EIR which we think is not viable. They suggested, because of the traffic impact of commercial loading, that the loading happen before 7:00 a.m. and after 7:00 p.m. Well, if you're one of the hundred people that live across the street, that makes absolutely no sense. And I think what was ignored were the hundred-plus people across the street when you're considering a commercial loading zone.

3 (TR-10) cont'd

PRESIDENT HILLIS: Thank you very much. Thank you. Next speaker, please.

MS. ALSCHUELER: Hi. Good afternoon. My name is Donna Alschueler and I also live in the neighborhood. I just missed this entire hearing up `til now. I am very, very concerned that when the building is taken down, when the UC is cleared -- I'm extremely concerned about asbestos contamination. I do not know how that is going to be handled, but I just wanted to let you know. Thank you.

I-Alschueler

1 (HZ-1)

PRESIDENT HILLIS: All right. Thank you. Any additional public comment on this item? No? Okay.

Seeing none, we'll close public comment.

I just wanted to ask a clarifying question. On the 15 days, do we -- I mean, I would support extending this 15 days, but I don't think we have the authority to do it; I think only -- only you do. But we can encourage you to do it. Is that right, Ms. Gibson?

MS. GIBSON: President Hillis, I can answer that question. In fact, you do have the authority. The Chapter 31 of the Administrative Code allows for extension of the Draft EIR comment review period by either the environmental review officer or by the commission. And, you know, we've asked that that be by a vote for clarity.

And, if I may, I'd like to note that I did respond to a prior request for extension of this comment period for this Draft EIR, and I can explain the basis for my decision that, in fact, it wouldn't be warranted here. That's, again, my --

PRESIDENT HILLIS: Right. I agree. It doesn't seem like the most complex EIR. We've certainly seen projects that are a lot more complex in a lot more truncated time period. I think the holidays caused some concern. This project is going to take a while to get through the process. I don't think 15 days is going to -- is going to be a factor. So I would

support the extension, but I get your rationale and agree with it.

And then there was discussion of the community alternative. I think it was flashed quickly by Ms. Devincenzi, but I haven't seen anything. Do we have this alternative?

MS. GIBSON: According to staff who have been reviewing the comments that have come in, we don't recall receiving that yet. Of course, the comment period hasn't yet closed, so we hope that we will receive some more information about that.

PRESIDENT HILLIS: Okay. And, Ms. Devincenzi, do you have that? Do you want to submit that to us at this point? I mean, it would be great. It seems like a lot of people have seen it and have commented on it. It would be great to have it.

MS. DEVINCENZI: So we have a draft of it and we're going to submit it. We had asked that this be postponed to put our alternatives --

PRESIDENT HILLIS: I get it.

MS. DEVINCENZI: -- EIR and it wasn't done.

PRESIDENT HILLIS: Right. But if you have it --

MS. DEVINCENZI: -- submit it as comments.

PRESIDENT HILLIS: Okay. But it would be good to get it. It seems like a lot of people have seen it

and we haven't, staff hasn't, the developer hasn't --

MS. DEVINCENZI: I just put it out last night and I have to do a little more checking and there are legends that go with it.

PRESIDENT HILLIS: Okay.

MS. DEVINCENZI: We just have the drawing. There are legends how many housing units and things, so it's not finished yet. But we will get in there and --

PRESIDENT HILLIS: But there's a lot of support for it, so it seems like people are supporting it, but if nobody's seen it, I don't know how they're quite supporting it. But I get you.

MS. DEVINCENZI: We just got the drawings last night, sir. We're working as fast as we can.

PRESIDENT HILLIS: Okay. Thank you very much. So we'll open it up to comments on the DEIR. Commissioner Moore.

A-CPC-Moore

COMMISSIONER MOORE: The document as constructed is accurate and well set up. It follows pretty much of what the department has done. I think it is thorough, except where it comes to process. And I will repeat what I have said in different circumstances. I think projects of this size have been recommended to be introduced to the public and to the commission in public hearings with soft presentations and introductions of

1 (GC-1)

2 (CEQA-4)

the project which, in this particular case, again, has not occurred.

I'd like to remind the commission and the public how smoothly 1 Oak, the Goodwill site, India Basin, Shipyard 2, Schlage Lock, Lucky Penny and CPMC ultimately were in these huge EIRs because they were properly introduced to this commission and to the public who were interested in a manner that let public dialogue, commissioners' feedback of questions shape alternatives in a manner that they are not as clashing sitting here as today's comments indicate.

While many of the comments are not necessarily in response to the customary questions that DEIR hearings require, it was quite obvious that the community has comments and concerns that should have been flushed out in meetings where the commission themselves would have participated in hearing them.

So, that said, thank you, President Hillis. I would definitely ask for a 15-day and support a 15-day extension, because it is only through today's presentation by the developer that more clarity was brought to what's intended than what the document, even after very careful and painful reading, allowed me to gather.

And I'm a pretty good reader and quite versed

2 (CEQA-4) cont'd

3 (GC-3)

4 (PD-3)

in reading EIRs, and I'm quite versed in reading drawings, many of which were missing in this document. There were more elevations and sections than a proper description about the project and its planning diagrams and urban design intentions. 4 (PD-3) cont'd

Moving on -- sounds like a negative comment -- I'd like to speak about process and encourage people in the future with large projects to bring these projects as they develop, because this is the most futile ground to get what you ultimately need to go through the EIR and the environmental process, which is complicated. This department knows how to do that, except they can not fully respond to the community's feelings that you so very much brought to the table today. 5 (CEQA-4)

Onward. I made a couple of notes here. When I hear the concerns about the length of suggested construction, project implementation, I would agree 17 years or whatever the accurate time frame is -- I heard a different number, but all of them are excessively long. 6 (PD-1)

The first thing I would ask is what is actually the phasing of this project? I think it's one of the most important projects -- most important questions, because the cumulative impact over extended periods of time in construction is more accentuated when it occurs over this length of time, and a healthy phasing diagram would

clearly allow people to understand what the actual impacts are, relative to their own location near the project. 6 (PD-1) cont'd

By the same token, I would be interested in seeing the EIR address cumulative impact on construction phasing and construction realization in the corridor, with the public mentioning that the large Children's Hospital's complex is being taken down in 2019. The demolition of that site and construction of a very large project on that particular site definitely has interactive cumulative effects together with what's intended here on the 3333 California Street site. 7 (CU-1)

I would be interested in a further examination how below-grade parking which, from an environmental visual point of view, is desirable, increases proportionately the cost of construction. And I would like to see that mirrored against the expressed need that was affordability on this site. 8 (PD-3)

The site already has particular issues which makes construction more complicated because it has significant topography which adds to construction costs. Adding completely below-grade parking will further accentuate that. I'd like the issue of affordability further examined.

I support President Hillis' comment on a community preservation alternative. I would like that 9 (AL-2)

to be visually added to the alternatives. I would like -- if at all possible, like to see that further evaluated. The seamless factor of the alternatives, as they're proposed, is a little bit disturbing to me because it is only about adding and subtracting pieces. There are not really any new ideas in the alternatives here, and this particular alternative may indeed add a completely different view on how the site is used and how the site lays itself out as a change in land use yet reflects adjoining community concerns -- for example, the location of retail, continued presence of office on the site, where retail is, et cetera, et cetera. 9 (AL-2) cont'd

I believe that single-sided retail on, for example, the Euclid Street side -- on the Euclid Avenue side, is very questionable. The site itself is more or less a freeway. I'm sorry to use that word, but that's just what it is. And single-sided retail on very busy commercial corridors have a very small survival factor. 10 (GC-2)

I see Commissioner Fong nod. And I like to use that empirical experience of where retail is strategically placed. That goes all around the site with a decline in retail corridors. Putting that much retail on all street frontages in this block is a question to me that I think creates a risk, a front end risk of retail of not succeeding.

So there should be a backup strategy, where we really want to support retail. Do we like to support retail intensification in Laurel shopping center, which is in front of this commission frequently? And do we expect more successful retail to be in the Sacramento and Presidio Avenue corridor? I'm just raising it as questions. I've spent quite a bit of time there. But the way at this moment the site is bordered in areas where it doesn't work, I would like the EIR to take a closer look at the realities of how we look at retail. 10 (GC-2) cont'd

I spoke about cumulative construction effects for Children's Hospital. 11 (CU-1) I spoke about support for the 15-day extension, 12 (GC-3) adding the community preservation alternative, 13 (AL-2) looking more closely at affordability relative to below-grade parking and affordability not being properly yet or clearly addressed in the document that's in front of us, 14 (PD-3) and generally about process. But that is not as much a specific DEIR comment, but is an invitation for you to invite that as we move into the future and hear other EIRs. Thank you. 15 (CEQA-4)

PRESIDENT HILLIS: All right. Commissioner Melgar. A-CPC-Melgar

COMMISSIONER MELGAR: Thank you. So to start off, I would also support the extension of the review 1 (GC-3)

period. But I am wondering if that gives you enough time, 15 days, to incorporate perhaps another alternative which we haven't even seen. So I'm actually interested in that alternative. I mean, I remember you guys worked pretty fast when we had another alternative for that Christian Scientist, you know, Church project. So I -- I haven't heard anyone in the comments talk about the existing building's architectural aesthetics, but I actually really like that building. I've always really liked that building. 2 (AL-2)

My dad was an engineer and he, you know, was partial to modern and house architecture, and it just reminds me of something that my dad would have worked on. So, I like the way the -- you know, it builds into the hill and the topography. And so I would be really interested to see what a preservation alternative looks like, if it actually works. 3 (AL-2)

And just from an environmental point of view, reusing something is always more environmentally conscious than knocking it down and building it new. So I'd be interested in seeing that.

So does 15 days give you enough time to do that with people's holidays and stuff?

VOICE: Probably not.

MS. GIBSON: The extension of the public

comment period for the Draft EIR allows more time for the public to comment. Following the close of that review period, then the planning department will prepare a Responses To Comments document, and the schedule for that will depend, in part, on the nature and complexity of the comments that we receive.

COMMISSIONER MELGAR: Okay.

MS. GIBSON: So we'll take whatever time we need to adequately respond to the comments that the public provides.

COMMISSIONER MELGAR: Awesome. Thank you. There are some things about the proposed project that I do like, you know. I know that we're commenting now on the accuracy of the EIR and the adequacy. I do think it's adequate and it's thorough. 4 (GC-1)

For what it's worth, you know, you brought up a point that I really hadn't thought about, Commissioner Moore, which is where the retail is and, you know, in terms of the traffic going in, too. So I will think about that more. 5 (ME-1)

I actually like having the retail. I particularly like the child care component. I think there is a very large shortage of child care in this neighborhood. I spend a lot of time there because I spend a lot of time at a JCC, and, you know, I can tell

you, those slots are very, very sought after.

So I think it's a good addition to the neighborhood. I would like to see some more flexibility about what type of retail goes in there. But I'm looking forward to having comments and having an extra period for those comments that come in.

5 (ME-1) cont'd

6 (GC-3)

PRESIDENT HILLIS: Commissioner Koppel.

A-CPC Koppel

COMMISSIONER KOPPEL: Yeah, thank you. We don't often see housing projects on or near the west side; we don't see a lot of housing projects in District 2. So it's just good that we're actually spreading out the housing, not just on the eastern side of the town.

1 (ME-1)

I definitely think this is an opportunity site. I visited the site recently. Ten and a quarter acres is a pretty large chunk that we don't see very often. I've frequented the neighborhood often and I've always looked at this site as a dead zone. You just don't go in there. I mean, anywhere that's that large that's surrounded by a brick wall, I mean, halfway around the perimeter, I'm just -- I'm not a big fan of right there. That says to me, "Stay out; you're not welcome."

The site to me is cold, uninviting, inactive, it has no retail, and it's way too car-oriented. This definitely has "opportunity site" written all over

it. I want to see as much done with this as possible. I do think the EIR, the Draft EIR, is fully adequate and accurate, and as far as I'm concerned, I want to make the most out of this site as possible. Thank you.

1 (ME-1) cont'd

PRESIDENT HILLIS: Commissioner Richards.

A-CPC Richards

COMMISSIONER RICHARDS: So I guess on the process, scoping document goes out, shows what the project sponsor's programming needs or programming desires are for the site, it has the layout and the map proposed. That's what we have here. And then the community should take a look at that and internalize that and say, "Here's our alternative plan," and maybe you would, at the time you did all this work, put that as, say a G or an H, or you change one of these alternatives. That's what the scoping process and scoping document is.

1 (CEQA-1)

2 (AL-1)

That all being said, it's a complex project, and I do support, as with Commissioner Moore and Commissioner Melgar, if there is a real viable alternative, I'd like to see it evaluated against the other alternatives.

The other thing is I think there is an inadequate alternative to the full preservation alternative. So I'd love to see, regardless of what it looks like, the project sponsor's programming needs in the full preservation alternative model. So would we

3 (AL-2)

have to go eight stories? How do we get all this stuff squeezed into that site with the full preservation alternative? We always say a full preservation, we have office, then residential. 3 (AL-2) cont'd

But what if we combined the two, B and C? What would that look like? Because we've got all these other alternatives that are different heights -- there's a lot of different variables, and it's hard to actually kind of compare them because you don't get the full programming one or the other; you get a partial, partial programming of that. 4 (AL-1)

That all being said, since the landscape is an integral part of the I guess the historic nature of the site, as soon as you start putting anything on the landscaping, you've already degraded or defaced it, so there is no real full preservation alternative. I think the real full preservation alternative is no project alternative, right, because we just leave it like it is. So I'm struggling with that.

I do support the 15-day extension. I do -- I do understand from a circulation point of view where the department was going with reimagining the street grid as it is. We've had several projects that have come before us that actually we kind of put the street grid back, the power plant, Pier 70, there's projects in Selma, 5 (GC-3) 6 (ME-1)

and several in the Mission where you have that mid-block alleyway that actually connects the street grid. And I think that's a very desirable thing, but it does actually have a negative effect on the building.

6 (ME-1) cont'd

You know, one of the other things for me is where else do we have these kind of office parks out there? So I used to work at HP on Deer Creek Road in Palo Alto --

7 (CR-1)

PRESIDENT HILLIS: Walnut Creek.

COMMISSIONER RICHARDS: Walnut Creek, Palo Alto. So I'm kind of going -- I have to start weighing off. We do overriding considerations. What is -- are we destroying the last of its kind or are we actually really helping the city out and trying to keep some sense of what it used to be? I wouldn't call this facadism; it's a different kind of partial preservation or what this project has. But those are really my comments, mostly process-oriented.

A-CPC-Hillis 1 (GC-1)

PRESIDENT HILLIS: All right, thanks. Just on the -- I mean, one, on the EIR, I hope folks know the EIR is a tool for us and you to help evaluate this project. I think this EIR is one of the better ones we've seen. Any issue anybody brought up here is addressed in an alternative of the EIR. From no preservation to historic preservation, to partial historic preservation,

it really gives us the flexibility to do almost anything as a result of this. And it analyzes the impacts, and it's meant as a tool to tell us and you what these impacts are going to be. So I wouldn't get too hung up on the EIR. I know Ms. Devincenzi's an expert on it and she can guide you, but the EIR works. I mean, the EIR is complete. 1 (GC-1) cont'd

I would say there's two areas, you know, I don't think we've quite looked at or analyzed. One is the level of kind of historic importance that this building is. You know, when we declare something historic, any building now becomes the painted ladies or the most important building down-town. 2 (CR-1)

And although I agree with Commissioner Melgar, I think this building is interesting. It's a D-plus as far as historic goes. I mean, it is not -- it's kind of a -- I'm sorry to tell you. Go take a look at it. Go take a look at it.

Hey, you know, what, I didn't comment when you all spoke, Mr. Frisbie. I didn't comment when you spoke, right?

MR. FRISBIE: That's true.

PRESIDENT HILLIS: Yeah. I didn't comment when you spoke.

So it's actually a historic example of bad planning. It's like the Sears building on Geary and Masonic. It's like some of the redevelopment projects in the Safeway down the street on Geary. It's actually -- it's actually an example of bad planning in the suburbanization of San Francisco that happened in the 50s and 60s. It's not something I would necessarily salute or celebrate as an example of a great urban development. It's exactly the opposite. 3 (CR-1)

The person who spoke about this being like the freeways, it is like that. It's part of our history we should almost forget. And we need housing. So it would be good to analyze kind of how this fits on that spectrum of historic.

I, for one, do not think it's an enormously significant historic resource. I think it's interesting, like the cemetery was that was there, but I'm not saying we should bring back that cemetery. If somebody came in today with a project that proposed this on Laurel Heights, it wouldn't get through the front door of the planning department. So, I encourage us to look at this.

There's also a no higher density alternative, and I actually think this site could take more density than what's being proposed. I get, judging by the response 4 (AL-1)

today from neighbors, people aren't going to be too excited about higher density, but I think we're remiss, actually, in not looking at this site in a state density alternative. As the developer said, this site slopes down significantly and could take a state density bonus or more density. I think we're remiss not to look at a higher density alternative. 4 (AL-1) cont'd

Just a couple of notes. So those are my comments on the project itself -- I mean on the EIR. On the project itself, I didn't encourage people to look at retail. This is not meant to mimic what's at Laurel Village, which tends to be more chain in bigger, fuller retail. 5 (ME-1)

It's actually you've got this big disconnect from Laurel Village to California and Presidio where there is additional retail and it's spotty. I think this retail would be great and help connect that corridor to the higher transportation corridors of California and Presidios that are there. So I think I'm not quite getting the disconnect on the retail, but I heard it. I would encourage people to look at it.

Time frame wise, I'm sure the developer and the community are aligned. Nobody wants to sit around and wait for this project to happen. They invest a lot. The community wants it to happen. I think that the time

frame laid out in the EIR is kind of the longest level if we see, you know, a recession hit or something like that, but people want to see this happen.

And I'd say give concrete comments. I didn't hear many of them today on the project itself. We see tons of projects here much bigger than this. This is not an enormously dense project. I'd just say keep an open mind as you look at this project.

We desperately need this housing. As Commissioner Koppel said, there's almost no better site in the city for housing than this site. I get that this project in these areas around it, they act kind of as some open space to the neighborhood, but it's really limited to that Laurel and Euclid corner, which they are proposing open space. You walk around this site in the other areas, it's dominated by parking and private open space. It's not a welcome area. This project will knit this together.

I get there's nervousness about what this will do and the impacts, and it seems like a major construction project, but trust me, it's not. And we've seen this happen around the city. Not much here. I know the folks who live here haven't experienced it because we don't see it happen around this corridor too much, but it's a fairly modest project that meets the zoning.

6 (ME-1)

7 (ME-1)

8 (PD-1)

9 (ME-1)

A-CPC-Hillis

It doesn't try to go too far. So give productive comments to that, because I think this is a great site for housing. Commissioner Richards. 9 (ME-1) cont'd

A-CPC-Richards

COMMISSIONER RICHARDS: I just have one point of clarification. I support the PUD minus one density. I do not support the state density bonus one because we don't get anything for it. So the PUD one, you get your affordable units on all the units, which I think is a better community benefit. So I'm sure the developer would consider that. 8 (ME-1)

PRESIDENT HILLIS: Okay, so you -- you want -- is everybody supportive of an extra 15 days on this? Okay. Is there any objection to it?

SECRETARY IONIN: Take a vote?

PRESIDENT HILLIS: Do you want a motion for it?

SECRETARY IONIN: It's cleaner if you make a motion.

PRESIDENT HILLIS: All right.

COMMISSIONER MELGAR: I'd like to make a motion that we extend the period for comments for this EIR by 15 more days.

COMMISSIONER RICHARDS: Second.

SECRETARY IONIN: Thank you, commissioners. If there's nothing further, there's a motion that has been seconded to extend the Draft EIR comment period by 15

days.

On that motion, Commissioner Fong?

MR. FONG: Aye.

SECRETARY IONIN: Commissioner Johnson. I'm sorry. Commissioner Koppel.

COMMISSIONER KOPPEL: No.

SECRETARY IONIN: Commissioner Moore.

COMMISSIONER MOORE: Aye.

SECRETARY IONIN: Commissioner Richards.

COMMISSIONER RICHARDS: Aye.

SECRETARY IONIN: Commissioner Melgar.

COMMISSIONER MELGAR: Aye.

SECRETARY IONIN: President Hillis.

PRESIDENT HILLIS: Aye.

SECRETARY IONIN: So moved, commissioners. That motion passes 5 to 1 with Commissioner Koppel voting against.

PRESIDENT HILLIS: All right. Commissioner Moore, do you have additional comments?

COMMISSIONER MOORE: Would you please give the date and the hour, including stating that the address remains the same?

SECRETARY IONIN: What does 15 days put us on? January 7th at 5:00 p.m.?

PRESIDENT HILLIS: Ms. Gibson?

MS. GIBSON: That would be January 8th.

PRESIDENT HILLIS: All right, January 8th, 5:00 p.m. You can submit them, written comments by then. All right. Thank you very much.

(End of item.)

# ATTACHMENT B

## Draft EIR Comment Letters and E-mails

# Agencies

Received at CPC Hearing 12/13/18
K. Zush; A-HPC

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

December 11, 2018

Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Dear Ms. Gibson,

On December 5, 2018, the Historic Preservation Commission (HPC) held a public hearing in order for the commissioners to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the proposed 3333 California Street Project (2015-014028ENV). As noted at the hearing, public comment provided at the December 6, 2018 hearing, will not be responded to in the Responses to Comments document. After discussion, the HPC arrived at the comments below:

- The HPC found the analysis of historic resources in DEIR to be adequate and accurate. The HPC concurs with the finding that the proposed project would result in a significant, unavoidable impact to the identified historic resource. 1 (CR-2)
- The HPC expressed the importance of the historic resource as an integrated landscape and building. 2 (CR-1)
- The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts. 3 (AL-1)
- The HPC expressed interest in understanding more about a "neighborhood alternative" that was discussed by the public during public comment at the hearing. 4 (AL-2)
- The HPC also supported combining some elements of the different alternatives in order to increase the amount of housing in the Full Preservation Alternative C. Commissioner Hyland specifically requested that Alternative C incorporate some elements from alternatives B and D such as increased building heights along California Street (up to 65 feet), the conversion of some areas of office or retail to residential use, and the incorporation of duplexes along Laurel Street. 5 (AL-3)

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

Sincerely,

Andrew Wolfram, President
Historic Preservation Commission

A-NAHC

STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
**Environmental and Cultural Department**
**1550 Harbor Blvd., Suite 100**
**West Sacramento, CA 95691**
**Phone (916) 373-3710**
**Fax (916) 373-5471**

November 29, 2018

Kei Zushi
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Also sent via e-mail: CPC.3333CaliforniaEIR@sfgov.org

Re: SCH# 2017092053, 3333 California Street Mixed-Use Project, City of San Francisco; San Francisco County, California

Dear Mr. Zushi:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the project referenced above. The review included the Executive Summary; the Introduction and Project Description; the Environmental Setting and Impacts; and Appendix B (Initial Study) prepared by Environmental Science Associates for the San Francisco Planning Department. We have the following concerns: 1 (CR-3)

1. While Tribal Cultural Resources are listed as a subsection under Cultural Resources, the subsection does not adequately address the questions od significance stipulated in the California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf A separate section addressing these questions, and consultation outreach and responses, is preferred.

2. There is no documentation in the Initial Study or the DEIR of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes.

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3714 if you have any questions.

Sincerely,

Gayle Totton

Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

**ADDITIONAL INFORMATION:**

The California Environmental Quality Act (CEQA)[1], specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[2] If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.[3] In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).[4] **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"[5], that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.[6] Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.[7] Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements**. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966[8] may also apply.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws**.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

**Pertinent Statutory Information:**

**Under AB 52:**

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.[9] and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report**. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).[10]

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.
b. Recommended mitigation measures.
c. Significant effects.[11]

**1.** The following topics are discretionary topics of consultation:

**a.** Type of environmental review necessary.
**b.** Significance of the tribal cultural resources.
**c.** Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. [12]

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native

[1] Pub. Resources Code § 21000 et seq.
[2] Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
[3] Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)
[4] Government Code 65352.3
[5] Pub. Resources Code § 21074
[6] Pub. Resources Code § 21084.2
[7] Pub. Resources Code § 21084.3 (a)
[8] 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.
[9] Pub. Resources Code § 21080.3.1, subds. (d) and (e)
[10] Pub. Resources Code § 21080.3.1 (b)
[11] Pub. Resources Code § 21080.3.2 (a)
[12] Pub. Resources Code § 21080.3.2 (a)

American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.[13]

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.[14]

Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[15]

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.[16]

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).[17]

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

**a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
**b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
**c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.[18]

***This process should be documented in the Tribal Cultural Resources section of your environmental document.***

**Under SB 18:**

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe**.[19]
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research,[20] the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.[21]
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
  - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or

[13] Pub. Resources Code § 21082.3 (c)(1)
[14] Pub. Resources Code § 21082.3 (b)
[15] Pub. Resources Code § 21080.3.2 (b)
[16] Pub. Resources Code § 21082.3 (a)
[17] Pub. Resources Code § 21082.3 (e)
[18] Pub. Resources Code § 21082.3 (d)
[19] (Gov. Code § 65352.3 (a)(2)).
[20] pursuant to Gov. Code section 65040.2,
[21] (Gov. Code § 65352.3 (b)).

- Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.[22]

**NAHC Recommendations for Cultural Resources Assessments:**

- Contact the NAHC for:
  - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
    - The request form can be found at http://nahc.ca.gov/resources/forms/.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
  - If part or the entire APE has been previously surveyed for cultural resources.
  - If any known cultural resources have been already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

**Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**

- Avoidance and preservation of the resources in place, including, but not limited to:
  - Planning and construction to avoid the resources and protect the cultural and natural context.
  - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
  - Protecting the cultural character and integrity of the resource.
  - Protecting the traditional use of the resource.
  - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.[23]
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.[24]

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.[25] In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be

[22] (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).
[23] (Civ. Code § 815.3 (c)).
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[25] per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

A-OPR1

STATE OF CALIFORNIA

# GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

December 26, 2018

Kei Zushi
City and County of San Francisco
1650 Mission St, 4th Floor
San Francisco, CA 94103

Subject: 3333 California Street Mixed-Use Project
SCH#: 2017092053

Dear Kei Zushi:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 24, 2018, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly. 1 (CEQA-5)

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

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

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

A-OPR1

# Document Details Report
# State Clearinghouse Data Base

**SCH#** 2017092053
**Project Title** 3333 California Street Mixed-Use Project
**Lead Agency** San Francisco, City and County of

**Type** EIR Draft EIR

**Description** Note: Review Per Lead

Overall, the proposed project would include 558 dwelling units within 824,691 gsf of residential floor area; 49,999 gsf of office floor area; 54,117 gsf of retail floor area; a 14,690 gsf child care center, and 236,000 sf of open areas. Parking would be provided in four below-grade parking garages and six individual, two-car, parking garages serving 12 of the 14 units in the Laurel Duplexes. New public pedestrian walkways are proposed through the site in a north-south direction between California Street and the intersection of Masonic and Euclid avenues approx along the line of Walnut St and in an east-west direction between Mayfair Dr and Presidio Ave. A variant that would replace the office space in the Walnut Building with 186 additional residential units, for a total of 744 dwelling units and no office space on the project site, is also being considered. The Walnut Building would be taller under this variant (from 45 ft under the proposed project to 67 ft).

## Lead Agency Contact


**Name** Kei Zushi
**Agency** City and County of San Francisco
**Phone** 415-575-9038 **Fax**
**email**
**Address** 1650 Mission St, 4th Floor
**City** San Francisco **State** CA **Zip** 94103


## Project Location

**County** San Francisco
**City** San Francisco
**Region**
**Lat / Long** 37° 47' 10.5" N / 122° 26' 53.9" W
**Cross Streets** California St; Presidio, Masonic, & Euclid Ave; Laurel St and Mayfair Drive
**Parcel No.** 1032/Lot 3
**Township** **Range** **Section** **Base**

## Proximity to:

**Highways** I-280, I-80, US 101
**Airports**
**Railways** SF Muni; BART
**Waterways** SF BAY
**Schools** Lilienthal ES, Cobb ES, PePresidio Early Education....
**Land Use** Residential, Mixed, Low Density [RM-1] Zoning District and 40-X Height and Bulk District

**Project Issues** Traffic/Circulation; Air Quality; Archaeologic-Historic; Noise; Growth Inducing; Cumulative Effects

**Reviewing Agencies** Native American Heritage Commission; Resources Agency; Department of Fish and Wildlife, Region 3; Office of Historic Preservation; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Department of Housing and Community Development; Public Utilities Commission; State Lands Commission; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 2; State Water Resources Control Board, Division of Drinking Water

**Date Received** 11/07/2018 **Start of Review** 11/07/2018 **End of Review** 12/24/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.

A-OPR1

STATE OF CALIFORNIA — Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
**Environmental and Cultural Department**
**1550 Harbor Blvd., Suite 100**
**West Sacramento, CA 95691**
**Phone (916) 373-3710**
**Fax (916) 373-5471**

clear 12/24/18 E

Governor's Office of Planning & Research

DEC 03 2018

STATE CLEARINGHOUSE

November 29, 2018

Kei Zushi
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Also sent via e-mail: CPC.3333CaliforniaEIR@sfgov.org

Submitted separately (See A-NAHC [Gayle Totten, Native American Heritage Commission])

Re: SCH# 2017092053, 3333 California Street Mixed-Use Project, City of San Francisco; San Francisco County, California

Dear Mr. Zushi:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report (DEIR) prepared for the project referenced above. The review included the Executive Summary; the Introduction and Project Description; the Environmental Setting and Impacts; and Appendix B (Initial Study) prepared by Environmental Science Associates for the San Francisco Planning Department. We have the following concerns: 2 (CR-3)

1. While Tribal Cultural Resources are listed as a subsection under Cultural Resources, the subsection does not adequately address the questions od significance stipulated in the California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/cega/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf A separate section addressing these questions, and consultation outreach and responses, is preferred.

2. There is no documentation in the Initial Study or the DEIR of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes.

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3714 if you have any questions.

Sincerely,

Gayle Totton

Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

**ADDITIONAL INFORMATION:**

The California Environmental Quality Act (CEQA)[1], specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[2] If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.[3] In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).[4] **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"[5], that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.[6] Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.[7] Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements**. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966[8] may also apply.

**Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

**Pertinent Statutory Information:**

**Under AB 52:**

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.[9] and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report**. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18).[10]

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

a. Alternatives to the project.
b. Recommended mitigation measures.
c. Significant effects.[11]

1. The following topics are discretionary topics of consultation:
   **a.** Type of environmental review necessary.
   **b.** Significance of the tribal cultural resources.
   **c.** Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. [12]

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native

[1] Pub. Resources Code § 21000 et seq.
[2] Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
[3] Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)
[4] Government Code 65352.3
[5] Pub. Resources Code § 21074
[6] Pub. Resources Code § 21084.2
[7] Pub. Resources Code § 21084.3 (a)
[8] 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.
[9] Pub. Resources Code § 21080.3.1, subds. (d) and (e)
[10] Pub. Resources Code § 21080.3.1 (b)
[11] Pub. Resources Code § 21080.3.2 (a)
[12] Pub. Resources Code § 21080.3.2 (a)

American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.[13]

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.[14]

Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[15]

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.[16]

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).[17]

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

**a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
**b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
**c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.[18]

***This process should be documented in the Tribal Cultural Resources section of your environmental document.***

**Under SB 18:**

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**[19]
- There is no Statutory Time Limit on Tribal Consultation under the law.
- Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research,[20] the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.[21]
- Conclusion Tribal Consultation: Consultation should be concluded at the point in which:
  - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or

[13] Pub. Resources Code § 21082.3 (c)(1)
[14] Pub. Resources Code § 21082.3 (b)
[15] Pub. Resources Code § 21080.3.2 (b)
[16] Pub. Resources Code § 21082.3 (a)
[17] Pub. Resources Code § 21082.3 (e)
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  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
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**Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**

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- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be

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followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

# Organizations

**California Street Homeowners Group**
**c/o**
**Joseph J. Catalano and Joan M. Varrone**
**3320 California St. Apt. 3**
**San Francisco CA 94118-1995**
**Joseph.catalano@gmail.com**
**415 845 7745**
**Jvarrone@aol.com**
**415 305 6329**

**Dec. 11, 2018**

Kei Zushi
EIR Coordinator
San Francisco Planning Department
1650 Mission Street
Suite 400
San Francisco CA 4103
Cpc.3333CaliforniaEIR@sfgov.org

Re: Case No. 2015-014028ENV

Dear Mr. Zushi;

Please accept these comments from the California Street Homeowners Group to the Draft EIR for the 3333 California Street project proposed by Laurel Village Partners. We speak for the interests of our neighborhood, which is the block of California Street between Laurel and Walnut.

**Background**

For context, it is important to note that our constituency lives directly across the street from the Project's proposed retail uses. Our street has no retail or commercial use. It is entirely residential except for the UCSF facility. Our neighborhood houses 40 families with more than 100 residents, including many children (30-40) and many elderly residents.

California Street, between Laurel and Walnut, is 4 lanes plus parallel parking lanes, or two lanes with opposing bus stops (at Laurel). Along with the garages of our 40 families, the garages for an additional 11 families open to this block of California Street, and require (sometimes blind) backing onto the already congested street for exit.

1 (TR-7)

While we agree with some of the comments provided by others, the most severe, proximate and prolonged adverse environmental impact from this Project falls uniquely and disproportionately on our neighborhood, and the EIR fails to address or provide adequate mitigation for them. 2 (GC-1)

This gives rise to our comments. We trust you will give them your most careful consideration with our unique situation in mind.

**DURATION OF CONSTRUCTION** 3 (PD-1)

Based on the construction plan reported in the Draft EIR, our neighborhood will bear an overwhelmingly disproportionate burden from the construction of this Project. We are concerned by the potential duration of the construction and the planned location of construction staging.

As described in the EIR, construction will continue for between seven (7) and fifteen (15) years. The elderly residents of our neighborhood could look forward to facing construction across their street for the remainder of their life expectancies.

For years, during this construction, the Developer seeks closure of an eastbound/parking lane of the street for its benefit. The loss of parking is a taking from our community. It means that there will a drastic reduction in available parking places for families, caregivers, etc., which will radically affect our chosen neighborhood. 4 (TR-6)

Further, the readily foreseeable traffic snarls will deprive us of access to, and quiet enjoyment of our residences. This plan (and the staging plan described below) will diminish our ability to enjoy our homes and could adversely impact any residential sale process for an unnecessarily long time. 5 (TR-3) 6 (PD-1)

The Developer appears to be acting in its own self-interest. It seeks to prolong entitlements for use or sale to other developers; to time the market; and, to change product mix over time if more profit would result. It is attempting this by seeking permission for this extraordinarily prolonged construction period. If permitted, the Developer's construction timetable will unjustly prolong the disproportionate environmental impact that the families in our neighborhood will endure.

As the immediate "neighbors" of this Project, this unfairly imposes the construction noise, dirt, disruption, personal risk and displacement on us for as many extra years. In fact, on numerous occasions, the Developer indicated they could build the complete project in three (3) years. 7 (GC-1) 8 (PD-1)

The most obvious way to mitigate this impact would be to require the Developer to complete construction within three years of commencement.

**CONSTRUCTION STAGING**

The Developer plans to stage three of the four phases of the entire Project directly across the street from our neighborhood, near the already challenged corner of California and Laurel. This is an unfair and incredible burden on our neighborhood.

This current plan would mean that even when direct construction is not happening in front of our homes, we would still uniquely bear the brunt of the construction noise by being exposed to the sound of construction trucks and machinery (back up beeping), and the non-residential aspect of having a truck parking lot at your front door for years.

This staging plan is the least impactful to the developer, but the most intrusive to us. The most obvious way to mitigate this impact would be to require the Develop to move its construction staging throughout the project during the construction and have no one adjacent neighborhood to the 10.5 acre site unduly carry the burden. This is only reasonable and fair.

8 (PD-1) cont'd

**RETAIL**

Our neighborhood will be the only neighborhood (existing or new) facing the Project's proposed retail. In addition to patrons, retail will add traffic to our already congested street, and add turbulence from passenger pick up and drop off. While the Draft EIR acknowledges this, it assesses the impact through a much wider lens than ours; and it does not address the unique and specific localized impact we will experience.

9 (TR-3)

So, even though the Draft EIR acknowledges additional traffic; and the loading and unloading of passengers and freight, it does not recognize the added unspecified activity retail will create across the street from us. Nor does it assess the environmental impact of changing our streetscape from a walkway in front of open space to a 45-foot high wall the Developer seeks to build through a zoning change. The Developer's plan has an unmitigated and severe environmental impact on our neighborhood. Our residential neighborhood zoning should not be changed to permit retail.

10 (GC-1)

11 (ME-1)

**CALIFORNIA STREET COMMERCIAL LOADING ZONE**

12 (TR-10)

There is no more enduring or objectionable environmental impact from this Project than the creation of a commercial loading zone outside our doors.

The City (or the Developer) has proposed a 100-foot commercial loading zone instead of passenger loading or car parking on most of the parking lane on the eastbound side of our block.

In every meeting with the Developer over the past several years, the Developer asserted that the Project would require that all commercial loading would be underground, and advised that subterranean facilities for these purposes would be part of their Project. That assurance from the Developer relieved our concerns about the potential for commercial loading in front of our homes, so we were frankly shocked when the proposed Project description provided for commercial loading directly across the street from us.

12 (TR-10) cont'd

There was originally no need to find measures to mitigate the significant and adverse environmental impact of commercial loading in front of our homes. The Developer has already proposed that all commercial loading would be underground. If the City has some rationale for a commercial loading zone on California Street, it should at least mitigate its impact by creating it across from the existing commercial uses between Walnut and Presidio, away from existing residences and the already problematic intersection of Laurel and California.

**INCREASED TRAFFIC HAZARDS**

13 (TR-7)

Garages for more than 50 residences exit in reverse onto this block of California Street. Currently this is challenging and sometimes hazardous. When it is manageable, it is so because the Walnut Street traffic coming on to California St when the California light is red is very light. Increased traffic coming from both directions on Walnut may make it impossible at times for the California Street neighbors to exit our buildings.

The Project's inevitable additional congestion from long term construction; followed by retail traffic, perhaps with commercial loading, will significantly and adversely impact this already difficult circumstance.

The Draft EIR is fundamentally deficient in its failure to address this unique and significant environmental impact on our neighborhood, and of course, it necessarily fails to identify or require any mitigation of it by the Developer or the City's traffic authorities.

**LOSS OF OPEN SPACE AND OBSTRUCTION OF HORIZON**

14 (CEQA-3)

Our neighborhood will also lose the existing open space in front of our homes and the entire view of the horizon that many in our neighborhood enjoy. The Developer takes this open space from us and sequesters it inside the Project's walls.

The open space we now enjoy is framed by 100 year old cypress trees, and our horizon extends more than a mile away. (See view below taken from 3320 California St.)

15 (GC-1)

As the State Legislature noted in enacting the California Environmental Quality Act, it is the Policy of the state to: "...take all action necessary to provide the people of this state with clean

air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise..." CEQA Section 21001.

15
(GC-1)
cont'd

Each of the above environmental impacts directly across from our front doors violates state policy, and any one of them would compel us to challenge the Draft EIR. Together, they threaten a significant loss of the peaceful enjoyment of our homes.

We have not included all our concerns, and we reserve the right to supplement our comments and responses.

We look forward to working with you and the Developer to eliminate, or significantly mitigate these impacts.

Thank you,

California Street Homeowners

Joseph J. Catalano and Joan M. Varrone



View of Project Site from 3320 California St.

CC: Catherine Stefani
Dan Safier
Dan Kingsley
California Street Homeowners Group

JCCSF

January 8, 2019

San Francisco Planning Department
Attn: Zushi, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Comments on Draft EIR ("DEIR) for 3333 California Street Project ("Project"); Case No. 2015-014028ENV

Dear Sirs:

The Jewish Community Center of San Francisco (JCCSF), located at 3200 California Street, has been working closely with the developer of 3333 California (Developer) and the City on the Project. Our comments below, in response to the DEIR, supplement those set forth in our attached 10/20/17 letter responding to the Project NOP and 6/8/18 letter responding to the Project Initial Study.

1. **Traffic/Pedestrian Safety Concerns**. Pages 4.C. 68-71. As previously noted in our other letters, we have 4500 daily users ranging from newborns in strollers to school children to frail older adults. Our only access point for pedestrians and cars is from California Street (except for preschool pick-up and drop-off which enters off Walnut Street but exits onto California Street.) Many of our users and employees routinely cross the California/Presidio and California/Walnut intersections to enter or exit our building. We do not believe that the DEIR has fully described the existing traffic patterns around the JCCSF and, therefore, has not adequately analyzed the potential negative impact of the 7-15 years of Project construction traffic in the vicinity of our building on traffic and pedestrian safety in the vicinity of the JCCSF building. In particular, the DEIR's description of the existing traffic patterns around the JCCSF should acknowledge the existing traffic issues and (resulting impact on pedestrian safety) in the vicinity of the JCCSF caused by afternoon westbound traffic (much higher than morning westbound traffic) intermingling with: (a) cars picking up and dropping JCCSF users in the JCCSF California Street white zone; (b) cars entering the JCCSF garage snaking back in a waiting

1 (TR-8)

pattern along California; (c) cars leaving the JCCSF garage weaving into westbound traffic on California Street; and (d) cars leaving the preschool drive-through weaving into westbound traffic on California Street. All these factors are also affected by the slowdown in westbound traffic that occurs due to the dramatic decrease in visibility experienced by late afternoon westbound drivers as the sun hits their windshields causing glare. Additionally, the DEIR needs to account for the morning traffic patterns as preschool cars drop off children at the Walnut Street entrance with the line of waiting cars snaking back onto California Street in front of the JCCSF garage. We already have implemented many measures ourselves to address these issues including: (i) assignment of additional staff during peak times to manage loading zone backups; (ii) increased signage for parents re loading/ unloading; (iiiv); provision of a white zone on Walnut (east-side close to California) to allow the line of cars waiting to go through the drive-through to have a place to queue without blocking traffic; (iv) during camp season (which is a peak period of usage), staggering programs to shift pick up and drop off and adding cones to direct traffic; and (v) working with MTA to move the bus stop on Presidio back 20 feet from the California/Presidio intersection to improve visibility of pedestrians for other southbound vehicles. Nonetheless, we are very concerned that current situation could be made much worse by 7-15 years of construction traffic. As a result, while acknowledging that we are not traffic experts, we would request that the DEIR analyze potential mitigations such as: limiting construction traffic entering into the Walnut Street entrance to the Project site; installing longer lights for pedestrian crossings at California/Walnut and/or California/Presidio; constructing sidewalk bulb outs in the vicinity of the JCCSF; installing flashing pedestrian crossing signals, etc.; directing blue book regulations to be applied in a manner that limits the exacerbation of these problems. Even if the City believes that the construction traffic will not cause significant impacts pursuant to the DEIR standards of significance, we believe that it is in everyone's best interests to implement every advance preventative action possible to enhance the safety of the thousands of young children and older adults who use this community center on a daily basis.

1 (TR-8) cont'd

2. **Sensitive Receptor.** Page 4.D.12. We appreciate the fact that the DEIR identifies the JCCSF site as a sensitive receptor (in fact,

2 (NO-1)

the JCCSF is identified as the closest sensitive receptor to the Project site). As a result of this designation, we believe it imperative that the City, through DEIR mitigations and application of blue book regulations, implement all feasible measures to decrease construction noise and dust on our users. In light of the potentially negative effect on our preschool and other programs of the 7-15 year construction period (e.g. page 4.D. 40 indicates a maximum increase of 9dBA over existing 67dBA for 82 months), we would hope that the City would design a mitigation measure that creates a collaborative process enabling the City, Developer and JCCSF to monitor the impact of the construction noise, dust and traffic on the JCCSF with the City retaining the ability to impose enhanced mitigation measures throughout the construction period, if warranted, depending on the actual on-the-ground experience of the JCCSF, as a sensitive receptor. 2 (NO-1)

3. **Construction Vibration.** Pages 4.D.54-56. The DEIR concludes that the JCCSF is located too far from the Project construction site to experience construction vibration impacts to the JCCSF structure. We acknowledge that the San Francisco Fire Credit Union building is closer and is more at risk from vibrations from construction activities; however, we continue to be extremely worried about this issue especially given the presence of the underground garage and pool at the JCCSF. As a result, we request that the City amend the last sentence of the fourth bullet of Mitigation M-NO-2 to add the JCCSF to the list of entities which is alerted when vibration levels exceed the allowable threshold at the San Francisco Fire Credit Union building. In other words, if the San Francisco Fire Credit Union is the canary in the coal mine, then the JCCSF will want to know when something happens to the canary. Additionally, if damage is observed at the JCCSF, then similarly to the San Francisco Credit Union Building, we believe that excavation should cease and vibration control measures should be implemented. Thus, we would request that the phrase in the fifth bullet of Mitigation M-No-2 be amended to add the bolded language: i.e. "if damage to the SF Fire Credit Union building or the JCCSF building is observed…" 3 (NO-2)

4. **Dewatering/Subsidence.** Page 2.99. When the JCCSF building was constructed, it was necessary to pump a significant amount of water to draw down the water table to perform construction. We assume 4 (GEO-1)

that the Project will face similar water tables issues. In fact, Page 2.99 indicates that groundwater or perched water could be encountered; however, the DEIR does not include any mitigation measures in the event of dewatering. We believe that the DEIR needs to include appropriate mitigation measures addressing potential subsidence in the event of dewatering.

4 (GEO-1) cont'd

We look forward to continuing to work collaboratively with the City and the Project developer, and remain excited about the increased housing density and the activation of the streetscape created by the Project. Thank you for taking these items into consideration.

Regards,

Craig Salgado
JCCSF Chief Operating Officer

Cc:

Marci Glazer, JCCSF CEO

Bob Fields, JCCSF Board Chair

Dan Safier, Prado

O-JCCSF2

JCCSF

Jewish Community Center of San Francisco

June 8, 2018

San Francisco Planning

Department, Attn: Julie Moore

1650 Mission Street, Suite 400

San Francisco, CA 94103

RE: Response to Initial Study ("IS") for 3333 California Street Project ("Project")

Dear Ms. Moore:

The Jewish Community Center of San Francisco (JCCSF), located at 3200 California Street, has been working closely with the developer of 3333 California and the City on this project. Our comments below, in response to the project Initial Study (IS), supplement those set forth in our attached 10/20/17 letter responding to the Project NOP. We believe that the EIR should contain specific construction mitigations designed to consider the following construction-related concerns, which we have developed in conjunction with Cahill Contractors, the contractor which built the JCCSF building:

1. Construction Traffic, Staging and Safety – We have 4500 daily users ranging from newborns in strollers to school children to frail older adults. Our only access point for pedestrians and cars is from California Street (except for preschool pick-up and drop-off which enters off Walnut Street but exits onto California Street.) Many of our users and employees routinely cross the California/Presidio and California/Walnut intersections to enter or exit our building. As a result, we are concerned about disruption to our facility caused by construction traffic on California Street and by California Street southside parking lane closures (IS pg.77) during the construction period. We request that the EIR study these considerations in an effort to minimize these impacts.
2. Construction Dust and Hazardous Materials – We are concerned about safety to our users and employees from exposure to dust and potentially hazardous materials during the construction process, especially given that many of them are sensitive receptors – e.g. young children and older adults (pgs. 144-145, Impacts AQ-2 and AQ-3). It is important that Best Management Practices are employed to minimize these potential hazards (especially given that winds pick up in the afternoon with fog).

1 (TR-6)

2 (AQ-1)

3. Construction Vibration and Noise – The IS notes (pg. 142, Impact NO-3) that vibration is a potential issue for the SF Fire Credit Union. We are similarly concerned by construction related activity and request that the EIR consider potential impact to the JCCSF building – including our underground pool, parking and overall structure. Additionally, in light of the fact that we have approximately 170 preschoolers who use our outdoor play yard every day from 8:00 am – 3:00pm, we would like to make sure that the Impact NO-2 analysis considers construction noise impacts on these sensitive receptors. 3 (NO-2) 4 (NO-1)
4. Dewatering/Subsidence - When we built the JCCSF, we pumped a significant amount of water to draw down the water table to perform construction. Please study this issue to confirm if this issue will apply to this project and if so please study the impact on the JCCSF including potential settlement. 5 (GEO-1)

Additionally, please note that we continue to strongly support the inclusion of 60 on-site public parking spaces on the Project site given that the Project is causing not only the loss of current public parking on the site but also the loss of significant neighborhood street parking (*i.e.* conversion of 15 on-street parking spaces to loading zones and the loss of 36 on street parking spaces.) 6 (TR-11)

We look forward to continuing to work collaboratively with the City and the Project developer, and remain excited about the increased housing density and the activation of the streetscape created by the Project. Thank you for taking these additional items into consideration. 7 (ME-1)

Regards,

Craig Salgado

JCCSF Chief Operating Officer

Cc:

Marci Glazer, JCCSF CEO

Susan Lowenberg, JCCSF Board Chair

Dan Safier, Prado

October 20, 2017

San Francisco Planning Department, Attn: Julie Moore
1650 Mission Street, Suite 400
San Francisco, CA 94103
Case # 2015-014028ENV

RE: Response to Notice of Preparation ("NOP") for 3333 California Street Project ("Project")

Dear Ms. Moore,

I am writing on behalf of the Jewish Community Center of San Francisco (JCCSF) located at 3200 California Street in response to the Project NOP. As you consider the EIR scope, we request that you address the environmental issues described below that are of concern to the JCCSF. We have met on multiple occasions with Project representatives and found them to be very forthcoming in their desire to work with the JCCSF to address our concerns and find mitigation solutions. We are submitting these comments so that the Project can be the best it can be and because there are certain unique aspects of the JCCSF of which we want the city to be aware. We look forward to continued productive discussions with the city and the developer.

The JCCSF is a 501c3 organization which has been in existence for almost 140 years, providing social, cultural and physical programs that are open and welcoming to all, including, by way of example, after school programs, holiday programs, youth sports, arts enrichment and older adults exercise and music programs. Our rebuilt facility reopened in 2004 and serves approximately 4500 users every day who range in age from newborns in strollers to frail older adults. As a result, our primary concerns relate to safety – *e.g.*, traffic, air quality, construction and noise – and our continued ability to use our outdoor areas (roof and courtyards) for programming. Your scope likely already includes these general issues, so this letter explains the specifics as they pertain to the JCCSF. 1 (GC-1)

A. **Traffic/Safety**: The TIS should evaluate: 2 (TR-7)
   1. Impacts of Project traffic on: the white zone in front of 3200 California; the Muni bus stops on Presidio and California Streets; traffic flow on California Street; and the ability of JCCSF users to safely cross California Street, as detailed in the attached 6/3/16 letter to you. All the issues in that letter continue to be relevant, except that we are pleased to note that the developer has eliminated the midblock entrance on California Street directly across from the JCCSF. We request that the TIS address the other issues in the attached letter.
   2. Conflicts between the Walnut Street entrance to the Project (location of its passenger loading and retail parking entrances) and the JCCSF Walnut Street drive-through for preschool pick-up/drop-off and the Jackson Muni line, detailed in the attached letter.



3200 California Street, San Francisco, California 94118-1904 • Tel: 415.292.1200 Fax: 415.276.1550 • www.jccsf.org

3. Project traffic impacts on the JCCSF accounting for the fact that many of the core JCCSF users are families with small children who require safety restraints in their cars, and consequently require extra timing loading and unloading children from cars in the JCCSF loading zone and in the preschool pick-up and drop-off zone. It is the JCCSF's observation that families with young children have been slow to adapt to ride share or public transit. 3 (TR-10)
4. Impacts on California Street and Walnut Street traffic from the Project's proposed: commercial loading spaces; residential move-in and move-out use of on street parking spaces; two bus stops on California; Walnut street bulb-out.
5. JCCSF desire for continued availability of publicly available spaces at the Project, especially given the Project's elimination of 33 on-street parking spaces 4 (TR-11)
6. Our traffic consultant, Fehr and Peers, raised the following specific traffic-related concerns:
    a. Passenger Loading - The TIS should evaluate passenger loading needs on California Street to minimize potential effects on JCCSF passenger loading and Muni service. The site plan includes mixed use office, retail, and childcare facilities along California Street east of Walnut Street. These uses are likely to generate demand for passenger loading and commercial loading activities. However, the NOP states that the Project will include three passenger loading zones (Masonic Avenue, Euclid Avenue, and Laurel Street) and two commercial zones (both near the Laurel/California intersection) but does not include (or mention) any spaces on California Street near the JCCSF. The TIS should quantify passenger loading (including Transportation Network Companies) and commercial loading demand, and identify an appropriate amount of curb space on California Street to ensure minimization of spillover that could affect JCCSF operations. 5 (TR-10)
    b. Traffic Circulation and Pedestrian Safety 6 (TR-8)
        i. California Street: The TIS should evaluate sidewalk capacity on both sides of California Street with respect to Project-related pedestrian trips, particularly at bus shelter pinch points.
        ii. California/Walnut Intersection: The TIS should evaluate left turn restrictions as a means of mitigating the pedestrian safety effects of unprotected left turns across California Street by Project-related traffic.
        iii. California/Presidio Avenue intersection: The TIS should assess the removal of the right-turn (slip) lane on California Street as a means of mitigating the pedestrian safety effects of free right turns by Project-related traffic.
    c. Transit - The TIS should consider the need for bus bulbs to handle Project-related transit ridership. 7 (TR-9)
    d. Cumulative - The TIS should consider the cumulative effects of the Project in relation to other nearby projects that are currently in the planning stages. 8 (TR-12)

B. **Shadow, Wind and Noise** – The EIR should examine Project shadow, wind and noise impacts on outdoor program use of the JCCSF roof and courtyard spaces. 9 (GC-1)

We understand that a project of this scale and magnitude has a longer than typical construction period and, therefore, we anticipate that you will be examining the impacts of the seven-year construction period on such issues as air quality, toxic waste removal, ingress and egress, staging, traffic and noise. 9 (GC-1) cont'd

Among other aspects we are excited about the increased housing density and the activation of the streetscape this project creates. We look forward to continuing to work collaboratively with the city and the developer. Thank you for taking these items into consideration in the EIR. 10 (ME-1)

Regards,

Craig Salgado
JCCSF Chief Operating Officer

cc:
Marci Glazer, JCCSF CEO
Susan Lowenberg, JCCSF Board Chair
Dan Safier, Prado

JCCSF
Jewish Community Center of San Francisco
O-JCCSF4
3200 California Street
San Francisco, California
94118-1904
Tel: 415.292.1200
Fax: 415.276.1550
www.jccsf.org

June 3, 2016

Sarah Jones, Director of Environmental Planning
Daniel A. Sider, AICP, Senior Advisor for Special Projects,
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-6378

Dear Ms. Jones and Mr. Sider,

I am writing on behalf of the Jewish Community Center of San Francisco (JCCSF) located at 3200 California Street with respect to the proposed Prado/SKS 3333 California Street and TMG CPMC projects. We understand that the former has submitted its PPA and EEA applications but that the latter has not yet done so. As you review those applications and consider the scope of their traffic/circulation studies, we thought it important to share our perspective on some of the safety-related traffic/circulation issues in the neighborhood, so that you have that background in mind as you consider the appropriate analysis for these two proposed projects. We have met on multiple occasions with the developers of both projects and find them to be very forthcoming in their desire to work with the JCCSF to address our concerns and find mitigation solutions for the issues identified below. We look forward to productive discussions with both developers to find solutions to these issues.

The JCCSF is a 501c3 organization which has been in existence in San Francisco for almost 140 years, providing social, cultural and physical programs that are open and welcoming to everyone. Our rebuilt facility located at 3200 California Street opened in January 2004 and serves users of all ages ranging from newborns in strollers to the frail elderly. Because we serve so many children and older adults, we are very focused on safety concerns around traffic/circulation. In the 12 years since it has opened, the JCCSF has observed an increasing number of traffic/circulation problems in the vicinity of 3200 California, primarily attributable to conflicts with MUNI and increasing amounts of westbound and eastbound traffic on California. Given that the surrounding neighborhood is currently in the beginning phases of a number of significant development projects which would likely increase traffic in the neighborhood, the JCCSF would like to make sure that the following background conditions and safety issues are taken into account in the city's analysis of the proposed projects and in the development of mitigations to address the issues.

1 (TR-14)

We understand that the City Planning Department has recently shifted from a focus on intersection analysis to vehicle miles traveled from potential projects, but that, in conjunction with the SFMTA, it will still consider the projects' impacts to the adjacent transportation

2 (TR-1)

network, including existing safety and circulation issues (identified in 1-3 below). We look forward to coordinating with the Department, the SFMTA and the developers to create a safer neighborhood for all users.

2 (TR-1) cont'd

1. **The white zone in front of 3200 California.**

This zone extends the full length of the building on California. This space is used as a drop off/pick up point for participants, including parents, transportation services and school buses dropping off and picking up children. It is also the holding zone where cars wait to enter the garage when it is full. Unfortunately, the increase in westward flow traffic along California since the JCCSF opened 12 years ago contributes to a bottlenecking of vehicles entering/leaving our garage/white zone/drive through areas, particularly in the afternoons and evenings, creating congestion and safety concerns. We hope that the city's traffic analysis for the proposed new projects addresses mitigations for any increase in this bottlenecking linked to any potential increase in westbound traffic from the proposed projects. We are particularly concerned about the impact of cars headed westbound on California that may queue as they wait to turn south onto Walnut into the primary entrance to the 3333 project. We look forward to conversations with the developers and SFMTA about potential management, parking and intersection design solutions to mitigate this concern that could be implemented by some combination of the developers, the JCCSF and SFMTA.

3 (TR-7)

2. **Walnut Street Drive-Through Conflict with the Jackson MUNI line**

The JCCSF has a parent drive-through area that enters the JCCSF property on Walnut Street and exits onto California Street (just west of the JCCSF garage entrance). This drive-through is used by parents to drop off their preschoolers in the morning and pick them up in the afternoon. At peak times (i.e., weekday mornings and late afternoons) the line of cars waiting to enter this area will back up and wrap around onto California Street, blocking the drive-through exit. Space is at a premium at this Walnut/California intersection, given that MUNI's Jackson line heads west on California and then turns north onto Walnut (the buses have little room to manoeuver around the cars, as they run on overhead electric lines, and the lines of cars and buses then interfere with each other). Recently, we contacted SFMTA to start to find solutions to this problem. We would like to make sure that the traffic studies for the proposed projects take this concern into account and closely examine the space premium issues at the Walnut/California intersection in order to devise appropriate mitigations in light of the likely increase in traffic at this intersection from cars entering and exiting the 3333 project on Walnut Street.

4 (TR-9)

3. **MUNI bus stops on Presidio Street and California Street.**

MUNI buses staging on Presidio directly adjacent to the east side of the JCCSF block the views of cars heading south on Presidio and turning west on California. Importantly, pedestrians in the California/Presidio intersection crosswalks can be obscured by the waiting MUNI buses. We are already in conversation with SFMTA about the impact of this conflict on the safety of pedestrians in these crosswalks (particularly older adults who walk more slowly and young children who can be hard to see). We want to make sure that the potential increase in California Street traffic (whether east- or westbound) does not further exacerbate the safety

5 (TR-8)

issues at this intersection. We are hopeful that your analysis might look at different intersection design configurations at California/Presidio that would reduce these safety impacts. 5 (TR-8)

**4. UCSF Parking**

We understand that the developers of the 3333 project are proposing around 60 public spaces as part of their facility. We are very supportive of the proposal for additional public parking, given that a number of JCCSF employees and users have been using the UCSF lot for many years during peak parking periods at the JCCSF. 6 (TR-11)

**5. Midblock passageway**

We understand that the initial conceptual design for the 3333 project shows a north/south midblock passageway with a California Street entrance to this passageway across from the JCCSF entrance on California. We are very concerned that this location will encourage jaywalking across the middle of California. We think it advisable that the developers of the 3333 project use design measures to discourage that kind of unsafe behavior and would ask that consideration be given to moving the location of that opening so that it does not encourage jaywalking. 7 (ME-1)

Thank you for your consideration of these issues in the analysis for the proposed projects. We would be very happy to meet with you at your convenience to discuss these concerns in more detail.

Regards,

Craig Salgado
Chief Operating Officer
JCCSF

Cc: Dan Safier, *President and CEO, Prado Group*
Matt Field, *Chief Investment Officer, TMG Partners*
Susan Diamond, *JCCSF Land Use Counsel*
Marci Glazer, *CEO, JCCSF*

O-LHIA1

# Laurel Heights Improvement Association of San Francisco, Inc.

By Hand Delivery December 5, 2018

By E-Mail to: Commissions.secretary@sfgov.org and julie.moore@sfgov.org and nicholas.foster@sfgov.org

San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94102-4689

December 13, 2018
Planning Commission

RECEIVED
DEC 0 5 2018
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT

Dear President Hillis and Commissioners:

Re: 3333 California Street, Draft Environmental Impact Report
SF Planning Department Case No: 2015-014028ENV
Hearing Date: December 13, 2018

## INTRODUCTION AND REQUEST FOR EXTENSION OF COMMENT PERIOD

The Draft EIR states that the proposed project would have ***SIGNIFICANT AND UNAVOIDABLE IMPACTS ON HISTORICAL RESOURCES AND NOISE FROM CONSTRUCTION.***

RECEPTION DESK

The Draft EIR states that the "proposed project or project variant would cause substantial additional Vehicles Miles Traveled and/or substantially induce automobile travel" but claims that reducing the retail parking would mitigate the impact to less than significant. DEIR pp. 4.C.68 and 80. We will submit comments on these and other matters. *74* 1 (TR-5)

***We request a 15-day extension of the 45-day comment period on the Draft EIR from December 24, 2018 to January 8, 2018 since the project construction would last for 7-15 years and there is substantial community opposition to the developer's concept.*** We presented to the Supervisor of District 2 approximately 800 signatures of residents opposing the developer's concept and requested rezonings. 2 (GC-3)

There are two new Full Preservation Alternatives which are feasible.

This Commission should support the Community Full Preservation Alternative because such an alternative is feasible and would avoid substantial adverse changes in character-defining 3 (AL-2)

features of the historically significant resource. This Alternative would include the same number of housing units as the proposed project (558 units) and the project variant (744 units). This Commission should request that the Draft EIR (DEIR) be revised to substitute the Community Full Preservation Alternative for DEIR Alternative C, because Alternative C would have 24 less housing units than the proposed project and substantial new retail uses, which are not permitted under the current site zoning. Retail was banned when the site was rezoned from First Residential to limited commercial in order to prevent adverse effects on the Laurel Village Shopping Center and Sacrament Street merchants.

3
(AL-2)
cont'd

Public Resources Code section 21002 confirms that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. The DEIR admits that the developer's proposed concept "would cause a substantial adverse change in the significance of a historical resource." DEIR p. B.41.

## 1. COMMUNITY FULL PRESERVATION ALTERNATIVE

The Community Full Preservation Alternative would have the same number of housing units as the project (558 units) or project variant (744 units) and would build new residential buildings where the parking lots are located along California Street. Also, a residential Mayfair building would be built on a small portion of the landscaping. Other than that, the historically significant landscaping including the beautiful Terrace designed by the renowned landscape architects Eckbo, Royston & Williams and the majority of the 185 mature trees would be retained and would continue to absorb greenhouse gases. Under this Alternative, the existing 1,183 asf café and 11,500 gsf childcare center would remain in the main building. Approximately 10,000 gsf of office uses in the existing main building could be retained, at the developer's option.

The site would not be rezoned for approximately 54,117 gsf of retail uses or a 49,999 gsf new office building. By using all the newly constructed buildings for housing, some units large enough to be attractive to middle-income families would be provided along with other affordable

3 (AL-2) cont'd

housing. Retail uses were banned as a commercial use on the site by Planning Commission Resolution 4109, which still applies, when the site zoning was changed from First Residential to commercial with limitations, in order to prevent adverse effects on the adjacent retail uses in Laurel Village Shopping Center and along the Sacramento Street neighborhood commercial area. See Attachment G, Resolution 4109. This resolution was recorded in the chain of title as a Stipulation as to Character of Improvements and can only be changed by the Board of Supervisors.

4 (PP-1)

The Community Alternative would retain all of the existing office building's character-defining features and the bulk of the character-defining features of the site and landscape. Also, this Alternative would be built in approximately 3 years, as opposed to the 15 years which the developer is requesting in the development agreement so that if "conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability." Attachment A, October 12, 2017 email from Dan Safier. An architect is drawing up a graphic of the Community Alternative, which we will submit as comment on the Draft EIR.

5 (AL-2)

**2. ALTERNATIVE C: FULL PRESERVATION RESIDENTIAL ALTERNATIVE**

6 (AL-3)

There is also a new alternative in the Draft EIR (DEIR) which was not presented to the Architectural Review Committee of the San Francisco Historic Preservation Commission on March 21, 2018.

DEIR Alternative C: Full Preservation Residential Alternative would have 534 residential units plus 44,306 gsf of retail uses. DEIR p. 6.13. Please note that some of the proposed retail uses under this Alternative can be converted to residential uses to add 24 more residential units in order to match the 558 residential units in the proposed project. The DEIR unreasonably configured this alternative to have 24 less residential units than the project, in order to provide a false pretext for its rejection.

Alternative C would not divide the existing office building with a 40-foot-wide pathway, demolish the south wing of the building or destroy the Eckbo Terrace and majority of the

historically-significant landscaping. (See Attachment B hereto - Alternative C Site Plan from DEIR p. 6.67) This alternative would also have 14,650 gsf of daycare uses. *Ibid.*

According to the DEIR, Alternative C would retain most of the existing office building's character-defining features and many of the character-defining features of the site and landscape. DEIR p. 6.78. It is unclear what the DEIR means by stating that "the glass curtain wall system would be replaced with a system compatible with the historic resource," as the DEIR only states that the replacement would be "a residential system that would be compatible with the historic character of the resource; e.g. operable windows with small panes divided by a mullion and muntins." DEIR pp. 6.77-6.78. Illustrations do not appear to have been provided. It is also unclear what the DEIR means by stating that the proposed one-story vertical addition (12-feet tall) "would appear visually subordinate to the historic portion of the building" and that "the new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles." DEIR pp. 6.77-6.79. Illustrations do not appear to have been provided. The Final EIR should explain exactly what is meant by these two items so that their impact on the character-defining features of the resource can be determined.

6 (AL-3) cont'd

**3. THERE IS AN EXISTING PATHWAY THROUGH THE BUILDING TO MASONIC.**

7 (PD-4)

Opening at the front of the main building, there is a pathway through the building that opens into the Eckbo Terrace and continues to Masonic. See Attachment C, photos of pathway.

**4. PHOTOGRAPHS OF THE SITE ARE PROVIDED IN ATTACHMENT D.**

8 (CR-1)

Photographs of the property that were provided to the State Historic Resources Commission are attached hereto because the DEIR does not appear to contain photographs of the character-defining features, other than the aerial view on the cover. See Attachment D.

**5. THE DEVELOPERS AND USCF CONCEALED THE HISTORIC SIGNIFICANCE OF THE PROPERTY.**

During the meetings UCSF held with community members prior to granting the developer a 99-year lease for the property in 2015, UCSF concealed the historic significance of the property from the community members. The developers also concealed the historic significance of the site from community members during the time they met with community members to discuss their development concepts. The City of San Francisco disclosed the historic significance of the site in the Notice of Preparation of Environmental Impact Report and Notice of Public Scoping Meeting dated September 20, 2017. However, UCSF knew at least six years earlier that the site was a historically significant resource eligible for listing in the National Register and California Register, as shown in the *UCSF HISTORIC RESOURCES SURVEY* prepared on February 8, 2011 by Carey & Co, Inc. See Attachment E, excerpts from Carey & Co, Inc., *UCSF HISTORIC RESOURCES SURVEY.*

8 (CR-1) cont'd

**6. The Public Has Acquired Rights of Recreational Use on Open Space on the Property.**

9 (PD-5)

As explained in the letter from attorney Fitzgerald, the public has acquired recreational rights to the open space on the property as a result of the public's use of the used open space on the property as a park. See Attachment F.

## CONCLUSION

The Commission should support the Community Full Preservation Alternative which would construct the new residential uses in approximately three years, rather than 7-15 years, under the developer's proposal. This Commission should also request that the Community Full Preservation Alternative be substituted for Alternative C in the DEIR. In the alternative, this Commission should propose that Alternative C be modified so that no portion of the exterior of the existing office building be removed or expanded and that 24 additional residential units be constructed in the space allocated for 44,306 gsf of retail uses in Alternative C so that the total number of residential uses in Alternative C would match the 558 units in the proposed project

10 (AL-2)

11 (AL-3)

and 744 units in the project variant. Under this Alternative, as well as the Community Full Preservation Alternative, the existing passageway which extends from the north of the building, through the building, into the Eckbo Terrace, and onto an open-air pathway that directly connects to Masonic Avenue can be used as a pathway open to the public. No division of the main building would be needed to produce a pathway. There is also an existing open-air passageway from the north gate through the property that connects with Laurel Street.

12
(PD-4)

The confirmation of listing on the California Register of Historical Resources is attached. See Attachment H.

Respectfully submitted,

Laurel Heights Improvement Association of SF, Inc.

Kathryn Devincenzi

By: Kathryn Devincenzi, President

Telephone: (415) 221-4700

E-mail: LaurelHeights2016@gmail.com

ATTACHMENTS A-H

# EXHIBIT A

O-LHIA1

**Dan Safier** <dsafier@pradogroup.com> Thu, Oct 12, 2017 at 3:45 PM
To: John Rothmann <johnrothmann2@yahoo.com>, Dan Kingsley <dkingsley@sksre.com>
Cc: Kathy Devincenzi <krdevincenzi@gmail.com>, Catherine Carr <catherine.a.carr@gmail.com>, "M.J. Thomas" <mjinsf@comcast.net>, Richard Frisbie <frfbeagle@gmail.com>

Dear John, Kathy, Catherine, M.J., and Dick:

First of all John, thank you for the meeting last week at your home. As we agreed in the meeting, we are responding to your recent questions regarding the project. We have re-arranged your questions slightly to group them according to subject. If we haven't answered any of your questions, please let us know. We very much appreciate your willingness to promptly write back to us with your five outstanding issues on the project that are currently preventing us from obtaining LHIA support for the project. We appreciate your doing this so we can set a follow up meeting to find a mutually workable solution.

**LHIA Questions:**

**Q: You also stated that Prado wants to have a development agreement to lock in entitlements for longer periods of time than would normally be allowed?**

**A:** Yes, we are looking to enter into a development agreement (DA) with the City for a term of approximately 15 years. For large projects with multiple buildings like 3333 California Street, the City generally requires a DA. The DA vests the entitlements, protecting the entitlements from changes in the law in exchange for certain community benefits. This would include the community benefit of certainty of the entitlements during that period. If we did not build the project during the term of the DA, then the DA would expire and we would lose the protections of the DA.

**Q: What portion of the project would be built first?**

**A:** At this time, we have assumed that the Masonic and Euclid buildings would be built first. In general, we anticipate construction beginning with a staging and site preparation phase, which will include some demolition, then excavation for underground parking, followed by construction of the buildings. With the exception of work on the sidewalks, addition of landscaping, paving, and connecting to the City's various systems and utilities, our general contractor, Webcor Builders, is anticipating that construction will occur within the site. We will be preparing a detailed construction management plan, and the EIR will include mitigation measures around construction emissions, air quality, etc. with which we will have to comply.

**Q: What would you expect to be built in each successive phase of the project?**

**A:** At this time, we anticipate the following in each phase – Phase 1: Masonic and Euclid buildings; Phase 2: Center Buildings A and B; Phase 3: Plaza A, Plaza B and Walnut buildings; and Phase 4: Mayfair Building and Laurel Duplexes.

**Q: What do you anticipate the total period of time will be during each phase of construction?**

**A:** Our current planning assumes that each phase would overlap, e.g., Phase 2 begins approximately 20 months after Phase 1. Specifically, we think Phase 1 could take 30 months, Phase 2 could take 24 months, Phase 3 could take 36 months, and Phase 4 could take 20 months. Assuming an overlap of phases, from start to finish it could take approximately six to seven years to complete all phases of the construction. This construction phasing and related

durations are consistent with and defined in the phasing schedule under review in our environmental application. While the phasing could be accelerated, we have assumed a relatively conservative approach to the construction phasing.

**Q: What is the period of time that you anticipate that construction will occur?**

**A:** We anticipate that construction will occur in the spring of 2020.

**Q: What is the reason for constructing the project in phases?**

**A:** By allowing for potential phased construction, we would have the ability to complete and occupy portions of the project as each phase is completed. If conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability.

**Q: How many extensions do you anticipate requesting for the entitlements?**

**A:** None. Any extension of the DA's term would be a material amendment that would require Board of Supervisor's approval.

**Q: During those extended periods, would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased numbers of residential units, increased amounts of retail or office space? What about the possibility of design changes or other changes? Could Prado apply to change any part of the construction to provide the opportunity to have high rise construction?**

**A:** Once the EIR is certified and the project is approved, any material changes to the project would be subject to new environmental review, would require Planning Commission and Board of Supervisor approvals and also an amendment to the DA. Any increase in height over what is entitled in our project would require a revision to the Planning Code and Zoning Maps that would entail Planning Commission and Board of Supervisors approval.

**Q: There are genuine concerns about reducing open spaces and reduced on-site parking places.**

**A:** Open space will be part of the entitlements and will likely be considered by the City as one of the public benefits supporting the DA -- for that reason alone, reducing the amount of it would be very difficult if not impossible. The open space requirements will be carefully described in the project's approvals and will also be recorded against the property. So, as with any material changes to the approved project, any material change to the open space would be very difficult and would involve a public process and City approval. As to parking spaces, as you know, the City would like to see the number of spaces reduced. We plan to continue advocating for the proposed number of project parking spaces in our application.

**Q: During the phased construction could Prado transfer shares in the project to provide for new or additional investors?**

A: We have no plan to transfer any shares in the project and construction lenders generally prohibit any changes of ownership by the project developer during construction and stabilization of a project. PSKS, along with our equity partners and lenders, intend to provide all of the capital necessary to construct, own and operate the project. We plan to

retain day-to-day control of the project during development, construction, stabilization and ongoing operations. We design and build our projects to hold for the long-term owner.

We look forward to reconnecting and thank you again for making the time to meet with us.

Sincerely, Dan

PRADO GROUP

Dan Safier | President & CEO

Prado Group, Inc.

150 Post Street, Suite 320

San Francisco, CA 94108

dsafier@pradogroup.com

T: 415.395.0880 | D: 415.857.9306

**From:** John Rothmann [mailto:johnrothmann2@yahoo.com]
**Sent:** Monday, September 25, 2017 8:20 PM
**To:** Dan Safier <dsafier@pradogroup.com>; Dan Kingsley <dkingsley@sksre.com>
**Cc:** Kathy Devincenzi <krdevincenzi@gmail.com>; Catherine Carr <catherine.a.carr@gmail.com>; M.J. Thomas <mjinsf@comcast.net>; Richard Frisbie <frfbeagle@gmail.com>
**Subject:** Specific qwuetions about thre proposed project

Dear Dan and Dan,

[Quoted text hidden]

**John Rothmann** <johnrothmann2@yahoo.com> Mon, Oct 30, 2017 at 7:21 PM
To: Kathy Devincenzi <krdevincenzi@gmail.com>

----- Forwarded Message -----
**From:** Dan Safier <dsafier@pradogroup.com>
**To:** John Rothmann <johnrothmann2@yahoo.com>; Dan Kingsley <dkingsley@sksre.com>
**Cc:** Kathy Devincenzi <krdevincenzi@gmail.com>; Catherine Carr <catherine.a.carr@gmail.com>; M.J. Thomas <mjinsf@comcast.net>; Richard Frisbie <frfbeagle@gmail.com>
[Quoted text hidden]

# EXHIBIT B

FIGURE 6.5: ALTERNATIVE C: FULL PRESERVATION - RESIDENTIAL ALTERNATIVE SITE PLAN

# EXHIBIT C

O-LHIA1



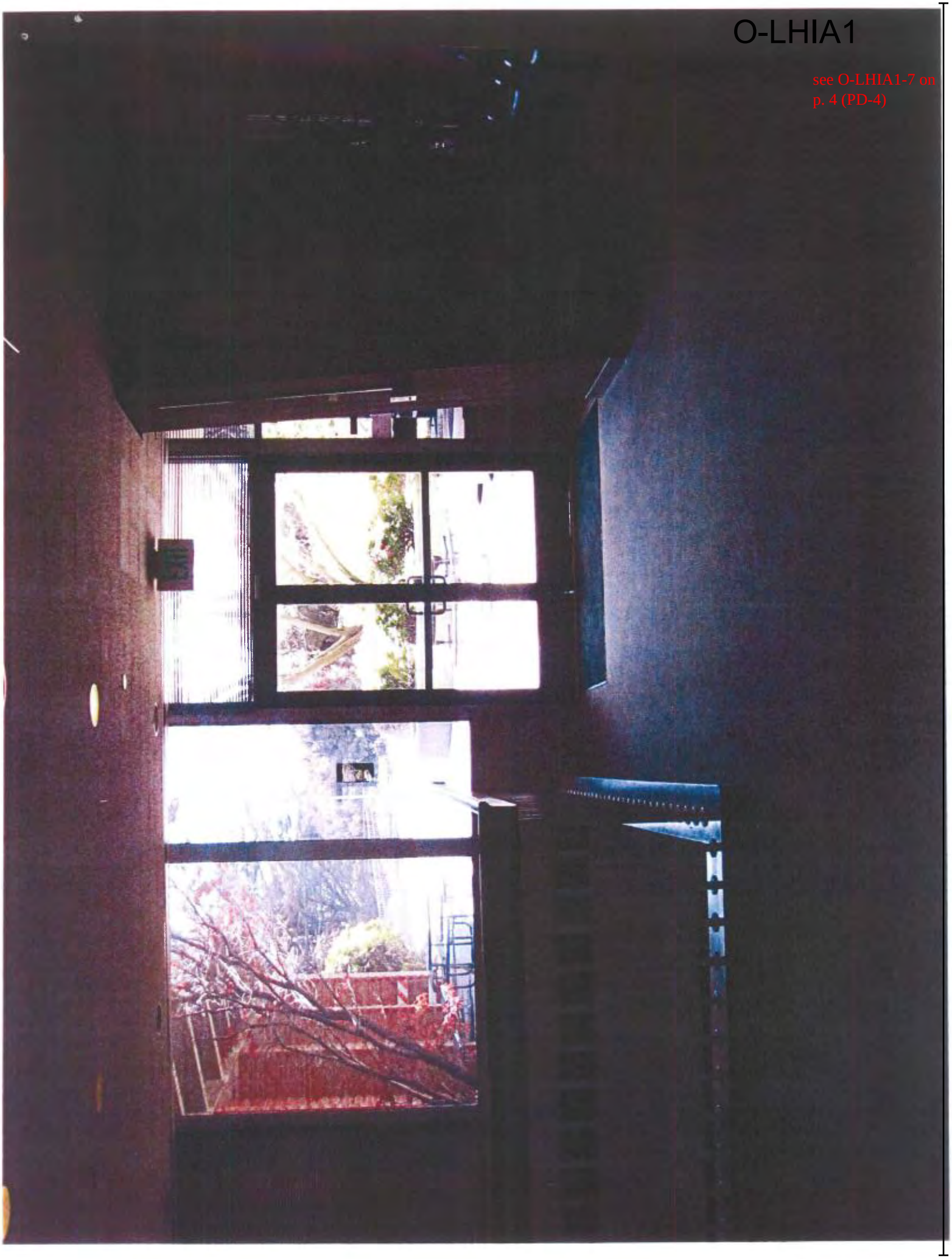

see O-LHIA1-7
on p. 4 (PD-4)

O-LHIA1

see O-LHIA1-7
on p. 4 (PD-4)

O-LHIA1

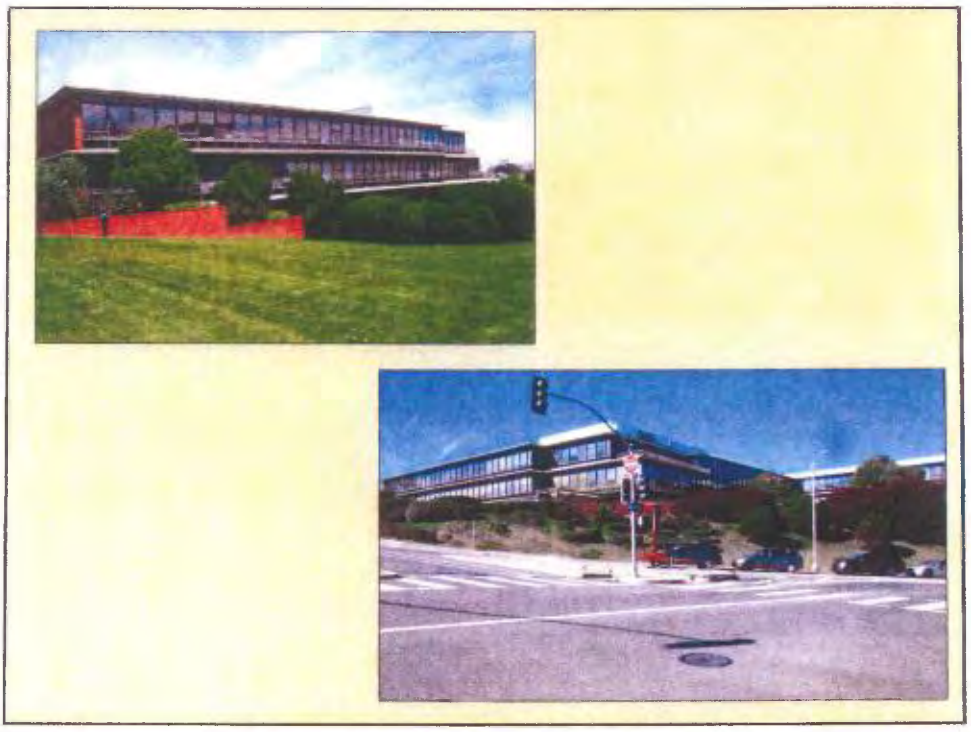
see O-LHIA1-7 on p. 4 (PD-4)



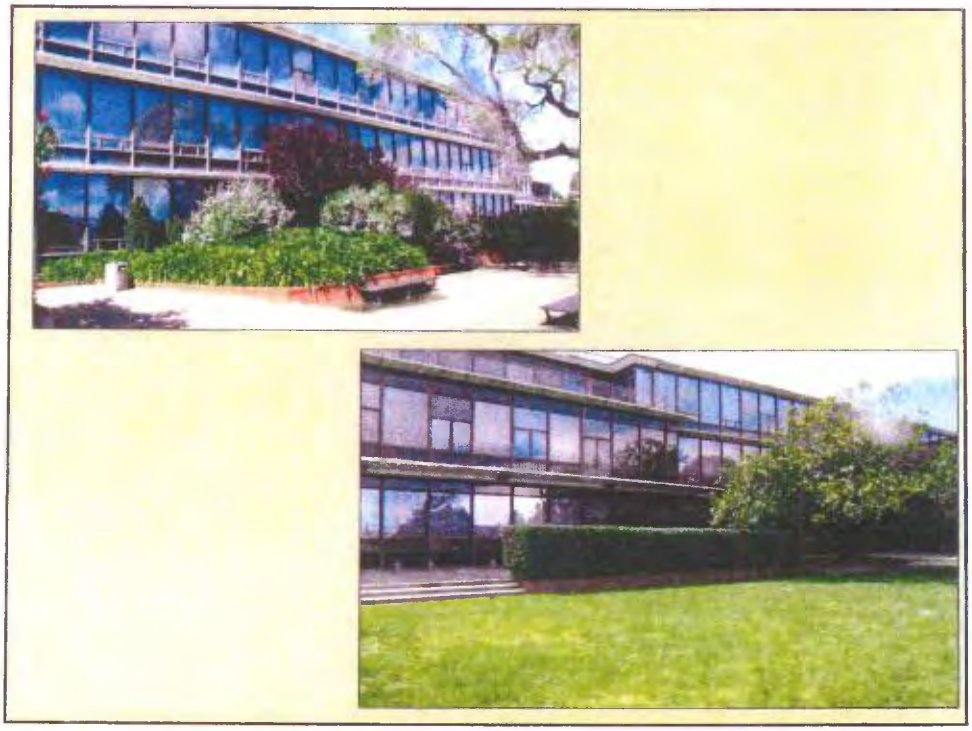
O-LHIA1

see O-LHIA1-7 on p. 4 (PD-4)

# EXHIBIT D



The next slides show the horizontality of the composition as the building steps down the hillside. As the nomination explains, the horizontality of the architecture both in its long, low wings, and in the specific design features of the wings—the division of floors by continuous thin edges of concrete and the walls of the floors consisting of long repetitions of similar window units—helped to balance the massing of the Office Building with the surrounding landscape.



These photos of the windows show the modern aluminum materials and the long repetitions of similar window units and the modernist design of the vertical and horizontal dividers in the windows evoking modern art forms. Also, the exterior glass walls provided views into the landscape of the outdoor spaces and at certain times of day reflected landscape features (trees, lawn, walls, patterned pavement, etc.), adding yet another level of integration between interior and exterior spaces. P. 21. This reflection can be seen on these slides.

In 1984, the glass of the windows was tinted, the aluminum frames of the units of the windows were painted brown and the bottom panels of ceramic coated glass were changed from blue to brown. As the nomination explains, this change did not alter the essential features of the building or its "design as a glass box open to its immediate landscape and to distant views."



Next, we see the exquisite outdoor Terrace— which was set on the east side of the building, framed by the Office and Cafeteria Wings, where it was "protected from the prevailing west wind" and on a portion of the site that had been graded to provide "a good view of a large part of San Francisco." Here a biomorphic-shaped lawn was framed by a patio, whose exposed aggregate pavement was divided by rows of brick that aligned with the window frames of the building.



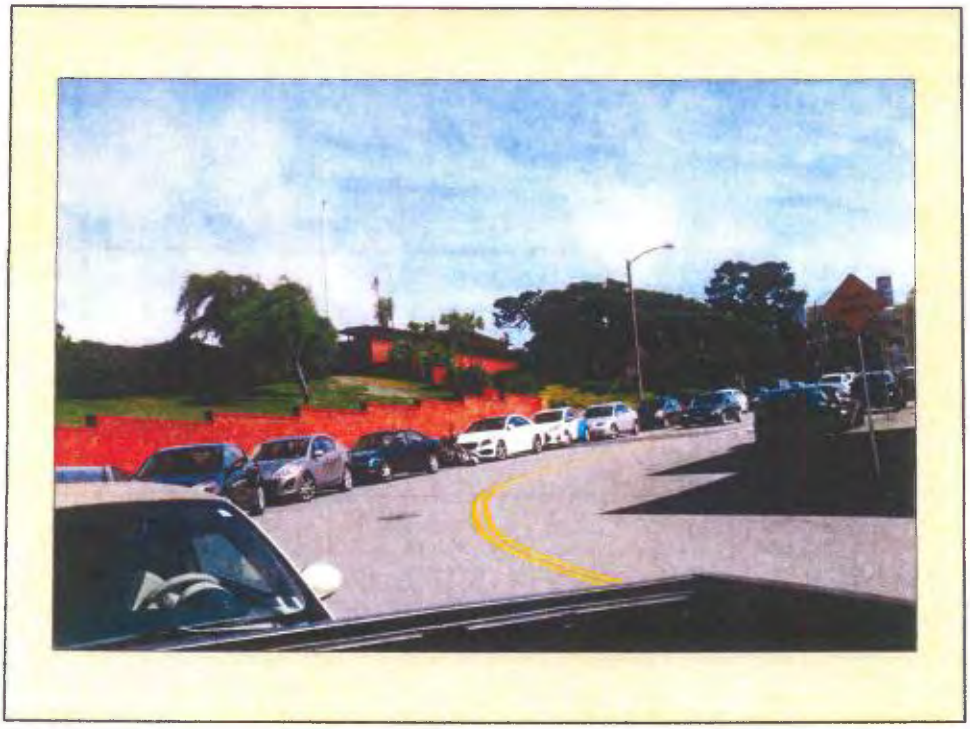
Benches attached to the niches of the zig-zag of the seat wall, which enclosed the eastern side of the Terrace, provided places for employees "to relax in the sun during lunch or coffee breaks." P. 21



Here we see the views of the Transamerica Pyramid and other notable buildings from the Terrace.



In these photos we see the brick aligned with the window frames of the building.



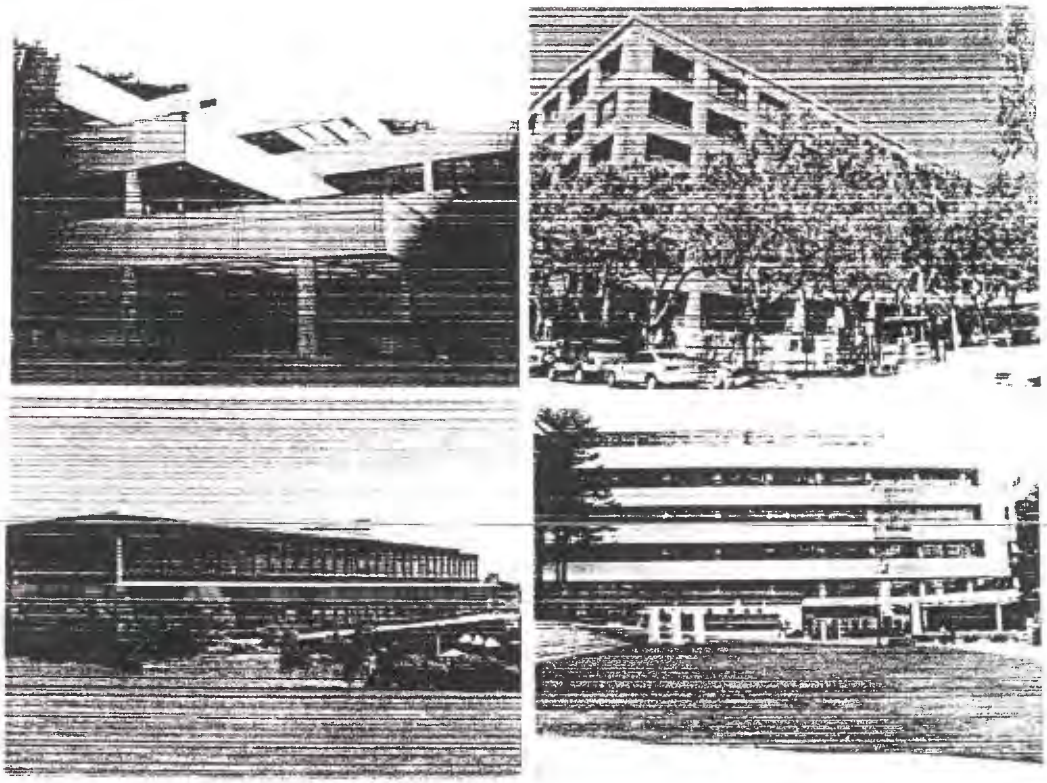
It created a boundary wall along some sides of the property and was transformed into low retaining walls that defined a series of planting beds along the some sides of the property.

# EXHIBIT E

# UCSF HISTORIC RESOURCES SURVEY

San Francisco, California

February 8, 2011



*Prepared for*

University of California, San Francisco

*Prepared by*

The materials Rockrise used for the student housing, their scale, their immediate access to the outdoors – particularly the sliding glass door and wide balconies – and their siting and landscaping, which landscape architect Lawrence Halprin designed, all conform to the principles of the Second Bay Region Tradition. In terms of integrity Aldea 10 retains a high degree of integrity of location, design, setting, workmanship, feeling and association. Some materials have been replaced, such as wood railings or siding, but these alterations are visually compatible. Therefore, Aldea 10 appears to be eligible for listing NRHP/CRHR under Criterion C/3 as an intact example of Second Bay Region Tradition.

**745 Parnassus Avenue/Faculty Alumni House**

Built in 1915, this two-story building occupies a heavily wooded lot at the southeast corner of 5th Avenue and Judah Street. The L-shaped building faces northwest and wraps around a small enclosed courtyard covered with brick pavers. Textured stucco clads the structure. The primary window type is wood sash, casement. The clay tile-clad, cross-gable roof features exposed rafter tails. The main entrance, which faces the courtyard at the northwest corner of the building, consists of a round projection with a conical roof clad with clay tiles; its door is framed by a deep shaped opening. Three wood, glazed double doors are located at the first story on other side of the main entrance. At the second story, each façade contains four sets of paired casement windows with shutters featuring prominent rivets. The second floor of the west-facing façade overhangs the first and is supported by machicolations. Each gable end features a paired double door at the second story that opens to a small balcony supported by decorative brackets.

The Faculty Alumni House is not known to be associated with persons of significance and therefore does not appear to be eligible for the NRHP/CRHR under Criterion B/2. It does, however, appear to be eligible for the NRHP/CRHR under Criteria A/1 and C/3, for its association with significant developments in the history of UCSF and as an excellent example of Spanish Eclectic architecture with high artistic value. Built for dental students in 1915, the building marks the first attempt to address student needs outside of the classroom. Recreational facilities also coordinated by the dental students followed within a few years. Thus the building expresses early attempts to foster student life at UCSF, rendering it eligible under Criterion A/1. With its stucco cladding, clay tile roof, heavy brackets, rounded entrance and carved archway, the Faculty Alumni House also stands as a fine example of Spanish Eclectic architecture, which was entering its peak of popularity in 1915. The building has not been moved or undergone significant alterations and stands in a residential neighborhood that has changed little since 1915. It thus retains its integrity of location, setting, design, materials, workmanship, feeling, and association.

**3333 California Street/Laurel Heights Building**

Built in 1957, this four-story building has an irregular plan and occupies the approximate center of an irregular-shaped city block. The intervening spaces are filled with extensive landscaping or parking lots. The concrete slab floors extend beyond the wall surface to form projecting cornices at each floor, and between these projections, an aluminum-sash window wall with dark, slightly mirrored glass forms the exterior walls. Brick veneer covers the walls in certain locations, and the roof is flat. The main entry opens on the north side of the building and features a covered entry with the roof supported on large square brick piers, a small ground-level fountain, and sliding aluminum doors.

The Laurel Heights building appears to be eligible for listing in the NRHP/CRHR under Criteria A/1 and C/3. It stands as the most prominent postwar commercial development in the Laurel Heights neighborhood and dramatically transformed the former cemetery site, rendering it eligible for the NRHP/CRHR under Criterion A/1. No persons of significance are known to be associated with the building; thus it does not appear to be eligible under Criterion B/2. While Edward B. Page was not the most prominent architect in San Francisco during the postwar period, his resume does accord him master

architect status. More importantly, this main building at the Laurel Heights campus is an excellent example of mid-century Modernism and the International Style. Its horizontality makes it a particularly good regional example of the architectural style. For these reasons the building appears to be eligible for the NRHP/CRHR under Criterion C/3.

The Firemen's Fund Insurance Company Building at Laurel Heights retains excellent integrity. It has not been moved and its surroundings have not undergone many alterations. Thus the building retains its integrity in all seven categories – location, setting, design, materials, workmanship, feeling, and association.

**513 Parnassus Avenue/Medical Sciences Building**

Built in 1954, this L-shaped building rises 17 stories on a steel structural frame and forms the east boundary and part of the north boundary of the Parnassus Heights campus' Saunders Courtyard. The north elevation faces Parnassus Avenue and features ten structural bays. Masonry panels clad the first and tenth bays. In the remaining bays, masonry spandrels with horizontal ribbing separate horizontal bands of aluminum windows. Four exhaust shafts enclosed in masonry panels project from the wall surface and rise from the second story to above the roof line. The ground floor features floor-to-ceiling aluminum windows separated by dark masonry panels at the structural columns. Monumental stairs rise approximately four feet above the sidewalk level to the main entry, where three columns support a flat entry roof. On the south and west elevations facing Saunders Courtyard, masonry panels cover the wall surfaces and separate horizontal bands of aluminum windows. Projecting metal brackets used to support exposed mechanical pipes and ducts attach to the wall surface in line with the structural columns.

The Medical Sciences Building was constructed at a time when UCSF was undergoing its most significant metamorphosis since the Affiliated Colleges were founded in the 1890s. Enrollment skyrocketed during the postwar years and the institution received unprecedented levels of government funding for research and curriculum development. New buildings were added rapidly to meet the demand and reflect the growing prestige. Within this context, MSB appears eligible for listing in the NRHP/CRHR under Criterion A/1, for its association with events or historic themes of significance in UCSF's history. It also stands as a good example of mid-century hospital architecture and the shift from Palladian Style campuses to International Style, highrise buildings. Blanchard and Maher, while not the most prominent architects in the San Francisco Bay Area, also rise to the level of master architects and this building stands as one of the firm's most prominent buildings in San Francisco. Thus, MSB appears to be eligible for the NRHP/CRHR under Criterion C/3. The building is not known to be associated with persons significant to history and therefore does not appear to be eligible for the NRHP/CRHR under Criterion B/2.

MSB has undergone some alterations but appears to retain a good degree of integrity to convey its historical significance. It has not been moved and continues to stand between Moffitt Hospital and the Clinical Sciences building, down the road from LPPI, and among hospital and medical school facilities. Thus it retains its integrity of location, setting, association, and feeling. The building has undergone some alterations, most notably a new exit to Saunders Court and a glass shaft containing a stairwell and vents on the west elevation. As these alterations occur on secondary elevations and are not notable on the primary, Parnassus Avenue façade, they do not significantly detract from the building's overall design, materials, and workmanship. Thus the building retains a good degree of integrity in these areas.

**707 Parnassus Avenue/School of Dentistry**

Built in 1979, this L-shaped building rises four stories and steps back to form terraces. The lot contains a parking lot to the south and a partially wooded green space at the north. This reinforced concrete

# EXHIBIT F

O-LHIA1

Margaret Fitzgerald

30 Wood Street, San Francisco, CA 94118

Date: February 28, 2016

Ms. Mary Woods
Planner – North West Quadrant
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2414

RE: 3333 California St. Development

Dear Ms. Woods:

I am writing regarding the development of the 3333 California Street development, currently the UCSF Laurel Heights Campus (the "Site"). It is my understanding that the San Francisco Planning Department is working with the developer of the Site regarding the initial project plans for the proposed development. The owner of the fee interest and the developer of the Site are limited in their joint ability to develop the Site because the owner of the Site does not have free and clear title; rather the general public holds a permanent recreational interest in all of the open space at the Site. Therefore, any development plans at the Site may not impinge upon this open space. 13 (PD-5)

The general public holds a ***permanent*** right of recreational use on all of the open space at 3333 California and such rights were obtained by implied dedication. Dedication is a common law principle that enables a private landowner to donate his land for public use. Implied dedication is also a common law principle and is established when the public uses private land for a long period of time, which period of time is five (5) years in California. In 1972, the California legislature enacted Civil Code Section 1009 to modify the common law doctrine of implied dedication and to limit the ability of the public to secure ***permanent*** adverse rights in private property. Here, however, the existing open space at the Site was well established and well used as a park by the general public long before the completion of the construction of the full footprint of the improvements at the Site in 1966. Therefore, the general public has permanent recreational rights to the open space at the Site; the rights were obtained by implied dedication prior to the enactment of Cal. Civil Code Sec. 1009 in 1972.

Even if the general public had not secured permanent rights to recreational use through implied dedication prior to 1972, the public and countless individuals have acquired a prescriptive easement over the recreational open space. The recreational use has been continuous, uninterrupted for decades, open and notorious and hostile (in this context, hostile means without permission). Every day, individuals and their dogs use the green space along Laurel, Euclid and along the back of the Site at Presidio. Individuals ignore the brick wall along Laurel and regularly use the green space behind the wall as a park for people and for their dogs. The use of the Site has not been permissive. For example, the owner of the Site has not posted permission to pass signs in accordance with Cal. Civil Code Sec. 1008. If such signs ever were posted, they have not been reposted at least once per year. Although it is counterintuitive, an owner typically posts such signs to protect against the public securing adverse rights. One might assume the owner of the Site has not posted such signs, as the owner is aware of the pre-existing and permanent recreational rights the general public has secured to the open space. Because the

public's rights to the open space were secured decades ago through implied dedication, it is not necessary for the general public to rely upon its prescriptive easement rights outlined in this paragraph; rather it is another means to the same end.

13
(PD-5)
cont'd

It is important that the Planning Department understand these legal issues as any project plan (or any future project description in an Environmental Impact Report ("EIR") for the Site) cannot include development of the open land over which the public has a secured permanent rights of recreational use. It would not be a concession by the owner/developer to leave the open space undeveloped and allow public recreational use as the general public holds permanent recreational rights to this space. It is important to note that even the open space behind the walls that has been used as park space is also included in this dedication to the public. According to well-established case law, a wall or fence is not effective in preventing the development of adverse property rights if individuals go around the wall, as is the case here.

In sum, the open space at the Site cannot be developed as the public secured such rights through implied dedication prior to 1972 (or, alternatively, by prescriptive easement). In reviewing the development plans for the Site, the City cannot decide to allow development of any of the open space as the recreational rights to the space are held by the public at large. Any project description in the future EIR for the Site that contemplates development of any of the open space would be an inadequate project description and would eviscerate any lower impact alternative presented in the EIR. One only need to look to the seminal land use case decided by the California Supreme Court regarding this very Site[1] to see that an EIR will not be upheld if the project alternatives are legally inadequate. It would be misleading to the public to suggest that a lesser impact alternative is one that allows the public to use the space to which it already has permanent recreational use rights.

In sum, please be advised of the public's permanent recreational rights to all of the existing open space at the Site and please ensure that a copy of this letter is placed in the project file.

Sincerely,

*Meg Fitzgerald*

Margaret N. Fitzgerald

With copies to:
Mark Farrell, Supervisor
Dan Safir, Prado Group
Kathy DiVicenzi, Laurel Heights Improvement Association
Robert Charles Friese, Esq.

[1] Laurel Heights Improvement Association of San Francisco, Inc. v. The Regents of the University of California, 47 Cal. 3rd 376 (1988).

# EXHIBIT G

O-LHIA1

CITY PLANNING COMMISSION

RESOLUTION NO. 4109

RESOLVED, That Proposal No. Z-52.62.2, an application to change the Use District Classification of the hereinafter described parcel of land from a First Residential District to a Commercial District, be, and the same is hereby APPROVED; subject to the stipulations submitted by the applicant and set forth herein:

Commencing at a point on the S/L of California Street distant thereon 187 feet west of the W/L of Presidio Avenue (produced), thence westerly on said line 707.375 feet to a curve to the left having a radius of 15 feet, thence 23.562 feet measured on the arc of the curve to the left to the E/L of Laurel Street, thence southerly on the E/L of Laurel Street 127.227 feet to the curve to the left having a radius of 60 feet, thence 77.113 feet measured on the arc of the curve to the left to a curve to the right having a radius of 120 feet, thence 149.153 feet measured on the arc of the curve to the right to a curve to the right having a radius of 4033 feet, thence 388.710 feet measured on the arc of the curve to the right to a curve to the left having a radius of 20 feet, thence 35.186 feet measured on the arc of the curve to the left to the northwest line of Euclid Avenue, thence N 73° 12' E on the northwest line of Euclid Avenue 312.934 feet to a curve to the left having a radius of 65 feet, thence 42.316 feet, measured on the arc of the curve to the left to the northwesterly line of Masonic Avenue (proposed extension), thence N 35° 54' E, 380.066 feet to the arc of a curve to the left having a radius of 425 feet, thence 254.176 feet measured on the arc of the curve to the left, thence N 52° 36' 29.74" W, 252.860 feet to the point of commencement. Being the major portion of Lot 1A, Block 1032, containing 10.2717 acres, more or less.

RESOLVED, FURTHER, That this change shall be and at all times remain contingent upon observance by the owner or owners and by his or their successors in interest of the conditions contained in the following stipulations as to the use of the land affected.

1. The character of the improvement for commercial purposes of the subject property, or any portion thereof, shall be limited to a building or buildings designed as professional, institutional or office buildings, including service buildings which are normally accessory thereto.

2. The aggregate gross floor area of all such buildings, calculated exclusive of cellars, of basement areas used only for storage or services incidental to the operation and maintenance of a building, and of indoor or other covered automobile parking space, shall not exceed the total area of the property allotted to such use.

O-LHIA1



3. For each five hundred square feet of gross floor area in such buildings, calculated as in stipulation 2, above, there shall be reserved and kept available on the property or the portion thereof allotted to such use, one off-street automobile parking space, or equivalent open space suitable for the ultimate provision of such parking space as needed for the accommodation of users of the premises.

4. No such building, other than a minor accessory building having a floor area of not more than 400 square feet, shall occupy any portion of the property which is within 100 feet of the line of the Euclid Avenue boundary thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

5. If the subject property, or any portion thereof, is developed as a site for residential buildings, such buildings shall be limited as follows:

a. No residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

b. No dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than thirty three hundred (3300) square feet, nor shall any such dwelling cover more than fifty percent (50%) of the area of such parcel or be less than twelve (12) feet from any other such dwelling, or be set back less than ten (10) feet from any presently existing or future public street, or have a height in excess of forty (40) feet, measured and regulated as set forth in pertinent section of the Building Code of the City and County of San Francisco.

c. No residential building in other portions of the subject property shall have a ground coverage in excess of fifty percent (50%) of the area allotted to such building.

6. Development of the subject property, or of any separate portion thereof, for commercial use as stipulated herein, shall include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building or buildings there shall be submitted to the City Planning Commission, for approval as to conformity with these stipulations, a site plan showing the character and location of the proposed

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building or buildings, and related parking spaces and landscaped areas upon the property, or upon such separate portion thereof as is allotted to such building or buildings. It shall be understood that approval of any such plan shall not preclude subsequent approval by the Commission of a revised or alternative plan which conforms to these stipulations.

I hereby certify that the foregoing resolution was adopted by the City Planning Commission at its special meeting on November 13, 1952, and I further certify that the stipulations set forth in the said resolution were submitted in a written statement placed on file.

Joseph Mignola, Jr.
Secretary

Ayes : Commissioners Kilduff, Towle, Devine, Williams
Noes : None
Absent: Commissioners Brooks, Lopez, Prince
Passed: November 13, 1952

BOOK 6071 PAGE 539

O-LHIA1

RECORDED AT REQUEST OF
CITY & COUNTY OF SAN FRANCISCO
At 33 Min. Past 10 A M
JAN 8 - 1953
OFFICIAL RECORDS
City and County of San Francisco, Calif.

B40426

BOOK 6071 PAGE 539

Stipulation as to Character of Improvements on that portion of Lot 1A, Block 1032 Affected by Zoning Proposal Z-52.62.2

Official

The San Francisco Unified School District, being the owner of the above property described, and the applicant in Proposal No. Z-52.62.2 for reclassification thereof from a Second Residential District to a Commercial District, set for hearing before the City Planning Commission of the City and County of San Francisco on October 23, 1952, hereby agrees that the said property shall be developed only as set forth in the following stipulations, which if accepted by the said City Planning Commission shall be observed by the applicant and by its successors in interest for as long as the property remains in the zone classification presently sought. The owner further agrees that no improvements shall be constructed on said property in violation of the conditions hereinafter set forth, and recognizes that the reclassification of the property to a Commercial District is by the Commission's action made contingent, and will remain contingent unless further reclassified, upon adherence to these stipulations.

Stipulations

1. The character of the improvement for commercial purposes of the subject property, or any portion thereof, shall be limited to a building or buildings designed as professional, institutional or office buildings, including service buildings which are normally accessory thereto.

2. The aggregate gross floor area of all such buildings, calculated exclusive of cellars, of basement areas used only for storage or services incidental to the operation and maintenance of a building, and of indoor or other covered automobile parking space, shall not exceed the total area of the property allotted to such use.

3. For each five hundred square feet of gross floor area in such buildings, calculated as in stipulation 2, above, there shall be reserved and kept available on the property or the portion thereof allotted to such use, one off-street automobile parking space, or equivalent open space suitable for the ultimate provision of such parking space as needed for the accommodation of users of the premises.

4. No such building, other than a minor accessory building having a floor area of not more than 400 square feet, shall occupy any portion of the property which is within 100 feet of the line of the Euclid Avenue boundary thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

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5. If the subject property, or any portion thereof, is developed as a site for residential buildings, such buildings shall be limited as follows:

a. No residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

b. No dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than thirty three hundred (3300) square feet, nor shall any such dwelling cover more than fifty percent (50%) of the area of such parcel or be less than twelve (12) feet from any other such dwelling, or be set back less than ten (10) feet from any presently existing or future public street, or have a height in excess of forty (40) feet, measured and regulated as set forth in pertinent section of the Building Code of the City and County of San Francisco.

c. No residential building in other portions of the subject property shall have a ground coverage in excess of fifty percent (50%) of the area allotted to such building.

6. Development of the subject property, or of any separate portion thereof, for commercial use as stipulated herein, shall include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building or buildings there shall be submitted to the City Planning Commission, for approval as to conformity with these stipulations, a site plan showing the character and location of the proposed building or buildings, and related parking spaces and landscaped areas upon the property, or upon such separate portion thereof as is allotted to such building or buildings. It shall be understood that approval of any such plan shall not preclude subsequent approval by the Commission of a revised or alternative plan which conforms to these stipulations.

SAN FRANCISCO UNIFIED SCHOOL DISTRICT,
a public corporation

By _____
Eugene J. Riordan
Director of Property of the City
and County of San Francisco

Subscribed and sworn to
before me this 13th day
of November, 1952

_____
County Clerk in and for
the City and County of San
Francisco, State of
California.

# EXHIBIT H

STATE OF CALIFORNIA - THE NATURAL RESOURCES AGENCY
EDMUND G. BROWN, JR., Governor

**OFFICE OF HISTORIC PRESERVATION**
**DEPARTMENT OF PARKS AND RECREATION**
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov

August 31, 2018

John Rothman, President
Kathryn Devincenzi, Vice President
Laurel Heights Improvement Association of San Francisco
22 Iris Avenue
San Francisco, California 94118

RE: **Fireman's Fund Insurance Company, Determination of Eligibility National Register of Historic Places**

Dear Mr. Rothman and Ms. Devincenzi:

I am writing to inform you that on August 29, 2018, Fireman's Fund Insurance Company was determined eligible for the National Register of Historic Places (National Register). As a result of being determined eligible for the National Register, this property has been listed in the California Register of Historical Resources, pursuant to Section 4851(a)(2) of the California Code of Regulations.

There are no restrictions placed upon a private property owner with regard to normal use, maintenance, or sale of a property determined eligible for the National Register. However, a project that may cause substantial adverse changes in the significance of a registered property may require compliance with local ordinances or the California Environmental Quality Act. In addition, registered properties damaged due to a natural disaster may be subject to the provisions of Section 5028 of the Public Resources Code regarding demolition or significant alterations, if imminent threat to life safety does not exist.

If you have any questions or require further information, please contact Jay Correia of the Registration Unit at (916) 445-7008.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Enclosure

August 31, 2018

Previous Weekly Lists are available here: http://www.nps.gov/history/nr/nrlist.htm

Please visit our homepage: http://www.nps.gov/nr/

Check out what's Pending: https://www.nps.gov/nr/pending/pending.htm

Prefix Codes:

SG - Single nomination
MC - Multiple cover sheet
MP – Multiple nomination (a nomination under a multiple cover sheet)
FP - Federal DOE Project
FD - Federal DOE property under the Federal DOE project
NL - NHL
BC - Boundary change (increase, decrease, or both)
MV - Move request
AD - Additional documentation
OT - All other requests (appeal, removal, delisting, direct submission)
RS – Resubmission

WEEKLY LIST OF ACTIONS TAKEN ON PROPERTIES: 8/16/2018 THROUGH 8/31/2018

KEY: State, County, Property Name, Address/Boundary, City, Vicinity, Reference Number, NHL, Action, Date, Multiple Name

CALIFORNIA, SAN FRANCISCO COUNTY,
Fireman's Fund Insurance Company Home Office,
3333 California St.,
San Francisco, RS100002709,
OWNER OBJECTION DETERMINED ELIGIBLE, 8/29/2018

| | |
|---|---|
| **From:** | Kathy Devincenzi |
| **To:** | Rich Hillis; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary; CPC.3333CaliforniaEIR; Foster, Nicholas (CPC) |
| **Subject:** | Photographs of Item 11: December 13, 2018 Planning Commission Meeting |
| **Date:** | Monday, December 10, 2018 1:27:55 PM |
| **Attachments:** | 20181210163544.pdf |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Re: December 13, 2018 Planning Commission Meeting
Item 11: 3333 California Street, Case Number 2015-014028ENV

Dear President Hillis and Commissioners,

Attached are photographs of historically significant characteristics of the site and comments that were presented to the State Historical Resources Commission on May 17, 2018. As a result of the State Commission's approval of our nomination, the site was listed on the California Register of Historical Resources.

Thank you for your consideration of this matter.

Laurel Heights Improvement Association of SF, Inc.
By: Kathy Devincenzi, President
(415) 221-4700



Good afternoon Commissioners. I am Kathy Devincenzi, Vice-President of the Laurel Heights Improvement Association which is a neighborhood association adjacent to the 3333 California Street property. We were fortunate to have had our nomination prepared by such highly qualified historians as Michael Corbett and Denise Bradley. Michael Corbett is widely recognized as one of San Francisco's acclaimed architectural historians. He was the author of the Uptown Tenderloin Historic District nomination with 477 contributing properties, which was accepted by the keeper of the National Register. Michael was the author of *Port City: The History and Transformation of the Port of San Francisco, 1848*-2010 (2011) published by San Francisco Architectural Heritage. Michael was also the principal author of the Port's Embarcadero Historic District nomination report. He is also the author of *Splendid Survivors: San Francisco's Downtown Architectural Heritage* (1979), the survey that formed the basis of the Downtown Plan and remains a standard reference on architecture in the city.

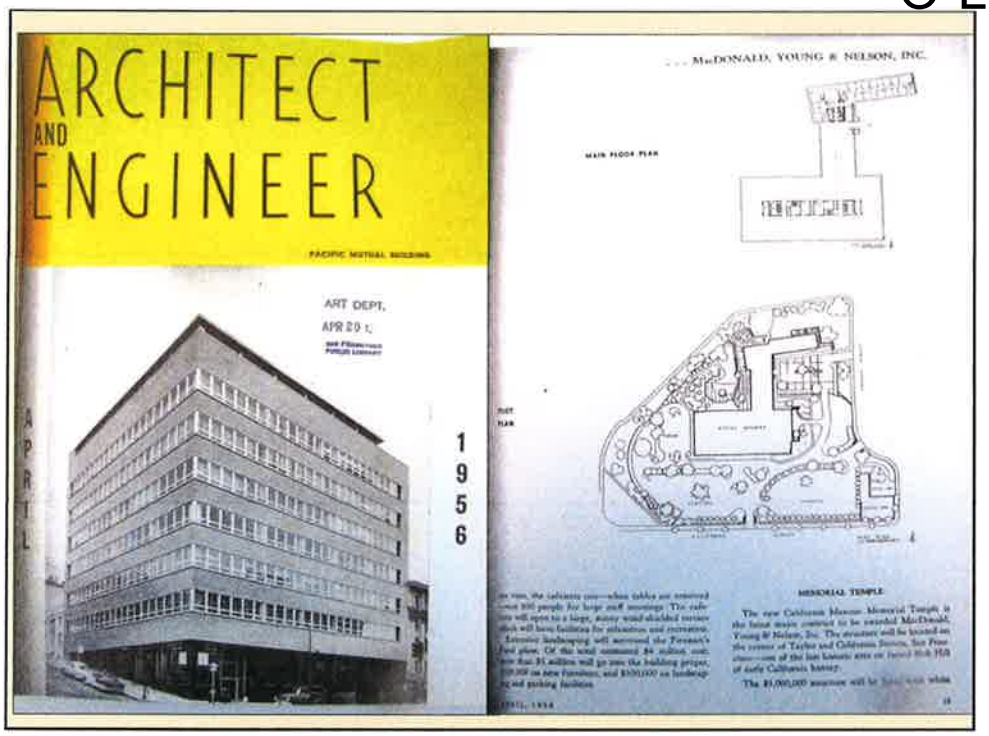
Denise Bradley has over 25 years of experience in providing research, documentation and evaluations of historical significance and served as Senior Landscape Historian for URS Corporation (formerly Dames & Moore) for 10 years before founding her own firm. She has received recent awards for documenting landscapes or studies of cultural resources as to Marin General Hospital, Mission Dolores, Fort Scott, Vallejo's Home and Alcatraz Island. In the past two years, she has evaluated cultural landscapes in the Delta Heritage Feasibility Study, Shellmound Boulevard, Mare Island, Mount Sutro Open Space Reserve, Sunnyvale Civic Center Historic District, and Vallejo, among others.



The Fireman's Fund Home Office, a single property including both architectural and landscape architectural elements which were designed to complement each other, is significant under Criterion C as an example of a corporate headquarters in San Francisco that reflects mid-twentieth century modernist design principles.



As an example of the International Style and the idea that form follows function, the building itself expresses the use of new technologies and materials, designing without ornament, an economy of means, a focus on function, an orientation to the landscape, and a process of design that resulted in a characteristic expression in glass and concrete. Key characteristics of a post-World War II suburban corporate headquarters are expressed the design's centrally-sited ...building's low-rise perpendicular wings which frame outdoor spaces designed to function with the building. The landscape was designed to promote the integration between architecture and landscape and uses forms and materials that are characteristic of modernist designs from the mid-twentieth century. The composition is a masterpiece of modern architecture.



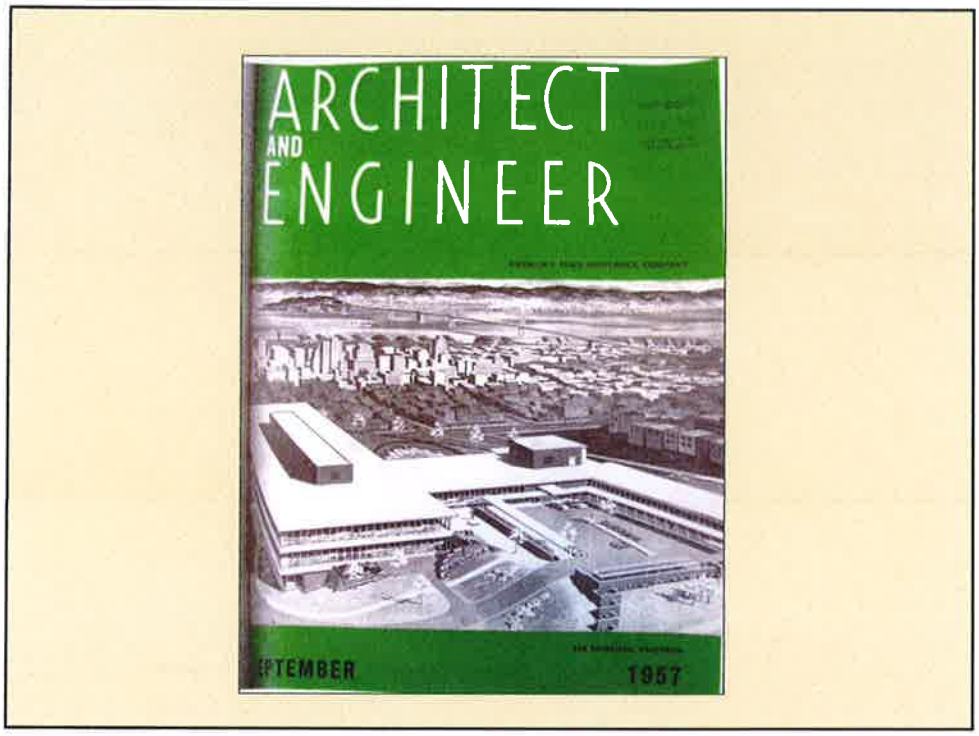

The April 1956 edition of *Architect and Engineer*, cited in the nomination, reported that the "horizontal, country-type structure will be unique among the typically vertical office buildings in San Francisco to conform to the lines of the surrounding area, which is predominantly residential." The structure will overlook San Francisco and "has been designed to relate to its park-like setting. P. 12 Highlighting the planning for the comfort and convenience of the company's staff "is a new concept of office lighting, area illumination, which will furnish maximum light quality for optimum working condition," and "most employees will be no more than 40 feet from an outside window." P. 12 ."



FINANCE

Casualty Insurer Faces the Mus

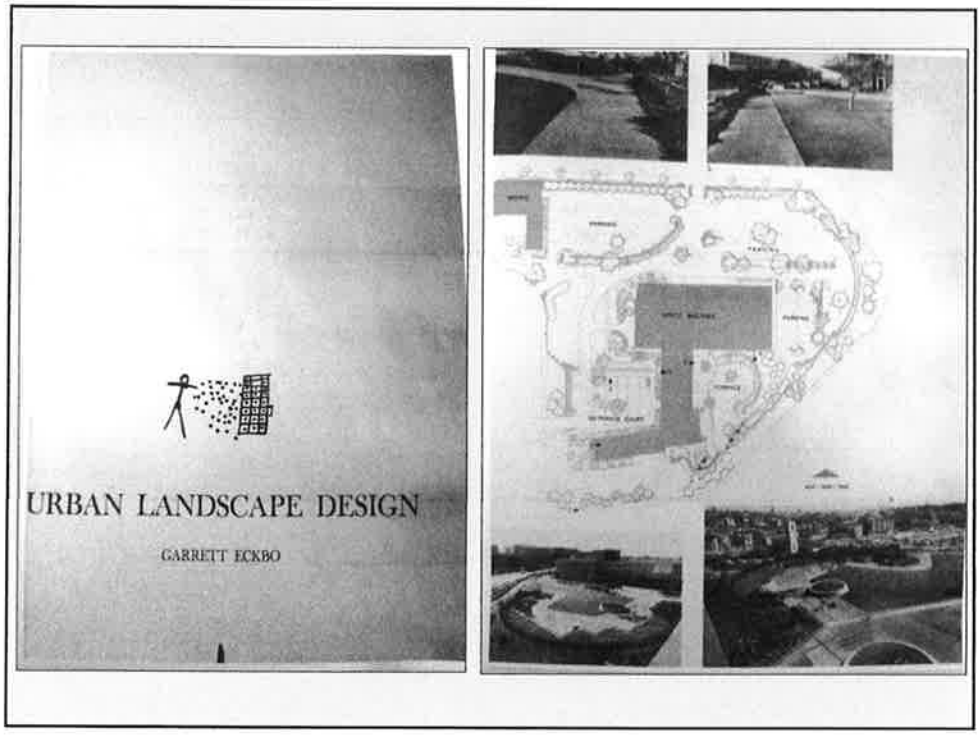
*Business Week* ran an article on the company to coincide with the completion of its new headquarters in a "contemporary building of glass and steel on the fringe of the Laurel Heights residential district." P. 95




*In September 1957, Architect and Engineer* ran a long **cover story** of the building beginning with the company's goal "that the new structure would be the finest and most efficient possible for the conduct of the firm's business and the welfare of its staff" and reporting construction innovations such as special support columns whose dimensions were far smaller than conventional columns, and a layout in which most employees would be within 40 feet of an outside window and a truly superb job of landscaping.




In 1959, the prominent French journal, *Architecture d'aujourdhui*, reported on the architecture and landscape design of the property in a special issue on office buildings around the world. Fireman's Fund was the only American building featured among 43 buildings in 16 countries on 3 continents.




The master landscape architect Garrett Eckbo included a description, site plan and nine photographs of Fireman's Fund to illustrate the "Building and Site" chapter of his book *Urban Landscape Design*



The next slides show the horizontality of the composition as the building steps down the hillside. As the nomination explains, the horizontality of the architecture both in its long, low wings, and in the specific design features of the wings—the division of floors by continuous thin edges of concrete and the walls of the floors consisting of long repetitions of similar window units—helped to balance the massing of the Office Building with the surrounding landscape.



These photos of the windows show the modern aluminum materials and the long repetitions of similar window units and the modernist design of the vertical and horizontal dividers in the windows evoking modern art forms. Also, the exterior glass walls provided views into the landscape of the outdoor spaces and at certain times of day reflected landscape features (trees, lawn, walls, patterned pavement, etc.), adding yet another level of integration between interior and exterior spaces. P. 21. This reflection can be seen on these slides.

In 1984, the glass of the windows was tinted, the aluminum frames of the units of the windows were painted brown and the bottom panels of ceramic coated glass were changed from blue to brown. As the nomination explains, this change did not alter the essential features of the building or its "design as a glass box open to its immediate landscape and to distant views."



Next, we see the exquisite outdoor Terrace— which was set on the east side of the building, framed by the Office and Cafeteria Wings, where it was "protected from the prevailing west wind" and on a portion of the site that had been graded to provide "a good view of a large part of San Francisco." Here a biomorphic-shaped lawn was framed by a patio, whose exposed aggregate pavement was divided by rows of brick that aligned with the window frames of the building.



Benches attached to the niches of the zig-zag of the seat wall, which enclosed the eastern side of the Terrace, provided places for employees "to relax in the sun during lunch or coffee breaks." P. 21



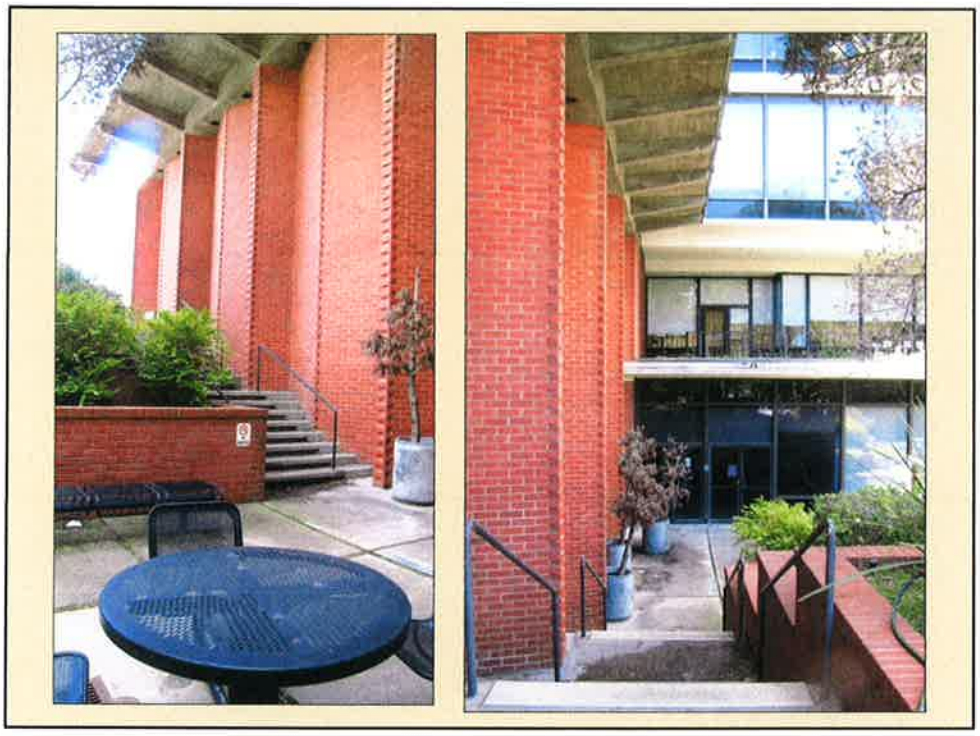
Here we see the views of the Transamerica Pyramid and other notable buildings from the Terrace.



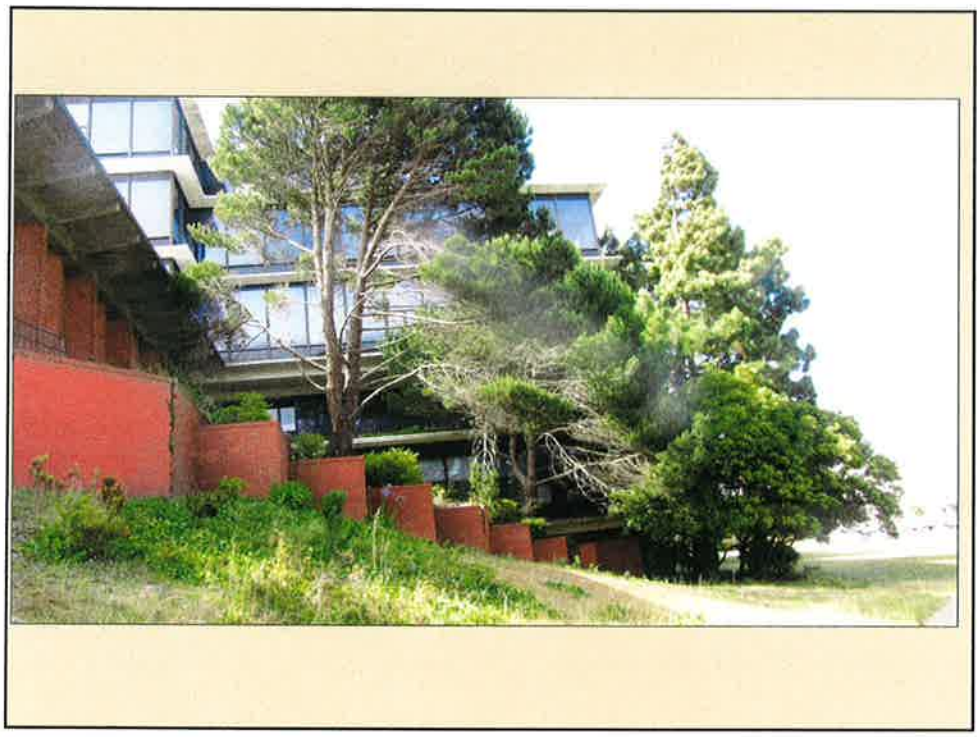
In these photos we see the brick aligned with the window frames of the building.



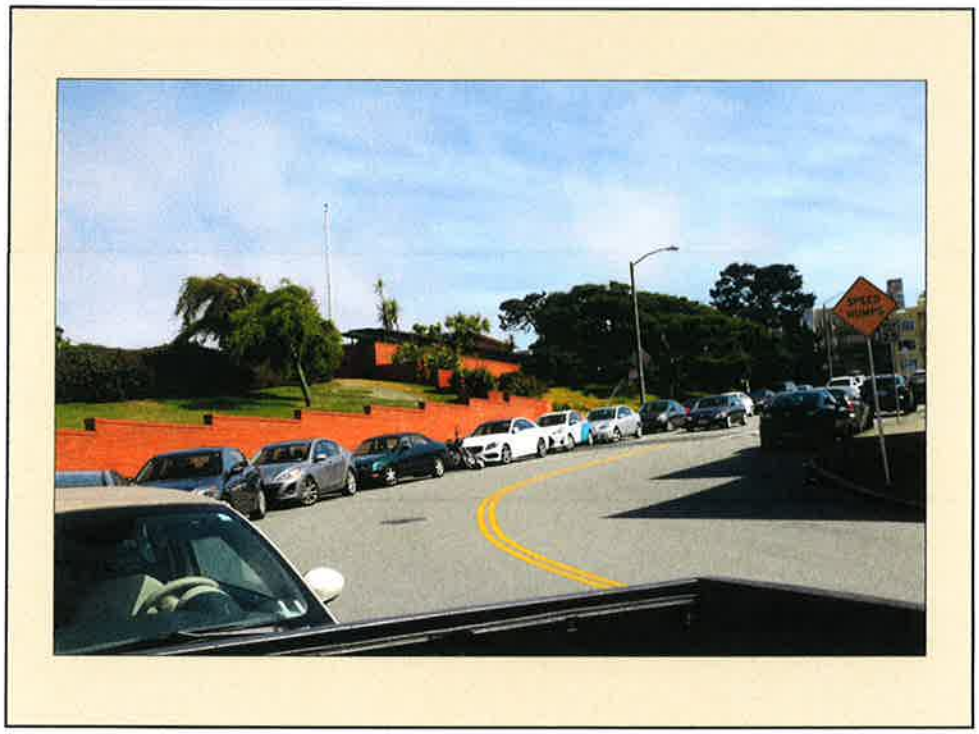
This composite shows all the features just discussed.



Next, we see beautiful geometric detailing in the brick work.



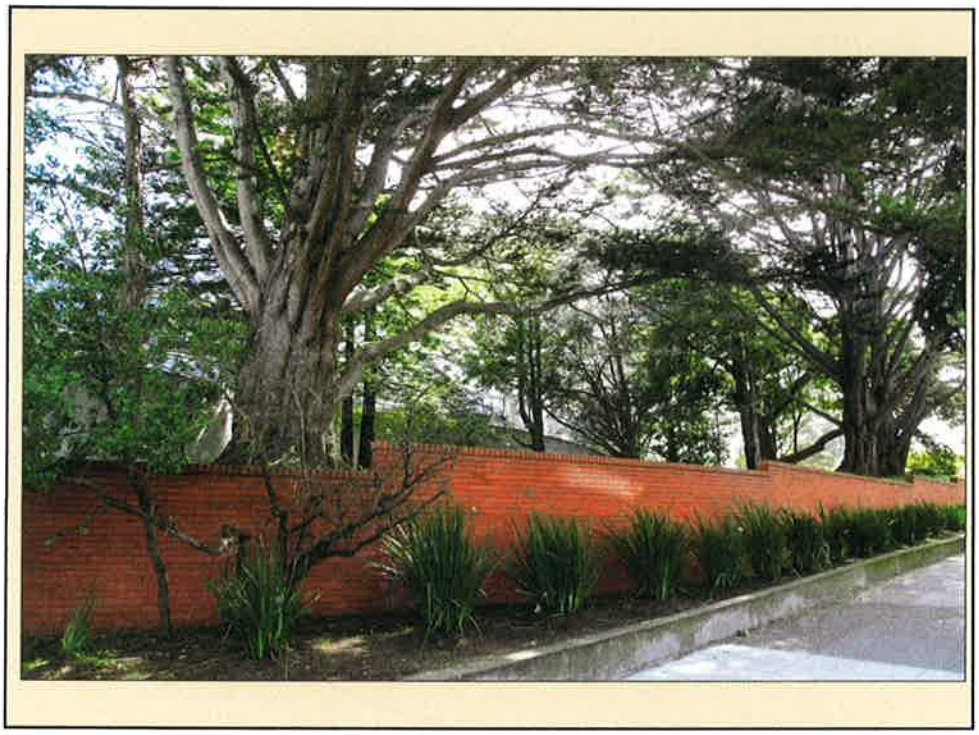
The next 4 slides show the brick wall, which took several different forms and provided a continuous and unifying element around the edges of the site.



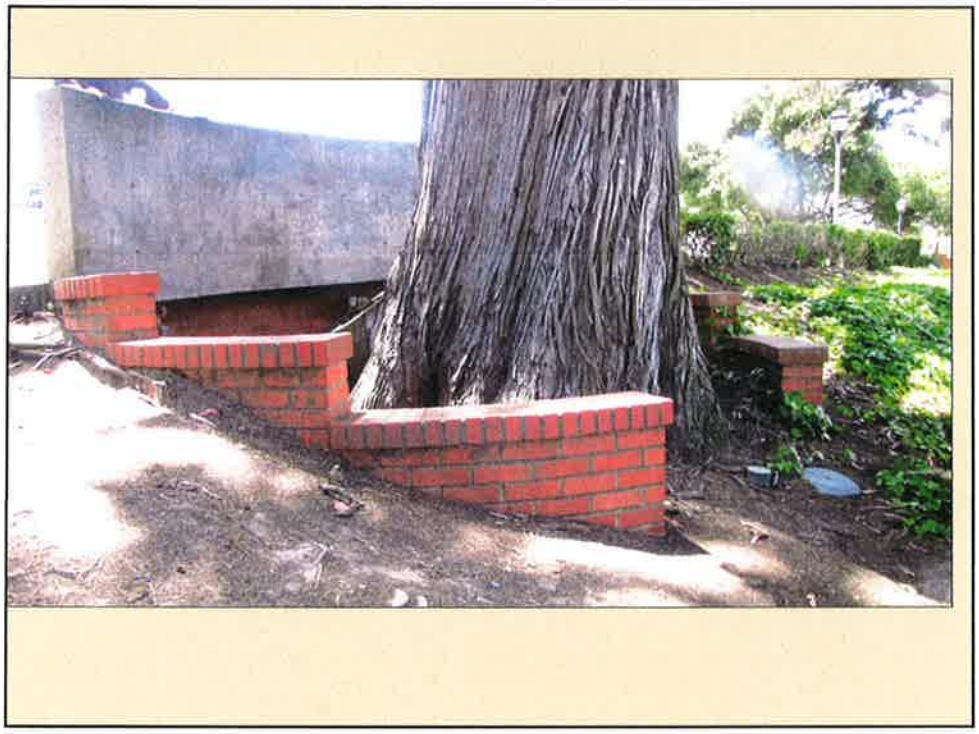
It created a boundary wall along some sides of the property and was transformed into low retaining walls that defined a series of planting beds along the some sides of the property.



The brick in the various sections of this wall and in the pavement patterns of the Terrace and Entrance Court was the same as that used in the Office Building and Service Building and helped to integrate the architecture and landscape. P. 21



A good view of the wall stepping down along California Street.



The ziz zag pattern used in the brick wall was employed as edging surrounding the base of an original tree remaining from the Laurel Hill cemetery, paying a sort of homage to its historic status as a representative of that significant garden cemetery, which was the resting place of the builders of the west and 11 United States Senators and the inventor of the cable car..



Here is a composite of the brickwork and walls.



Brick and glass were also integrated into the 1984 entrance gateway . As the nomination explains, the ground level of this structure is clad in the same brick that is used elsewhere on the site and the use of glass on its second level is compatible with the glass windows that dominate the exterior surface of the original building in the Fireman's Fund era. Also, at present, the gateway is partially hidden by trees, lessening its impact..



The additions to the office wing used the same aluminum frame and glass window walls as the original building and enclosed the new auditorium in brick. As with all the additions, the character of the original building remained intact.



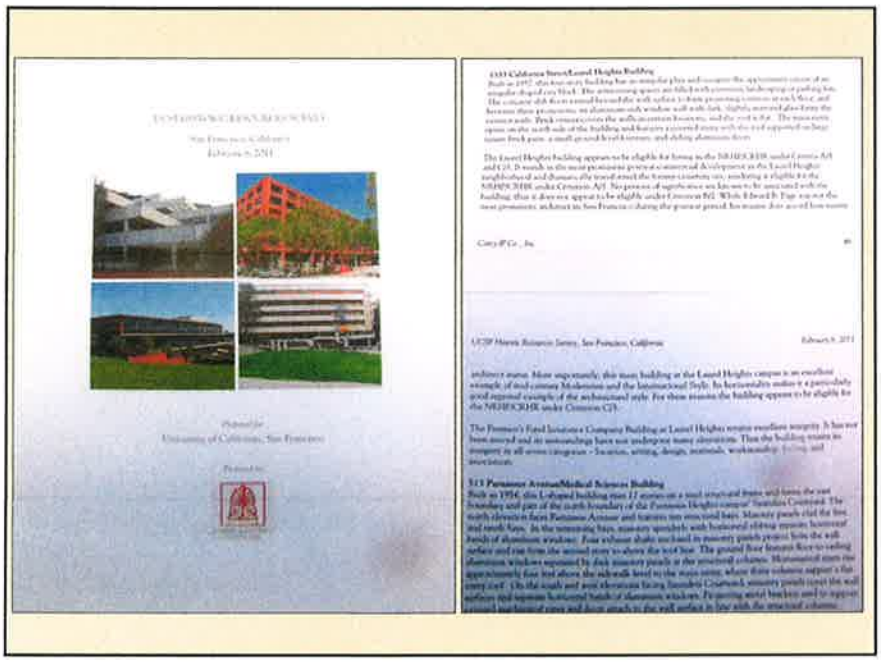
Here we see the Redwood trees planted along the east side of the Office Wing on Presidio Avenue



These two slides show that the exterior landscaping is visible from the interior of the building.



Looking out from café to landscaped terrace.



**Masters**

In addition to displaying distinctive characteristics of modernism, the property is also significant as the work of three masters, the architect Edward B. Page, the landscape architectural firm of Eckbo, Royston & Williams and its successor and the engineering firm of Gould & Degenkolb and it successor.

Not only was this property developed by 3 masters, Degenbold and Eckbo were giants in their respective fields.

Carey & Company's 2011 UCSF Historic Resources Survey states that the Edward B. Page's "**resume does accord him master architect status.** This survey was commissioned by UCSF when it was owner of the property.

The work on the Fireman's Fund Building that represented a phase in his career and made Edward page locally recognized as a master satisfies the National Register criteria.

**His design for the 1954 Mason B. Wells house in Belvedere won an Award of Merit from the Northern California Chapter of the American Institute of Architects**...

## Three Masters Cont'd

Following the success of the first phase of the Home Office in 1957, Page designed **branch offices in Fresno, Riverside, San Jose, and Los Angeles and he oversaw the architectural work for** branches New York, New Orleans, and Atlanta, where he advised primarily on matters related to the way the insurance business works." (Nomination p. 43, emphasis added) Under Criterion c, a property may be significant if it represents a work of a master.

As the National Register Bulletin explains, the "work of a master" refers to the technical or aesthetic achievements of an architect or craftsman." P. 17, As further explained in the Bulletin, a "master" includes "**a known craftsman of consummate skill**, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality" as well as "a figure of generally recognized greatness in a field." P. 20.
"The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft." (See Attachment 2 hereto, U.S. Department of the Interior, *National Register Bulletin, How to Apply the National Register Criteria for Evaluation* (1995) p. 20, emphasis added.) The criteria do not require that an architect be "prolific" or have had significant influence on the architectural community.

## Three Masters Cont'd

The nomination explains that:
On the Fireman's Fund project, Page coordinated the contributions of all. He was described as **'the master'** by Loring Wylie, an engineer in the Degenkolb office who had a major role working on the additions of the 1960s. Wylie remembered Page's deep involvement with and lead in solving issues with expansion joints as representative of his high level of competence and control. On another technical matter, he designed an innovative system of dispersed lighting for Fireman's Fund in an effort to provide better working conditions. (Nomination, p. 43)

The nomination documents other projects of Mr. Page.
"In 1947, Page opened his own office in San Francisco, Many of his early projects were in association with others, including the Glen Crags Housing Project with Wilbur D. Peugh in 1951 and two schools with Cantin & Cantin in 1952
Following the success of the first phase of the Home Office in 1957, Page designed three subsequent additions in 1963-1967, and **branch offices in Fresno, Riverside, San Jose, and Los Angeles**. He also consulted on the designs of branches outside of California including those in New York, New Orleans, and Atlanta,

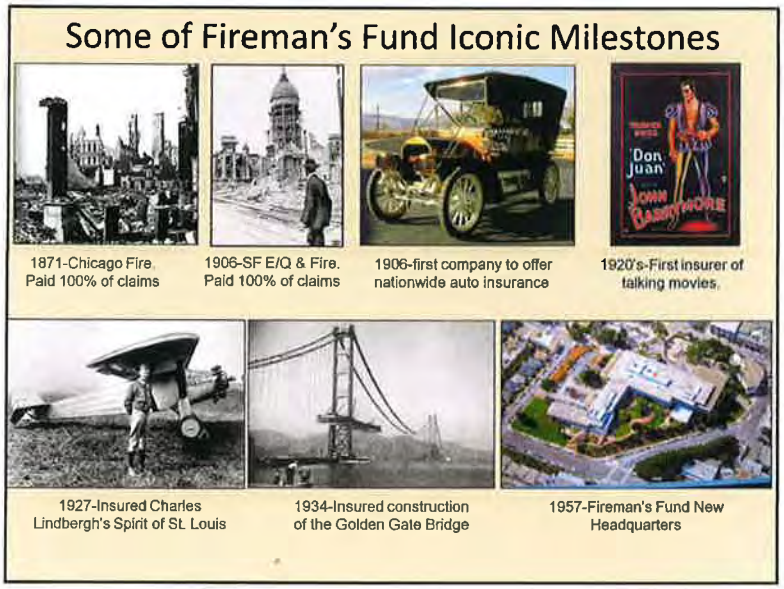
"As to earlier projects when working in the office of Bakewell &Weihe,
"...Page was allowed to work there on his own projects and in 1937-1938 was a draftsman for the Golden Gate International Exposition (G.G.I.E.). Later in life he remembered his design for the Island Club (demolished) at the G.G.I.E. with particular pride....

After receiving his architectural license in 1938, Page worked for himself and for others on small projects from 1939 to 1942. On one of these projects, for Lewis Hobart, another prominent Beaux-Arts architect, he worked on drawings for the floor of Grace Cathedral. From 1942-1947, he worked as the Chief of Architecture and Engineering for San Francisco architect Wilbur D. Peugh supervising wartime projects for U.S. Naval Operations."
(Nomination, p. 42)

## Three Masters Cont'd

The nomination also documents the mastery of the landscape architect. It discusses a history that accompanied an award presented to EDAW by the American Society of Landscape Architects that noted that ERW "established a compelling portfolio of modernist landscapes" and the partnership became "one of the leading firms in the country, highly regarded for its advanced planning, innovative vocabulary, and the quality of execution." The nomination also discussed that in 1950, ERW was awarded the Gold Medal in Landscape Architecture by the New York Architectural League. (Nomination p. 46) The nomination also explained that ERW was regularly written about in popular magazines, completed gardens in four states and was a pioneer ins expanding the practice of landscape architecture into the scale of neighborhood and community design. (Nomination p. 47) Park and playground projects gained the attention of the national media, and the firm worked on numerous new housing projects and public outdoor spaces including the Venetian Room Roof Garden at the Fairmont Hotel, the entrance court to the Palace of the Legion of Honor and St. Mary's Park. (Nomination p. 47-48).

The nomination also documents the mastery of the Gould & Degenkolb engineering firm. The Fireman's Fund building was the first major project of the firm after Degenkolb became a partner and was a successful debut for the partnership, with its innovative structural design that provided open floors with minimal columns and exterior walls of glass. P. 46 The firm designed may of San Francisco's major structures of the 1940s – 1960s including Park Merced, the Bank of California towne, parking garages at St. Mary's Square and Civic Center, expansion of the San Francisco airport , and many branches of the Bank of America and Pacific Telephone. P. 45.




**CRITERION A: COMMUNITY PLANNING AND DEVELOPMENT**

In the post WW II years there was an accelerated general movement of population and growth out of the central cities and into the suburbs.
While there were many reasons for this movement, a primary factor was the growing use of the automobile.
San Francisco was no exception.
Park Merced and Stonestown in1952; San Francisco State College in 1954: and Fireman's Fund in 1957 are examples of this movement with Fireman's Fund being the leading example of an emerging corporate trend.
One of the strongest traditional patterns at the time was the location of large office buildings downtown.
Between 1946 and 1967, twenty-one large office buildings were built in San Francisco. Nineteen of these were medium or high rise buildings were built downtown.
The Fireman's Fund new Headquarters was one of the two exceptions to this pattern in both location and design.
It was a low-rise building built in a predominantly residential area.
Apples' new corporate headquarters in Santa Clara shows that the vision pioneered by Fireman's Fund is alive and well 60 years later.
The Fireman's Fund Insurance Company Home Office is eligible for the National Register under Criterion A as one of the principal embodiments of the post World War II decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting and it was the first whose design was fully adapted to the automobile.

**CRITERION A: COMMERCE**

Two conditions of San Francisco's early history and growth, maritime commerce and frequent destructive fires, quickly gave rise to an insurance industry which would play an important role in the local economy and would lead to San Francisco becoming the center for the insurance industry on the west coast.

These destructive fires were the result of the rapid growth of the city and the haphazard construction of its buildings.

In the 1850s alone, fires destroyed large parts of the city on at least six occasions.

At the time fire insurance was provided by distant companies at exorbitant rates, if available at all.

More than thirty local insurance companies formed in San Francisco in the 1850s and1860s.

Fireman's Fund was formed in 1863 and was the only local insurance company left in business by 1895.

Fireman's Fund succeeded where other local companies failed for a number of reasons:

1. It quickly established branch agencies throughout the United States and abroad;
2. It paid all its claims in a number of high profile situations which gave it a reputation for honesty and reliability;
3. It was a leading innovator within the industry.

Fireman's Fund was the only company to pay 100% of its claims in the Chicago fire of 1871.

By the time of the 1906 earthquake Fireman's Fund was the most trusted and leading locally based insurance company in San Francisco, a position that it has never relinquished.

In the 1906 earthquake and fire its building and all its records were destroyed. Based on "word of mouth" it again paid 100% its claims by again assessing its shareholders.

As noted above, its pre-eminent position was also due to innovation and early adoption of new ideas:
1. In the nineteenth century it was a pioneer in insurance for agricultural products.
2. At the beginning of the twentieth century it was a pioneer in automobile insurance and one of the very first to sell it nationwide.
3. Likewise it led in new fields such as life insurance and health and accident insurance.

In the 1920s, Fireman's Fund grew substantially and was known as " 'the Tiffany' of the insurance world."
Fireman's Fund was to insurance what Bank of America was to banking. Both were home grown businesses which built reputations of excellence on respect for their employees, policyholders and shareholders.

The growth of the postwar years produced a great need to consolidate in one location so the company selected Laurel Heights in 1953.
Fireman's Fund was unique, moving to the suburbs to provide their employees a better working environment closer to their homes.

The Fireman's Fund Insurance Company Building is eligible for the National Register under Criterion A for its association with the growth and development of the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present.
In particular, it represents the post World War II boom in San Francisco's insurance industry when many companies built new office buildings.
At that time, Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquartered in San Francisco.
It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location.

## Historic Preservation

**Developers Plan:**

**Demolish** Executive & Cafeteria Wings
**Cut** 30 ft gap though main building
**Add** 3 floors to remaining truncated sections
**Demolish** the Terrace, Children's Childcare Playground; Redwood Trees
**Bulldoze** All Landscaping
**Number** of New Housing Units: **558-744**
**Schedule** to complete critically needed units: **15 years**

**Neighborhood Plan:**

**Retain** entire Historic Building completely
**Re-purpose** Historic Building
**Retain** the Terrace, Children's Childcare Playground: Redwood Trees
**Preserve** Landscaping
**Number** of New Housing Units**: 558-744**
**Schedule** to complete critically needed units: **3 years**

This is **NOT** a Housing Issue but an Historic Preservation Issue.

O-LHIA3
Received at CPC Hearing 12/13/18
K. Zushi



EIR responses to comments). But see *Burrtec Waste Indus., Inc. v City of Colton* (2002) 97 CA4th 1133, 1140, 119 CR2d 410 (court refused to apply presumption in negative declaration case when record contained no evidence that required notice was posted, but contained evidence that prior notices had been posted). If a claim of improper notice is later raised, and there is some evidence supporting that claim, evidence of compliance with the notice requirements may be critical in establishing compliance.

## §9.20 B. Review Period

10
(GC-3)
cont'd from
Draft EIR
Hearing
Transcript p. 46

The required time periods for public review of draft EIRs are set forth in CEQA and the CEQA guidelines. See Pub Res C §21091(a); 14 Cal Code Regs §§15087, 15105, 15205. Generally, a draft EIR must be circulated for public review for 30 to 60 days, but the public review period for EIRs submitted to the State Clearinghouse must be at least 45 days (unless a shorter period, not less than 30 days, is approved by the State Clearinghouse). 14 Cal Code Regs §15105(a). Under the CEQA Guidelines, the review period should not be longer than 60 days, except in unusual circumstances, and the review period should run from the date of the public review notice (see §9.17). 14 Cal Code Regs §§15087(e), 15105(a). Occasionally, an agency will decide to establish a review period longer than 60 days. Neither the Guidelines nor CEQA case law have defined an "unusual situation" that may justify a longer public review period.

Agencies may adopt time periods for review as part of their CEQA implementing procedures, consistent with the requirements of CEQA, the CEQA Guidelines, and State Clearinghouse review periods (see §§9.21-9.23). Agencies must notify the public and reviewing agencies of the time period for receipt of comments on draft EIRs. 14 Cal Code Regs §15203(a). CEQA and the Guidelines set forth different rules for projects for which only local review is required (see §9.21) and for projects that are submitted for Clearinghouse review (see §§9.22-9.23).

Failure to circulate a draft EIR for the full required time period is an abuse of discretion. *Gilroy Citizens for Responsible Planning v City of Gilroy* (2006) 140 CA4th 911, 922, 45 CR3d 102.

O-LHIA4

# Laurel Heights Improvement Association of San Francisco, Inc.

BY HAND

January 8, 2019

RECEIVED
JAN 0 8 2019
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

San Francisco Planning Department
Attn: Kei Zushi, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Draft EIR for 3333 California Street, San Francisco, CA 94118
Planning Department Case No: 2015-014028ENV
State Clearinghouse No: 2017092053

As comment on the Draft EIR (DEIR), the Laurel Heights Improvement Association hereby submits for evaluation the Community Full Preservation Alternative and Variant (Community Alternative, unless otherwise indicated) along with the evaluation of that Alternative's compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation (SOIS) by Nancy Goldenberg, Principal architect and architectural historian with TreanorHL. Ms. Goldenberg was formerly Principal architect at Carey & Company, Inc. 1 (AL-2)

Ms. Goldengerg's SOIS evaluation is attached hereto as Exhibit 1, and the Community Full Preservation Alternative/Variant is attached thereto as Appendix A.

The Laurel Heights Improvement Association specifically requests that the Environmental Impact Report evaluate the Community Full Preservation Alternative/Variant with the same degree of specificity as the DEIR used to evaluate the alternatives discussed in the DEIR.

At the December 13, 2018 hearing on the Draft EIR, members of the San Francisco Planning Commission stated that the Community Alternative should be evaluated during the environmental review process with the same degree of specificity that the DEIR used to evaluate the alternatives discussed in the DEIR. In addition, members of the San Francisco Historic Preservation Commission expressed interest in understanding more about the community alternative that was discussed by the public in the hearing held before that Commission on December 5, 2018. (See Ex. 2, December 11, 2018 Letter from Andrew Wolfram, President of Historic Preservation Commission to Environmental Review Officer; video of hearing on SFGOV-TV and transcript of hearing reported by court reporter. It is important that a full evaluation of the Community Alternative be performed because DEIR Alternative C: Full 2 (AL-3)

Preservation - Residential Alternative would have 24 fewer residential units than the proposed Project and 210 fewer units than the proposed Project Variant. DEIR p. 6.75. Based on this discrepancy and other characteristics of the alternatives described in the DEIR, the Draft EIR failed to present a reasonable range of alternatives for evaluation in the DEIR.

2 (AL-3) cont'd

The Community Full Preservation Alternative would meet the basic objectives of the project described at DEIR p. 2.12, as follows:

3 (AL-2)

- Redevelop a large site into a new high quality walkable mixed-use community with a mix of uses on site including 558 new residences (744 in the Community Alternative Variant), an existing 1,183 asf café, an existing 11,500 gsf childcare center, 5,000 gsf of existing nonconforming office uses and substantial open space, while building these new residential units adjacent to the Laurel Village Shopping Center, one block from Trader Joe's grocery store and one block from the Sacramento Street neighborhood commercial uses.

- Create a mixed-use project that encourages walkability and convenience by opening the existing north/south throughway on the first floor of the main building to the public and maintaining other existing pathways that pass through the landscaping, building substantial new housing units adjacent to the existing Laurel Village Shopping Center, and providing on-site childcare and on-site office use.

- Address the City's housing goals by building the same number of new residential dwelling units on site as the proposed project (and proposed project variant), including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco.

- Open and connect the site to the surrounding community by opening the existing north/south throughway on the first floor of the main building to the public, designating the Eckbo Terrace as privately-owned, publicly accessible open space, maintaining other existing pathways that pass through the landscaping, and maintaining the extensive existing natural landscaping that provides a welcoming atmosphere for the public.

- Create complimentary designs and uses that are compatible with the surrounding neighborhoods by conforming with the scale of surrounding development and maintaining the active, natural landscaped, neighborhood-friendly spaces along the west, south and eastern perimeter of the site.

- Provide a high quality and varied architectural and landscape design that is compatible with its diverse surrounding context, and utilizes the site's topography

3
(AL-2)
cont'd

and other unique characteristics.

- Provide substantial open space for project residents and community members by maintaining the existing welcoming, natural green space and walkable environment that will encourage continued use of the landscaped areas and community interaction.

- Incorporate open space in an amount equal to or greater than that required under the current zoning, in multiple, varied types designed to maximize pedestrian accessibility and ease of use.

- Include sufficient off-street parking for residential and office uses below grade and childcare center uses above grade to meet the project's needs.

- Work to retain and maintain the integration of the office building into the development to promote sustainability and eco-friendly infill redevelopment.

The Community Alternative would meet most of the basic project objectives and would be superior to the proposed project/variant because it would maintain the historically significant characteristics of the site by preserving the existing main building and integrated landscaping in its present, neighborhood-friendly, natural form.

The Community Alternative would redevelop a large site with the same amount of new residential units as the proposed project but with a lesser number of commercial uses, retaining the existing café, childcare center and 5,000 square feet of office use on site. The Community Alternative would construct the same number of new housing units as the proposed project/variant in a location that is rich with easily accessible retail uses at the adjacent Laurel Village Shopping Center and is located one block from a Trader Joe's grocery store and Sacramento Street neighborhood commercial uses. Also, a Target variety store is located approximately one-two blocks from the site. Given the location of the project site directly adjacent to the Laurel Village Shopping Center but not near the downtown, the lesser amount of on-site retail and office space that the Community Alternative would provide would not materially impair achievement of Objective 1.

The Community Alternative would meet Objectives 2, 4, 7 and 8 by enhancing the public open space by designating the Eckbo Terrace as privately-owned, publicly accessible open space, opening the existing north/south passageway to the public, maintaining the other existing pathways that pass through the landscaping, and maintaining the extensive existing natural landscaping that provides a welcoming atmosphere for the public. Due to the maintenance of the natural landscape, the welcoming atmosphere would be greater under the Community Alternative and the public accessibility would be similar under the Community Alternative with passageways open to walkers from the north, south and west of the site. On balance, the Community

Alternative would satisfy the Objectives 2, 4, 7 and 8 to substantially the same degree as the proposed project.

3
(AL-2)
cont'd

The Community Alternative would increase the City's housing supply to the same degree as the proposed project/variant but would better meet the Objective of including on-site affordable units, in an economically feasible project consistent with the City's General Plan Housing Element and ABAG's Regional Housing Needs Allocation for the City and County of San Francisco. The Community Alternative specifically includes 56 family-size units (average size 1,821 square feet) for middle-income families in the new California Street Front buildings and additional on-site affordable housing as determined by the Board of Supervisors. In contrast, the proposed project does not state the amount or type of affordable housing that it would have on-site or commit to build the amount of affordable units on-site that are currently required by the Planning Code. The ambiguity in the project description maintains other options, such as paying a fee in lieu of building a portion of the affordable housing on-site or requesting an adjustment under Planning Code provisions applicable to development agreements. Further, the proposed project does not indicate that it would build affordable housing for middle-income families on site, so the Community Alternative would better meet Objective 3 by providing housing for middle-income families, which is the income level for which the City's housing production is the most deficient under ABAG allocations. Thus, the Community Alternative would better meet Objective 3 than the proposed project.

The Community Alternative would better meet Objectives 5 and 6 than the proposed project, because the design of the Community Alternative would conform with neighborhood scale and complement its character by building new structures that conform with the scale and character of surrounding buildings and would maintain the landscaped set backs on the west, south and east of the site, which better integrate the site with the surrounding residential community. In contrast, the proposed project/variant would add two to three additional floors to the existing main building that would not be compatible with the predominant 40-foot height limit in the surrounding neighborhoods, would build 40-foot tall structures along the east side of Laurel Street (with rooftop decks) that would not be compatible with the scale of the residences on the western side of Laurel Street, and would remove portions of the landscaped buffer that now exists between the site and those residences by building new residential buildings on portions of that landscaping.

The Community Alternative would meet Objective 9 to the substantially same degree as the proposed project, because it would provide almost one on-site parking space for each residential unit, but the spaces provided would have direct access, so would be more accessible than the mechanically accessible spaces proposed for the project/variant. The Community Alternative would provide above-ground parking spaces for the on-site childcare use.

The Community Alternative would meet Objective 10 to a far greater degree than the proposed project because the Community Alternative would preserve the existing main building and the majority of its integrated landscaping, including maintaining large Monterey Cypress trees that

remain from the Laurel Hill Cemetery (California Registered Historical Landmark number 760). (Ex. 3, Memo from Denise Bradley concerning Location of Trees that were part of the Laurel Hill Cemetery) Thus, the Community Alternative would be a superior example of sustainability and eco-friendly development. In contrast, the proposed project would destroy character-defining features of the main building by dividing it in two, demolishing its wings, destroying its integrated landscaping by building on top of it and conducting substantial excavation including by removing large portions of the slope of Laurel Hill.

3
(AL-2)
cont'd

CONCLUSION

The Community Alternative meets all the basic objectives of the proposed project and is feasible. It would entail far less excavation for underground garages and be completed in approximately three years, as opposed to the seven to fifteen years which the developers request to construct the proposed project. Moreover, the Community Alternative is far superior as to compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. The project objectives do not even mention compliance with those standards as to rehabilitation of a historically significant resource, which is a telling omission and proof that the statement of project objectives in the DEIR is unduly narrow. DEIR p. 2.12.

Very truly yours,

Laurel Heights Improvement Association of SF, Inc.

Kathryn R. Devincenzi

By: Kathryn R. Devincenzi, President
Email: LaurelHeights2016@gmail.com

Attachments: Exhibits 1-3

# EXHIBIT 1

TREANORHL

January 7, 2019

3333 California Street
San Francisco, California

# Secretary of the Interior's Standards Compliancy Evaluation

## INTRODUCTION

This report evaluates three proposed designs for 3333 California Street: the Proposed Project (and Project Variant), Preservation Alternative C from the Draft EIR, and a Community Preservation Alternative put forth by the Laurel Heights Improvement Association of SF, Inc. The 10.2-acre property, in the Laurel Heights neighborhood, consists of two buildings and a landscape designed to function as a single entity, dating from 1957. The buildings were designed by Edward B. Page, while the site was the work of Eckbo, Royston and Williams. The complex was created for the Home Office of the Fireman's Fund Insurance Company, the original tenant. The property is listed in the California Register of Historical Resources and has been determined eligible for the National Register of Historic Places.

## METHODOLOGY

Nancy Goldenberg, Principal architect and architectural historian with TreanorHL reviewed the Draft EIR, which includes both the proposed design and several preservation alternatives, including full preservation alternative C. Ms. Goldenberg also spoke to Kathy Devincenzi and Richard Frisbee from the Laurel Heights Association regarding their preferred alternative. Ms. Goldenberg is already very familiar with the property, as she has lived in the nearby Anza Vista neighborhood for over 30 years. Each of the three alternatives (proposed project, alternative C, and the Laurel Heights Association's preferred alternative) will be evaluated according to the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. As used herein, the term "Proposed Project" will include the Proposed Project Variant, unless otherwise indicated.

## SIGNIFICANCE SUMMARY[1]

The following is the significance summary paragraph from the Draft National Register Nomination:

"The Fireman's Fund Insurance Company Home Office is eligible for the National Register under Criteria A and C at the local level. Under Criterion A, it is significant in the area of Commerce for its association with the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present. In particular, it represents the postwar boom in San Francisco's insurance industry when many companies built new office buildings. At that time, Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquarted in San Francisco. It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location. Under Criterion A, the Fireman's Fund Home Office is significant in the area of Community Planning and Development as one of the

[1] The district significance is summarized from Michael R. Corbett and Denise Bradley, *National Register of Historic Places Registration Form – Fireman's Fund Insurance Company Home Office*, April 19, 2018, Section 8.

principal embodiments of the postwar decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting and it was the first whose design was fully adapted to the automobile.

Under Criterion C, the Fireman's Fund Home Office is significant as the work of three masters, the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston & Williams (ERW)/Eckbo, Austin, Dean, and Williams (EDAW). As a modernist, through his experiences in Paris in 1930, Edward Page had direct links to the birth of modern architecture and to its development in the United States. The Fireman's Fund Home Office is his best known and most important work. The Fireman's Fund Home Office – with its innovative structural design that provided open floors with minimal columns and exterior walls of glass – represents the beginning of the reputation of the Gould and Degenkolb engineering firms as among the leading structural engineers in San Francisco in the post-World War II period. ERW/EDAW was recognized as one of the country's leading landscape architectural firms during the period of significance, and their designs and writings contributed to the popularization of the modernist landscape design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs within a broad range of settings. The Fireman's Fund Home Office represents an example of the firm's mastery of modern design within a corporate landscape context. Additionally, the Fireman's Fund Home Office, a single property including both architectural and landscape architectural elements which were designed to complement each other, is significant under Criterion C as an example of a corporate headquarters in San Francisco that reflects mid-twentieth-century modernist design principles. The period of significance is 1957-1967, covering the period from the year when the first phase of the buildings and landscape were completed (1957) to the year the final phase of construction was undertaken (1967) by Fireman's Fund. The Fireman's Fund company continued on this site as a leading insurance company in San Francisco and nationally until it sold the property in 1983. Although there are numerous alterations, these alterations do not alter the essential character of a property and it retains a high level of integrity."

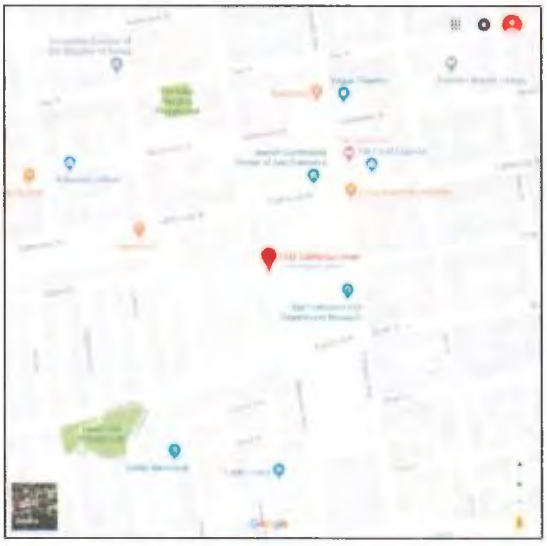


Figure 1 – Location Map

SUMMARY DESCRIPTION

"The Fireman's Fund Insurance Company Home Office is a 10.2-acre property in a central, predominantly residential area of San Francisco called Laurel Heights...The property consists of two buildings and a landscape that were designed to function as a single entity. The main building, referred to in the nomination as the Office Building, is a large three-to-seven-story building located in the center of the property. There is also a much smaller, one-story Service Building in the northwest corner of the property. The two buildings were designed to complement each other in character and materials. The Office Building is a glass walled building with an open character. The Service Building is a brick building with a closed character. The Office Building is an International style building which despite its size is built into its sloping hillside site in such a way as to minimize its presence. Its four wings, each built for different functions, range from three floors to seven floors. It is characterized by its horizontality, its bands of windows separated by the thin edges of projecting concrete floors, and brick trim. The wings of the building frame outdoor spaces whose landscape design connects the outdoors with the indoors both functionally and conceptually. The landscape design includes outdoor spaces for use by employees, parking lots, circulation paths, and vegetation. The principal outdoor spaces are the Entrance Court, the Terrace, and small areas around the Auditorium."[2]





Figure 2 left: View of Property looking northwest, from Masonic. Figure 3, right: View of property looking east, from the corner of Euclid and Laurel.

The following are the character-defining features of the property, as listed in the Draft National Register Nomination. Since the property has been listed in the California Register of Historical Resources by the California Office of Historic Preservation, and that listing was based, in part, on this list of character-defining features, this is the list that should be included in the EIR.

The character defining features of the Office Building are as follows:

- Plan of the building with wings open along the sides to the immediate landscape and to views of the city.
- Horizontality of massing.
- Horizontal lines of projecting edges of concrete floors.
- Horizontal bands of nearly identical window units.
- Uninterrupted glass walls.
- Window units of aluminum and glass.

[2] Michael R. Corbett and Denise Bradley, *National Register of Historic Places Registration Form – Fireman's Fund Insurance Company Home Office*, April 19, 2018, Section 7.

- Circular garage ramps.
- Exposed concrete piers over the garage.
- Wrought iron deck railings that match gates in the landscape.
- Brick accents and trim.

Service Building

- Massing of rectangular volumes
- Brick Walls with a minimum of openings

Landscape
Terrace, as the centerpiece of the landscape, designed to integrate the architecture of the building with the site and with the b roader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east and west sides by narrow planting beds; exposed aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

Two outdoor sitting areas – one on the east side of the Auditorium and one on its west side – that connect to entrances into the Auditorium; key character-defining features for the area on the west side of the Auditorium include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete; and metal benches; key character-defining features for the area on the east side of the Auditorium include the pavement (concrete divided into panels by wood inserted into expansion joints).

Brick wall (constructed of red brick set in running bond pattern similar in appearance to brick used in exterior of main building) that takes several forms and which forms a continuous and unifying element around the edges of the site.

Three gated entrances – one for the employees on California Street and the service and the executive/visitor entrances on Laurel Street – that are integrated into the brick perimeter wall.

Internal Circulation System (entrance drive, service drive, East and West Parking lots).

Vegetation features that help to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West Parking Lots, (2) the lawns on the west, south, and east sides of the property, and (3) the planted banks along Laurel and Masonic Streets.

## PROJECT DESCRIPTION

"The Proposed Project would partially demolish the existing office building, divide it into two separate buildings, vertically expand it to include two to three new levels (proposed building heights of 80 and 92 feet) and adapt it for residential use. The two separate buildings would be connected by a covered bridge. Thirteen new buildings ranging in height from 37 to 45 feet would be constructed along the perimeter of the site along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street. The Proposed Project would demolish the existing service building, surface parking lots and circular garage ramp structures. New public pedestrian walkways are proposed through the site in a north-south direction along the line of Walnut Street and in an east-west direction along the line of Mayfair Drive.

A Proposed Project Variant would add three new residential floors (proposed building height of 67 feet) containing 186 additional residential units in the new multi-story building along California Street between Walnut Street and Presidio Avenue."[3]

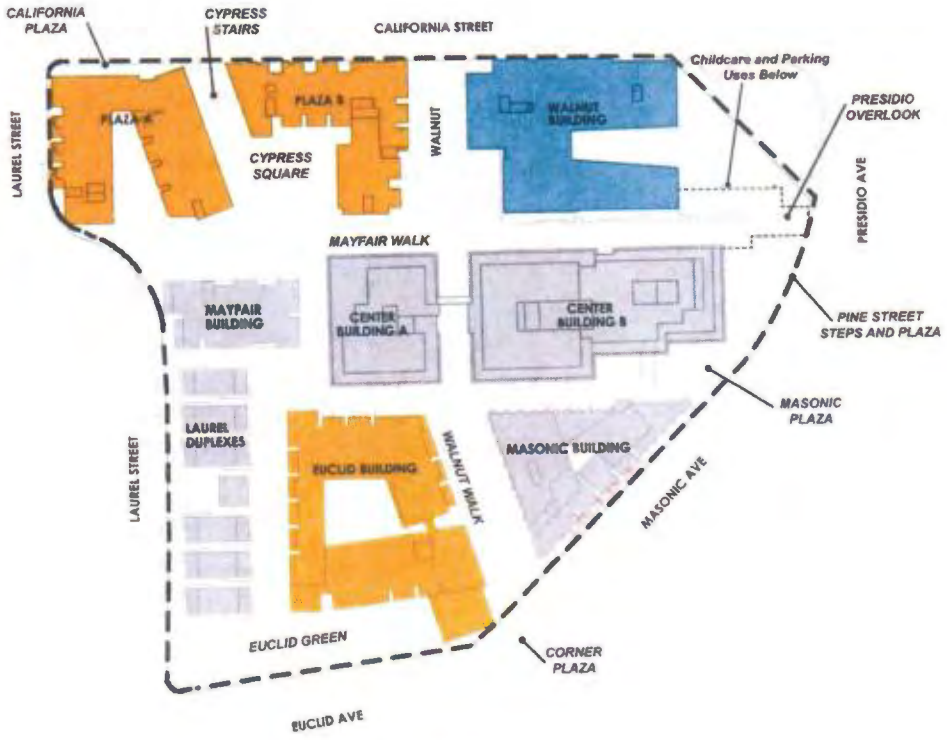



Figure 4 – The Proposed Project site plan

[3] [3] The project description is largely taken from the Draft Environmental Impact Report, 3333 California Street Mixed-Use Project, November 7, 2018, pp. S.2 and 2.6.

## PRESERVATION ALTERNATIVE C

The Draft Environmental Impact Report lists several project alternatives, some of which have fewer impacts to the historic resource than does the Proposed Project. Full Preservation Alternative C proposes a less intensive development of the site, retaining more of the Main Building and landscape. Under this Alternative, new construction is limited to the northern, and a small area in the western, portion of the site, along California and Laurel Streets. The Main Building would receive a one-level vertical addition, and the glass curtain wall would be replaced with "a compatible design to accommodate the residential use." Along California Street, four new mixed use/multi-family residential buildings would be constructed, with ground floor retail. 534 total residential units would be created.




Figure 5 – Full Preservation Alternative C

## COMMUNITY FULL PRESERVATION ALTERNATIVE

The Laurel Heights community has come up with its own preservation alternative. This alternative retains more of the historic resource while providing more residential units than does Preservation Alternative C.

4
(AL-2)

4 (AL-2) cont'd

The Community Full Preservation Alternative (Community Alternative) would construct the same number of new housing units as the developer's proposed project (558 units) or project variant (744 units) and would be completed in approximately three years rather than the 7-15 years requested by the developer to complete his proposals. It would preserve virtually all of the character-defining features of the main building and its integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. In addition, the Community Alternative would excavate only for a single, one-level underground parking garage and for the foundation for the Mayfair Building. In contrast, the developer proposes to excavate for three new underground garages including a three-level one.

The Community Alternative would keep the main building in its entirety, only adding light wells to bring light and air into the center. The existing north-south through passage would remain. As in the other proposals, the Service Building would be demolished. A new residential building would be constructed near the intersection of Mayfair Drive and Laurel Street. Two other new buildings would be constructed along California Street, replacing what are now surface parking lots and the former Service Building. These new buildings would match the scale and massing of the residential townhouse buildings across California Street, and would also be designed to be compatible with the Main Building.

For a complete description of this Alternative, please see Appendix A.

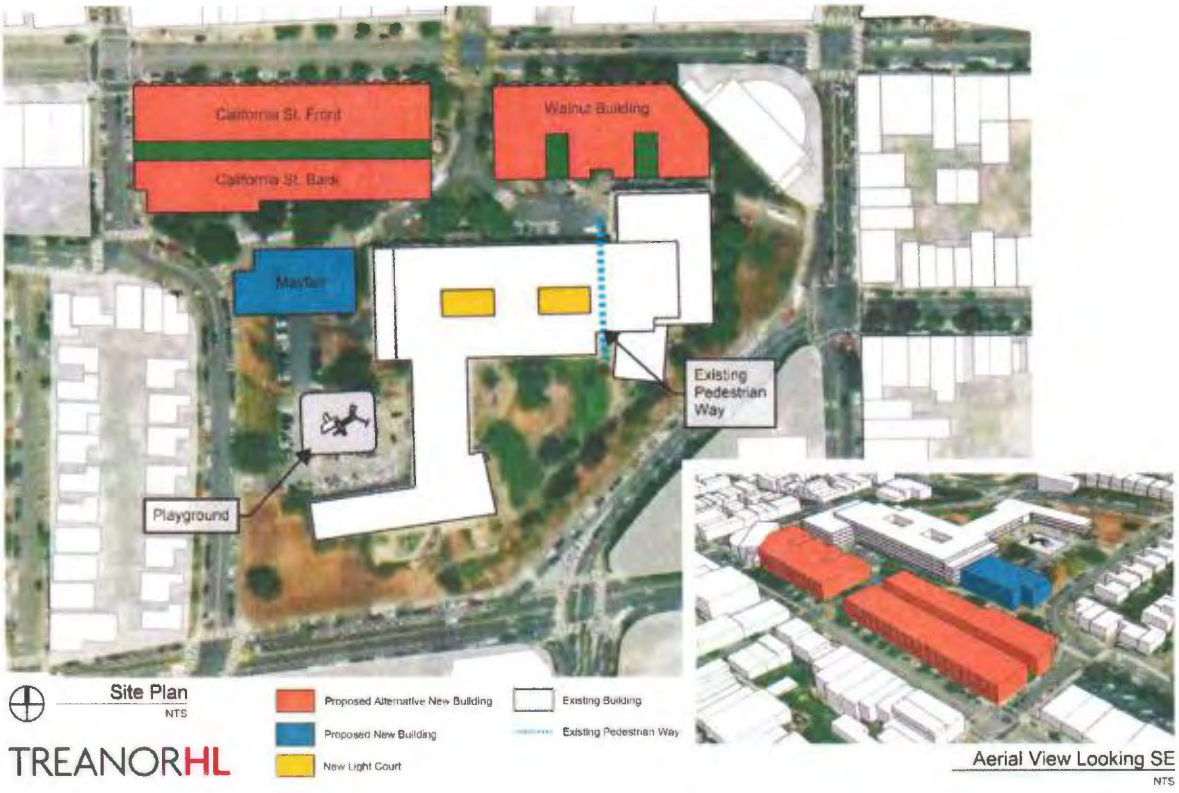



Figure 6 – The Community Full Preservation Alternative

4
(AL-2)
cont'd

## SECRETARY OF THE INTERIOR'S STANDARDS ANALYSIS

The following evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for Rehabilitation (Standards). Where appropriate, we also compare the compliance of the Community Preservation Alternative with that of the Proposed Project as well as "Preservation Alternative C," as presented in the Environmental Impact Report.

The Standards are listed below. Each of the 10 Standards is shown in italics, with the analysis of how each of the three proposals – the Community Full Preservation Alternative, the Proposed Project, and Preservation Alternative C from the Draft EIR – meets or fails to meet each standard.

*1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*

While the historic use of the property was office, with an office building set amongst green space and parking, the conversion of the property to residential could be done while retaining the character-defining features of the building and site. While the proposed Project design does not retain these features, the Community Preservation Alternative does. Therefore, the Community Preservation Alternative design complies with Standard 1.

Since the Proposed Project would destroy most of the character-defining features of the building and site, it does not comply with Standard 1, although given the proposed use, this standard can certainly be met, as is demonstrated by the Community Preservation Alternative. Preservation Alternative C, like the Community Preservation Alternative, does meet Standard 1.

*2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

The Community Preservation Alternative retains most of the character-defining features of the main building and site. Most of the new construction will occur at the parking lot along California Street, which is not considered character-defining. The main building will be retained in its entirety, except for lightwells that will provide interior illumination. The landscaping will also be retained. The Proposed Project removes the wing from the main building and cuts it in two. The Proposed Project also destroys most of the existing landscaping. Therefore, while the Community Preservation Alternate complies with Standard 2, the Proposed Project does not.

Preservation Alternative C is more compliant with Standard 2 than is the Proposed Project but will have more impact on the property than will the Community Preservation Alternative. Preservation Alternative C proposes to add a story to the Main Building and replace the building's glass curtain wall. Without knowing the design of the vertical addition, or what will replace the curtain wall, it is difficult to determine whether these features will be compatible. Also, it should be noted that many residential buildings now feature curtain walls, so it is unclear why the existing curtain wall is incompatible with residential uses.

4 (AL-2) cont'd

*3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*

The Community Preservation Alternate does not propose adding any conjectural features that would create a false sense of historical development. Therefore, the Community Preservation Alternative complies with Standard 3.

Neither the Proposed Project nor Preservation Alternative C propose changes that would create a false sense of historical development, so these designs would also comply with Standard 3.

*4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*

As described in the California Register Nomination, the Main Building was constructed in phases. The first part of the building was completed in 1957. However, its siting, plan and structure were designed such that it could accommodate future expansion. This expansion took place from 1963 to 1967, in three phases, which added wings to the building. The work was designed by the original architect, and constructed by the original contractor for the original client (Fireman's Fund). The wings are now over 50 years old, and are considered part of the historic resource even if they were not part of the original construction. Since that time, most alterations have occurred on the interior, typical of open-plan office buildings. Under the Community Preservation Alternative, the wings would be retained; under the Proposed Project they would not be. The Community Preservation Alternative therefore meets Standard 4, while the Proposed Project does not. Similar to the Community Preservation Alternative, Alternative C complies with Standard 4.

*5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.*

The Community Preservation Alternative will retain all distinctive features of the main building and landscape, including the curtain wall and footprint. And, by not raising the height of the building, its horizontality will also be retained. Character defining features of the site will also be retained. (The Service Building, however, will be demolished under this scheme, as it would under the Proposed Project and Preservation Alternative C. While the Service Building is an original feature of the site and contributes to its historic significance, the loss of this building would have only a minor impact on the overall integrity of the property). Therefore, the Community Preservation Alternative complies with Standard 5.

The Proposed Project is demolishing too much of the Main Building and the landscaping to comply with Standard 5. Preservation Alternative C is superior to the Proposed Project but will have a greater impact on the property than will the Community Preservation Alternative. Alternative C proposes to replace the curtain wall and add a vertical addition, which could impact the building's horizontality, which according to the California Register Nomination is an important character defining feature. Therefore, while better than the Proposed Project, Alternative C does not fully comply with Standard 5.

*6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design,*

4
(AL-2)
cont'd

*color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.*

During the design phase, the property, including building and landscape features, should be carefully surveyed to determine the condition of all character defining features. If any of these features are found to be deteriorated, they should be repaired rather than replaced, and any features that are deteriorated beyond repair should be replaced in kind, or, if substitute materials must be used (if, for example, the same material is no longer available), then the substitute material should match the old in design, color, texture and any other visual qualities. If that is done, then the Community Preservation Alternative will comply with Standard 6.

The Proposed Project, however, since it will remove most of the character defining features of the property, will not comply with this Standard. Alternative C, since it retains more of the historic resource, would not fully comply with Standard 6 because it would replace the glass curtain window wall system "with a residential system that would be compatible with the historic character of the resource; e.g. operable windows with small panes divided by a mullion and muntins." DEIR p. 6.77. The Community Alternative would retain and repair the existing window system if feasible for residential use, or replace it with a residential system that would be compatible with the historic character of the resource.

*7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*

No harsh chemical or physical treatments are contemplated at this time. If they are avoided, then the Community Alternative will meet Standard 7.

Since the Proposed Project is removing so much of the resource, the SOIS Analysis in the Draft Environmental Impact Report simply claims that Standard 7 does not apply. The Community Alternative and Alternative C could comply with Standard 7 provided that harsh chemical or physical treatments are prohibited.

*8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*

Since the project site was formerly part of a cemetery, it is possible that archaeological resources may be encountered during the construction of any project on this site. Language in the specifications must direct construction personnel to stop work should any archeological features be encountered. A professional archeologist would then be alerted to come and identify, document, and safely remove (if warranted) the feature. If such protocols are put into place prior to the start of construction, the project will comply with Standard 8.

According to the EIR, "Mitigation has been identified to reduce the potential impact to archaeological resources to a less-than-significant level. Thus, the Proposed Project or Project Variant would conform with Standard 8." If Alternative C and the Community Preservation Alternative follow similar protocols, than they too would comply with Standard 8.

4
(AL-2)
cont'd

*9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

For the Community Preservation Alternate, the exterior envelope of the Main Building will be kept intact, and new construction is proposed primarily along California Street, where currently non-character-defining parking lots exist. These new structures can be designed such that they are compatible with both the Main Building and the existing buildings along the north side of California Street. This can be accomplished by utilizing brick, glass, and concrete as exterior materials (tying into the materials of the Main Building), while maintaining the rhythm and scale of the townhouses across California Street. The Community Alternative will therefore comply with Standard 9. In addition, the Mayfair Building would be designed to be compatible with the Main Building.

The proposed project, on the other hand, does not comply with this Standard. Portions of the Main building will be removed, and most of the landscape will be destroyed. Therefore, the Proposed Project will not comply with Standard 9.

Preservation Alternative C is more compliant than the Proposed Project. However, the massing of the new buildings along California Street is very different from the buildings across California Street, and from the residential development surrounding the site.

*10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

For the Community Preservation Alternative, new construction would be relegated to the parking lots along California Street and a Mayfair Building. The Main Building would retain its existing form, and the curtain wall would be retained if feasible for residential use or replaced with a system that would be compatible with the historic character of the resource (however, given that the present curtain wall, according to the California Register nomination, has become darker since the sale of the building to UCSF in 1985, the curtain wall could be revised if the original tint can be determined.) The work proposed for the Main Building would almost entirely occur on the interior, with the exception of proposed lightwells. So, if the proposed new development is removed in the future, the property could easily be returned to its historic appearance.

The Proposed Project would make so many changes to the building and landscape that it would not comply with Standard 10. Alternative C does better at compliance than the Proposed Project. However, with the developer's proposal to replace the curtain wall and add a story to the building, it is difficult to see how the original form and integrity of the property could be returned if the changes were reversed. Therefore, Alternative C would not comply with Standard 10.

Conclusion

The above discussion evaluates the Community Preservation Alternative's compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties: Rehabilitation. It also discusses how and whether the Proposed Project and Alternative C complies with these standards. Here are the results:

Community Preservation Alternative: Complies with all 10 Standards

Proposed Project: Complies with Standards 3 and 8 only.

Alternative C: Complies with Standards 1, 3, 4, 6, 7, and 8. Partially complies with Standards 2, 5 and 9. Does not comply with Standard 10.

The Community Alternative is clearly superior in its compliance with the Standards than are the other two designs evaluated. In addition, it provides more housing units than Alternative C, and the new construction is more compatible with surrounding neighborhood development.

4
(AL-2)
cont'd

Nancy Goldenberg

January 7, 2019

Nancy Goldenberg — Date

# APPENDIX A

## COMMUNITY FULL PRESERVATION ALTERNATIVE

## OVERVIEW

The Community Full Preservation Alternative would construct the same number of new housing units as the developer's proposed project (558 units) or project variant (744 units) and would be completed in approximately three years rather than the 7-15 years requested by the developer to complete his proposals. The Community Full Preservation Alternative would preserve virtually all of the character-defining features of the main building and its integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. The Community Full Preservation Alternative would excavate only for a single, one-level underground parking garage and for the foundation for the Mayfair Building. In contrast, the developer proposes to excavate for three new underground garages including a three-level one.

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(AL-2)

The Community Full Preservation Alternative would: (1) convert the interior of the main building to residential uses while retaining the existing 1,183 asf café, 11,500 gsf childcare center, and 5,000 gsf of the existing office space (at the developer's option, this existing office space could be converted to residential use), (2) construct three new residential buildings along California Street where parking lots are now located and also construct a new residential building near the intersection of Mayfair Drive and Laurel Street, (3) provide at least 56 flat-type units affordable to and sized for middle-income families, with additional on-site affordable housing determined by the Board of Supervisors, (4) excavate for only a single, one-level underground parking garage and the foundation for the Mayfair Building, (5) require all freight loading and unloading to be conducted in the underground freight loading areas accessed from Presidio

Avenue and all passenger loading and unloading to be conducted inside the site in turnarounds or in the underground parking garage, (6) retain the historically significant landscaping designed by the renowned landscape architects of Eckbo, Royston & Williams which is integrated with the window-walled main building, including the Eckbo Terrace and existing landscaped green spaces along Laurel Street, Euclid Avenue and Presidio Avenue, which would be designated as community benefits in the development agreement, (7) preserve the majority of the 195 mature trees on the site which are comprised of 48 different tree species (Initial Study p. 16), and (8) maintain public vistas of the downtown and Golden Gate Bridge and the historically significant main building and integrated landscaping. The Community Full Preservation Variant Alternative would add 110 more units to the Walnut Building, which could be used for senior housing, and additional units within the other buildings which would result in smaller unit sizes, as described herein. The Community Full Preservation Alternative and Variant would use all the new construction for residential use and would not rezone the site for approximately 54,117 gsf of retail uses or a 49,999 gsf new office building, as the developer proposes.

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(AL-2)
cont'd

**THE COMMUNITY FULL PRESERVATION ALTERNATIVE WOULD PROVIDE THE SAME AMOUNT OF NEW HOUSING UNITS IN APPROXIMATELY THREE YEARS WITHOUT DESTROYING A HISTORICALLY SIGNIFICANT RESOURCE.**

The Community Full Preservation Alternative (Alternative) would preserve virtually all of the character-defining features of the main building and integrated landscaping, which are listed in the California Register of Historical Resources pursuant to Section 4851(a)(2) of the California Code of Regulations. (Ex. A, confirmation of listing) The window-walled main building would be converted to primarily residential use. This Alternative would have the same

number of residential units as the developer's proposed project (558 units) and would be constructed in approximately three years because the existing main building would be converted to residential use at the same time as the new residential buildings are constructed. (See Exhibit B, layout of buildings) The Alternative would entail far less excavation, as it would have only one new level of underground parking garages along California Street and a total of approximately 460 on-site parking spaces. In contrast, the developer proposes to construct four new underground parking garages, including up to three levels of parking, to provide a total of 896 parking spaces for the developer's proposed project (970 parking spaces for the developer's proposed variant).

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(AL-2)
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The Community Alternative would retain the existing Eckbo Terrace and green landscaped areas along Laurel Street, Euclid Avenue and Presidio Avenue, except for a small portion to be occupied by the Mayfair Building. The existing Terrace would be designated as Privately-Owned, Publicly-Accessible Open Space in recorded deed restrictions and would be open to the public from 8:00 am to sundown. The existing passageway that runs through the first floor of the existing main building and opens onto the Terrace and thence onto Masonic Avenue would be retained and opened to the public from 8 am to sunset and marked with signage identifying it as a public throughway.

The character-defining features of the existing main building that the Community Alternative would retain include all of the following:

Plan of the building with wings open along the sides to the immediate landscape and to views of the distant city.

Horizontality of massing.

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(AL-2)
cont'd

Horizontal lines of projecting edges of concrete floors.

Horizontal bands of nearly identical window units.

Uninterrupted glass walls.

Window units of aluminum and glass.

Brick accents and trim.

Wrought iron deck railings that match gates in the landscape.

The character-defining features of the existing landscape that the Community Alternative would be retain include all of the following:

In the Eckbo Terrace, which was designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco), key character-defining features include its biomorphic-shaped (amoeba-shaped) lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick), brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

The Concrete Pergola atop terraced planted beds facing Laurel Street, which creates a welcoming, shaded transition area where the inside and outside merged. (Draft EIR pp. 4.B.12 and 21)

In the Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria wing, key character-defining features include narrow planting beds adjacent to sidewalks; exposed aggregate sidewalks, and a low free-standing brick wall along its north side.

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(AL-2)
cont'd

In the two outdoor sitting areas on the east and west sides of the area now used as an auditorium, key character-defining features for the area on the west side include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete, and metal benches; key character-defining features for the area on the east side include the pavement (concrete divided into panels by wood inserted into expansion joints).

The Brick Wall (constructed of red brick set in running bond pattern similar in appearance to the brick used in the exterior of the main building) that takes several forms and which forms a continuous and unifying element around the edges of the site, would be retained except for the areas of the wall that surround the Service Building and which run along California Street. The brick from these areas will be retained, if feasible, and reused as trim on the bottom portions of the new California Street Back Buildings.

The Community Alternative would retain the three gated entrances - the entrance on California Street at Walnut Street, the service entrance at Mayfair and Laurel Street, and the executive/visitor entrance on Laurel Street. In this Alternative, much of the internal circulation system will be retained (entrance drive, service drive and executive/visitor entrance). All passenger loading, pick-ups and drop-offs will be internal to the site, and turnarounds will be provided in front of the main building to the east of the entrance on California/Walnut and in front of the executive/visitor entrance on Laurel Street. (See Ex. C, circulation and loading plan) All freight loading and unloading will be conducted in the underground freight loading areas accessed from Presidio Avenue.

Vegetation features that help to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods that will be retained include (1) the large Cypress trees in the existing west parking lot area, (2) the lawns on the west, south and east sides of the property, and (3) the planted banks along Laurel and Masonic streets.

5 (AL-2) cont'd

The service building and circular garage ramps would not be retained.

In the Community Full Preservation Alternative, the existing 1,183 asf café and 11,500 gsf childcare center would remain in their present locations in the main building. At the developer's option, the existing 12,500 gsf of storage in the main building could be converted to parking spaces or used for underground off-loading or other functions. Approximately 5,000 square feet of the existing nonconforming office space in the main building would remain, which the developer could continue to use for offices. At the developer's option, this existing office space could be converted to residential use.

In the Community Alternative, new residential buildings would be constructed along California Street where parking lots are currently located, and a Mayfair building would also be constructed at the same approximate location as the Mayfair building proposed by the developer. The new California Front buildings would be designed for middle-income families, and their average size would be 1,821 square feet. They would be designed to be compatible with both the main building and the existing buildings along the north side of California Street and would maintain the rhythm and scale of the townhouses across California Street. Each California Front building would be 40 feet tall, approximately 28.5 feet wide and 100 feet in length with 25% of that length consisting of a private rear yard. Approximately 14 new buildings containing 56

units for middle-income families would be built in California Front between Laurel Street and Walnut Street.

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(AL-2)
cont'd

The new California Street Back buildings would face inward toward the existing main building and be constructed with window walls designed to be compatible with the character-defining features of the windows in the existing main building. They would be sculpted around the large Monterey Cypress trees that remain from the Laurel Hill Cemetery, so the lengths of the buildings would vary from approximately 65 to 50 or 40 feet long, and each building would be approximately 28.5 feet wide. They would have 56 units, with the average unit size ranging from 1,575 to 1,215 to 971 square feet depending on location, and the buildings would be 40 feet tall and be constructed between Laurel Street and Walnut Street. For each residential unit in the California Street Front and Back Buildings, one parking space with direct access would be provided in a new one-level underground garage constructed under these buildings.

In the Community Alternative, approximately 292 residential units would be provided in the existing main building, averaging 798 square feet in size. The developer can configure the size of the units and/or eliminate the office use. Internal Light Courts similar to those described on Developer's August 17, 2017 plan sheets A6.15 and A6.16 will be located where feasible. For these units, parking with direct access would be provided in the existing underground garage in the main building.

A new 40-foot tall Walnut Building would be built along California Street between Walnut Street and Presidio Avenue. This building would contain approximately 118 residential units with an average square footage of 809 square feet. The developer can configure the size of

the units. For these units, parking with direct access would be provided in a new one-level underground garage to be built under this building.

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(AL-2)
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In the Community Alternative, a new 40-foot tall Mayfair Building would be constructed approximately east of Mayfair Drive at Laurel Street. The Mayfair Building would have 36 residential units with an average size of 1,073 square feet. The Mayfair Building would not contain an underground parking garage. For these units, parking with direct access would be provided in the new underground garages constructed under the California Street Front and Back Buildings. The Mayfair Building would be constructed of window walls designed to be compatible with the character-defining features of the windows in the existing main building. A small portion of a grassy area of the existing landscaping would be occupied by this building.

Other than removing the circular garage ramps, the Community Full Preservation Alternative would not make any of the exterior or interior circulation or site access changes proposed by the developer in August 17, 2017 plan sheets C.202 or L1.01 or in the "PRELIMINARY DESIGN" dated 08/2018. Under the Community Alternative, all Truck Loading or Unloading would occur in the underground garage accessed on Presidio Avenue, and trucks and automobiles will have ingress and egress to these areas for loading, unloading, pick-ups, drop-offs and parking. Truck Loading or Unloading will be permitted from 8 am to 8 pm only. Passenger vehicles and automobiles will also have ingress and egress to the site through the Walnut Gate at Walnut and California Streets and through the Mayfair Gate at Mayfair and Laurel streets. Passenger vehicles and automobiles will also have access to a turnaround for passenger loading and unloading through the Laurel Street gate and through the Walnut gate.

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(AL-2)
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In the Community Full Preservation Alternative Variant (Variant), there would be 228 residential units with an average of 732 square feet in a 7-floor Walnut Building, which would require a height limit change for this area of the property only. Under the Community Variant, there would be 64 new residential units in the California Street Front Buildings with an average of 1,594 square feet, and 64 new residential units in the California Street Back Buildings with an average of 1,332, 1,275 or 850 square feet; these buildings would be 25 feet wide under this Variant, and lengths would vary with location. Under the Community Variant, there would be 48 new residential units in the Mayfair Building, with an average of 805 square feet. All new buildings would be 40 feet tall except the Walnut Building. The developer could configure the size of the residential units. In addition to the existing café, childcare center and 5,000 gsf of office space, in the Community Variant, the main building would be converted to approximately 340 residential units, with an average of 686 square feet.

The Community Alternative/Variant would comply with all applicable laws and regulations, including by making any modifications in the design needed to achieve such compliance or to provide additional space for necessary functions.

In the Community Full Preservation Alternative, the glass curtain wall of the existing main building would be retained and repaired if feasible for residential use, or replaced with a window system that would be designed to be compatible with the character of the historic resource. DEIR pp. 6.66 and 6.77. In the Community Alternative, any replacements of the glass curtain wall would be compatible with the geometric pattern of the windows in the existing main building.

The Community Full Preservation Alternative Variant would have the same characteristics as the Community Alternative, unless otherwise indicated above.

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(AL-2)
cont'd

# EXHIBIT A

O-LHIA4

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY
EDMUND G. BROWN, JR., Governor

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov

August 31, 2018

John Rothman, President
Kathryn Devincenzi, Vice President
Laurel Heights Improvement Association of San Francisco
22 Iris Avenue
San Francisco, California 94118

RE: **Fireman's Fund Insurance Company, Determination of Eligibility National Register of Historic Places**

Dear Mr. Rothman and Ms. Devincenzi:

I am writing to inform you that on August 29, 2018, Fireman's Fund Insurance Company was determined eligible for the National Register of Historic Places (National Register). As a result of being determined eligible for the National Register, this property has been listed in the California Register of Historical Resources, pursuant to Section 4851(a)(2) of the California Code of Regulations.

There are no restrictions placed upon a private property owner with regard to normal use, maintenance, or sale of a property determined eligible for the National Register. However, a project that may cause substantial adverse changes in the significance of a registered property may require compliance with local ordinances or the California Environmental Quality Act. In addition, registered properties damaged due to a natural disaster may be subject to the provisions of Section 5028 of the Public Resources Code regarding demolition or significant alterations, if imminent threat to life safety does not exist.

If you have any questions or require further information, please contact Jay Correia of the Registration Unit at (916) 445-7008.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

Enclosure

August 31, 2018

Previous Weekly Lists are available here: http://www.nps.gov/history/nr/nrlist.htm

Please visit our homepage: http://www.nps.gov/nr/

Check out what's Pending: https://www.nps.gov/nr/pending/pending.htm

Prefix Codes:

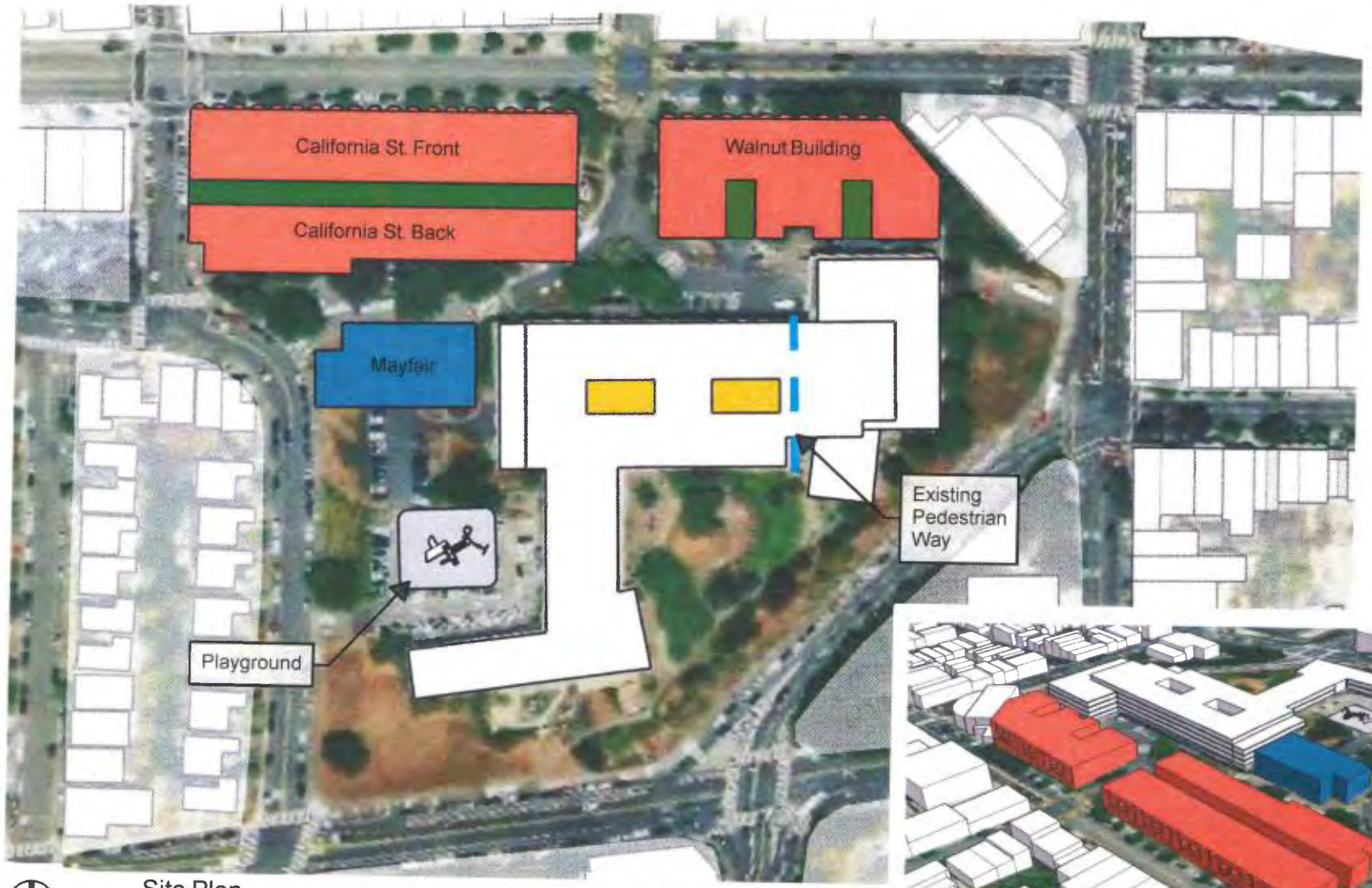
SG - Single nomination
MC - Multiple cover sheet
MP – Multiple nomination (a nomination under a multiple cover sheet)
FP - Federal DOE Project
FD - Federal DOE property under the Federal DOE project
NL - NHL
BC - Boundary change (increase, decrease, or both)
MV - Move request
AD - Additional documentation
OT - All other requests (appeal, removal, delisting, direct submission)
RS – Resubmission

WEEKLY LIST OF ACTIONS TAKEN ON PROPERTIES: 8/16/2018 THROUGH 8/31/2018

KEY: State, County, Property Name, Address/Boundary, City, Vicinity, Reference Number, NHL, Action, Date, Multiple Name

CALIFORNIA, SAN FRANCISCO COUNTY,
Fireman's Fund Insurance Company Home Office,
3333 California St.,
San Francisco, RS100002709,
OWNER OBJECTION DETERMINED ELIGIBLE, 8/29/2018

# EXHIBIT B




Site Plan
NTS



Aerial View Looking SE
NTS

Proposed Alternative New Building
Proposed New Building
New Light Court
Existing Building
Existing Pedestrian Way

TREANORHL

O-LHIA4

See O-LHIA4 Comment 5 on p. 3 of Exhibit A (AL-2)

# EXHIBIT C

# O-LHIA4

See O-LHIA4 Comment 5 on p. 7 of Exhibit A (AL-2)




Circulation Plan NTS

TREANORHL

# EXHIBIT 2

O-LHIA4

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

December 11, 2018

Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, 4th Floor
San Francisco, CA 94103

Submitted separately (See A-HPC [Andrew Wolfram, President, Historic Preservation Commission])

Dear Ms. Gibson,

On December 5, 2018, the Historic Preservation Commission (HPC) held a public hearing in order for the commissioners to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the proposed 3333 California Street Project (2015-014028ENV). As noted at the hearing, public comment provided at the December 6, 2018 hearing, will not be responded to in the Responses to Comments document. After discussion, the HPC arrived at the comments below:

- The HPC found the analysis of historic resources in DEIR to be adequate and accurate. The HPC concurs with the finding that the proposed project would result in a significant, unavoidable impact to the identified historic resource. — 6 (CR-2)
- The HPC expressed the importance of the historic resource as an integrated landscape and building. — 7 (CR-1)
- The HPC agreed that the DEIR analyzed a reasonable and appropriate range of preservation alternatives to address historic resource impacts. — 8 (AL-1)
- The HPC expressed interest in understanding more about a "neighborhood alternative" that was discussed by the public during public comment at the hearing. — 9 (AL-2)
- The HPC also supported combining some elements of the different alternatives in order to increase the amount of housing in the Full Preservation Alternative C. Commissioner Hyland specifically requested that Alternative C incorporate some elements from alternatives B and D such as increased building heights along California Street (up to 65 feet), the conversion of some areas of office or retail to residential use, and the incorporation of duplexes along Laurel Street. — 10 (AL-3)

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

Sincerely,

Andrew Wolfram, President
Historic Preservation Commission

# EXHIBIT 3

O-LHIA4

# Memo

**Denise Bradley Cultural Landscapes**

**520 Frederick Street No. 37**
**San Francisco, CA 94117**
**415. 751. 2604 (phone)**
**sfodab@hotmail.com (email)**
**www.denisebradley.us**

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**Date**: 24 April 2018

**To:** Kathy Devincenzi, Vice President
Laurel Heights Improvement Association of San Francisco, Inc.

cc: Michael Corbett

**Subject**: 3333 California Street Property
Location of Trees that were part of the Laurel Hill Cemetery

---

This memo provides a summary of the reference materials, reviewed as part of the Fireman's Fund National Register Nomination, that provide information on the location of trees at the 3333 California Street property that appear to have been part of the Laurel Hill Cemetery landscape. 11 (CR-1)

In his book *Urban Landscape Design*, Garrett Eckbo described the design process for the mid-1950s landscape design for the Fireman's Fund site, which had been prepared by Eckbo, Royston, and Williams (ERW). In this description, he noted how some of the trees from the former cemetery were saved and incorporated into the Fireman's Fund landscape design.

> *Considerable care was taken in the arrangement of the building, parking areas, and levels* [i.e., grading] *to save all the existing trees. Some of the trees were left on mounds of earth where the ground was depressed, and others were contained in wells where the ground was raised. In all cases, special pruning, feeding, aeration, and watering were done during construction to help the trees make the necessary adjustments.*
>
> *The most impressive of the trees saved are the beautiful specimens of Monterey cypress in the parking areas on the California Street side of the building. Here, too, three very large blue gums are retained. In some ways, the most distinctive specimens saved are the large red-flowering eucalyptus near the corner of California street and Presidio, and the magnificent native toyon or Christmas berry in the parking area above Presidio. In addition to these six live oaks and a very large redwood and Monterey pine are saved.* (Eckbo 1964:47).

The locations of the cemetery trees that were saved and incorporated into the Fireman's Fund landscape can best be understood through a review of historical aerial photographs that are attached to this memo.

11 (CR-1) cont'd

Figure 1 shows the extent of the vegetation at the former Laurel Hill Cemetery in 1948 before any grading or construction work associated with the Fireman's Fund Home Office had occurred.

Figure 2 shows the 3333 California Street property in 1955 after grading for the Fireman's Fund Home Office had begun. The site has been cleared of all traces of the former cemetery except for select trees; these trees are circled on Figure 2.

Figure 3 shows the 3333 California Street property in 1958 after the completion of the initial phase of construction on the Fireman's Fund Home Office. Former cemetery trees that have been incorporated into the design, as described by Eckbo, are circled on Figure 3.

Figure 4 shows the 3333 California Street property in 1969, after the addition of the parking garage, auditorium, and office wing extension, which occurred between 1965 and 1967. This construction required the removal of some of the cemetery trees, and the ones that remained in 1969 are circled on Figure 4.

Figure 5 shows the current configuration of the 3333 California Street property. The trees which appear to have been part of the Laurel Hill cemetery vegetation are circled on Figure 5; these include:

- two Monterey cypress trees (#24 and #25 on the SBCA Tree Location Map)[1] on a low mound in the East Parking Lot,
- a blue gum eucalyptus (#118 on the SBCA Tree Location Map)[2] in the West Parking Lot, and
- several Monterey cypress (#119, #120, and #121 on the SBCA Tree Location Map)[3] in the West Parking Lot.

[1]SBCA Tree Consulting, Memo to Lisa Congdon (Prado Group Inc.), 3333 California Street, Protected Tree Survey, amended 24 March 2017.

[2]Ibid.

[3]Ibid.

11
(CR-1)
cont'd




Figure 1. Former Laurel Hill Cemetery in 1948 before landscape features were removed. Source: Pacific Aerial Surveys.

11
(CR-1)
cont'd




Figure 2. Aerial view of 3333 California Street property in 1955 after initial construction has begun. Trees from the Laurel Hill Cemetery that were retained are circled. Source: Pacific Aerial Surveys, annotated by Denise Bradley.

11
(CR-1)
cont'd




Figure 3. Aerial view of 3333 California Street property in 1958. Trees from the Laurel Hill Cemetery that were incorporated into the landscape design are circled. Source: Pacific Aerial Surveys, annotated by Denise Bradley.




Figure 4. Aerial view of 3333 California Street in 1969 after the addition of the parking garage, auditorium, and office wing extension. Trees from Laurel Hill Cemetery that remain are circled. Source: Pacific Aerial Surveys, annotated by Denise Bradley.

11
(CR-1)
cont'd



Figure 5. Aerial view of 3333 California Street property today. Trees from Laurel Hill Cemetery that remain are circled. Source: GoogleEarth, annotated by Denise Bradley.

11
(CR-1)
cont'd

LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
michael@lozeaudrury.com

*Via Email and U.S. Mail*

December 11, 2018

Kei Zushi, EIR Coordinator
City and County of San Francisco
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
CPC.3333CaliforniaEIR@sfgov.org

Re: Comment on Draft Environmental Impact Report, 3333 California Street Mixed-Use Project (State Clearinghouse # 2017092053)

Dear Mr. Zushi:

I am writing on behalf of Laborers International Union of North America, Local Union No. 261 and its members living in and around the City and County of San Francisco ("LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as 3333 California Street Mixed-Use Project (SCH2017092053 and Case No. 2015-014028ENV), including all actions related or referring to the proposed demolition and redevelopment of existing buildings and proposed construction of thirteen new buildings containing 558 residential units within 824,691 gross square feet (gsf) of residential floor area, 49,999 gsf of office, 54,117 gsf of retail, and a 14,690-gsf child care center on Block 1032/Lot 003 in the City and County of San Francisco ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. LIUNA requests that the San Francisco Planning Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the DEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,

Michael R. Lozeau

Michael R. Lozeau

LOZEAU DRURY LLP

T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
michael@lozeaudrury.com

*Via Email and U.S. Mail*

December 12, 2018

Kei Zushi, EIR Coordinator
City and County of San Francisco
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
CPC.3333CaliforniaEIR@sfgov.org

**RE: Withdrawal of Draft EIR Comment and CEQA and Land Use Notice Request for the project known as 3333 California Street Mixed-Use Project aka State Clearinghouse # 2017092053**

Dear Mr. Zushi:

I am writing on behalf of the Laborers' International Union of North America, Local Union No. 261 ("LIUNA"). LIUNA hereby withdraws its request, sent on April 6, 2018, that the City of San Francisco ("City") send mailed or emailed notices related to the project known as 3333 California Street Mixed-Use Project aka State Clearinghouse # 2017092053 ("Project"). Additionally, LIUNA hereby withdraws its DEIR comment, sent on December 11, 2018. If you could please confirm that the notice request and DEIR comment have been withdrawn would be appreciated.

Sincerely,

Hannah Hughes
Legal Assistant
Lozeau | Drury LLP

# Individuals

**From:** Sal Ahani
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary
**Cc:** Richard Frisbie; Stefani, Catherine (BOS)
**Subject:** Discrepancies and Comments with 3333 California St. DEIR
**Date:** Tuesday, January 08, 2019 9:26:07 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the planning Commision:

I am deeply concerned of what is occurring in my neighborhood, specifically at 3333 California St. Please read the following:

**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.** 1 (PD-1)

**I fully support the Community Full Preservation Residential Alternative for 3333** 2 (AL-2)

It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 8,000 retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It matches the surrounding neighborhoods for character, style, scale and bulk.

**I strongly oppose** the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 3 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 8,000 retail caused the Developers Destructive Proposal. 4 (AL-2)

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses. The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more. We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal calls for. One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense.

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents? 5 (ME-1)

In a recent Petition Drive at Laurel Village over 800 residents signed the Petition opposing the Developers Full Destruction and Massive ROC plan and supporting the Community's residential Alternative. Three people opposed it the Petition. These signatures were gathered in less than 8 hours. In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods. "A deal is a deal "was how everyone felt. The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted. These signatures are in the hands of the District 2 Supervisor. 6 (AL-2) 7 (PP-1)

The Developers Destructive Proposal is well named. Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG) and the many associated and far more destructive climate changing gases that accompany the primary CO2. The Community's Full Preservation Alternative will, by comparison, generate approx. 4,100 tons of GHG. The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.
The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required. The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required. 8 (GHG-2)

**Could there be something they want to conceal from the public?** Much like they concealed the Historic nature of 3333 for over 4 years? 9 (CR-1)
**We pollute less and protect the environment:** the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative: **We destroy less:** we preserve the historic site. **We build less:** 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building. **One single level underground parking garage for 450** spaces versus a complex of parking garages, some of three levels, for 896 spaces; **We excavate less:** 90,000cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads); **We preserve and protect our local businesses and shops:** no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business; **We better protect the health and well being of everyone:** no 13,000+ auto trips to pollute the air, 10 (AL-2)

generate the noise, put pedestrians at risk, unload trucks on the streets, etc. **the Community's solution will always be three times better than the Developers solution.**

10 (AL-1) cont'd

The Developers Destructive Proposal not only destroys the Historic Site it destroys our climate. Concrete is a major contributor to GHG, in fact the GHG generated by the manufacture of cement and steel equals the GHG generated by traffic. **And, 95% of the cement used in the Bay Area is manufactured in the Bay Area so the GHGs are OUR GHGs.** The cement is not made somewhere else in the country it is made here.

11 (GHG-1)

**We fully support housing:**
The Community has supported the Lucky Penny (95 units), CPMC (270 units) and now 3333 (558) units. Over 1,000 units in a half mile radius. So please don't offend me and misrepresent the Community's position.We support housing and history; we oppose unneeded, unwanted and unnecessary Retail and mindless destruction of a historic site. AND we provide housing in as much as 12 years sooner than the Developers Full Destruction Plan does. The YIMBYs should be 100% in favor of the Community's Full Preservation plan and if they're not then they are being grossly hypocritical.

12 (ME-1)

Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading. At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact. The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. Studies also show that TNCs increase passenger trips by almost 10%. There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.
Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 8,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is an entirely bogus number based on questionable assumptions, such as "The SF Guidelines **do not provide a specific methodology to** assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…."
Rather amazing that these "refinements" all work in the Developers favor. Nowhere in these "refinements" have TNCs been taken into account!
Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!
Seawall Lot 337 & Pier 48 summary: **Project type** Mixed-use, open space, residential, commercial
**Project area** Approx. 28 acres
**Proposed building area** 1.3 – 1.7 million sf commercial; 750,000 - 1.5 million sf residential; 150,000 – 200,000 sf retail, 850,000 sf structured parking

13 (TR-1)



Seawall Lot 337 & Pier 48

Pier 70 summary: "The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

**WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable? Simply bogus. The DEIR consistently attempts to misrepresent and mislead the public. It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.**

Under their previous, Level of Service, methodology they would have calculated 8,000 retail trips alone. I I think it safe to say that the numbers presented by Planning are simply "Developer friendly!". Their VMT methodology with "refinements" will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 35% less trips! This entire section is suspect and Planning must explain this profound discrepancy. As noted above, nowhere are the TNCs incorporated into the calculations.
**All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.

Planning's mitigation measure is a stone age solution to a digital age problem. How will many people respond to a perceived lack of parking? They'll simply call a TNC and go anyway. **Eliminating parking won't eliminate auto trips it will actually increase auto trips.**

A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past – by any mode of transport. The VMT methodology used by the Planning Department fails to account for the impact of

TNCs.
And, the use of TNCs makes the GHG situation worse.
Let's assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles. Data shows that many people will now use a TNC rather than drive their own cars. This will be even more pronounced if Parking is reduced! So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles. When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip! So, not only do we have 8,000 retail auto trips, excluding the effect of TNCs (not addressed) to deal with we have many of them generating significant more GHG per trip!
Planning needs to do a comprehensive analyses using credible data and a credible methodology so that the public knows the extent of the GHG generated.
We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly. In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR.

13 (TR-1) cont'd

14 (GHG-1)

The Developers Destructive Proposal first demolishes and destroys the Historic Characteristics and nature of 3333. Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft. The only area that isn't excavated is under a portion of the existing building! Not sure how they missed that opportunity! Removal of the demolition debris and the excavated soils will require approx. 32,000 dump truck loads, all of which have to pass though and pollute our neighborhoods. By contrast, the Community Full Preservation Alternative generates approx. 9,000 dump truck loads, one quarter as many! After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings. How many large truck loads, concrete truck loads, etc. will this require? The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads. A quick look at the turning radii of the trucks, ie. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution. In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate.

15 (CR-2)

16 (GEO-1)

17 (AQ-1)

18 (TR-7)

The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4.

19 (AL-2)

The Developers Destructive Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs.

20 (TR-10)

**From:** James Bassuk_
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC)
**Subject:** 3333 California Street Project
**Date:** Monday, January 07, 2019 10:45:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi

Our family lives at 3320 California Street, a location directly across the street from the planned project and also the block most heavily impacted by this project. We are members of the California Street Homeowners Group, you received the letter of our concerns on Dec 11, 2018, and representatives from our group spoke at the hearing.

Much has been written so we'll leave this note short.

The draft EIR is insufficient in identifying the environmental impacts of the Project and the impacts identified are largely unmitigated. 1 (GC-1)

**We strongly support the Residential Alternative plan for 3333.** I can assure you that although you may not get a letter from every single resident on "our" block, the support for the residential plan is unanimous. 2 (AL-2)

This plan addresses many of the neighborhood concerns regarding the developers plan including:
1. Can be completed in 3 years, significantly less burdensome for families and elderly
2. Preserves the character of the neighborhood
3. Does not add unwanted and excess retail, supports small business owners
4. Lessons the harmful impacts on the environment
5. Will create far less traffic and safety hazards
6. Does not line the developers pockets at the expense of a community

**We DO NOT support the developers plan**. The developers plan is clearly profit motivated with a complete lack of concern and respect for the residents of this community. 3 (ME-1)

The residential plan is superior in addressing the city's housing shortage. That is the purpose of this project, correct? 4 (AL-2)

Thank you,
Jim and Jessica Bassuk

**Monday, January 7, 2019 at 3:27:51 PM Pacific Standard Time**

**Subject:** 3333 California St Development Comments
**Date:** Monday, January 7, 2019 at 1:36:58 PM Pacific Standard Time
**From:** David Bercovich <davidb@gmail.com>
**To:** Zushi, Kei (CPC) <kei.zushi@sfgov.org>, Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>, laurelheights2016@gmail.com <laurelheights2016@gmail.com>

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I live with my family at 3318 California St, Unit 2, San Francisco, CA 94118. Please find my comments below opposing the current development plan and supporting the community alternative. 1 (ME-1) 2 (AL-2)

There is no hardship with the site and so in my opinion no reason to change the zoning to allow the increased height limit, retail etc. There is a reason that the zoning was changed and it should be respected. 3 (PP-1)

There are numerous issues with the current plan including:

- The proposed seven to fifteen- year construction period would hold our neighborhood hostage to the traffic, noise, disruption and dirt that it will create and would likely result in a negative impact on any residents that might need to sell their homes during such an egregiously long construction period. Moreover, the Developers have met with our neighborhood group and advised us on several occasions that they could complete all construction within 2 to 4 years from Project commencement. We surmise that the longer time frame being requested is to reduce the economic risk of the Project and increase return to their investors, perhaps creating many extra years of valuable tax "losses". The Developers need to go back to the drawing board to present a more realistic construction time frame, even if it means altering their proposed design. 4 (PD-1)

- The current proposal has construction staging for three of the four phases and most of this time period directly across from our front doors. We have proposed that the Developer move staging next to each phase in the 10 acre site during construction.

- There is a commercial loading zone being proposed directly across the street from our neighborhood which will create noise and disruption. The Draft EIR's mitigation is to restrict loading to before 7AM and after 7PM, which is even more disruptive to the quiet enjoyment of our homes. Since the Developers have included provisions for all commercial loading to take place underground, there is no justification for the significant adverse impact street side commercial loading would create. 5 (TR-10)

- The garages for our homes back out onto California Street and there was no mention in the Draft EIR of the hazards that will be created as a result of the Project during construction, and particularly with the added traffic that will be created by its proposed retail. 6 (TR-7)

Thank you
David Bercovich
415-409-9288
davidb@gmail.com

# I-BERKLEY

**From:** Daniel Berkley
**To:** Zushi, Kei (CPC)
**Subject:** EIR 3333 California exposed
**Date:** Monday, January 07, 2019 8:01:12 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Honorable Kei Zushi,
Much has been written about EIR 3333 California Street project. From where I sit at 3320 Street there have been so little realities for the neighborhood and city as a whole. Massive height increases; lack of true recognition of traffic choked streets; wind tunnel impact on street; darkened corridors; destroyed vistas and treasured flora; major nearly decade long disruption with selfish development; is this what growth means in our City? It is destruction of a community. I recall some elements of The Invisible Man by Ralph Ellison. Use space for gentle residence. Remember the false promises of Candlestick?
Daniel Berkley

1
(ME-1)

Sent from my iPhone

**From:** Gail Boyer [mailto:gail4195@gmail.com]
**Sent:** Wednesday, January 02, 2019 12:47 PM
**To:** Richard Frisbie <frfbeagle@gmail.com>; Zushi, Kei (CPC) <kei.zushi@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>
**Subject:** Fwd: 3333 Comments

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I APPRECIATE YOUR KINDNESS AND UNDERSTANDING THAT THERE ARE ELDERLY, DISABLED, CHRONICALLY ILL,HOMEBOUND PEOPLE WHO CANNOT AFFORD TO RELOCATE IN THE CITY, AND THE GRAND, LENGTHY,AND VARIANCES REQUIRED FOR COMMERCIAL,OFFICE RETAIL COMPLEX, AND SCALE OF THIS PROJECT, AND AIR TOXICITY, WILL BE A TRAGEDY FOR THEIR HEALTH AND WELL BEING. PLEASE HELP US AND THANK YOU FOR YOUR CONSIDERATION IN THIS MATTER. BEST, GAIL BOYER, 3316 CALIFORNIA STREET. THANKS AGAIN RICHARD FOR ALL YOUR HELP.

1
(AQ-2)

Begin forwarded message:

**From:** Richard Frisbie <frfbeagle@gmail.com>
**Subject: 3333 Comments**
**Date:** January 2, 2019 at 11:47:50 AM PST
**To:** Gail Boyer <gail4195@gmail.com>

Gail, below are two paragraphs you can send.
Send them to : Kei Sushi; Catherine Stefani; and myself:

kei.zushi@sfgov.org, Catherine.Stefani@sfgov.org, frfbeagle@gmail.com

**I fully support the Community Full Preservation Residential Alternative for 3333**

It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 8,000 retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.

2
(AL-2)

It matches the surrounding neighborhoods for character, style, scale and bulk.

2 (AL-2) cont'd

**I strongly oppose** the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change.

3 (ME-1)

Let me know if you have any questions.

Dick Frisbie

Robert Bransten

3370 Clay Street

San Francisco, California 94118

Dear Planning Commissioners,

I enthusiastically support the proposed development at 3333California Street. This development will create more housing in our city, a critical need. 1 (ME-1)

For over fifty years my wife and I have lived just two blocks from California Street and Presidio Avenue. We believe in additional new homes that will allow both city new comers and longtime residents to find affordable and also market rate housing on the city's west side. I also like the proposed five acres of open space and the pedestrian walkways through the site,

Our vibrant city needs to address our housing shortage.

I urge you to support this thoughtful development which creates an opportunity for families to stay in San Francisco.

1
(ME-1)
cont'd

Robert Branstein

**From:** Barbara Brenner
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary; Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Cc:** Richard Frisbie
**Subject:** 3333 California Street- Support for Neighborhood Alternative Plan
**Date:** Thursday, January 03, 2019 10:27:56 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To whom it may concern:

I am writing in opposition to the developer's plan for 3333 California Street. The proposal is objectionable for several reasons: 1 (ME-1)

Architecture is not in line with existing neighborhood character. 2 (CEQA-3)

Retail stores and offices will bring in too much additional traffic and are unnecessary. Existing local stores are more than sufficient for the needs of the neighborhood. 3 (TR-1)

Parking is currently extremely difficult. The developer originally stated loading zones would be on-site or underground however that plan was scrapped. On-street loading zones would eliminate 40 additional street parking spaces. 4 (TR-11)

15-year construction timeline is excessive and unnecessary and as costs spiral invites the sale of an up-zoned property. 5 (PD-1)

THE NEIGHBORHOOD RESIDENTIAL ALTERNATIVE SATISFIES THE NEED FOR ADDITIONAL HOUSING IN SAN FRANCISCO BUT WITH SIGNIFICANTLY LESS DAMAGE TO THE ENVIRONMENT WHILE MAINTAINING THE CHARACTER OF THE NEIGHBORHOOD. 6 (AL-2)

Sincerely,

Barbara and Jim Brenner

homeowners-1809 Lyon Street, San Francisco

**From:** Joseph Catalano
**To:** CPC.3333CaliforniaEIR
**Cc:** Joan M. Varrone; Miller Hall, Ellie (BOS); Stefani, Catherine (BOS)
**Subject:** Neighborhood Comment 2015-014028ENV
**Date:** Tuesday, January 08, 2019 12:43:33 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi;

The Draft EIR fails to recognize the disproportionate adverse impact the addition of 750 residential units on a 10 acre site will have on the site's immediate neighbors. The Draft EIR only adopts a citywide density metric, and fails to incorporate mitigation for the more local adverse impact. The Draft EIR disregards the immediate adversity such a massive influx of units will have on property owners who chose their homes based on the neighborhood's characteristics. 1 (GC-1)

The Draft EIR fails to include adequate mitigation for the adverse and persistent impact a potential 15 year construction period will have on the neighbors of the Project. 2 (PD-1)

The Draft EIR does not address the traffic impact of ride share drivers driving around the neighborhood waiting for a fare. 3 (TR-2)

The Draft EIR fails to address the deleterious effect of freight loading on a currently entirely residential street. (California between Laurel and Walnut) 4 (TR-10)

The Draft EIR does not mention, much less adequately address, the loss of horizon the Project will create. 5 (CEQA-3)

The Draft EIR does not mention, much less include mitigation requirements for the additional hazards the Project's foreseeable congestion will create for exiting garages on California Street. 6 (TR-7)

The Draft EIR disregards the Project's strategy of privatizing open space which is currently a community resource. 7 (PD-3)

We would welcome the opportunity for dialogue with municipal government representatives and the Developer to resolve these concerns.

Regards,
Joe Catalano and Joan Varrone
3320 California Street Apt. 3
San Francisco CA

Sent from my iPad

**Subject:** 3333 California Street Mixed Use Project
**Date:** Sunday, January 6, 2019 at 5:17:34 PM Pacific Standard Time
**From:** Michael Coholan
**To:** Zushi, Kei (CPC), richhillissf@gmail.com, Melgar, Myrna (CPC), planning@rodneyfong.com, Johnson, Milicent (CPC), Koppel, Joel (CPC), Moore, Kathrin (CPC), Richards, Dennis (CPC), CPC-Commissions Secretary
**CC:** Stefani, Catherine (BOS), Dick Frisbie (frfbeagle@gmail.com)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi and Planning Department Commissioners:

I've lived in the Laurel Heights neighborhood for nearly 40 years and would like to make the following comments regarding the 3333 California Street Mixed Use Project:

*But before I do, I want to be clear that I am 100% in favor of building the 558 (or 744 variant) housing units as soon as possible. I am not an obstructionist, just a concerned resident who understands the desperate need for more housing at all price levels. Further, I was a part of the neighborhood group that was so successful in working with the developer on the "Lucky Penny" (Geary and Masonic) project and hope that the developers of 3333 Cal would see the benefit of collaborating with the neighborhood on this project too, so that the housing can be built as quickly as possible. Many of my neighbors share the same desires and beliefs.* 1 (ME-1)

**I fully support the Community Full Preservation Residential Alternative for 3333 because:** 2 (AL-2)

It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 8,000 retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It matches the surrounding neighborhoods for character, style, scale and bulk.

**I strongly oppose** the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 3 (ME-1)

Thank you,

~Michael Coholan

**Subject:** Re: Comments on 3333 California Street Mixed Use Project -- 2015-014028ENV
**Date:** Sunday, January 6, 2019 at 9:34:47 PM Pacific Standard Time
**From:** Adam Cole <adamcole415@gmail.com>
**To:** Zushi, Kei (CPC) <kei.zushi@sfgov.org>

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Please accept my apologies: I meant to say Dear Mr. Zushi.

> On Jan 6, 2019, at 9:32 PM, Adam Cole <adamcole415@gmail.com> wrote:
>
> Dear Mr. Sushi and Commissioners — I live two blocks from 3333 California Street. I OBJECT to the "Proposed Project" and "Variant" (collectively, "developer's proposal") and urge the Planning Department to accept and review and the Commission to adopt the Community Residential Alternative. 1 (ME-1) 2 (AL-2)
>
> I have lived in this neighborhood for 23 years and value its character, which has kept its residential charm all that time, but which the developer's proposal threatens.
>
> I object to the developer's proposal for two main reasons.
>
> First, the developer is proposing to take up to ***15 years*** to complete it. That's absurd. The Golden Gate Bridge was completed in four years. Fifteen years of construction is also deeply unfair to us who live here and must suffer the noise. The timeframe also casts doubt on the developer's bona fides, suggesting that the goal isn't to develop the property at all but to flip it after approval or otherwise manipulate the City's approval process. Each of these concerns by itself militates against approval of the developer's proposal. 3 (PD-1)
>
> Second, the developer's proposal will result in a massive increase in car traffic in the neighborhood, which we can't handle. Thousands more car trips a day will congest and destroy the historic residential feel of this area. 4 (TR-3)
>
> The Community Residential Alternative addresses these and other issues and draws the right balance between the need for more housing and preservation of this historic neighborhood. 5 (AL-2)
>
> Thank you for your consideration.
>
> Adam M. Cole
> 3401 Clay Street, Apt. 405
> San Francisco, CA 94118
> Cell 415-828-1812

**Subject:** Project Title: 3333 California Street Mixed Use Project - Comments on the Draft EIR
**Date:** Saturday, January 5, 2019 at 5:15:17 PM Pacific Standard Time
**From:** Bill Cutler
**To:** richhillissf@gmail.com, Melgar, Myrna (CPC), planning@rodneyfong.com, Johnson, Milicent (CPC), Koppel, Joel (CPC), Moore, Kathrin (CPC), Richards, Dennis (CPC), Stefani, Catherine (BOS), Zushi, Kei (CPC), CPC-Commissions Secretary, LaurelHeights2016@gmail.com

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Bill Cutler and Judy Doane
3101 California Street Apt. 7
San Francisco, CA 94115

January 5, 2019

Re: Case No. 2015-014028ENV

Dear Planning Commissioners:

We are a married couple who have lived in Laurel Heights on California Street, one block from the site of the proposed real estate development, for over 45 years. Over the decades, we've seen many big changes to our neighborhood—some positive, and some negative—but this Prado development proposal, which violates the zoning laws and the character of the district, is by far, the most disturbing to date. 1 (ME-1)

We recognize the pressing need for more affordable housing in San Francisco, and we support construction of housing on this site, but the current proposal, which Prado wants 7-15 years to complete, includes unnecessary retail space, threatens the quality of life, and mars the beauty of Laurel Hill by altering the Historic Building, obscuring the beautiful views, and destroying the majority of 185 old growth trees that we cannot afford to lose in an era of toxic air and climate change. 2 (ME-1)

The high density of the proposed project as described in the Draft Environmental Impact Report, will increase traffic flow and congestion, increase noise and pollution, and contribute to the loss of parking, in a neighborhood where it's already almost impossible to find adequate street parking, even for residents with G-Stickers. It's important to realize that not only will the construction of the Prado project permanently eliminate 40 currently available non-metered parking spaces to accommodate five loading/unloading zones for TNCs (Uber, Lyft, Chariot) and freight traffic, but it will also take away another 200 non-metered parking spaces, which surround the 10 acre site on 3 (GC-1) 4 (TR-11)

Euclid and Laurel Streets for the entire 15 years of construction. That is parking that residents, as well as businesses in Laurel Village Shopping Center need desperately, and that severe impact on our community is not addressed anywhere in the DEIR. Essentially, Prado's current DEIR changes what should be a residential development into a full scale retail destination. 4 (TR-11) cont'd

In addition to Prado's proposal, there are three other large real estate projects already approved to be built in this same neighborhood over the next few years: 5 (CU-1)

*A residential building (95 units) at the current site of the former Lucky Penny Restaurant at Geary and Masonic.

*A residential development (270 units), covering two and a half blocks at the current site of CPMC on California Street.

*A new housing development nearby on Sacramento Street.

Along with the Prado project, these will bring thousands of new residents to Laurel Heights in the coming years, so the YIMBY argument that there is no new housing in the Western Addition makes little sense once you take into account how many new buildings will be going up in our neighborhood simultaneously. In fact, in a recent petition drive at Laurel Village, over 800 residents signed the petition opposing the developer's plan for ROC (retail, office, and commercial) space, and fully supporting a development consisting of new housing only.

Fortunately, there is a much better way to address the need for a development at Laurel Hill that both meets the housing demands and still protects the Historic Building as well as the beautiful landscaping that surrounds it. It's called the Neighborhood Full Preservation Alternative. It provides the same number of residential housing units as the Prado project, 558 with a 744 variant, protects the majority of the 185 mature trees, and does not include major retail that would only negatively compete with Laurel Village Shopping Center, which borders the site. For perspective, Laurel Village already has two supermarkets, Cal-Mart and Bryan's, Starbucks and Peet's coffee, a liquor store, Ace Hardware, several restaurants, including Beautifull! and Rigolo Cafe, 3 banks, Bank of America, Wells Fargo and First Republic, Walgreen's Pharmacy, multiple doctors, dentists, and psychotherapy offices, Peninsula Beauty, a GAP store, several boutiques and a variety of other businesses. Sacramento Street, which is one block away from the development, has numerous restaurants, including The Magic Flute, Spruce, Sociale, Cafe Luna and Osteria, The Vogue movie theater, 3 dry cleaners, multiple boutiques, antique shops, nail salons, hair salons, a automotive repair shop, several liquor stores, a shoe repair shop, and many other businesses, all within a short walking distance of Laurel Hill. It is also important to remember that the development is directly across California Street from the San Francisco Jewish Community Center, which offers a pool, a fitness center, a spa, a concert hall, a full calendar of performances, lectures, and a host of other amenities. 6 (AL-2)

We don't need new retail in Laurel Heights. We are inundated with retail right now. We need affordable housing—built without changing existing zoning laws, without 10 story buildings, without 7 (ME-1)

over 100,000 square feet of additional retail, office and commercial space. We should be using the construction primarily for affordable housing, which would allow for some units big enough for middle class families. The Neighborhood Alternative does all that and can be built in about 3 years, not 7-15.

7 (ME-1) cont'd

Among the many things that make the Neighborhood Alternative a much better solution than any of the alternatives presented in the DEIR are as follows: it preserves the characteristics of this wonderful historic site, it provides 558 (or 744 in the Variant) housing units, it does not create 8000 retail auto trips per day, it does not generate approximately 15,000 tons of greenhouse gases, it preserves both the present childcare center and the existing cafe, and it matches the surrounding neighborhood for character, style, scale and bulk. In short, it is the ideal solution—providing housing without destroying what makes Laurel Heights a desirable place to live in San Francisco.

8 (AL-2)

Please consider supporting our plan. Thank you.

Very truly yours,

Bill Cutler and Judy Doane

**From:** Evelyn Davidson
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC)
**Subject:** ->Mr. Zushi: opposition to proposed 3333 California project
**Date:** Tuesday, January 08, 2019 4:32:07 PM

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# Memorandum

Date: January 8, 2019

To: kei.zushi@sfgov.org, Senior Environmental Planner

Cc: Supervisor Stefani Catherine.Stefani@sfgov.org

Planning commissioners richhillissf@gmail.com

President myrna.melgar@sfgov.org

From: Evelyn Davidson, Neighbor (ip_acre@ yahoo.com)

Re: Objection to 15-year developer development project (the "Destructive 3333 Project" or D3333P)

Premises: 3333 California Street, San Francisco

I am very concerned about, and object to, the current developers' development plan.

1
(ME-1)

I understand it is currently scheduled to take fifteen (15) years to complete. Apart from the incredibly drawn out length of such a project, the negative effects (such as dust, noise, diminished parking, danger to children, seniors and others), such a development does not fit within the natural, historic, familial, social and aesthetic contours of our community. Not to mention the environmental risks. Wouldn't such a project be more appropriate for Geary Blvd or similar streets. Moreover, the developers' stated uses are unlikely to be needed in the future. The increasing closing of retail and office premises due to online shopping and work-at-home jobs makes such proposed uses doubtful even fanciful, perhaps to be replaced by even less human friendly high-tech data or A.I. centers by the time occupancy is permitted.

2 (PD-1)

3 (GC-1)

4 (ME-1)

I and other community members propose a smaller development (the "Community Full Preservation Alternative" or CFPA) that will still add substantial needed housing but take only three (3) years to complete. The CFPA does not include the massive unneeded, unwanted and probable dead-on-arrival retail/office/commercial complex that the Destructive 3333 developer continues to insist upon. CFPA does not create outmoded 13,000+ retail auto trips per day; it does not generate approximately 15,000 tons of greenhouse gases. The CFPA preserves both the present childcare center and the existing café, a source of deep, positive social capital in our community. It matches the surrounding neighborhoods for character, style, scale and bulk.

5 (AL-2)

I strongly oppose the Destructive 3333 Project as it brings excessive, long-term, unwanted and destructive noise, dust (on top of the recent lung-damaging smoke from the wildfires), other pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it diminishes community members socializing; it poses threats to pedestrian safety, especially the more fragile members of our community; it contributes to climate change; it will leave a bad taste in the mouth of those who remain in the community or are forced to leave due to damage cause by the D3333P; and worse. The Community Full Preservation Alternative will however generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the developers' Destructive 3333 Project.

6 (ME-1)

7 (AL-2)

Please do not permit the Destructive 3333 Project to go forward.

8 (ME-1)

**From:** Linda L. Day
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Subject:** Support for 3333 California Development
**Date:** Monday, December 10, 2018 4:18:42 PM

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Gentlepeople,

I live on Masonic and support the 3333 California development. Having attended the 3333 California NIMBY meeting, I believe that their arguments are specious.

They say that they want housing, although less than proposed, and that they do not want commercial because it will threaten the Laurel Shopping Center merchants. They call out the assault made by Trader Joe's and Target and insist that no more competition be allowed. They do not development on busy arterial streets.

I am a retired professor who is only able to live in the city where I worked because a small, affordable (at the time) multi-family unit was available. development of my building was fiercely contested by neighbors.

The developer's plans call for townhouses on the one edge of the site that faces single family detached dwellings.

The argument for preservation of an unworthy office building is a desperate attempt to preserve an enclave for the rich. Why should we declare any neighborhood off-limits for housing that will serve a diverse mix of residents? This neighborhood is well served by transit, is close to stores for modest income shoppers, and has a great library branch.

1
(ME-1)

Linda Day

**From:** Shanan Delp
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California: Let"s Make it a dense housing solutuon
**Date:** Monday, December 10, 2018 3:37:29 PM

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Hi,

The UCSF laurel heights campus is a nice park setting, but it's not a landmark. Let's use this wonderful, transit-rich spot to add some density to the inner richmond.

I do not believe the current campus is in any way worth preserving. Let's go dense.

1
(ME-1)

Thanks,

Shanan Delp

San Francisco Voter.

**KATHRYN R. DEVINCENZI**
22 IRIS AVENUE
**SAN FRANCISCO, CALIFORNIA 94118-2727**
Telephone: (415) 221-4700
E-mail: KRDevincenzi@gmail.com

January 8, 2019

BY EMAIL TO: CPC.3333CaliforniaEIR@sfgov.org

San Francisco Planning Department
Attn: Kei Zushi, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Draft EIR for 3333 California Street, San Francisco, CA 94118
Planning Department Case No: 2015-014028ENV
State Clearinghouse No: 2017092053

1. The DEIR Fails to Disclose the Uncertainty as to Whether the SFPUC Has Sufficient Water Supply Available to Serve the Project Site from Existing Entitlements and Resources and Whether SFPUC Would Require New or Expanded Water Supply Resources or Entitlements.

1 (UT-1)

The July 27, 2018 letter from the San Francisco City Attorney to the State Water Resources Control Board (SWRCB) discloses that SFPUC would have to greatly increase water rationing in a sequential-year drought if SWRCB adopted proposed amendments to the Water Quality Control Board Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary that were then under consideration (Plan Amendment). (Ex. A, excerpts of letter from City Attorney to SWRCB, pp. 1-3) The letter states that if the Plan Amendments were adopted, if a sequential-year drought occurs, San Francisco's diversions from the Tuolumne River - on which the SFPUC relies to meet approximately 85% of demand for drinking water throughout the Bay Area - could be severely reduced. (Ex. A, p. 3) The letter discloses that if the Plan Amendments were implemented, SFPUC could have to increase water supply rationing over the 20% level allowed by the SFPUC's current drought management plan and indicates that it is uncertain that SFPUC will be able to develop sufficient replacement supplies in approximately four years before the SWRCB's intended implementation of the Plan Amendment in 2022. (Ex. A, p. 4)

In *Delta plan approved: cities face water cuts*, the San Francisco Chronicle reported that the SWRCB approved this Plan Amendment, which would require cuts to water supplies that could cause households in the Bay Area to curb water use by 20 percent or more. (Ex. B) Please state whether the SWRCB approved the Plan Amendments and explain the potential consequences of those Plan Amendments on SFPUC' water supply for San Francisco and the possibility of increased water rationing. (Ex. B) While agencies have an opportunity to propose alternative proposals, the passage of this Plan Amendment has created uncertainty as to San Francisco' water supply which the DEIR for 3333 California Street fails to acknowledge. CEQA

requires an agency to disclose uncertainty about water supply.

The water supply assessment performed for the proposed 3333 California Street project was performed before the Plan Amendment was passed. That water supply assessment was based on the SFPUC's urban water management plan which was based on estimations of water supplies that pre-dated the plan amendments.

The 3333 California Street Initial Study projects that the proposed project would use an estimated 73,000 gallons of water per day, which would result in a net increase of approximately 53,000 gallons per day. The net increase per year would be 19,345,000 gallons (53,000 x 365). The Initial Study concludes that the increase could be accommodated "by the anticipated water supply for San Francisco." That anticipated water supply for San Francisco has now changed as a result of the Plan Amendments. Although the DEIR appears to have been released after the Plan Amendment was passed, it failed to disclose the uncertainty about changes in the anticipated SFPUC water supply .

1 (UT-1) cont'd

2. The DEIR Fails to Disclose the Uncertainty as to Whether the Proposed Project or Project Variant, in Combination With Past, Present and Reasonably Foreseeable Future Projects Could Result in a Cumulatively Considerable Contribution to Cumulative Impacts on Water Supply Systems.

2 (UT-1)

Since the City Attorney's letter indicates that the SWRCB expects SFPUC to develop additional supplies of water, the DEIR should have disclosed the uncertainty about the cumulative impact of the proposed project's contribution to the demand for water supplies together with the water supply demand of other reasonably anticipated projects, in the current context that new projects to develop additional water supplies may be needed.

The DEIR should explain the potential cumulative impacts of developing potential additional water supplies to serve existing SFPUC customers and customers drawing on SFPUC water supplies in current and foreseeable developments in the context of significant water reductions in a sequential-year drought. The DEIR should disclose any uncertainty as to whether sufficient additional water supplies can be developed before 2022 to avoid SFPUC customer rationing above 20% in sequential-drought years and estimate the amount of water that could be used by SFPUC customers in current and reasonably foreseeable development and the amount of water that could be available in sequential-drought years.

Very truly yours,

Kathryn R. Devincenzi

Kathryn R. Devincenzi

# EXHIBIT A

I-DEVINCENZI1

CITY AND COUNTY OF SAN FRANCISCO

DENNIS J. HERRERA
City Attorney

OFFICE OF THE CITY ATTORNEY

JONATHAN P. KNAPP
Deputy City Attorney

Direct Dial: (415) 554-4261
Email: jonathan.knapp@sfcityatty.org

July 27, 2018

***Via Electronic and U.S. Mail***

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814
LSJR-SD-Comments@waterboards.ca.gov

RE: *San Francisco's Comments to Plan Amendment and Final SED.*

Dear Ms. Townsend,

This office represents the San Francisco Public Utilities Commission ("SFPUC"), operator of the Hetch Hetchy Regional Water System ("RWS"), which provides water to over 2.6 million people throughout the Bay Area. On behalf of the SFPUC and the City and County of San Francisco ("San Francisco"), we respectfully request that the State Water Resources Control Board's ("Board") consider our comments to the proposed updates to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary ("Plan Amendment") and reconsider its decision to preclude any additional comments on the Final Substitute Environmental Document for the Plan Amendment ("Final SED").

On July 18, 2018, San Francisco requested that the Board recirculate the Final SED, or, at the very least, expand the scope of permissible comments to include comments on the Final SED, extend the comment deadline by 30 days, and postpone the public hearing ("San Francisco's Letter"). By letter dated July 19, 2018, the Board denied San Francisco's request in its entirety, stating that recirculation is not required under the California Environmental Quality Act ("CEQA") or the CEQA Guidelines because the changes in the Final SED "do not result in any new potentially significant adverse impacts on the environment, any substantial increase in the severity of potentially significant adverse impacts on the environment, or establish any new feasible project alternatives or mitigation measures."[1] But San Francisco never asserted that recirculation was required under those bases.

Instead, as noted in San Francisco's Letter, Title 14, California Code of Regulations, section 15088.5(a)(4) provides that recirculation is also required if "[t]he draft [Environmental

[1] Letter from Eileen Sobeck, Executive Director, State Water Resources Control Board, to Dennis Herrera, City Attorney, and Jonathan Knapp, Deputy City Attorney, San Francisco City Attorney's Office, July 19, 2018, at 2.

Impact Report ("EIR")] was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." (*See also* Cal. Code Regs., tit. 23, § 3779(e).) The Board's analysis in the Final SED of San Francisco's potential actions in response to implementation of the Plan Amendment is "fundamentally and basically inadequate and conclusory in nature" because, among other reasons, it excludes any consideration of increased water supply rationing. The Board's July 18, 2018 letter did not respond to this argument at all.

Under protest, and without waiving any legal claims that the Board has violated, among other things, its obligation to recirculate the Final SED under the CEQA Guidelines and California Code of Regulations, Title 23, California Code of Regulations, section 3779(e), San Francisco submits the following comments and urges the Board not to adopt the Plan Amendment or the Final SED.

**San Francisco's Comments on the Plan Amendment**

**1. The Board Is Not Authorized to Require Implementation of the Water Quality Objectives Through the Adoption of Regulations.**

The Plan Amendment states—we believe for the first time since the Board's Plan Amendment process began over six years ago—that "the State Water Board may implement the [water quality] objectives by conducting water right proceedings, *which may include adopting regulations*, conducting adjudicative proceedings, or both, that take into consideration the requirements of the Public Trust Doctrine and the California Constitution, article X, section 2."[2] The Board states that the addition of the phrase "including adopting regulations" is intended to clarify the "implementation measures within the State Water Board's authority."[3] However, the Board has no authority to implement the Plan Amendment through such quasi-legislative means.

This newly stated implementation authority—*i.e.*, conducting water rights proceedings by rulemaking—appears to be a continuation and expansion of the Board's recent flawed proposal to adopt a Regulation on Waste and Unreasonable Water Uses to implement conservation measures by rulemaking. As the SFPUC informed the Board in a letter dated December 22, 2017, in the context of the waste and unreasonable use regulations, the Board does not have authority to restrict or limit the exercise of water rights without due process of law.[4] Water rights are real property that can be restricted only after the opportunity for a hearing and the presentation of evidence. To do otherwise would constitute an unlawful confiscation of property without due process of law. The Board's exercise of authorities under the Public Trust Doctrine and article X section 2 of the California Constitution is adjudicative in nature, and demands fact-finding and balancing of numerous factors and consideration of the water rights of other diverters. This can only be accomplished by conducting comprehensive water right adjudicative proceedings. The Board's rulemaking authority simply does not extend to restrictions on the otherwise lawful exercise of water rights.

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[2] Appendix K at 26 (emphasis added).

[3] Master Response 2.1 at 4. See also *id.* at 12

[4] Comment Letter – Proposed "Prohibiting Wasteful Water Use Practices" Regulation, jointly submitted by the San Francisco Public Utilities Commission and the Bay Area Water Supply & Conservation Agency, December 22, 2017, attached hereto as Exhibit 1.

Further, even if the Board had the authority to implement the Plan Amendment through rulemaking, the Final SED fails to analyze the exercise of such authority as required by CEQA. This new proposed basis of implementation authority was not described in the Draft SED or prior versions of the proposed program of implementation and the public and affected parties have not had an opportunity to comment on the potentially significant environmental impacts of a rulemaking implementation approach. Moreover, the Final SED does not fully describe the proposed action and does not analyze the potential environmental impacts from a rulemaking approach such as might be the case if the Board does not take water rights priorities into account when it allocates responsibilities to water users to meet the flow requirements in the Plan Amendment. By not describing a known potential implementation action in the Final SED, the Final SED inappropriately segments environmental review of the proposed action. As a result, the Final SED fails to identify potentially significant impacts that may result from the proposed action and the potential effects of the action as a whole. The Board must recirculate the proposed program of implementation to more fully describe how the Board might "conduct water right proceedings [by] adopting regulations," revise the Final SED to analyze the potential environmental impacts associated with that approach, and recirculate the Final SED.

## San Francisco's Comments on the Final SED

### 1. The Board Failed to Analyze Impacts to the Bay Area from Increased Water Supply Rationing.

In its Responses to Comments, the Board recognizes that if it implements the Plan Amendment and a sequential-year drought occurs, San Francisco's diversions from the Tuolumne River—on which the SFPUC relies to meet approximately 85% of demand for drinking water throughout the Bay Area—could be severely reduced.[5] For example, assuming a reoccurrence of the historical hydrological conditions preceding and including the 1987-92 drought, under a 40% unimpaired flow ("UIF") objective San Francisco would, on average, be responsible for contributing approximately 116 million gallons per day ("mgd") per year for each year of the six-year drought period, or more than 43% of the water needed in the Bay Area.[6] San Francisco has repeatedly explained to the Board that faced with such severe reductions it would be compelled to increase water supply rationing throughout the RWS service area.[7] Yet the

[5] See *e.g.*, Board's Responses to Comments, Master Response 8.5, at 17 (where the Board incorrectly, as explained below, identifies the potential deficit to San Francisco's water supply as 119,000 acre-feet/year or approximately 106 million gallons per day ("mgd")).

[6] *See* Declaration of Matt Moses in Support of Comments by the City and County of San Francisco to the Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan, *see* Attachment 1 to the Moses Decl., SFPUC Analysis of Proposed Changes to Tuolumne River Flow Criteria, March 14, 2017 ("2017 SFPUC Water Supply Analysis"), at 17, Table 9 (showing that the reduction would be 129,884 acre-feet ("AF")/year for each of the 6 years; 129,884 AF = 116 mgd.) This analysis assumes an RWS demand of 265 mgd, which is San Francisco's contract obligation and consistent with projected 2040 RWS demand.

[7] The analysis in these Comments assumes a 51.7% flow contribution by San Francisco. As a water supply provider to over 2.6 million people throughout the Bay Area, San Francisco must utilize worst-case scenarios for water supply planning purposes. In presenting the potential water supply, environmental, and socioeconomic effects from certain interpretations of the Raker Act and the Fourth Agreement San Francisco does not waive arguments it may have about how the Raker Act or Fourth

Board's analysis of San Francisco's potential actions in response to implementation of the Plan Amendment entirely excludes consideration of *any* increase in water supply rationing over the 20% level allowed by the SFPUC's current drought management plan.[8] Instead, the Board has based its entire analysis of San Francisco's potential actions in response to the Plan Amendment on the unsupported assumption that San Francisco will be able to develop sufficient replacement water supplies in approximately four years, *i.e.*, prior to the Board's intended implementation of the Plan Amendment in 2022.[9] It is patently unreasonable for the Final SED to omit consideration of even the *possibility* that San Francisco would need to increase water supply rationing in these circumstances. And as we explained in our July 17, 2018 letter, this critical omission precludes meaningful public review of and comment on the most reasonably foreseeable water supply, environmental, and economic effects of the Plan Amendment on the Bay Area.

**2. The Board Failed to Use San Francisco's Eight-and-a-Half-Year Design Drought in its Modeling of Water Supply Impacts.**

Following the 1987-92 drought, the SFPUC implemented the "design drought," which is a water supply planning methodology that ensures the SFPUC will retain adequate storage to withstand an eight-and-half year drought without imposing more than 20% system-wide rationing.[10] The SFPUC subsequently approved the design drought as part of its adoption of the goals and objectives for the Water System Improvement Program ("WSIP").[11] The Final SED rejects use of San Francisco's design drought because it represents hydrological conditions more severe than historically experienced by the RWS.[12] CEQA requires, however, that the Board

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Agreement should or will be interpreted in future proceedings before the Board, the Federal Energy Regulatory Commission, courts of competent jurisdiction, or in any other context.

[8] See *e.g.*, Board's Responses to Comments, Master Response 1.1: General Comments ("Master Response 1.1"), at 47 (where the Board states it intends to implement the Plan Amendment by 2022); *see also* Master Response 8.5 at 49 (where the Board explains that rationing by the SFPUC throughout the RWS service area in response to the Plan Amendment would not exceed 20%, the maximum level of system-wide rationing that the SFPUC allows in its current drought management plan).

[9] See *e.g.* Board's Responses to Comments, Master Response 1.1 at 47.

[10] See *e.g.*, Comments by the City and County of San Francisco to the Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan ("San Francisco's 2017 Comments"), March 17, 2017, at 18-19, n.26 (explaining that the SFPUC's design drought is based on the hydrology of the six years of the worst sequential historical drought, 1987-1992, plus the two and a half years of the 1976 1977 drought, for a combined total of an eight-and-a-half-year design drought sequence).

[11] San Francisco Public Utilities Commission, Resolution No. 08-0200, attached hereto as Exhibit 2 (where the SFPUC approved the performance objective to "[m]eet dry-year delivery needs through 2018 while limiting rationing to a maximum 20 percent system-wide reduction in water service during extended droughts," which incorporates the eight-and-a-half year design drought methodology).

[12] Master Response 8.5 at 15, 18.

consider impacts to San Francisco from implementation of the Plan Amendment in accordance with the SFPUC's existing, adopted policies, such as its design drought.[13]

San Francisco developed its design drought after having lived through the consequences of basing the SFPUC's water supply operations "in accordance with rules based only on historical data."[14] Prior to the 1987-1992 drought, the SFPUC had based its water supply planning on "the experience of many years of historical operation, including the knowledge of previous drought events such as had occurred in 1976-1977."[15] It was therefore inadequately prepared when the 1987-1992 drought broke new records. As explained by the General Manager of the SFPUC during that drought, San Francisco "learned the painful lesson as to the adverse impacts that are caused by not planning for a drought worse than any experienced to date . . . . when the hydrology of the Tuolumne River and the City's operations through 1990 and early 1991 had created a situation where a 45 percent rationing program among City customers was initiated – a level of rationing that was found to be intolerable and not achievable."[16] "[G]iven the dire consequences of just being wrong in the forecasting of the length of drought that may hit the City" San Francisco responsibly relies on its water supply planning methodology to ensure it retains adequate water supplies during sequential-year droughts.[17] CEQA requires that the Board must take into account San Francisco's design drought when assessing impacts to the Bay Area from implementation of the Plan Amendment.

**3. Although the Board Concedes that the SFPUC's Hydrological Model is More Precise than the Board's Model, it Refuses to Use the SFPUC's Modeling Results.**

The Board concedes that the SFPUC's Hetch Hetchy and Local System Model ("HHLSM") model is more precise than the Board's Water Supply Effects ("WSE") model for calculating water supply effects to the RWS service area, yet the Board fails to use the HHLSM modeling results in the Final SED.[18] For example, instead of using the correct HHLSM figure

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[13] Master Response at 52 (emphasis added) (where Board mischaracterizes San Francisco's adherence to the approved design drought methodology, the SFPUC's associated modeling of water rationing that would be required under a 40% UIF objective across the historical hydrology, and San Francisco's other supporting evidentiary submissions and related comments as a mere "statement of intent" that the Board may disregard at its own discretion: "*a statement of intent* regarding future extreme water rationing *is not sufficient and reliable information on which to base an environmental analysis* of related impacts.")

[14] Affidavit of Anson B. Moran ¶¶ 7, 16 Project No. 2299, January 26, 1994 (referred to below as "Moran Decl."), attached to San Francisco's 2017 Comments as Exhibit 7.

[15] Moran Decl. ¶ 7.

[16] *Id.* ¶ 8.

[17] *Id.* ¶ 16.

[18] Master Response 8.5 at 16 (explaining, [w]hile the HH/LSM is a more detailed model that simulates operation of the RWS service area, the WSE model and water bank balance provide similar water supply effects as the HH/LSM under the SFPUC middle demand level and SED Scenario 2"); *id.* at 18 (where the Board acknowledges, "[t]he SED uses a simple method to assess potential water supply reductions in the absence of having access to a model that simulates the operation of the entire RWS service area.").

# EXHIBIT B

# Delta plan approved; cities face water cuts

*By Kurtis Alexander*



Carlos Avila Gonzalez / The Chronicle

Old River meanders in the Sacramento-San Joaquin Delta in Contra Costa County. The plan approved Wednesday is part of an effort to restore the health of the state's rivers and fish.

Dozens of California communities dependent on the cool, clear water of the High Sierra, from Central Valley farm towns to San Francisco, will see cuts to their water supplies under a plan approved Wednesday by state water regulators.

The reductions, which could force households in the Bay Area to curb water use by 20 percent or more, are the product of a decade-long effort to restore the health of the state's struggling rivers and fish.

But the move by the state water board to boost flows in the waterways by limiting draws, starting with the San Joaquin River basin, is not as strict as initially proposed. The plan leaves open the door for water agencies to trade other improvements to the rivers, such as enhancing salmon habitat, for smaller water cuts. The water agencies have until March to flesh out alternative proposals.

"We've gone out of our way to give multiple opportunities," said Felicia Marcus, chair of the State Water Resources Control Board, which met in Sacramento for 10 hours Wednesday. But "we're not just going to walk away."

At the heart of the water board's Bay Delta Plan is protecting the Sacramento-San Joaquin River Delta. The West Coast's largest estuary and the hub of California's water supplies has seen its waters choked and dirtied amid relentless pumping by cities and farms. The salmon population has collapsed, and the harm has rippled up the food chain to bears, birds and whales.

While San Francisco has long been removed from California's vicious water wars, having coveted rights to supplies in Yosemite, the city's primary source has not escaped this battle. The first phase of the Bay Delta Plan calls for limiting pumping on the San Joaquin River and its three major tributaries, which include the

Tuolumne River that feeds San Francisco's Hetchy Hetchy Reservoir. The water board is in the process of developing similar measures for the Sacramento River basin.

The apparent softening of the Bay Delta Plan on Wednesday comes after fierce opposition from an unlikely alliance between San Francisco and thirsty agricultural districts, with support from the Trump administration. The powerful bloc has argued that the fallout from water cuts would bring undo hardship to residents and businesses.

The water suppliers, joined by the state Natural Resources Agency, introduced their own last-minute proposal that downplayed the need for water cuts on rivers while emphasizing the importance of timing their water draws with fish runs and restoring habitat.

"This (plan) provides us more flexibility, more tools to address the issues that are facing you," Michael Carlin, deputy general manager of the San Francisco Public Utilities Commission, told the water board. The SFPUC provides water to San Francisco and about two dozen other Bay Area communities.

Gov. Jerry Brown and Gov.-elect Gavin Newsom had been advocating for such a compromise plan to head off a prolonged legal fight. Sen. Dianne Feinstein this month even introduced federal water legislation that, while controversial, included a provision for restoration funding in the event of a deal.

The plan put forth by the water agencies and the state Natural Resources Agency not only included the San Joaquin River basin, the first target of the water board, but the Sacramento River watershed.

It offered up about $1.8 billion for habitat fixes, coming from fees on water agency customers across the state, and state government money. It also conceded to some water reductions, giving up as much as 1 million acre feet of water statewide. That's nearly three times what Hetch Hetchy holds.

State water board members praised the alternative plan as a good start and said it represented a commitment to working toward the goal of improving the health of the delta. The board instructed its staff to look more closely at the document before the issue returns in March.

Environmental groups and the fishing industry, which have advocated for stronger protections for rivers and wildlife, flatly criticized the plan from the water agencies.

"Many elements of their proposal have already been tried and failed or represent no change from the status quo," said Jon Rosenfield, lead scientist at the Bay Institute.

As it stands, as much as 80 percent of the flow in the San Joaquin River basin is tapped by cities and farms during peak spring runoff. Environmentalists and fishermen have wanted to limit draws to 50 percent, saying salmon won't survive without the reduction, while cities and farms have opposed any major cuts.

State water officials split the difference, approving a plan that allows no more than 60 percent of flows to be diverted, on average.

The decision means urban and agricultural water users in the San Joaquin River watershed will generally have to draw 7 to 23 percent less water, depending on the year, according to state estimates.

The SFPUC believes its customers could be forced to reduce water use 40 percent during prolonged dry spells. The city's water rights are inferior to those of other water agencies on the Tuolumne River.

I-DEVINCENZI1

City officials say they'll develop other sources of water, such as groundwater reserves and perhaps desalination, to make up for lost water. But that will take time and money. Building out supplies, according to city estimates, could trigger rate hikes of 17 percent over 15 years, on top of already scheduled increases.

The loss of water to agriculture is estimated to result in a 2.5 percent drop in produce output in the San Joaquin River basin, according to the state. The area is a hotbed of almonds, alfalfa and peaches.

Farm groups say during drought years, crop production could fall even more.

The Trump administration has joined the agricultural industry in trying to scale back the Bay Delta Plan. President Trump has accused California of "foolishly" leaving water in the rivers while the U.S. Bureau of Reclamation has threatened to take legal action if its supplies on the Stanislaus River are curtailed, which the plan calls for.

Kurtis Alexander is a San Francisco Chronicle staff writer. Email: **kalexander@sfchronicle.com** Twitter: @kurtisalexander

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**KATHRYN R. DEVINCENZI**
22 IRIS AVENUE
**SAN FRANCISCO, CALIFORNIA 94118-2727**
Telephone: (415) 221-4700
E-mail: KRDevincenzi@gmail.com

BY HAND

January 8, 2019

San Francisco Planning Department
Attn: Kei Zushi, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103

RECEIVED
JAN 08 2019
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Re: Draft EIR for 3333 California Street, San Francisco, CA 94118
Planning Department Case No: 2015-014028ENV
State Clearinghouse No: 2017092053

1 (TR-4)

**1. The DEIR Fails to Adequately Analyze Whether the Proposed Project/Variant Would Cause Substantial Additional VMT and/or Substantially Induce Automobile Travel and/or Have a Cumulative Impact on VMT and/or Substantially Induce Automobile Travel in Combination with Other Reasonably Foreseeable Development and Projects.**

The Draft EIR admits that the proposed project or project variant would cause substantial additional Vehicles Miles Traveled (VMT) and/or substantially induce automobile travel. DEIR p. 4.C.74. The DEIR fails to estimate the total amount of VMT that would result from this significant impact on VMT and claims that the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for the non-residential use. *Ibid.* Similarly, the DEIR admits that the proposed project or project variant's incremental, cumulative effects on regional VMT would be significant, when viewed in combination with past, present and reasonably foreseeable future projects. DEIR p. 4.C. 102. The DEIR claims that both the project and cumulative impact on VMT would be reduced to a less than significant level by reducing retail parking provided by the proposed project/variant. DEIR pp. 4.C. 80 and 103.

In these comments, the term "project" shall include the proposed project and the proposed project variant, unless otherwise indicated.

The DEIR's traffic analysis is inadequate because it fails to state the total Vehicle Miles Traveled (VMT), understates the impact by discussing VMT per person in the AM and PM peak periods, fails to analyze VMT likely to result from special aspects of the project configuration and fails to support its conclusions with substantial evidence. In particular, the DEIR's central claims that the amount of parking included in the proposed project would result inVMT that would be beyond the significance threshold for non-residential use and that merely reducing some of the retail parking spaces would mitigate the impact to a less than significant level, are

unsubstantiated and not supported by substantial evidence.

1 (TR-4) cont'd

**A. The DEIR Is Inadequate Because It Lacks An Estimate and Discussion of Total Net New Travel Demand (Net New Person Trips) and Understates the Project Impacts by Providing Estimates and Discussion of Net New Person Trips during A.M and P.M. Peak Hours.**

2 (TR-1)

The San Francisco Planning Department *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002 (*San Francisco Guidelines)*, provide that:

> Travel demand analysis shall include textual information, supported by tables or figures detailing the project's trip generation, trip distribution, trip assignment and modal split characteristics.
>
> Net new travel demand generated by the project is to be estimated, based on the difference between existing and proposed land uses. Person trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C, are to be used for estimating levels of activity for the proposed project...
>
> To "net-out" existing land uses that will be replaced, the existing levels of trip activity should, in most cases, be based on actual observations rather than on estimates based on rates in these *Guidelines* or other sources.
>
> Each analysis should apply the trip generation rates from the *Guidelines* individually to the proposed uses, compare the proposed trips to existing levels of trip activity, and show the differences ("net new") by land use and in aggregate.
>
> The Travel Demand Analysis is to include the following, unless otherwise directed in the work scope (Note that different or additional analysis periods may be defined in the scope of work process):
>
> - Trip Generation Information: Project trip generation information (total person trips) by land use for existing and proposed uses. The total unadjusted daily and P.M. peak hour trips by mode can be calculated. The number of daily and peak hour vehicles (autos) generated by the project should also be calculated by using the auto occupancy rates noted in the tables in Appendix E.
>
> - Work and Non-Work Trip Generation Information: Since work and non-work trips have different characteristics in terms of distribution and the mode of travel, the number of work and non-work (visitor) trips should be calculated separately. Appendix C provides the methodology to compute the work and non-work

(visitor) trips for a specific land use.

- Trip Distribution, Assignment and Modal Split Information: Net new person trips distributed to various directions of travel and assigned to the appropriate modes of travel (auto, transit, walk, and other) should be calculated, presented in tables and a graphic diagram (for vehicle and transit trips), and discussed in the text. Modal assignments should also be calculated for daily and the P.M. Peak Hour.

The weekday P.M. Peak Period is generally 4:00-6:00, and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. The Planning Department may also request data for other periods to reflect the peak period of trip generation by the land use. (Ex. A, *San Francisco Guidelines* pp. 9-10)

The DEIR failed to estimate the net new travel demand that would be generated by the project, as required by the *San Francisco Guidelines*, at pages 9-10. (Ex. A, pp. 9-10) EIR Table 4.C.11 at page 4. C.54 estimated the total new travel demand generated by the project (person-trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C) based on the proposed project land uses. However, the DEIR lacks an estimate of the total existing levels of trip activity at the project site, so that the "net-out" of existing land uses that will be replaced can be determined, as required by the *San Francisco Guidelines*. The DEIR failed to provide estimates of the total existing levels of vehicle trips that currently occur at the project site and merely provided estimates of existing vehicle-trips in the Weekday AM. Peak Hour and Weekday P.M. Peak Hour. DEIR p. 4.C.60. Instead of the total increase, the DEIR only discusses "the anticipated increase in weekday a.m. and p.m. peak hour vehicle trips resulting from the proposed project and project variant, as compared to existing conditions." DEIR p. 4.C.60. The DEIR reports the total net-new external vehicle-trips "during the weekday a.m. peak hour" and the net-new external vehicle-trips "during the weekday p.m. peak hour" for the proposed project and project variant. DEIR p. 4.C.60. The estimated total increase in vehicle-trips is missing. The absence of this information is misleading to the decision maker and the public because the DEIR lacks estimation of the total increase in vehicle-trips that would be caused by the proposed project/variant.

In addition, the DEIR fails to "show the differences ('net new') by land use and in aggregate," as specified in the *San Francisco Guidelines*, at p. 9. DEIR Table 4.C.15, at page 4.C.60 lacks information as to net-new vehicle-trips by land use or in the aggregate, and merely presents estimates of net-new external vehicle trips in the "Weekday A.M. Peak Hour" and "Weekday P.M. Peak Hour." The DEIR's focus on peak-hour net-new vehicle trips is more relevant to traffic level of service impacts than to the greenhouse gas emissions that could result from total net-new vehicle trips. However, the lack of the information renders the DEIR

2
(TR-1)
cont'd

inadequate because it lacks estimates of the net-new trips by each proposed land use, depriving decision makers of important information they would use to mitigate effects by tailoring land use.

2
(TR-1)
cont'd

In addition, the DEIR fails to provide the "total unadjusted daily and P.M. peak hour trips by mode," which is generally required by the *San Francisco Guidelines* at page 9 unless otherwise directed in the work scope. DEIR Table 4.C.14 provides adjusted daily and A.M. and P.M. peak hour person-trip generation by mode; the estimates in that table had been reduced by the internal trip capture rates set forth in DEIR Table 4.C.12 at page 4.C.55. In that table, the total weekday A.M. peak hour person-trip generation was reduced by 409 alleged internal person-trips and the table reported the net external person-trips as 1,917. The adjusted 1,917 trips figure was carried over and reported as total A.M. Peak Hour person-trips per mode on Table 4.C.14 and those 1,917 person-trips were divided into 1,197 auto trips, 295 transit trips, 376 walk trips and 49 other trips (bicycle, motorcycle, transportation network companies, and other modes). Thus, the DEIR failed to provide unadjusted daily and P.M. peak hour trips by mode as specified in the *San Francisco Guidelines*.

The DEIR provides no explanation of the manner in which the walk trips in Table 4.C.14 were calculated or the manner in which the alleged internal trip rates set forth in Table 4.C.12 were calculated, and the general source reference to Kittleson & Associates 2018 and the *San Francisco Guidelines*, 2002 provide no reference to an explanation or calculations supporting those Tables. The total of the alleged external walk trips and internal trips indicates that the walk trips are inaccurately estimated or the calculations in the tables are inaccurate. Table 4.C.14 reports 376 A.M. Peak Hour walk trips for the proposed project, which is 19.6 percent of the total A.M. Peak Hour person-trips (376/1,917), and 398 P.M. Peak Hour walk trips for the proposed project, which is 19.07 percent of the P.M. Peak Hour total person-trips. (398/2,086). Table 4.C.12 reports 409 internal person-trips of the total 2,326 person-trips for the A.M. Peak Hour, which is 17.6 percent of the total A.M. peak hour internal trips, and 485 internal person-trips of the total 2,571 for the P.M. Peak Hour, which is 18.9 percent of the total P.M. Peak Hour internal trips. Adding the percentages of the alleged internal trips to the alleged walk trips reported on these two tables, 37.2 percent of the A.M. Peak Hour Trips would be performed by walking externally or by internal trips (376 plus 409) and 37.97 percent of the P.M. Peak Hour trips would be performed by walking externally or by internal trips (398 plus 485). Since it takes approximately one minute to walk across the site, it is likely that the internal trips consist of walk-trips rather than bicycle trips. The totals of the alleged walk trips and internal trips in perk periods, indicate that the DEIR overstated one or both of these trip rates, and the DEIR lacks substantial evidence that they were correctly stated.

The text at DEIR page 4.C.58 indicates that Table 4.C.14 reports "Overall" person-trips, and if this is the case, walk trips are being double-counted and the total person trips represented as external trips in Table 4.C.14 are inaccurate and were improperly reduced by alleged internal trips before person-trips were reported in Table 4.C.14. That DEIR text reports that "Overall, on

a daily basis, various types of land use would result in percentages of person-trips. Overall, residential use would generate 14% of walk trips, office use would generate 3%, general retail would generate 36%, restaurant uses would generate 40% and the day care center would account for 3-6% of trips for each model. These percentages add up to approximately 100 percent, so Table 4.C.14 likely reports total walk trips and total person-trips, rather than external trips only (as indicated by the heading "External Person-Trip Generation by Mode"), and it is likely that such table inaccurately double-counted walk trips, because walk-trips had been subtracted from total person-trips on Table 4.C.12 before the person-trip generation figures were carried over to Table 4.C.14.

2 (TR-1) cont'd

The text at DEIR 4.C.57 also indicates that walk trips were double counted. The DEIR states there that "Based on Table 4.C.14, about 61 percent of daily person-trips generated by the proposed project would be auto person-trips, 14 percent would be transit trips, 21 percent would be walk trips, and 4 percent of trips would be taken by other modes, including bicycles, motorcycles, and for-hire vehicles." DEIR p. 4.C.57. These mode shares add up to approximately 100 percent of trips and the 21 percent of walk trips is consistent with the 376 walk trips of the 1,917 total person-trips reported on Table 4.C.14. That DEIR text is not consistent with an additional 17-18 percent of trips being internal trips, as alleged in Table 4.C.12. Since the project site is easily traversed within approximately one minute or less, it is reasonable to assume that internal trips on this site would be walking trips. If there is any evidence contrary to this assumption, please present it.

The DEIR also lacks the actual site traffic counts for the P.M. peak period which the *San Francisco Guidelines* require:

3 (TR-14)

> The weekday P.M. Peak Period is generally 4:00-6:00, and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. *San Francisco Guidelines*, 2002, p. 10.

Instead of actual P.M. peak period counts, the DEIR only collected vehicle counts at 13 intersections within the transportation study area, existing site driveways, and nearby sidewalks. DEIR p. 4.C.2.

In addition, the DEIR failed to estimate and state the total daily vehicles miles traveled (VMT) expected from the proposed project and proposed project variant, as required by the City's scope of work:

4 (TR-4)

> KAI will utilize the San Francisco Transportation Information Map to obtain vehicle miles traveled data from the Planning Department data, which includes average daily VMT estimates for use for the region and the project's traffic analysis zone (TAZ 709)...

> Using the data collected in Task 2, KAI will document vehicle traffic ....within the study area, which includes the following:
>
> Discussion of vehicle miles traveled for the uses proposed by the project for the region and the Project's traffic analysis zone (TAZ). DEIR Appendix D, pp. 4-5.

4 (TR-4) cont'd

The DEIR admits that the proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel but fails to estimate the amount of additional VMT that the project/variant would generate or compare that to a significance standard that states an amount of VMT that would be below the significance threshold. The lack of this information makes it impossible for the decision maker to understand the amount of additional VMT which the project/variant would cause that is above the significance standard.

Instead, at page 4.C.8 the DEIR compares regional average daily miles traveled for residential, office and retail uses with alleged average daily vehicle miles traveled in TAZ 709, which includes the project site, and with citywide average vehicle miles traveled per capita. Again, total vehicle miles traveled in TAZ 709 are not provided, depriving the decision maker of important information that would be easy to understand. Also, no explanation of the methodology used to achieve the data stated for TAZ 709 is provided, rendering the source of the data used in the DEIR unsupported by substantial evidence.

The DEIR also lacks substantial evidence to show that the significance standard of average regional VMT for residential, office or retail uses is a reasonable baseline against which potentially significant increases in VMT caused by the project should be measured, especially since the project is located in a central city which is targeted for significant population increase and since the proposed project would exceed the citywide average VMT for office and retail uses. The population of the City is projected to grow significantly as a result of ABAG proposals to concentrate population in central cities. (Ex. B) As a result, ABAG estimates that total VMT in the region will increase as a result of population growth even though VMT per capita will decrease. (Ex. B) Thus, use of a regional average VMT standard as the significance standard for the proposed project, omits VMT expected from population and employment growth in the City and fails to evaluate whether project GHG increases could impact communitywide GHG reduction targets. Also, the regional averages include VMT from many existing developments, but if VMT is to be reduced regionally, it is reasonable to expect new developments to produce much less VMT than the average reduction sought by the region of 15%. Thus, the DEIR lacks substantial evidence to support the adequacy of the significance standard used, especially in view of special aspects of the proposed project, including the five loading zones proposed for the perimeter of the site. Substantial evidence does not support the DEIR's conclusion as to the degree of effectiveness of reducing the retail parking spaces to the degree proposed in the DEIR.

Table 4.C. 3 at DEIR page 4.C.8 and 50 shows that TAZ 709 (and the project) would exceed the citywide average VMT by 14.7% for office use and 53.7% for retail uses, although the

tables do not compute or substantiate the percentage exceedance to make it easy to understand the information. This data indicates that the proposed retail component of the project/variant could cause substantial additional VMT, because the TAZ 709 VMT from retail uses is in conflict with the goal stated in 2010 of local reduction in "municipal and communitywide GHG reduction targets of 15 percent below then-current levels by 2020." DEIR p. 4.C.50. The DEIR is inadequate because it fails to analyze this potentially significant impact as resulting from retail uses and claims, without substantiation, that "the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for the non-residential use. The DEIR fails to explain this conclusion and there is no evidence in the DEIR or Appendix D that supports it. 4 (TR-4) cont'd

The DEIR is also inadequate because its significance analysis fails to discuss the fact that the VMT from TAZ 709 retail uses exceeds the citywide average by 53.7%. DEIR pp. 4.C.74. It discusses only TAZ 709 and regional average daily VMT per capita. Thus, the DEIR is inadequate because its significance discussion failed to inform the decision makers that VMT from retail uses in TAZ 709 (in which the proposed project is located) exceed the citywide average by 53%. This information would be of importance to the decision maker and the public because it shows that reducing the square footage proposed for retail development in the proposed project would be a significant option to consider to reduce VMT.

**2. The DEIR Lacks Substantial Evidence to Support Its Conclusion that Reducing the Project's Retail Parking Supply Would Mitigate the Project's Significant Impact on VMT to a Less Than Significant Level.**

The DEIR contains no evidence that supports the conclusion that "the amount of parking included in the proposed project or project variant would result in VMT that would be beyond the significance threshold for non-residential use. DEIR p. 4.c.74. In fact, the only source that specifically addresses the issue treats the retail or office square footage as the cause of the net new vehicle travel demand generated by the project. Appendix C of the *San Francisco Guidelines* 2002, estimates travel demand based on square footage of land use, and states that these metrics are to be used to estimate net new travel demand generated by the project. Appendix C of the *San Francisco Guidelines* 2002 contains trip generation rates for office, retail and other uses based on square footage of space or number of residential units. (Ex. A) These Guidelines indicate that the parking space alone is not the cause of the VMT generated. It is not reasonable to assume that the parking space alone would generate VMT because there would be no reason to travel to the site and park if there were no new retail or new office uses that are the driver's intended destination. The parking space is not the driver's destination. The retail, office, residential or other use would be the driver's destination. Moreover, nothing in the DEIR substantiates the claim that the retail parking spaces are the cause of VMT, rather than the retail restaurants, retail goods and other retail services.

To the contrary, the DEIR inconsistently admits that numerous factors other than the

amount of parking included in the proposed project or project variant would influence VMT:

> Factors affecting travel behavior include the presence of parking, development density, the diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. The transportation authority's SF-CHAMP accounts for a variety of factors to estimate VMT throughout San Francisco, but SF-CHAMP is not sensitive to site-level characteristics such as project-specific TDM measures or the amount of parking provided on a site, which itself is considered a TDM measure. DEIR p. 4.C.74.

4
(TR-4)
cont'd

Thus, diversity of land uses and development density are factors that affect travel behavior. There is no evidence that would support the DEIR's inaccurate conclusion that the amount of parking provided in the project alone would result in significant VMT. DEIR p. 4.C.74.

The DEIR also points to the City's Transportation Demand Management Program (TDM) which seeks to reduce VMT by allowing property owners to select from TDM measures that are under the control of the property owner. The DEIR merely states the "[o]ne of the individual measures in the TDM menu that the City researched was parking supply, as described below." DEIR p. 4.C.75. The statement that parking is one of the individual TDM measures is vague and does not provide enough relevant information to support the conclusion that the project parking would cause the significant VMT.

Further, the DEIR states that the City's TDM program provides options that depend on the development of a project's parking supply compared to the neighborhood parking rate and that the "neighborhood parking rate is the number of existing parking spaces provided per dwelling unit or per 1,000 square feet of non-residential uses for each TAZ within San Francisco." DEIR p. 4.C.76. At page 33, the *Transportation Demand Management Technical Justification* states that if a Development Project is parked at or below the neighborhood parking rate, the Development project would receive points for this TDM measure. This discussion does not support the DEIR's conclusion that a reduction in retail parking spaces at the rate proposed in the DEIR would reduce the significant VMT impact to insignificance. (Ex. C)

The only evidence that addresses the effect of the amount of retail parking showed the opposite. Attachment 1 to the April 4, 2016 Wade Wietgrefe Memorandum shows that there is negligible increase in automobile trips per space if a retail establishment has at least 100 retail parking spaces, so reducing the retail spaces provided in excess of 100 spaces would have negligible effect upon VMT. (Ex. D) Given the proposed 54,117 square feet of retail uses, the proposed project parking rate of 3.66 spaces x 54,117/1000 = 198 retail spaces. Given the proposed mitigation of not exceeding the alleged existing neighborhood parking rate of 1.55 spaces per 1000 gross square feet of retail uses by 38% (or providing 2.14 retail spaces per 1000 gross square footage of retail spaces (38% x 1.55 = .589 plus 1.55 = 2.139), the retained retail

parking spaces would amount to 115.8 retail parking spaces (2.14 x 54,117/1000 = 115.756 spaces) Thus, the project proposes to reduce retail parking spaces to 115.8 spaces as opposed to the 198 initially proposed retail spaces (the 198 retail parking spaces includes 60 community public parking spaces. DEIR p. 4.C.80. The DEIR counts the 60 commercial public parking spaces as part of the retail spaces that would be provided by the proposed Project/Variant, so the 60 community spaces could be used by retail users of the project. DEIR p. 4.C.77.

4
(TR-4)
cont'd

The DEIR inaccurately claims that various publications support its conclusions as to the effect of parking spaces on causing VMT.

The DEIR claims that the August 2010 report of California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures: A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures* (CAPCOA report) quantifies project-level land use, transportation, energy use, and other measures of effects on GHG emissions. DEIR p. 4.C.75. The DEIR claims that the CAPCOA report identifies a maximum 12.5 percent reduction in VMT related to parking supply (PDT-1), but does not provide a citation to a page in the report that would support this claim. The discussion PDT-1 in the CAPCOA report actually states at page 207 that the range of effectiveness of limiting parking supply is a 5 to 12.5 percent vehicle miles traveled (VMT) reduction and that measure PDT-1 would accomplish a change in parking requirements and types of supply within the project site in a ***multi-faceted strategy*** consisting of elimination (or reduction) of minimum parking requirements, creation of maximum parking requirements and provision of shared parking. (Ex. E)

The DEIR and proposed project/variant do not adopt such mitigation measures, and the project's proposal to provide 896 new parking spaces for various uses (970 for the project variant) is inconsistent with the PDT-1 strategies. DEIR S.49. More importantly, the CAPCOA report states at page 207 that the reduction can be counted only if spillover parking is controlled (via residential permits and on-street market rate parking (See PPT-5 and PPT-7). The CAPCOA report makes it clear at page 209 that:

> Trip reduction should only be credited if measures are implemented to control for spillover parking in and around the project, such as residential parking permits, metered parking, or time-limited parking. (Ex. E)

The DEIR does not establish that such measures have been implemented, and there are substantial areas in the vicinity of the project (known based on personal information of Kathryn Devincenzi), where parking is not time-limited such as on Mayfair Drive, southern Euclid Avenue west of Collins Street, western Collins Street south of Euclid Avenue, and Heather Street near the project site. (Ex. F, photographs taken on 1-7-19 showing no time limits for parking on said portions of Euclid and Collins streets) Given the lack of controls for spillover parking in the area, the CAPCOA report does not support the DEIR's conclusion that reduction of retail parking

spaces on site would result in mitigation of the significant VMT impact to a less than significant level.

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In addition, CAPCOA PDT-4 as to requiring residential area parking permits, specifies at page 217 that:

> This project will require the purchase of residential parking permits (RPPs) for long-term use of on-street parking in residential areas. Permits reduce the impact of spillover parking in residential areas adjacent to commercial areas, transit stations, or other locations where parking may be limited and/or priced. Refer to Parking Supply Limitations (PPT-1), Unbundle Parking Costs from Property Cost (PPT-2), or market Rate Parking Pricing (PPT-3) strategies for the ranges of effectiveness in these categories. The benefits of Residential Area Parking Permits strategy should be combined with any or all of the above mentioned strategies, as providing RPPs are a key complementary strategy to other parking strategies.

Similarly, residential permit parking is required in each of the two combinations of parking strategies that could reduce VMT at page 61 of the CAPCOA report.

Since the proposed project would not implement the key parking control strategy of requiring residents or employees of the project site to purchase residential parking permits, the CAPCOA report does not support credit for trip reduction based on the proposed project's mere reduction in retail on-site parking supply, which the DEIR relies upon. The DEIR's inadequacy is obvious because the project would allow its residents, employees and visitors to park in the surrounding neighborhoods which have some parking spaces that are not time-limited and also to park for free for at least an hour and a half in the adjacent Laurel Village Shopping Center parking lot which has over two hundred fifty-two (252) above-ground parking spaces. (Conversation between Richard Frisbie and Ron Giampaoli, owner of Cal-Mart, December 18, 2018). The Spot Angels website also reports free parking spaces within walking distance of Laurel Village. (Ex. G)

Further the CAPCOA report at page 40 states that it "does not provide, or in any way alter, guidance on the level of detail required for the review or approval of any project. For the purposes of CEQA documents, the current CEQA guidelines address the information that is needed," and refers to footnote 2 which states: "See: California Natural Resources Agency: 2007 CEQA Guidelines - Title 14 California Code of Regulations, Sections 15125, 15126.2, 15144, and 15146."

In addition, as to limiting parking supply, the CAPCOA report provides that factors other than limiting parking supply must be considered and states at page 208:

Though not specifically documented in the literature, the degree of effectiveness of this

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measure will vary based on the level of urbanization of the project and surrounding areas, level of existing transit service, level of existing pedestrian and bicycle networks and other factors which would complement the shift away from single-occupant vehicle travel.

As discussed herein, the proposed addition of five loading zones around the site would attract additional vehicle trips but the EIR failed to take into account the VMT that would result from these new trips and failed to provide substantial evidence to support its conclusion that reducing retail parking supply in the manner stated in the DEIR would mitigate project VMT to a less than significant level.

The DEIR is also inadequate in that it relies upon the generalization that recent research indicates that an area with more parking influences higher demand for more automobile use without taking into account the large number of parking spaces proposed for the project. The DEIR relies upon a study by Rachael Weinberger that is cited in footnote 73, but the cited pages are not provided in the DEIR or Appendix D. However, the study deals only with the effects of residential parking spaces at home and does not predict the effect of retail parking spaces. (Ex. H, abstracts of Weinberger study)

The DEIR also relies upon a study of *Residential Street Parking and Car Ownership* that is also not provided in the DEIR or Appendix D, but cited in footnote 74. Again, the DEIR merely claims that the Zhan study deals the "the number of cars per household" and does not claim that the study says anything about the effect of retail parking supply. DEIR p. 4.C.75. Similarly, the DEIR relies on a study of households in New Jersey cited in footnote 75 that is not contained in the DEIR or Appendix D. Again, the DEIR does not claim that this study considers retail parking supply.

The DEIR also relied on the generalization that a study of nine cities across the United States concluded that "parking provision in cities is a likely cause of increased driving among residents and employees in those places." DEIR p. 4.C.76. Again, this study is not contained in the DEIR or Appendix D and says nothing about the effectiveness of reducing retail parking supply alone to the degree described in the DEIR, while still providing over 100 retail parking spaces and abundant parking for residential and office uses. The quoted portion of the study said nothing about the effectiveness of reducing the retail parking alone or the degree of increased driving associated with the provision of parking, so is too vague to support the conclusion set forth in the DEIR that reducing the retail parking to the degree proposed in the DEIR would mitigate the VMT impact to insignificance.

The DEIR also refers at page 4.C.76 to Fehr and Peers research that allegedly claims that reductions in off-street vehicular parking for office, residential and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar contexts that provide more off-street vehicular parking. The

conclusion which the DEIR draws from this research indicates that it has no relation to retail parking spaces: "In other words, more off-street vehicular parking is linked to more driving, indicating that people without dedicated parking spaces are less likely to drive." DEIR p. 4.C.76. In the context of the proposed mitigation for the proposed 3333 California Street project, which would reduce retail parking spaces from 198 to 116 (which would include 60 commercial parking spaces for the community), the generalization set forth in the Fehr and Peers research does not constitute substantial evidence that the reduction in retail parking to the degree proposed in the DEIR would reduce the significant VMT impact to insignificance. Again, the Fehr and Peers research cited in footnote 77 is not in the DEIR or Appendix D. 4 (TR-4) cont'd

In addition, the DEIR is legally inadequate in failing to present information on the number of retail parking spaces that the mitigation measure M-TR-2 proposes to eliminate, and requires the reader to perform a calculation to arrive at number of retail parking spaces proposed to be eliminated. DEIR p. 4.C.80. This type of obtuse discussion in an EIR is unlawful under CEQA. CEQA requires that information be presented in manner that is understandable to the decision maker and the public, but the transportation analysis in this DEIR is characterized by a hide-the-ball approach, replete with unexplained conclusions and unsubstantiated allegations. Under CEQA, conclusions that require blind trust in the decision maker are inadequate. The calculations of the amount of retail parking proposed to be reduced stated in this comment letter were performed by the author of this comment statement and are not set forth in the DEIR. Demand is made that the DEIR state the number of retail parking spaces that Mitigation Measure M-TR-2 on page 4.C.80 of the DEIR proposes to eliminate to mitigate the significant VMT impact and set forth the manner of calculating the number of retail spaces to be eliminated. After this information is provided in a revised EIR, please circulate it for public comment.

**3. The DEIR Lacks Any Substantiation or Explanation of the Alleged Neighborhood Parking Rate, and Substantial Evidence Does Not Support Its Conclusions as to the Accuracy of the Alleged Rate and TAZ 709 Data.**

Importantly, the alleged neighborhood parking rate is not substantiated or supported by substantial evidence in the DEIR or Appendix D. The DEIR lacks a description of the methodology used to calculate, and times of collecting data related to, the alleged existing neighborhood parking rates for residential, retail or other non-residential uses set forth in Table 4.C.19 of the DEIR on page 4.C.77-79 or the daily existing VMT per capita for Households (Residential), Employment (Office) and Visitors (Retail) in TAZ 709 at page 4.C.50 of the DEIR. Table 4.C.10 at page 4.C.50 of the DEIR cites the San Francisco Planning Department Information Map, accessed May 25, 2018, as the source of the data as to the existing average daily vehicle miles traveled in TAZ Zone 709. However, that map provides only conclusions and the DEIR does not contain a summary of the data used to produce the alleged average daily vehicle miles traveled or explain the methodology used to collect or produce the data or the dates on which the data was collected or estimates made. Due to the lack of sufficient substantiation or description of a reputable methodology, substantial evidence does not support the allegations in

the DEIR that the data in Table 4.C.10 of the DEIR accurately represents the existing average daily vehicle miles traveled.

4 (TR-4) cont'd

The data in the DEIR concerning the existing neighborhood parking rate is also unsubstantiated and fails to constitute substantial evidence that such data accurately represents the existing neighborhood parking rates for the uses claimed, including for residential, retail and other (office and daycare). The DEIR is inadequate because it fails to provide substantiation of the methodology for collecting data as to the alleged existing neighborhood parking rates or the times of collection of the data or the estimations made. As the Source of the data contained in Table 4.C.19 of the DEIR, the DEIR cites "Kittleson and Associates, Inc. 2018; San Francisco Planning Department, 2018." These citations merely identify the alleged source of the conclusions and the date.

Footnote 80 of the DEIR states that Planning department staff reviewed assessor and planning department records and street view/serial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site to derive the appropriate neighborhood parking rate for this analysis. No summary or description of such information is provided in the DEIR or Appendix D. Although footnote 80 does not refer to any review related to office or childcare uses, the DEIR cites footnote 80 as support for the claim that the analysis splits non-residential into retail and other non-residential (office and daycare) uses and compares those to the neighborhood parking rate, which accounts for parking associated with retail and other non-residential uses along California Street and Sacramento Street near the project site. DEIR p. 4.D.77. The methodology used in such analysis is not discussed in the DEIr or Appendix D. There is no substantiation for the parking rates for office and childcare uses.

Also, the note to Table 4.C.19 states that the existing parking rate for residential uses reflects data for TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance. The DEIR lacks any explanation of the type of data for TAZ 709 that was used to estimate the existing parking rate for residential use in the area described or substantiate the reliability of the methodology used to arrive at the existing parking rate for residential uses set forth in the DEIR. It is unclear whether the residential parking rate was estimated in some manner based on VMT, surveys of vehicle ownership or some other means and whether the dates on which the base data was collected, if any, was representative of existing conditions in the project area. The DEIR is inadequate because it lacks substantial evidence indicating that the methodology for collecting or analyzing the data was reliable, a sufficient explanation of the nature of the data collected for the identified land uses and the times at which the data was collected, and explanation of why the data gathered was representative of conditions in the project area. Surely, there should be memoranda explaining or analyzing any data collected, but none are discussed or cited in the DEIR or Appendix D. In essence, the TAZ data and the existing neighborhood parking rate data stated in the DEIR are lacking in the factual support needed to constitute substantial evidence under CEQA. Unsupported conclusions do not

constitute substantial evidence under CEQA. The DEIR's alleged TAZ data and alleged existing neighborhood parking rates are unsubstantiated black holes that lack the transparency required to constitute substantial evidence supported by fact under CEQA.

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Similarly, the DEIR admits that parking supply is not an input into SF-CHAMP, but claims that "based on recent research, the existing parking supply within a TAZ has a relationship with VMT for that TAZ." DEIR p. 4.C.76. The "recent research" is not described or substantiated with a citation to a document, and the claim that the existing parking supply within a TAZ is related to the VMT for that TAZ is too general to support the conclusion as to the effectiveness of the proposed mitigation drawn in the DEIR. The degree or nature of the alleged relationship is not explained or substantiated as providing a reasonable basis for calculating the existing neighborhood parking rate or the effectiveness of mitigation provided by reducing retail parking supply.

The DEIR also inadequately relies upon the ambiguous claim that even "though parking is not specifically an input in SF-CHAMP, the amount of existing parking is captured in the estimates of VMT outputs from SF-CHAMP because it is an existing condition on the ground. Therefore, it is likely that a new development that does not propose parking at or below the neighborhood parking rate would not reduce VMT below the existing VMT per capita rate for that TAZ." DEIR p. 4.C.76. The DEIR cites nothing as substantiation for this vague claim, rendering it suspect and lacking in substantial evidence. The claim that the existing neighborhood parking rate is likely captured in the estimates of VMT outputs from SF-CHAMP is so vague as to be unusable and does not provide a basis for calculating the alleged neighborhood parking rates from VMT attributable to the area or some amount of it. The claim that there is some relationship between VMT and the neighborhood parking rate fails to provide enough relevant information from which a conclusion can reasonably be drawn that a mere relationship provides a basis for calculating the existing neighborhood parking rate from VMT outputs or the effectiveness of reducing retail parking supply as a mitigation measure.

Also, the DEIR does not claim that the Planning Department or Kittleson and Associates estimated or calculated the existing neighborhood parking rates using VMT outputs. The DEIR's allegations as to the existing neighborhood parking rate and the VMT for TAZ 709 fail to qualify as substantial evidence, as they do not supply enough relevant information and reasonable inferences from this information that a fair argument can be made to support the conclusions made in the DEIR. 14 California Code of Regulations section 15384(a). The DEIR's claims as to the existing neighborhood parking rate for the project area and the VMT for TAZ 709 are unsupported allegations. Substantial evidence under CEQA does not include unsubstantiated opinion or narrative, evidence that is not credible, argument, or speculation. Public Resources Code sections 21080(e), 21082.2( c); 14 California Code of Regulations sections 15064 (f)(5)-(6), 15384.

In calculating the alleged existing parking rate for retail and other nonresidential uses on

"California and Sacramento streets, as provided by the planning department," the DEIR ignored the existing retail uses on Presidio Avenue, which are adjacent to the project site and included in TAZ 709. Also, the DEIR fails to describe the areas on California and Sacramento streets that were included in the alleged measurement, so fails to demonstrate that they were reasonable estimates of the area from which the neighborhood parking rate should be determined. DEIR p. 4.C. 77. Demand is made that the City provide detailed explanation of the method of calculating the existing neighborhood parking rates used in the DEIR, the method and nature of collecting the data underlying the rates, the dates on which data was collected and the basis for determining that the data accurately reflects the existing neighborhood parking rate for the project area.

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Importantly, the January 20, 2016 Governor's Office of Planning & Research *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* does not recommend basing the evaluation on estimates of neighborhood parking rates. (Ex. I) Rather, OPR recommended that:

> Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e. the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts. (Ex. I, p. III:23.)

Moreover, there is not substantial evidence in the recorrd that the project's proposed retail would be local-serving. The proposed 198 retail parking spaces indicates that the retail would not be local serving and the plans do not specify the square footage of the retail spaces. August 17, 2017 plan sheet A4.03 shows a very large retail space whose square footage is not specified. (Ex. J, compare sheet A4.03 with sheet A4.02) Thus, there is a fair argument that the project would have a large anchor tenant which would draw non-local-serving retail. Demand is made that the DEIR calculate the estimated total daily VMT that the project would generate, including the total VMT for each land use type. Also, the five proposed loading zones proposed to be installed in streets surrounding the site further support a fair argument that the retail uses would attract non-local customers. (Ex. L)

Agencies do not have unlimited discretion to adopt their own thresholds for significance of impacts, including impacts on VMT. Agencies may adopt their own thresholds or rely upon thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." CEQA Guidelines section 15064.7( c).

Thresholds of significance are not a safe harbor under CEQA; rather, they are a starting point for analysis:

> [T]hresholds cannot be used to determine automatically whether a given effect will or will not be significant. Instead, thresholds of significance can be used only as a measure of whether a certain environmental effect "will normally be determined to be significant"

> or "normally will be determined to be less than significant" by the agency....In each instance, notwithstanding compliance with a pertinent threshold of significance, the agency must still consider any fair argument that a certain environmental effect may be significant. (Ex. I, OPR proposed transportation impact analysis guidelines, p. III:17-18, citing *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108)

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Substantial evidence does not support the City' decision to adopt the thresholds for estimating VMT increase used in the DEIR or the rate of mitigation adopted in the DEIR.

Thus, the EIR must consider the fair argument presented above that reducing the retail parking spaces in the manner described in Mitigation Measure M-TR-2, with reference to a percentage of the existing neighborhood parking rates, will not reduce the Significant VMT impact of the proposed project/variant to a less than significant level.

Also, the DEIR's claim that the existing neighborhood parking rate for retail uses is 1.55 conflicts with information on retail parking rates applicable to the project area. The Note in Table 4.C.19 at DEIR page 4.c.77 claims that the existing parking rate for retail and other non-residential uses reflects data from California Street and Sacramento streets, as provided by the Planning Department," but fails to describe a specific document produced by either Kittleson and Associates, Inc. or the San Francisco Planning Department that contains such data. Thus, the record does not contain substantial evidence to support the DEIR's claim that reducing retail parking to the extent proposed would mitigate the significant impact to insignificance. Similarly, footnote 80 on DEIR p. 4.C.77 claims that Planning Department staff reviewed assessor and planning department records and street view/aerial photos to estimate off-street parking associated with retail uses along California and Sacramento streets near the project site to derive the appropriate neighborhood parking rate for this analysis, but fails to provide such data or a description of a specific document that would support the analysis described. For these reasons, the DEIR lacks substantial evidence to support its conclusion that the existing neighborhood parking rate is 1.55 parking spaces per gsf of retail uses.

Resolution 4109, which applies to the 3333 California Street site, requires 1 automobile parking space for each 500 square feet of gross floor area on the property, which is 2 parking spaces for each 1,000 square feet of commercial building floor area. (Ex. K) Under the NC-S, Neighborhood Commercial Shopping Center zoning applicable to the Laurel Village Shopping Center, Planning Code section 151 requires for retail sales and services, one off-street parking space for each 500 square feet of Occupied Floor Area up to 20,000 where the Occupied Floor Area exceeds 5,000 square feet, plus one for each 250 square feet of Occupied Floor Area in excess of 20,000. Thus, the general standard applicable to Laurel Village is 2 parking spaces for each 1,000 square feet of Occupied Floor Area up to 20,000 square feet. Based on this information, there is a reasonable possibility that the existing neighborhood parking rate in the project area is greater than 1.55 parking spaces per gsf of retail uses, and the DEIR's claims as to

the existing neighborhood parking rate are inaccurate or unsubstantiated.

4 (TR-4) cont'd

The DEIR is also deficient because it used different thresholds for assessing VMT significance (exceeding regional VMT per employee minus 15 percent) and whether mitigation measures would reduce the significant VMT impact to less than significant, which is based on whether the retail parking exceeds the existing neighborhood rate of 1.55 spaces per 1,000 gross square feet. DEIR p. 4.C.80. This comparison of apples and oranges makes the analysis in the DEIR inadequate and confusing to the decision maker and the public. The deficient comparison is also contrary to the OPR proposes transportation impact guidelines, which state at p. III:16 that:

> Models and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due to mitigation should be comparable. (Ex. I, p. III:16)

**4. The DEIR Is Inadequate Because It Used Inaccurate Models to Forecast Vehicle-Trips and the DEIR's Traffic Demand Analysis is Inadequate Because It Omits Substantial Traffic that Would be Attracted to Five New Loading Zones Proposed to Be Installed on the Streets Surrounding the Property, Including VMT from Transportation Network Companies Such as Uber and Lyft.**

5 (TR-2)

The DEIR estimated the Existing Daily Vehicle Miles Traveled per Capita for the project site, TAZ 709, from data contained in the San Francisco Planning Department Transportation Information Map. (DEIR p. 4C.8 and Table 4.C.3 Existing Daily Vehicle Miles Traveled per Capita. Table 4.C.3 presented an alleged summary of the daily VMT per capita for the region, City and TAZ 709, in which the project site is located. DEIR p. 4.C.8.

Scope of Work for the 3333 California Street transportation demand analysis confirms that the DEIR used the TAZ zone information to estimate VMT:

> **Vehicle Miles Traveled:** KAI will utilize the San Francisco Transportation Information Map to obtain vehicle miles traveled data from the Planning Department data, which includes average daily VMT estimates by us for the region and the project's traffic analysis zone (TAZ 709). DEIR Appendix D, Scope of Work-Final dated July 11, 2017, p. 3.

For purposes of the VMT analysis, KAI assumes the baseline (Year 2020) conditions VMT for the region and the Project's transportation analysis zone for each of the uses proposed by the Project and Variant will be the same as Existing. DEIR Appendix D, Scope of Work-Final dated July 11, 2017, p. 6.

The DEIR explains that the San Francisco Transportation Authority uses a model called SF-CHAMP to estimate VMT by private automobiles and taxis for different land uses within

individual TAZs:

> The San Francisco Transportation Authority (transportation authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types within individual TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic populaiton, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The transportation authority uses a tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. DEIR p. 4.C.7.

As explained herein, the SF-CHAMP model does not include trips made by transportation network companies.

As explained at DEIR p. 4.C.27, the analyses in CEQA documents typically present the existing environmental setting as the baseline conditions against which the project conditions are compared to determine whether an impact is significant. The DEIR used the TAZ data to estimate baseline conditions:

> For purposes of the VMT analysis, the baseline conditions VMT for the region and the project's transportation analysis zone for each of the uses proposed by the project and project variant would be the same as existing. DEIR p. 4.C.30

The DEIR analyzed impacts of the proposed project or project variant by comparing the baseline conditions described in the "Baseline Conditions" discussion (pp. 4.C.27-4.C-31) to conditions under full buildout of the proposed project or project variant. DEIR p. 4.C.46. For the cumulative analysis, future year 2040 cumulative conditions are compared to project buildout conditions for the proposed project and project variant. The year 2040 was selected because it is the latest year that travel demand forecasts are available from the transportation authority's travel demand forecasting model, SF-CHAMP. DEIR p. 4.C.46.

The 3333 California Street proposed project/variant includes significant changes to the transportation network that would attract substantial numbers of automobiles, delivery vehicles, trucks and other vehicles to five new loading zones proposed to be installed on streets surrounding the perimeter of the site. Plan sheet C2.02 shows four new passenger loading zones proposed to be installed on streets surrounding the perimeter of the property and PRELIMINARY DESIGN 08/2018 shows one new 100-foot commercial loading zone proposed on California Street near the northwestern edge of the property. (Ex. L) The DEIR is inadequate because it omitted VMT that could be generated by automobiles, delivery vehicles, trucks and

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(TR-2)
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other vehicles attracted to these new loading zones, and such omission is substantial in view of the explosive growth of transportation network companies and food and other delivery vehicles documented herein. DEIR p. 6.86 indicates that commercial loading zones would be used for FedEx and Amazon Fresh, which use delivery vans that are typically about 30 feet long. 5 (TR-2) cont'd

The SF-CHAMP model, which was used to estimate project travel in the DEIR, did not include the traffic attracted to these loading zones.

The City is aware that the SF-CHAMP model, used to perform estimates of various transportation issues in the DEIR, is out of date and so inaccurate that it is in the process of being revised. The model used to produce the DEIR's transportation analyses is inadequate and inaccurate because it was based on observed behavior that occurred before the explosion of transportation network companies such as Uber and Lyft, which are causing huge increases in VMT. The DEIR shows that the SF-CHAMP did not take into account the VMT that can be anticipated from transportation network companies attracted to the project/variant site by the five loading zones proposed to be added to the perimeter of the site. The DEIR states at page 4.C.7 that:

> The San Francisco Transportation Authority (transportation authority) uses SF-CHAMP to estimate VMT by private automobiles and taxis for different land use types within individual TAZs. Travel behavior in SF-CHAMP is calibrated by transportation authority staff based on observed behavior from the California Household Travel Survey 2010-2012, census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings.

The Traffic study in the DEIR states that to estimate the travel demand for the project, the trip generation, mode split and distribution of trips generated by the Project and Variant will be based on data from the *SF Guidelines* information for Superdistrict 2 and the current U.S. Census American Community Survey Five-Year (2011-2015) Estimates journey-to-work data. DEIR Appendix D, p. 7. 6 (TR-1)

For estimating the trip-making patterns of the proposed project or project variant, the DEIR developed a methodology using the National Cooperative Highway Research Program Report 684 and the 2010 and 2011 Institute of Transportation Engineers Journal which was similar to the approach used in the analysis of other recently completed EIRs, including the Mission Rock Project at Seawall Lot 337 and Pier 48, and the Pier 70 Mixed Use District Project. DEIR 4.C.56; DEIR Appendix D page 22.

The two studies cited in footnote 2 and 3 on page 22 of Appendix D of the DEIR are the Transportation Research Board, National Cooperative Highway Research Program Report 684, 2011, *Enhancing Trip Capture Estimation for Mixed-Use Developments* and the ITE Journal, 2010 and 2011, *Improved Estimation of Internal Trip Capture for Mixed-Use Development and*

*Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Projects.* These deal with per capita trip capture rates, not total VMT generated. Also, the DEIR fails to provide an explanation of the methodologies discussed in the referenced publications or of the modified trip generation model specific to the 3333 California Street project that the DEIR claims was developed. Thus, the DEIR does not contain substantial evidence that would support the reliability of the modified methodology used to estimate trip-making patterns of the proposed project/variant. An explanation of the modified model and the cited publications are not contained in the DEIR or Appendix D.

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However, Appendix D explains that these studies were only the initial point for the analysis because the NCHRP Report 684 and ITE provided information on unconstrained internal trip capture rates for the proposed projects which "represent the highest possible values, resulting from the most favorable balance of land uses." DEIR Appendix D. p. 23. Kittleson then adjusted the initial information to estimate internal trip capture rates used in the analysis that "are contrained by the need for the number of trips generated by the producer uses to match the number of trips received by the attractor uses. Using the unconstrained internal trip capture rates as an initial point of analysis, the project- and scenario-specific internal trip capture rates were identified through an iterative balancing process. DEIR Appendix D, p. 23.

That iterative process was not explained in the DEIR or Appendix D, so the ultimate conclusion reached as to internal trip capture rates was evidently based on interpretation by Kittleson rather than on calculations or fact-based analysis, and the absence of such information renders the DEIR's conclusions as to the internal trip capture rate inadequate under CEQA. Unsupported opinion does ot constitute substantial evidence under CEQA.

Also, the internal trip capture rates included in Attachment C, and presented in Tables 6 and 7 at DEIR Appendix D pp. 9, lack rates of the internal trip capture rates for the entire day and contain rates for internal trip capture only in the A.M. and P.M. peak hour periods. DEIR Appendix D, Attachment C, p. 131. Kittleson fails to describe any support for its use of only alleged internal trip capture rates for peak periods.

Significantly, the Table 6 shows that the NCHRP and ITE unconstrained trip capture rate of 20% is the same rate as Kittleson estimated for residential uses in the project variants, which are supposed to be determined on the basis of constrained internal trip capture rates. Kittleson estimated that the internal trip capture rate for residential use in the office project variant would be 20% and the internal trip capture rate for residential use in the multi-family variant would be 19.9%. DEIR Appendix D, p. 9. The DEIR contains no support for the conclusion that constrained residential trip capture rates linked with beginning and ending points should be the same as the unconstrained residential trip capture rates that are not linked with a beginning and ending. OPR does not recommend using different methods to estimate VMT reduction. (Ex. I, p. III:16)

The fact that the residential trip capture rates Kittleson calculated for the project variants are the same as the unconstrained rates "which represent the highest possible values, resulting from the most favorable balance of land uses," indicates that Kittleson used a most favorable interpretation of data rather than conservative estimates to produce a biased and inaccurate conclusion. Also, since Kittleson used data for peak periods to estimate the internal trip capture rates for the project, it would be reasonable to assume that residents of the project site would drive the most at that time traveling to and from work, rather than make the highest possible number of internal trips during peak periods at the site. Since Kittleson provides no calculations to estimate total trip capture rates, and its estimates of peak period residential trip capture rates are suspect, the DEIR lacks substantial evidence to support its estimation of internal trip capture rates of the project/variant which the DEIR used to estimate daily auto trips. 6 (TR-1) cont'd

In Table 9 in Appendix D p. 27, Kittleson also projected mode share by trip purpose using P.M. peak hour mode share rather than 24-hour mode share, as provided by the *SF Guidelines* 2002 in Appendix C-4. Table 9 fails to compare work with non-work trips that total 100% of trips by the land use type. Instead, Table 9 presents comparisons of percentages of trips that occur by auto, transit, walking or other mode, for unspecified amounts of work and non-work trips so that the percentage of daily work and non-work trips cannot be determined. DEIR Appendix D, p. 27.

Also, the mode shares and average vehicle occupancy rates used in the DEIR were based on the United States Census Bureau five-year estimates of commute trip travel behavior from the 2011-2015 American Community Survey for Census Tract 154, which includes the project site. DEIR p. 4.C.57. As documented herein, TNC use became significant in 2016, so was not accurately taken into account in the mode shares, trip generation and distribution of trips used in the DEIR..

The DEIR estimated travel demand based on information in the 2002 *SF Guidelines* that predated the astronomical increase in TNA and food delivery trips and failed to provide an estimate of total VMT that would be caused by the project. The DEIR does not claim that its traffic demand analysis included any adjustment to add the traffic demand (and VMT) that would be caused by the current usage of vehicles such as TNCs and food or other delivery vehicles that would be attracted to the five proposed new loading zones surrounding the site. Rather, it claims that some person-trips would be reduced by an unexplained methodology dealing with internal trip capture.

The October 1, 2002 *Executive Summary* of the San Francisco Travel Demand Forecasting Model Development prepared for the San Francisco County Transportation Authority explains that its travel demand model was developed to provide detailed forecasts of travel demand for various planning applications and that its model components were estimates using various data that was in existence before 2002. (Ex. M, SFCTA Executive Summary and November 16, 2018 Wietgrief email stating that SF-CHAMP model is the model the City uses to 7 (TR-2)

estimate VMT by transportation analysis zone.) The SFCTA website indicates that SF-CHAMP was last updated in 2014. (Ex. N, excerpts from SFCTA DataMart) If the SF-CHAMP was updated based on any data that came into existence after 2014, please describe in detail the changes in such data that relate to TNC and food delivery traffic, neighborhood parking rates, and VMT (and related issues including mode share, average vehicle occupancy and trip distribution) and provide supporting documentation. Assuming that the last update to SF-CHAMP was in 2014, the date upon which that model was based pre-dated the explosion of transportation network companies such as Uber and Lyft.

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(TR-2)
cont'd

Since the 2002 San Francisco Guidelines were adopted, there has been explosive growth in TNC and food and other delivery vehicle trips.

City documents already acknowledge the substantial evidence exists that shows the transportation network companies are generating substantial VMT in the City. Page 1 of the September 28, 2017 San Francisco Planning Department *Transportation Impact Analysis Guidelines - Update* states that the Department's Transportation Impact Analysis Guidelines for assessing project's transportation impacts under CEQA were last updated in 2002. (Ex. O) The update further explains that:

> To assess these impacts, the department estimates how many trips people in newer developments may take, the ways they travel, and their common destinations based on the findings of the Citywide Travel Behavior Survey - Employees and Employers (May, 1993); the Citywide Travel Behavior Survey - Visitor Travel Behavior (August, 1993); revolving five-year estimates from US Census, American Community Survey data; San Francisco County Transportation Authority San Francisco Chained Activity Model, which is based upon, among other sources, observed behavior from California Household Travel Survey (2010-2012), and major San Francisco transportation studies...
>
> Also, since that time, San Francisco has experienced changes in the demographics of the population, the types of new jobs, and the cost of housing, among other variables that affect travel behavior. Some of these changes create greater constraints on our transportation systems, including more competition for curb space. **One of the major changes has been with emerging mobility services and technologies that have changed the way some people travel (using transportation network companies such as Uber and Lyft) and interact with goods (home deliveries). These changes also affect the percentages of how people travel (known as mode splits in the transportation analysis methodology).** For example, we understand anecdotally that people may be shifting from using their own vehicles or transit to instead use transportation network companies such as Uber and Lyft. (Ex. O, p. 2, emphasis added)

At that time, staff was considering substantive updates to the following topics:

> Process - scoping our topics from transportation review earlier in the process based upon the characteristics of the project, site, and surroundings (e.g., through a checklist)...
>
> Loading - Refine estimates of passenger and commercial loading demand, attempting to account for rise in for-hire vehicles and e-commerce deliveries.
>
> Vehicle Miles Traveled/Induced Auto Travel - Potential quantification of the relationship between parking supply and induced automobile travel.
>
> Traffic Hazards - Update definitions of types of traffic hazards as well and standards that can be implemented to potentially avoid traffic hazards (which may be incorporated into walking/accessibility and bicycling).
>
> Construction - consideration of the effects of excavation on overall project construction and the resulting duration/intensity of construction phases. (Ex. O, p. 3)

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(TR-2)
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Substantial data collection and analysis is currently underway, primarily at newer development sites and will result in the creation of refined estimates of how many trips people in newer developments take, the ways they travel, and their common destinations and updating of the travel demand methodology used in the guidelines. (Ex. O, p. 4) Importantly, data was being collected and analyzed on estimates of passenger and commercial loading demand. *Ibid.* Graphics distributed during the update to the Planning Commission showed that between 1/1/2003 and 1/1/2017 the San Francisco population had increased by 92,000 persons and Bay Area Population by 900,000. (Ex. P, second page)

The October 2018 Draft Report *TNCs & Congestion* by the San Francisco County Transportation Authority states that:

> Congestion in San Francisco worsened between 2010 and 2016...During this period significant changes occurred in San Francisco...San Francisco added 70,000 new residents and over 150,000 new jobs, and these new residents and workers added more trips to the City's transportation network. Finally, new mobility alternatives emerged, most visibly TNCs.... (Ex. Q, p. 3)
>
> **In recent years, the vehicles of transportation network companies (TNCs) such as Uber and Lyft have become ubiquitous in San Francisco and many other major cities**...In San Francisco, this agency (the San Francisco County Transportation Authority or SFCTA) estimated approximately 62 million TNC trips in late 2016, comprising about 15% of all intra-San Francisco vehicle trips and 9% of all intra-San Francisco person trips that fall (2). [sic] The rapid growth of TNCs is attributable to the numerous advantages and conveniences that TNCs provide over other modes of transportation, including point-to-point service, ease of reserving rides, shorter wait times, lower fares (relative to taxis),

ease of payment, and real-time communication with drivers. The availability of this new travel alternative provides improved mobility for some San Francisco residents, workers and visitors, who make over one million TNC trips in San Francisco every week, though these TNC trips may conflict with other City goals and policies...(Ex. Q, p. 3)

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(TR-2)
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When compared to employment and population growth and network capacity shifts (such as for a bus or bicycle lane), TNCs accounted for approximately 50% of the change in congestion in San Francisco between 2010 and 2016, as indicated by three congestion measures: vehicle hours of delay, vehicle miles travelled, and average speeds. Employment and population growth- encompassing citywide non-TNC driving activity by residents, local and regional workers, and visitors - are primarily responsible for the remainder of the change in congestion....Daily vehicle hours of delay (VHD) on the roadways studied increased by about 40,000 hours during the study period. We estimate TNCs account for 51% of this increase in delay, and for about 25% of the total delay on San Francisco roadways and about 36% of total delay in the downtown core in 2016, with employment and population growth accounting for most of the balance of the increased [sic] in delay...**Daily vehicle miles travelled (VMT) on study roadways increased by over 630,000 miles. We estimate TNCs account for 47% of this increase in VMT, and for about 5% of total VMT on study roadways in 2016.**...Average speeds on study roadways declined by about 3.1 miles per hour. We estimate TNCs account for 55% of this decline...(Ex. p. 4, emphasis added)

Similarly, during the AM peak, midday, and PM peak periods, TNCs cause about 40% of the increased vehicle miles travelled, while employment and population growth combined are responsible for about 60% of the increased VMT. However, in the evening time period, TNCs are responsible for over 61% of the increased VMT and for about 9% of total VMT....(Ex. Q, p.5)

As the *TNCs & Congestion* report documents, TNCs comprise a significant share of intra-San Francisco travel:

According to recent studies, between 43% and 61% of TNC trips substitute for transit, walk, or bike travel or would not have been made at all. (Ex. Q, pp. 11-12)

Given the rapid pace of technological change in the transportation sector, other factors may also be contributing to changes in congestion. For example, increased use of online shopping and delivery services might exacerbate roadway congestion due to an increase in delivery vehicle trips and loading duration. (Ex. Q. , p. 12)

**The SFCTA *TNCs & Congestion* report also states that in 2010 TNC use was negligible and in 2016 it was significant, and that SF-CHAMP version 5.2 does not account for TNCs. (Ex. Q, p. 16)**

A 2017 national study of ride-hailing from the University of California, Davis Institute of Transportation Studies, *Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States,* found that 49% to 61% of ride-hailing trips would not have been made at all, or by walking, biking, or transit. (Ex. R, p. 2) After using ride-hailing, the average net change in transit use was a 6% reduction among Americans in major cities, and ride-hailing attracts Americans away from bus services (a 6% reduction) and light rail services (a 3% reduction). (Ex. R, p. 2)

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(TR-2)
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The map at page 6 of the *TNCs & Congestion* report shows that TNCs are responsible for approximately 30-60% of vehicle delay on California Street in the project area. (Ex. R) The graphs on page 7 of that report show that TNCs account for 61% of the increase in vehicle miles travelled in Supervisor District 2, with employment change accounting for 21% and population change accounting for 16%. (Ex. R, pp. 6-7)

San Francisco County Transportation Authority's *TNCs Today*, Final Report, June 2017 is consistent with its 2018 *TNCs & Congestion* report. (Ex. S, pp. 1-5, 8) *TNCs Today* reports that on a typical weekday, TNCs make over 170,000 vehicle trips within San Francisco, which is 15% of all intra-San Francisco vehicle trips. Ex. S, p. 1) Intra-SF TNC trips generate approximately 570,000 vehicle miles of travel (VMT) on a typical weekday, comprising as much as 20% of intra-SF-only VMT. (Ex. S, p. 2) Recent SFMTA Travel Decisions Survey results indicate that TNCs are growing in significance as a share of overall San Francisco travel, doubling in mode share served between 2014 and 2015. (Ex. S, p. 3) Approximately 290,000 TNC person trips are estimated to occur within San Francisco during a typical weekday, which represents approximately 9 % of all weekday person trips within the City. (Ex. S, p. 9) During weekdays, TNCs have a clear pattern of peak usage that coincides with the existing AM and PM peak periods. (Ex. S, p. 10) The third highest rate of TNC pickups and drop-offs in the City occurs in Supervisorial District 2, in which the 3333 California Street site is located. (Ex. S, p. 13) Estimated total VMT produced by TNCs on a typical weekday is approximately 570,000 VMT, and intra-SF TNCs generate as much as 20% of weekday VMT for intra-SF vehicle trips and at least 6.5 % of total weekday VMT in San Francisco. (Ex. S, p. 15) Most of the VMT generated by TNCs occurs during the AM and PM peak hours, with significant VMT also occurring during the evening hours, following the PM peak. (Ex. S, p.15-16)

The October 2018 Draft Report *TNCs & Congestion* by the San Francisco County Transportation Authority also states at page 12 that increased use of online shopping and delivery services might exacerbate roadway congestion due to an increase in delivery vehicle trips and loading durations. In addition, the report states that TNC passenger pick up and drop off activity may also result in increased congestion by disturbing the flow in curb lanes or traffic lanes. (Ex. Q, –p. 12)

According to the October 2018 Draft Report *TNCs & Congestion* by the San Francisco County Transportation Authority, during most of the day, approximately 40% to 50% of the

increase in vehicle hours of delay is attributable to TNCs, but in the evening, almost 70% of the increase in vehicle delay is due to TNCs. (Ex. Q, p. 33) 7 (TR-2) cont'd

Although the DEIR does not explain the data used to derive the neighborhood parking rates used in Table 4.C.19, SFCTA documents show that the data included only off-street parking spaces, so did not include parking in loading zones or other on-street areas by transportation network companies. The April 6, 2016 Memorandum from Wade Wietgrefe concerning *General Non-Residential Off-Street Parking Rate Estimation for San Francisco* states at page 2 that the "Transportation Authority estimated a general non-residential off-street parking rate as the number of public and private off-street parking spaces per 1000 square feet of non-residential land use. Summaries of non-residential square footage and off-street parking supply for the TAZ and other nearby TAZs within .75 miles of network-based walking distance were made to derive a parking rate that is representative of the neighborhood and is not artificially truncated at arbitrary TAZ boundaries. Off-street, publicly available parking data were available through SFPark and off-street, private parking estimates were taken from the Transportation Authority's Parking Supply and Utilization Study. (Ex. T, pp. 1-2) The map following that page entitled *Non-Residential Parking Supply Estimated from SF Park Data* shows TAZ level estimates of parking supply rates for San Francisco, based on off-street parking supply from SFPark and scaled up by 35 to match citywide totals to match the *estimated* supply from the PSUS parking estimation model. (Ex. T) The source of the estimates on the map are cited as "2013 Parcel Land Use and Zoning District Methodology, San Francisco Planning Department." (Ex. T, map following p. 2) 8 (TR-4)

**5. The DEIR Is Inadequate Because It Lacks the Analyses Set Forth in the *SF Guidelines*.** 9 (TR-1)

The DEIR does not contain the calculations or substantiation for trip distribution, assignment and modal split information required by the 2002 *SF Guidelines,* which state that "***person trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C, are to be used for estimating levels of activities for the proposed project.***" (Ex. A, p. 9, emphasis added) Those *SF Guidelines* also state that:

> Trip Distribution, Assignment and Modal Split Information: Net new person trips distributed to various directions of travel and assignment of the appropriate modes of travel (auto, transit, walk, and other ) should be calculated, presented in tables and a graphic diagram (for vehicle and transit trips), and discussed in the text. Modal assignments should also be calculate for daily and the P.M. Peak Hour...
>
> The weekday P.M. Peak Period is generally 4:00 - 6:00 , and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. (Ex. A, pp. 9-10)

***The DEIR lacks information on the calculation of total daily trip generation of the project and the calculation of daily modal assignments and net new person-trips. Instead, the DEIR inadequately presents information on peak hour AM and PM trip generation, thus understating the trip generation of the project and the resulting VMT that produces greenhouse gas emissions.*** The mode share presented in Table 9 of Appendix D of the DEIR at p. 27 "reflects the weekday PM peak hour mode share." Table 10 also presents only AM and PM peak hour data and lacks daily modal share information, so total mode share cannot be understood. The DEIR is misleading to decision makers and the public.

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(TR-1)
cont'd

The 2002 *SF Guidelines* state that since work and on-work trips have different characteristics in terms of distribution and mode of travel, the number of work and non-work (visitor) trips should be calculated separately; Appendix C provides the methodology to compute the work and non-work (visitor) trips for specific land use. (Ex. A, p. 9-10) The DEIR does not calculate the percentage splits between work and non-work trips for specific land uses in the manner specified in Table C-2 based on the trip generation rates in Table C-1 of the 2002 *SF Guidelines*. For example - for residential use, Table C-2 states that 33% of daily trips are from work trips and 67% are from non-work trips; for office use 36% of daily trips are from work and 64% from non-work use; for retail 4% of daily trips are from work and 96% from non-work use.

However the DEIR lacks the calculation of the daily or PM peak hour percentage splits of work/non-work trips based on the trip generation rates per 1000 square feet of land use or number of residential units presented in Table C-1. The 2002 *SF Guidelines* make clear at p. 9 that "Person trip generation rates per unit of square footage for each land use, or other unit shown in Appendix C, are to be used for estimating levels of activity for the proposed project." The DEIR lacks these person trip generation rates per square footage of land use and understates person trips by presenting information on trips during weekday AM and PM peak periods.

Appendix E to the DEIR lacks substantiation or calculation of the total work and non-work trips for each trip purpose and merely sets forth unsubstantiated claims as to the amount of work and non-work trips divided into auto, transit, walk and other travel, rather than by square footage of land use. Table 9 lacks the total amount or percentage of work and non-work trips for residential, office, retail, restaurant and other use, and merely presents unsubstantiated percentages of work and non-work uses in the various categories of auto, transit, walk and other. Table 9's claim that 54.5% of residential trips are made with autos and 54.8% of residential non-work trips are made with autos provides no meaningful information to the decision maker as to the total amount of residential trips that are made or the percentage of residential trips made based on the land use devoted to residential use or the split between work and non-work trips attributable to residential uses. That split is the basis for the mode share split calculation required by Table C of the *SF Guidelines*. Table 9 of the DEIR fails to provide information needed to calculate VMT for each mode share. VMT is produced by total trips, not only in the AM and PM.

In addition, the figures set forth in the DEIR also conflict with the vehicle trip distribution information provided in the *SF Guidelines*. Table E-4 of the 2002 *SF Guidelines* provides the daily distribution of work trips to SD-2, but the DEIR lacks information on daily distribution and merely provides data on weekday AM and PM peak hour distribution. Ex. A; DEIR p. 4.C.57. Again, the DEIR Table is not substantiated and is supported only by an unexplained reference to Kittleson & Associates 2017 and *SF Guidelines* 2002. The DEIR did not follow the *SF Guidelines* as to calculation of trip distribution.

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(TR-1)
cont'd

The external person-trip generation by mode presented in Table 4.C.14 at page 4.C.58 of the DEIR is unsubstantiated and unsupported by substantial evidence. The support cited for this Table is merely Kittleson & Associates 2018 and *SF Guidelines* 2002. No explanation of the method or basis of calculation of the modes is provided, and modes are not provided as to trip purpose or type of trip (whether residential, office, retail or daycare). The allegations in the Table constitute unsupported conclusions and do not amount to substantial evidence.

There is also no calculation or substantiation to support the average vehicle occupancy as to mode share set forth in Table 9 of Appendix D page 12. The source cited for the average vehicle occupancy and PM peak hour mode share are merely general references to Kittleson & Associates 2017, the American Community Survey Five-Year (2011-2015) Estimates, and *SF Guidelines*, 2002. While the American survey may provide information as to residential non-work trips, there is no evidence that it provides information as to work or other trips, such as retail trips.

Also, the mode shares and average vehicle occupancy rates used in the DEIR consist of unsupported conclusions and are not supported by substantial evidence. The mode shares and average vehicle occupancy rates "for residential work trips" were based on the U.S. survey 2011-2015 estimates (DEIR p. 4.C.57), but the DEIR does not provide a supporting reference for the residential non-work trips, office work-trips or non-work trips, retail work trips or non-work trips, restaurant work-trips or non-work trips or daycare work or non-work trips. The DEIR is inadequate for failing to provide an explanation of the manner in which this information was derived. Also, as stated above, in *TNCs & Congestion*, **since TNC use became significant in 2016**, there is not substantial evidence that the increased mode shares by TNCs were taken into account in arriving at the DEIR's conclusions, and the DEIR's transportation analysis is inadequate for failing to take such information into account.

As to Mode Share, the DEIR states at page 4.C.57 that:

> Person-trips generated by the proposed project and project variant were distributed to San Francisco's four Superdistricts and the greater Bay Area and then assigned to travel modes based on mode shares presented in the *SF Guidelines* in order to determine the number of auto, transit, walk and "other" trips. The "other" mode includes trips taken by bicycle, motorcycle, for-hire vehicles such as transportation network companies, taxis,

> and other modes. The person-trips shown as "auto" person trips reflect the total number of persons traveling by automobile and some automobiles would transport more than one person or multiple people, each of whom is making one person trip. Vehicle trips are calculated as the number of auto person trips divided by the average vehicle occupancy. Mode shares and average vehicle occupancy rates for residential work trips are based on United States Census Bureau five-year estimates of commute trip travel behavior from the 2011-2015 American Community Survey for Census Tract 154, which includes the project site. External person-trip generation estimates by mode and vehicle types are shown in Table 4.C.14: External Person-Trip Generation by Mode.

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(TR-1)
cont'd

Thus, the DEIR used inaccurate estimates of mode share that pre-dated the great increase in TNCs that occurred in 2016.

DEIR Appendix D explains at page 27 that mode share by trip purpose (work or non-work) is presented in Table 9. The internal trips presented in Table 7 would be expected to occur for the most part by walking and bicycling. As a result, the preliminary modal split percentages presented in Table 9 would change. Table 10 provides a comparison of modal splits before and after the calculation of internal trips for the Mixed-Use Office Scenario and Mixed-Use Multi-Family Housing Scenario. The resulting person-trips by mode and external person- and vehicle-trips are shown in Table 11.

The traffic study in Appendix D of the DEIR admits at page 22 that the *SF Guidelines* do not provide a specific methodology to assess the amount of trips that could remain within a large mixed-use project site and claims that refinements were made to the standard travel demand analysis "to account for the size and land use mix of the project." However, the DEIR lacks explanation of the nature of the refinements made and substantiation of the accuracy of the methodology used to estimate the internal trip capture rates. Thus, substantial evidence does not support the DEIR's conclusions as to the internal trip capture rates stated in the DEIR.

As explained herein, the internal trip capture rates used in the DEIR for the proposed project are not supported by the referenced studies or other reports. Similarly, the conclusions as to mode share and average vehicle occupancy stated in Appendix D at page 27-29 are also unsupported by explanation or analysis. Again, the source of the conclusions is only Kittleson and an unreferenced page of the 2002 *SF Guidelines.*

The traffic study in DEIR Appendix D also explains at page 22 that:

> To better estimate the trip-making patterns of the proposed project, a modified trip generation model specific to the 3333 California Street project was developed. The methodology was developed using the National Cooperative Highway Research Program Report 684, ITE, and is similar to the approach used in the analysis of the Mission rock Project at Seawall Lot 337 and Pier 48, and the Pier 70 Mixed-Use District Project.

The two studies cited in footnote 2 and 3 on page 22 of Appendix D of the DEIR are the Transportation Research Board, National Cooperative Highway Research Program Report 684, 2011, *Enhancing Trip Capture Estimation for Mixed-Use Developments* and the ITE Journal, 2010 and 2011, *Improved Estimation of Internal Trip Capture for Mixed-Use Development and Alternative Approaches to Estimating Internal Traffic Capture of Mixed-Use Projects.*

9 (TR-1) cont'd

However, the DEIR fails to provide any explanation of the methodologies discussed in the referenced publications, which the DEIR cites as support for its estimates of the internal trip capture rate. The cited publications are not contained in the DEIR or Appendix D.

In addition, the DEIR's mode share analysis is inaccurate and inadequate because it fails to take into account the current mode share of vehicle trips currently occurring by transportation network companies such as Uber and Lyft and the 3333 California Street project proposal to add five new loading zones around the perimeter of the site which will attract such transportation network companies and other delivery vehicles.

Also, the DEIR fails to estimate the amount of VMT which the proposed non-residential use (54,117 gsf feet of retail and 49,999 gsf of new office use - DEIR p. 2.8) of the project/variant would cause substantially induce. Simply admitting that the project would cause substantial VMT would be caused is inadequate under CEQA because it fails to supply information to decisionmakers and the public as to the degree of the significant impact and nature of the cause(s).

10 (TR-4)

**6. The EIR's Traffic Analysis Fails to Adequately Analyze VMT Generated by Customers of the Proposed New Retail Uses.**

The DEIR claims that the following thresholds of significance and screening criteria used to determine if a land use project would result in significant impacts under CEQA are consistent with CEQA section 21099 and the thresholds of significance for other land uses recommended in OPR's Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (OPR proposed transportation impact guidelines):

> For residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent. This metric is consistent with OPR's proposed transportation impact guidelines stating that a project would cause substantial additional VMT if it exceeds both the existing city household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent.
>
> For office projects, a project would generate substantial additional VMT if it exceeds the regional VMT per employee minus 15 percent.
>
> For retail projects, the planning department uses a VMT efficiency metric approach for

retail projects; a project would generate substantial additional VMT if it exceeds the regional VMT per retail employee minus 15 percent.

For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above. DEIR p. 4.C.49.

For mixed-use projects or retail land use, the threshold of significance used in the DEIR is ***not*** consistent with the OPR proposed transportation impact guidelines). Those OPR proposed transportation impact guidelines actually state at page III:16 that:

**Retail Projects**. Lead agencies should usually analyze the effects of a retail project by assessing the change in total VMT, because a [sic] retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.

Page III:23 of those OPR Guidelines state that:

Because new retail development typically redistributes shopping trips rather than creating new trips, estimating the total change in VMT (i.e. the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts.

The DEIR failed to analyze adequately the project's potential change in total VMT because it only analyzed VMT caused by employees of the new retail uses. THE DEIR is inadequate because if failed to analyze VMT caused by customers of the proposed new retail uses. Also, as previously stated, the DEIr is inadequate because it determined whether increased VMT was significant based on a comparison with VMT per capita for various land use, rather than based on a comparison with total VMT. Given the increase in employment and population in the City and the rapid growth in TNCs, substantial evidence does not support the DEIR's use of significance standards for the proposed project/variant based on VMT per capita.

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(TR-4)

The 3333 California project site is in Superdistrict 2. (San Francisco Transportation Information Map, accessed December 26, 2018) According to Appendix D of the San Francisco Planning Department Transportation Analysis Impact Guidelines, October 2002, TABLE E-12 VISITOR TRIPS to SD-2 – RETAIL, percentages of automobile trips made to retail locations in SD-2 from residents in the districts described below are made at the rates listed below:

64.3 % of visitors from All Origins
78.4 % of visitors from Superdistrict 1
56.5 % of visitors from Superdistrict 2
60.9 % of visitors from Superdistrict 3
81.2 % of visitors from Superdistrict 4

11
(TR-1)

65.8 % of visitors from the East Bay
81.2 % of visitors from the North Bay
95.1 % of visitors from the South Bay and
62.5 % of visitors from other locations. (Ex. A, excerpts of said Appendix D)

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(TR-1)
cont'd

Page C-1 of Appendix C to the San Francisco Planning Department Transportation Impact Analysis Guidelines state that the "essential data necessary for the calculation of trip generation is contained in Tables C-1 and C-2, and in the trip distribution, mode split, and auto occupancy tables contained in Appendix E." (Ex. A, attached) Table C-1 of that Appendix shows that Eating/Drinking uses have higher trip rates that General Retail and all other uses except Supermarket, at the following rates of trips per 1,000 gross square feet of space:

| | |
|---|---|
| General Retail | 150.0 |
| Supermarket | 297.0 |
| Eating/Drinking | |
| Quality Sit-Down | 200.0 |
| Composite Rate | 600.0 |
| Fast Food | 1400.0 |
| Office | |
| General | 18.1 |
| Residential (all types) | |
| 2+ bedrooms | 10.0/unit |
| 1 Bedroom/studio | 7.5/unit |
| Senior Housing | 5.0/unit (Ex.----) |

These rates were used by the City in the EIR for the 901-16th Street and 1200-17th Street project in estimating trip generation for project retail; San Francisco rates were also used for estimating trip generation for project residential uses and calculating Daily Person trips in that Draft EIR for that project. (Ex. U, pp. IV.A.31, 32) The retail mode splits and AVO were based on the *San Francisco Guidelines* Appendix E, and showed that retail work trips accounted for only 4% of the daily auto retail person trips (262/5923) and retail non-work trips accounted for 96% of the daily auto retail person trips (5661/5923). *Ibid.* That EIR also showed, based on the *San Francisco Guidelines* Appendix E, that the Average Vehicle occupancy for retail work trips was 1.23 but the Average Vehicle Occupancy for retail non-work trips was 1.90. *Ibid.* According to Appendix E of the *San Francisco Guidelines*, 64.3 % of all visitor trips to SD-2 were made by automobile, with 1.88 persons per auto. (Ex. A)

Table C-2 of Appendix C of the San Francisco Transportation Impact Analysis Guidelines shows at page C-4 that the percentage splits between work and non-work trips for Retail (including Supermarkets & Eating/Drinking Establishments) is 4% work and 96% non-work for a daily 24-hour period. (Ex. A) Of the 54,117 gross square feet of total retail uses in the proposed 3333 California Street project, 40,004 gsf would be for general retail, 4,287 gsf for sit-down restaurant and 9,826 gsf for composite restaurant. (DEIR pp. S-49) According to Table

4.C.11 of the DEIR, of the total 19,644 daily person-trip generation estimated for the proposed project, 12,753 person trips generated by the project would be from total retail uses, or 64.9 % of the daily person trips. Since 96% of the retail trips would be for non-work trips, 96% of the 12,753 retail non-work person trips, or 12,243 daily person trips would be generated by customer, or non-work retail trips. 11 (TR-1) cont'd

Thus, the DEIR is inadequate because it failed to include approximately 12,243 daily person trips that would be generated by retail customers of the project, or non-work retail trips. Omission of this information misleads the decision maker and the public as to the true impacts of the project.

The DEIR failed to analyze whether a likely increase in VMT per retail customer, or non-work trips, could cause substantial additional VMT. DEIR p. 4.C.80. The DEIR only analyzed whether the likely increase in VMT per employee associated with provision of retail parking spaces may increase VMT per employee enough to exceed the threshold of 15 percent below the regional average for retail uses. DEIR p. 4.C.80. Based on the information set forth herein showing that 12,243 daily person trips would be generated by retail customers, the DEIR lacks substantial evidence to show that the significance standard used in the DEIR was a reasonable measure of VMT increase for the proposed project/variant, especially since the standard considered retail work-trips and not retail customer-trips. For these reasons, including the fact that the DEIR failed to analyze 64.9% of the daily person trips from total proposed retail uses, the DEIR also lacks substantial evidence to support its conclusion that reducing the retail parking supply in the manner stated in Mitigation Measure M-TR-2 would reduce the significant impact of the proposed project and variant on VMT to a less than significant level. DEIR 4.C.80. 12 (TR-4)

Vehicle miles traveled (VMT) measures the amount and distance vehicles would travel on the roadway as a result of a project or plan. (Ex. C, TDM Technical Justification, p. 6) That justification confirms that transportation demand management programs are "designed to reduce *Vehicle Miles Traveled* by residents, tenants, employees, and visitors." Thus, the DEIR is inadequate for failing to analyze potentially significant increase in visitor travel.

The DEIR also lacks a coherent and complete explanation of which retail uses would use the parking spaces being provided for retail uses. The DEIR contains numerical estimates of "Long-Term" and "Short-Term" proposed parking space supply for Retail, Sit-down and Composite retail uses. DEIR p. 4.C.118. Is the proposed Long-Term supply intended for employees of the retail uses and the proposed Short-Term supply intended for customers of the retail uses? Since it is a reasonable assumption that the proposed Short-Term supply is intended for customers of the retail uses, customers of the retail uses are expected to drive to the site, but the EIR inadequately lacks any estimate of the impact of that driving by retail customers on increased VMT, or the cumulative impact of retail customer driving with driving by customers of the adjacent Laurel Village Shopping Center. With respect to the mitigation measures proposed to reduce retail parking spaces, would those measures reduce long-term or short-term retail

parking spaces?

12 (TR-4) cont'd

The DEIR's analysis of the cumulative impact on VMT was also deficient for the reasons stated above.

The EIR also fails to analyze the combined or cumulative effect on VMT caused by the proposal to construct new project retail uses along two blocks of California Street that are immediately adjacent to the existing two-block long retail neighborhood shopping center of Laurel Village. The combination of the two adjacent shopping areas would likely attract more retail customers to the project area due to the potentially increased variety of retail uses and availability of a wider range of retail services including substantial amounts of new restaurant uses (both composite and sit-down) proposed for the project site. Due to the amount of potential added retail options that the proposed project would add to the area (54,117 gsf), the project area including the Laurel Village Shopping Center would likely become a shopping destination which would attract more customer traffic in combination than would occur with either component of the retail uses alone. Due to the increased attraction of retail customers to a retail shopping destination, the DEIR is seriously inadequate for failing to have analyzed the VMT likely caused by retail customers of the proposed project/variant as a project impact, and also as a cumulative impact on the VMT likely generated by the project retail uses in combination with the VMT generated by existing retail uses in the Laurel Village Shopping Center. The proposed addition of a Whole Foods market at the City Center on Geary Boulevard at Masonic, which is two blocks from the project site, together with the VMT caused by visitors to the Target store currently located at that site, and the visitors to the Trader Joe's market located on Masonic one block away from the project site, should also have been included in a cumulative impact analysis. In sum, based on my experience in shopping at Laurel Village, the proposed project could cause significantly increased VMT in the area of the proposed project because the area would become more of a shopping destination than it is presently. Thus, the EIR is inadequate for failure to estimate VMT from retail customers as an impact of the project and as a cumulative impact with VMT from existing customers of Laurel Village Shopping Center and other nearby commercial uses.

**7. Feasible Mitigation Should Be Adopted to Reduce the Project's Significant Impact on VMT and its Incremental Cumulative Effects on Regional VMT.**

13 (TR-5)

The following Mitigation Measure should be adopted as a condition of approval of the proposed project/variant.

**MITIGATION MEASURE - NO RESIDENTIAL PARKING PERMITS FOR RESIDENTS OF, OR PERSONS WORKING AT, THE PROJECT.**

In order to reduce VMT from project residents or workers parking in the areas surrounding the project site, as a condition of approval, the project sponsor shall be

required to agree to a deed restriction recorded against the property providing that persons living at 3333 California Street and workers employed at 3333 California Street shall not be entitled to apply for a residential parking permit in the residential parking permit area that includes the 3333 California Street site, and the project sponsor shall be required to fund development of a program at the City agency that governs issuance of residential parking permits (currently believed to be MTA) in an amount not to exceed $2 million (two million dollars) to be used to enable that agency to modify and screen applications for residential parking permits and identify persons residing or working at 3333 California Street who would not be eligible to apply for residential parking permits and to implement amendments to application procedures for residential parking permits sufficient to enable the agency to identify persons residing or working at 3333 California Street. This condition shall be incorporated into any approval of the project, including without limitation into any approval rendered by the Board of Supervisors or the Planning Commission.

13 (TR-5) cont'd

**8. The DEIR Inadequately Analyzes Whether the Proposed Project/Variant Would Cause Major Traffic Hazards.**

14 (TR-7)

**A. The Project Would Cause Significant Hazards of Collision with Oncoming Vehicles.**

Plan sheet C.4.03 shows that trucks with a 50-foot wheelbase would turn into the oncoming traffic lane/area when turning right from Euclid Avenue to onto Laurel Street, when travelling right at the curve of Laurel Street where it intersects Mayfair Drive, and when turning right from Laurel Street onto California Street. (Ex. V) At each of these locations, trucks with a 50-foot wheelbase would turn into the oncoming traffic lane/area. (Ex. V) At the curve of Laurel Street where it intersects Mayfair Drive, traffic often backs up onto northbound Laurel Street in peak hours and after school hours due to vehicles stopping on northerly bound Laurel Street while they are waiting to turn left into the Laurel Village Shopping Center. I have also seen vehicles traveling southbound on Laurel Street adjacent to the Laurel Village Shopping Center backup as they approach the entrance to the Laurel Village Shopping Center to the right, due to vehicle back-ups at the entrance to the Shopping Center. According to plan sheet C.403, a truck traveling northbound on the curve of Laurel Street which has a 50-foot wheelbase would turn into the oncoming traffic lane where vehicles southbound on Laurel Street back up, thereby creating a risk of collision. Such trucks turning right at the corner of Laurel Street eastbound onto California Street would also turn into the oncoming westbound traffic lane on California Street as they approach the 100-foot commercial loading zone proposed to be installed next to the bus stop on eastbound California Street. Such truck turns would also cause a collision hazard, because vehicles often back up in the eastbound lanes on California Street at the intersection of Laurel Street in the peak afternoon traffic periods. Plan Sheet C.4.06 shows that buses with a 40-foot wheelbase turning right in these areas would also turn into oncoming traffic lanes and have

the same risk of collision. (Ex. V) The DEIR is inadequate because it failed to analyze adequately this traffic hazard impact and and analyze and adopt mitigation measures that could reduce the significant impact from causing major traffic hazards. 14 (TR-7) cont'd

**B. The Project Would Cause a Potentially Significant Hazard to Pedestrians.** 15 (TR-8)

The DEIR failed to analyze adequately the significant hazard to pedestrians that would result from unloading operations conducted at the proposed 100-foot long commercial loading zone proposed to be installed on California Street adjacent to the project site. Preliminary Design 08/2018 and plan sheets C2.02 and L1.01 show that this 100-foot commercial loading zone would be adjacent to a "PEDESTRIAN ACCESS POINT" and the pedestrian sidewalk on California Street. (Ex. L) Trucks off-loading freight from this loading zone would likely cross the sidewalk to deliver freight to the site, and some such crossings would likely traverse that pedestrian access point. The proposed 100-foot commercial loading zone is adjacent to a major pedestrian access point in the proposed project. The off-loading of freight in this area could cause major hazards to pedestrians using the sidewalk in this area. The DEIR is inadequate because it failed to analyze this potentially significant impact and provide mitigation measures to avoid or substantially reduce this impact.

The following mitigation measure is feasible and would mitigate this hazard to a less than significant level:

> **MITIGATION MEASURE**. All freight loading or unloading will be conducted in the underground garages provided in the proposed project/variant.

**C. The Proposed Project/Variant Would Cause a Major Hazard From Vehicle Speed Reductions On Pine Street Approaching the Proposed Bulb-Out on Presidio Avenue at Pine Street Such that There Would be Increased Risk of Rear-End Collisions or Other Hazards.** 16 (TR-7)

Sheet C2.02 shows a new proposed bulb-out would be installed adjacent to the right westbound traffic lane on Pine Street at the corner of Presidio Avenue and Pine Street. (Ex. L) Pine Street is a Major Arterial containing three one-way lanes of westbound travel. DEIR 4.C.5. During commute hours, traffic is very heavy on Pine Street westbound, with substantial vehicles traveling from downtown work locations. The proposed bulb-out at this location would cause traffic to slow down at the intersection of Pine Street and Presidio Avenue where visibility is already impaired due to the upward slope. Due to vehicles slowing down near this bulb-out, the proposed project would have increased risk of rear-end crashes or other hazards to vehicles traveling on this major artery and also could cause potential traffic back-ups which would also cause increased risk of collisions. The DEIR is inadequate for failing to analyze this potentially significant impact and mitigation measures that could reduce the impact to insignificance. The DEIR's claim that the project's proposed streetscape changes, including bulbouts, would not

increase the risk of rear-end crashes or other hazards is conclusory and not supported by substantial evidence. The following mitigation measure would mitigate this impact to insignificance:

16
(TR-7)
cont'd

**MITIGATION MEASURE**: Eliminate the proposed bulb-out at the intersection of Pine Street and Presidio Avenue as shown in plan sheet C2.02.

**D. The DEIR Is Inadequate in Failing to Analyze the Potentially Significant Hazards From TNC and Delivery Vehicles Double-Parking Near Proposed Loading Zones.**

The five proposed new loading zones proposed to be installed on streets surrounding the project would attract TNCs and other delivery vehicles. Such vehicles are known to stop in the street when there is not an easily accessible or available turn-in area, such as when a loading zone is occupied. Literature previously discussed herein documents this hazard from TNCs. The DEIR fails to analyze adequately the traffic hazards caused by such vehicles potentially stopping in the street near the proposed project loading zones, including without limitation the increased hazards from the risk of collisions.

**E. The DEIR Fails to Analyze Potentially Significant Traffic Hazards From Vehicles Queueing at Project Site Driveways.**

The DEIR acknowledges that based on a review of existing conditions, the addition of project-generated traffic could result in queues and potential conflicts with existing traffic operations in the vicinity of the proposed Laurel Street driveway between California Street and Mayfair Drive with potential conflicts being between vehicles entering/exiting the Laurel Village Shopping Center surface parking lot and vehicles accessing the proposed project's below-grade parking garage from the Laurel Street northernmost driveway. DEIR p. 4.C.81. During times of peak demand, queues can spill back across the sidewalk and onto Laurel Street and affect operations of the adjacent, closely spaced intersections at California Street and at Mayfair Drive. *Ibid.* The DEIR included an improvement measure which is not binding for this impact. The DEIR is inadequate in failing to include as a binding mitigation measure the proposed queue abatement measures stated in Improvement Measure I-TR-3 and the following measure, which should be adopted as conditions of approval of the proposed project:

**MITIGATION MEASURE**: If significant queues develop on Laurel Street near the intersections of Mayfair Drive or California Street, entrance to the project garages on Laurel Street will be limited to residential occupants of the buildings along California Street. If such queues are reported to the Planning Director, the Planning Department will propose and support modifications to project approvals that will be sufficient to abate such queues to be approved by the Board of Supervisors, Planning Commission or other applicable authority.

**MITIGATION MEASURE**: The terms of Improvement Measure I-TR-3: Driveway Queue Abatement at DEIR p. 4.C.82 are incorporated herein by reference as Mitigation Measures required as a condition of approval of the proposed project/variant.

16
(TR-7)
cont'd

**CONCLUSION**

For the reasons set forth above, the DEIR is inadequate under CEQA and must be revised and the revision submitted for public comment.

Very truly yours,

Kathryn R. Devincenzi

Kathryn R. Devincenzi

ATTACHMENTS: Exhibits A - V

# EXHIBIT A

# TRANSPORTATION IMPACT ANALYSIS GUIDELINES
## FOR ENVIRONMENTAL REVIEW

October 2002

The Planning Department
City and County of San Francisco

## II. Overview of Process and Procedures

These guidelines update and revise the *Guidelines for Environmental Review: Transportation Impacts* (July, 1991) *and Interim Transportation Impact Analysis Guidelines for Environmental Review* (January 2000), and supersede all previously published transportation analysis guidelines. This document reflects the most current data available regarding San Francisco travel characteristics. A major portion of the analysis guidance is based on the findings of the *Citywide Travel Behavior Survey - Employees and Employers* (May, 1993), the *Citywide Travel Behavior Survey - Visitor Travel Behavior* (August, 1993), and updates or enhancements to those reports. In addition, the *Guidelines* employ certain findings and assumptions from major San Francisco study reports, including those for: Mission Bay (Case No. 1996.771E; EIR certified September 17, 1998); Transbay Terminal/Caltrain Extension (Case No. 2000.048E); and Van Ness Avenue (Case No. 1987.586; EIR certified on December 17, 1987). The data in the Citywide Travel Behavior Study (CTBS) was subsequently confirmed by the *1995 Citywide Travel Behavior Study* that was sponsored by the San Francisco County Transportation Authority.

It should be noted that these are only guidelines. It must not be assumed that the information provided herein constitutes a complete scope of work for any transportation analysis. The *Guidelines* provide a broad overview, while individual transportation study scopes of work are required to provide a level of detail tailored to fit the size and complexity of transportation issues associated with particular projects. Moreover, once a scope of work is prepared and approved under the direction of the Planning Department, the specific direction contained within that scope will provide a more precise focus than that which appears in these *Guidelines*.

For clarification, the following represents an overview of the process involved in the preparation of a transportation impact analysis for environmental review purposes. No estimate or assumption is made or inferred regarding time lines for the various steps.

(1) The project sponsor or a designated representative files an Environmental Review (EE) application with the Planning Department following the instructions contained in that application form (available at the Department and on-line). When the application is accepted by the Department, a case number is assigned and a staff person from the Department's Major Environmental Analysis section is designated as the coordinator for environmental review. This individual will likely be different than the staff person handling the Transportation Impact Report. All Department staff assigned to the project will coordinate activities throughout the review process. Filing for environmental review generally (but not always) precedes starting the review of transportation issues.

2) Determination concerning whether a transportation impact report is required is based on the scale, location, and/or potential level of activity of the proposed

## 3. Travel Demand Analysis

Travel demand analysis shall include textual information, supported by tables or figures detailing the project's trip generation, trip distribution, trip assignment and modal split characteristics.

Net new travel demand generated by the project is to be estimated, based on the difference between existing and proposed land uses. Person trip generation rates per unit of square footage for each land use, or other unit as shown in Appendix C, are to be used for estimating levels of activity for the proposed project. The rates were developed by an examination of various studies and sources, including the Citywide Travel Behavior Study, the ITE Trip Generation manual and special purpose studies, many of which are specific to San Francisco. No single source or analysis provides, by itself, an adequate means to define trip generation for all the situations encountered in San Francisco. Trip generation rates may sometimes need to be determined by other means, such as surveys of similar land uses, if so specified in the scope of work.

To "net-out" existing land uses that will be replaced, the existing levels of trip activity should, in most cases, be based on actual observations rather than on estimates based on rates in these *Guidelines* or other sources.

Each analysis should apply the trip generation rates from the *Guidelines* individually to the proposed uses, compare the proposed trips to existing levels of trip activity, and show the differences ("net new") by land use and in aggregate.

The Travel Demand Analysis is to include the following, unless otherwise directed in the work scope (Note that different or additional analysis periods may be defined in the scope of work process.) :

- Trip Generation Information: Project trip generation information (total person trips) by land use for existing and proposed uses. The total unadjusted daily and P.M. peak hour trips by mode can be calculated. The number of daily and peak hour vehicles (autos) generated by the project should also be calculated by using the auto occupancy rates noted in the tables in Appendix E.

- Work and Non-Work Trip Generation Information: Since work and non-work trips have different characteristics in terms of distribution and the mode of travel, the number of work and non-work (visitor) trips should be calculated separately. Appendix C provides the methodology to compute the work and non-work

(visitor) trips for a specific land use.

- Trip Distribution, Assignment and Modal Split Information: Net new person trips distributed to various directions of travel and assigned to the appropriate modes of travel (auto, transit, walk, and other) should be calculated, presented in tables and a graphic diagram (for vehicle and transit trips), and discussed in the text. Modal assignments should also be calculated for daily and the P.M. Peak Hour.

The weekday P.M. Peak Period is generally 4:00-6:00, and traffic counts shall generally be conducted during this period, unless otherwise specified in the scope of work. The peak hour must be determined from the counts (normally recorded in 15 minute intervals) for the entire peak period, and should represent the single hour within the peak period with the highest counts. The Planning Department may also request data for other periods to reflect the peak period of trip generation by the land use.

## 4. Transportation Impact Analysis

Analysis for all projects is to be conducted for project-specific impacts, and for cumulative impacts.

A. Traffic Impacts

Project-Specific Impacts. The project generated traffic impacts must be calculated for intersections identified in the scope of work using the methodologies explained in Appendix B. LOS levels for the specified intersections must be discussed in the text and presented in a table showing Existing, Existing plus Project and Cumulative intersection levels of service. The traffic attributable to the project is normally assumed to be included in the cumulative forecast, and should not be added to the cumulative totals. The percent contribution of the project should be shown both as a percentage of the total cumulative traffic and as a percentage of the growth in traffic (cumulative less existing) for each intersection.

The specific intersections to be analyzed will be identified in the approved scope of work for the transportation analysis, and based on an initial assessment of areas that could be impacted by the project. When a wide area may be impacted, the intersections selected for analysis may only be those that would experience the greatest change or have the greatest likelihood of degrading to an unacceptable LOS with the addition of the project traffic.

Cumulative (Horizon Year) Impacts. The transportation impact analysis should present and discuss the cumulative traffic impacts. The horizon year (normally 10 to 20 years in the future, depending on the location) should be used for the cumulative analysis year unless otherwise specified in the scope of work. The analysis is to assume a growth factor of one percent per year for "background" traffic, unless an areawide cumulative

**Appendix C**

## TRIP GENERATION METHODOLOGY

The trip generation approach in these "Guidelines" has been revised to reflect updated information that has become available since the 1991 version of the "Guidelines." The intent of this revised approach is to make the maximum use of relevant and refined data from the "Citywide Travel Behavior Survey" (CTBS) and other sources (such as the ITE "Trip Generation" reports, the San Francisco Land Use Database and transportation studies), and to better integrate trip generation with other aspects of the analysis process. As more refined data becomes available, it will also be incorporated into the methodology outlined here. Some of the changes may include the use of employee densities in the trip generation process, and the introduction of an adjustment factor to recognize linked and internal trips.

The essential data necessary for the calculation of trip generation is contained in Tables C-1 and C-2, and in the trip distribution, mode split, and auto occupancy tables contained in Appendix E. Multiple sources of information, as are cited in footnotes of Tables C-1 and C-2 and the "Selected Sources" were necessary to develop the rates and factors in the tables since no one source was complete in itself nor provided the linkage between the different collection and analysis methodologies. Some judgement derived from experience with San Francisco development and transportation activities was also applied to the development and refinement of the information. The tables in Appendix E are derived from the data in the CTBS reports.

The land uses in Tables C-1 and C-2 represent the majority of the projects being developed in San Francisco. However, there are a number of uses that might occur on an infrequent basis which are not specifically represented. In those cases, it may be appropriate to use other data sources or studies for trip generation rates which would be specified during the scoping process. Data sources could include field surveys or acceptable published data such as that from the Institute of Transportation Engineers (ITE) and the San Diego Association of Governments (SANDAG). In its *Trip Generation* publication, the Institute of Transportation Engineers (ITE) provides one of the largest sources of commonly used trip generation data. Most of this data, however, was collected in a suburban environment with low transit usage and land use and travel patterns different than San Francisco. Furthermore, the rates are based on vehicle trips as opposed to person trips, and there is no corresponding auto occupancy data for the sources. In some cases, it may be possible to use the data with an appropriate conversion to person trips. This would require the assumption of an auto occupancy rate and a percentage of non-auto trips. For example, if the auto occupancy rate were 1.3 and the "Other modes" trips were 10%, the conversion would factor would be 1.3/0.90, or 1.44. One hundred ITE vehicle trips would equate to 144 person trips.

NET NEW TRIPS: PROCEDURES FOR ADJUSTMENTS BASED ON EXISTING LAND USES ON THE PROJECT SITE

For project sites that are not vacant or were occupied until recently, adjustments to calculated daily and p.m. peak hour project-generated additional person trips may be made to account for the existing activities on a project site. Whenever feasible, any such adjustment should be based on conducting counts of actual existing commercial trip-making at the project site per specific direction from Planning Department MEA transportation staff. Unless surveys of existing modal splits and distributions are available or conducted, appropriate modal splits and distributions should be applied for the geographic area in which the project site is located in order to estimate net changes for each mode, e.g., vehicles, transit, walking, or other. Net new trips would be derived as follows:

Calculated additional trips for the project (for daily & pm peak hour)
\- Existing observed trips (from actual counts)
= Net new trips

Whenever it would be impractical to conduct actual counts of existing commercial trip-making activity at a project site, e.g., because the business has recently ceased operations, procedures for estimating and netting out existing trips shall be developed only according to specific direction from Planning Department MEA transportation staff. Whenever the level of trip-making associated with previous uses appears to have been low and/or prior uses have been discontinued for a substantial period of time, application of the concept of net new trips would be inappropriate and the analysis should be based on estimates of trip generation for the proposed project without adjustments.

In cases of existing or recently discontinued residential uses proposed to be replaced by any type of new project, Planning Department residential trip rates from Appendix C and appropriate modal split/distribution census tract data based on procedures described in Appendix D should be applied to estimate existing trips. Net new trips should, in turn, be derived by subtracting existing trips from new trips estimated to be generated by the proposed project.

Whenever a project is proposed to replace an existing or recently discontinued parking facility, netting out existing trips linked to the parking facility is generally inappropriate. The inherent character of parking facilities is to accommodate vehicular trips generated by commercial (and sometimes residential) land uses in the vicinity and to concentrate these vehicular trips in immediate proximity to the parking facility's access points. The basic analytical presumption should be that drivers who have previously parked in a parking facility to be displaced by a proposed project will seek to find other parking nearby and thus these vehicular trips should be treated as remaining at the intersections within the project study area. Therefore, while some reassignments to reflect greater dispersal of vehicles previously using a parking facility on the project site may be appropriate, the reassigned vehicles should be assumed to remain in the project study area. Thus, netting out of vehicles associated with a parking facility on the project site is generally not appropriate. One clear exception to this presumption would apply when the proposed project would replace the underlying land use which primarily accounts for users of the associated parking facility. Appropriate treatment for other exceptional situations should be according to specific direction from Planning Department MEA transportation staff.

TABLE C-1
TRIP GENERATION RATES & EMPLOYEE DENSITIES
FOR TYPICAL LAND USES

| | TRIP RATES | | EMPLOYEE DENSITY |
|---|---|---|---|
| LAND USE TYPE | RATE PER LAND USE (1) | PM PEAK HOUR (% DAILY) | AVERAGE DENSITY PER EMPLOYEE (2) |
| Office | | | |
| General | 18.1 | 8.5% | 276 |
| Government--- Admininistrative | 36.4 | 16.2% | 276 |
| Government--- High Public Use | 43.3 | 14.5% | 276 |
| General Retail | 150.0 | 9.0% | 350 |
| Supermarket | 297.0 | 7.3% | 350 |
| Eating/Drinking | | | |
| Quality Sit-Down | 200.0 | 13.5% | 350 |
| Composite Rate | 600.0 | 13.5% | 350 |
| Fast Food | 1400.0 | 13.5% | 240 |
| Hotel/Motel | 7/room | 10.0% | 0.9 employees/room (49% daytime work) |
| Manufacturing/Industrial | 7.9 | 12.4% | 567 |
| Athletic Clubs | 57.0 | 10.5% | --- |
| Cineplex Theatres | 1.13/seat | 23.0% | 0.023 employees/seat |
| Daycare Centers | 67.0 | 18.0% | --- |
| Residential (all types) | | | |
| 2+ bedrooms | 10.0/unit | 17.3% | --- |
| 1 bedroom/studio | 7.5/unit | 17.3% | --- |
| Senior Housing | 5.0/unit | 6.0% | --- |

Footnotes: (1) Trips per 1,000 gross square feet of space unless otherwise noted.

(2) Average gross square feet of space per employee.

Sources: San Francisco Citywide Travel Behavior Survey; Mission Bay 1990 FEIR;
525 Golden Gate FEIR; 1000 Van Ness FEIR; ITE Trip Generation, 6th Edition

| TABLE C-2<br>PERCENTAGE SPLITS BETWEEN WORK & NON-WORK TRIPS | | |
|---|---|---|
| | WORK/NON-WORK SPLIT | |
| LAND USE TYPE | DAILY 24-HOUR PERIOD | PM PEAK HOUR |
| Office<br>General<br>Government | <br>36%/64%<br>20%/80% | <br>83%/17%<br>83%/17% |
| Retail (including Supermarkets & Eating/Drinking Establishments) | 4%/96% | 4%/96% |
| Hotel/Motel | 12%/88% | 60%/40% |
| Manufacturing/Industrial | 40%/60% | 67%/33% |
| Residential | 33%/67% | 50%/50% |
| | | |
| Sources: South of Market FEIR; Mission Bay 1990 FEIR | | |
| For commercial uses, 100% of all work trips during the PM peak hour and 50% of all non-work trips during the PM peak hour should be treated as outbound.<br><br>For residential uses, all PM peak work trips and 33% of all PM peak hour non-work trips should be treated as inbound to the project; resident inbound/outbound trip directions may or may not correspond to peak outbound regional travel direction. | | |

**Appendix D**

## TRIP DISTRIBUTION, MODE SPLIT AND TRIP ASSIGNMENT METHODOLOGY

The steps in the transportation analysis process following trip generation include trip distribution, mode split and trip assignment. Unless a travel demand model is used, the procedure described below should be followed.

### Commercial Land Uses

Once it is determined how many person trips are generated by a project, it is necessary to determine the travel mode for the trips, the number of vehicle (auto) trips, the distribution of the trips, and the assignment of the trips to the appropriate transportation network (e.g., street network or transit service). The modal split and distribution can vary by the type of trip (e.g., work or non-work (visitor)), and the land use at the destination (e.g., office, retail, other). To aid in the process, the tables in Appendix E have been prepared using data from the Citywide Travel Behavior Study (CTBS). The data is provided according to the location of the proposed commercial project: the four Superdistricts (SD) in San Francisco, plus the C-3 District within Superdistrict 1. Because the data has been compiled by generalized locations and categories, it may not provide the maximum possible precision for any one project. Overall, however, it provides an adequate representation, and its use will maintain a consistency and comparability between the analyses of different projects.

For the C-3 District, work trips are categorized "Office" and "All Other." The visitor (non-work) trips for the C-3 District are categorized as "Office," "Retail" and "All Other." For the four Superdistricts, there is one category for work trips and two categories for visitor trips: "Retail" and "All Other." Some other areas of the city (e.g., Van Ness Avenue) also have tables that were derived from studies for those areas.

The number of trips by mode can be derived by applying the "Mode %" figure to the total trips. In order to calculate the number of auto vehicle trips, the number of auto trips needs to be divided by the "Persons Per Auto." For the C-3 District, the number of auto vehicle trips equals the number of "Drive Alone" trips plus the "Rideshare" trips that have been divided by "Persons Per Auto, Rideshare."

The tables in Appendix E provide a general distribution of trips (e.g., SD-3, South Bay) which will be useful in directing certain trips to a particular freeway or transit screenline. A graphic representation of these general distributions normally aids in presenting the tabular data. In the next step, judgment must be used to assign the trips to particular links on the street network or to a transit screenline or a feeder bus line to the mainline corridor service. This information needs to be included in the study report, and a graphic presentation is especially important for the street network. Of course, consistency needs to be maintained between the tabular data

## TABLE E-4
## WORK TRIPS to *SD-2 -- All*

| | Distribution (%) | Mode (%) | | | | Persons Per Auto |
|---|---|---|---|---|---|---|
| | | Auto | Transit | Walk | Other | |
| ***ALL ORIGINS*** | **100.0** | **52.8** | **31.7** | **12.6** | **2.9** | **1.23** |
| ***Superdistrict 1*** | 8.4 | 39.3 | 40.7 | 16.7 | 3.3 | 1.19 |
| ***Superdistrict 2*** | 35.2 | 41.0 | 24.4 | 30.6 | 4.0 | 1.14 |
| ***Superdistrict 3*** | 15.8 | 49.9 | 48.0 | 0.0 | 2.1 | 1.25 |
| ***Superdistrict 4*** | 15.1 | 55.9 | 38.9 | 3.0 | 2.2 | 1.22 |
| ***East Bay*** | 7.1 | 67.4 | 31.0 | 0.0 | 1.6 | 2.02 |
| ***North Bay*** | 7.0 | 81.5 | 16.1 | 0.0 | 2.4 | 1.53 |
| ***South Bay*** | 10.6 | 69.9 | 27.5 | 0.0 | 2.6 | 1.21 |
| ***Other*** | 0.8 | 95.7 | 1.8 | 0.0 | 2.5 | 3.16 |

## TABLE E-12
## VISITOR TRIPS to *SD-2* -- RETAIL

| | ALL ORIGINS | Home-Based Oirigns | Work-Based Origins | All Other Origins | Persons Per Auto |
|---|---|---|---|---|---|
| ***ALL VISITORS*** | | | | | |
| Distribution (%) | 100 | 45 | 19 | 36 | |
| Mode (%) | | | | | |
| Auto | 64.3 | 62.0 | 63.3 | 67.6 | 1.88 |
| Transit | 6.9 | 5.2 | 8.8 | 8.1 | |
| Walk | 26.2 | 30.4 | 25.9 | 21.0 | |
| Other | 2.6 | 2.4 | 2.0 | 3.3 | |
| ***SUPERDISTRICT 1 RESIDENTS*** | | | | | |
| Distribution (%) | 12 | 6 | 1 | 5 | |
| Mode (%) | | | | | |
| Auto | 78.4 | 72.9 | 88.9 | 82.0 | 2.30 |
| Transit | 8.5 | 10.8 | 11.1 | 4.9 | |
| Walk | 11.1 | 12.2 | 0.0 | 13.1 | |
| Other | 2.0 | 4.1 | 0.0 | 0.0 | |
| ***SUPERDISTRICT 2 RESIDENTS*** | | | | | |
| Distribution (%) | 55 | 29 | 9 | 17 | |
| Mode (%) | | | | | |
| Auto | 56.5 | 54.5 | 56.9 | 59.9 | 1.57 |
| Transit | 7.2 | 3.9 | 12.9 | 9.8 | |
| Walk | 34.5 | 39.8 | 29.3 | 28.1 | |
| Other | 1.8 | 1.8 | 0.9 | 2.2 | |
| ***SUPERDISTRICT 3 RESIDENTS*** | | | | | |
| Distribution (%) | 8 | 4 | 2 | 2 | |
| Mode (%) | | | | | |
| Auto | 60.9 | 68.4 | 33.3 | 69.3 | 2.04 |
| Transit | 10.0 | 8.3 | 12.5 | 11.5 | |
| Walk | 25.5 | 20.0 | 54.2 | 11.5 | |
| Other | 3.6 | 3.3 | 0.0 | 7.7 | |
| ***SUPERDISTRICT 4 RESIDENTS*** | | | | | |
| Distribution (%) | 7 | 3 | 2 | 2 | |
| Mode (%) | | | | | |
| Auto | 81.2 | 75.7 | 77.3 | 90.3 | 2.49 |
| Transit | 4.4 | 5.4 | 4.5 | 3.2 | |
| Walk | 10.0 | 13.5 | 9.1 | 6.5 | |

**TABLE E-12 (continued)**
**VISITOR TRIPS to *SD-2* -- RETAIL**

| | ALL ORIGINS | Home-Based Oirigns | Work-Based Origins | All Other Origins | Persons Per Auto |
|---|---|---|---|---|---|
| ***EAST BAY RESIDENTS*** | | | | | |
| Distribution (%) | 3 | 1 | 1 | 1 | |
| Mode (%) | | | | | |
| Auto | 65.8 | 100.0 | 64.7 | 46.6 | 2.31 |
| Transit | 9.8 | 0.0 | 0.0 | 26.7 | |
| Walk | 24.4 | 0.0 | 35.3 | 26.7 | |
| Other | 0.0 | 0.0 | 0.0 | 0.0 | |
| ***NORTH BAY RESIDENTS*** | | | | | |
| Distribution (%) | 2 | 0 | 1 | 1 | |
| Mode (%) | | | | | |
| Auto | 81.2 | 0.0 | 75.0 | 87.5 | 2.13 |
| Transit | 0.0 | 0.0 | 0.0 | 0.0 | |
| Walk | 18.8 | 0.0 | 25.0 | 12.5 | |
| Other | 0.0 | 0.0 | 0.0 | 0.0 | |
| ***SOUTH BAY RESIDENTS*** | | | | | |
| Distribution (%) | 5 | 2 | 1 | 2 | |
| Mode (%) | | | | | |
| Auto | 95.1 | 100.0 | 86.7 | 96.0 | 3.47 |
| Transit | 0.0 | 0.0 | 0.0 | 0.0 | |
| Walk | 4.9 | 0.0 | 13.3 | 4.0 | |
| Other | 0.0 | 0.0 | 0.0 | 0.0 | |
| ***OTHER RESIDENTS*** | | | | | |
| Distribution (%) | 8 | 0 | 2 | 6 | |
| Mode (%) | | | | | |
| Auto | 62.5 | 0.0 | 70.4 | 59.7 | 1.87 |
| Transit | 7.0 | 0.0 | 3.7 | 7.3 | |
| Walk | 20. 9 | 0.0 | 18.5 | 22.0 | |
| Other | 9.6 | 0.0 | 7.4 | 11.0 | |

## TABLE E-13
## VISITOR TRIPS to *SD-2* -- ALL OTHER

| | ALL ORIGINS | Home-Based Origins | Work-Based Origins | All Other Origins | Persons Per Auto |
|---|---|---|---|---|---|
| ***ALL VISITORS*** | | | | | |
| Distribution (%) | 100 | 44 | 15 | 41 | |
| Mode (%) | | | | | |
| Auto | 54.8 | 60.5 | 41.6 | 53.5 | 2.06 |
| Transit | 23.4 | 23.8 | 17.6 | 25.1 | |
| Walk | 15.2 | 10.4 | 32.8 | 14.0 | |
| Other | 6.6 | 5.3 | 8.0 | 7.4 | |
| ***SUPERDISTRICT 1 RESIDENTS*** | | | | | |
| Distribution (%) | 13 | 8 | 2 | 3 | |
| Mode (%) | | | | | |
| Auto | 41.7 | 46.1 | 26.7 | 40.0 | 1.93 |
| Transit | 35.5 | 32.3 | 20.0 | 50.0 | |
| Walk | 16.4 | 18.5 | 26.7 | 6.7 | |
| Other | 6.4 | 3.1 | 26.6 | 3.3 | |
| ***SUPERDISTRICT 2 RESIDENTS*** | | | | | |
| Distribution (%) | 27 | 14 | 3 | 10 | |
| Mode (%) | | | | | |
| Auto | 50.9 | 45.4 | 57.7 | 56.6 | 1.96 |
| Transit | 23.7 | 24.4 | 15.4 | 25.3 | |
| Walk | 19.7 | 21.0 | 26.9 | 15.7 | |
| Other | 5.7 | 9.2 | 0.0 | 2.4 | |
| ***SUPERDISTRICT 3 RESIDENTS*** | | | | | |
| Distribution (%) | 14 | 6 | 2 | 6 | |
| Mode (%) | | | | | |
| Auto | 57.1 | 65.5 | 36.8 | 58.0 | 2.05 |
| Transit | 22.3 | 23.0 | 10.5 | 24.0 | |
| Walk | 9.9 | 1.9 | 42.2 | 6.0 | |
| Other | 10.7 | 9.6 | 10.5 | 12.0 | |
| ***SUPERDISTRICT 4 RESIDENTS*** | | | | | |
| Distribution (%) | 9 | 4 | 1 | 4 | |
| Mode (%) | | | | | |
| Auto | 63.4 | 60.6 | 37.5 | 73.3 | 2.16 |
| Transit | 32.4 | 36.4 | 37.5 | 26.7 | |
| Walk | 4.2 | 3.0 | 25.0 | 0.0 | |
| Other | 0.0 | 0.0 | 0.0 | 0.0 | |

## TABLE E-13 (continued)
## VISITOR TRIPS to *SD-2* -- ALL OTHER

| | ALL ORIGINS | Home-Based Origins | Work-Based Origins | All Other Origins | Persons Per Auto |
|---|---|---|---|---|---|
| ***EAST BAY RESIDENTS*** | | | | | |
| Distribution (%) | 11 | 4 | 3 | 4 | |
| Mode (%) | | | | | |
| Auto | 52.2 | 77.1 | 24.0 | 46.8 | 2.20 |
| Transit | 25.0 | 22.9 | 28.0 | 25.0 | |
| Walk | 14.1 | 0.0 | 44.0 | 6.3 | |
| Other | 8.7 | 0.0 | 4.0 | 21.9 | |
| ***NORTH BAY RESIDENTS*** | | | | | |
| Distribution (%) | 4 | 2 | 1 | 1 | |
| Mode (%) | | | | | |
| Auto | 73.6 | 93.3 | 22.2 | 90.0 | 1.89 |
| Transit | 8.8 | 6.7 | 11.1 | 10.0 | |
| Walk | 14.7 | 0.0 | 55.6 | 0.0 | |
| Other | 2.9 | 0.0 | 11.1 | 0.0 | |
| ***SOUTH BAY RESIDENTS*** | | | | | |
| Distribution (%) | 8 | 4 | 2 | 2 | |
| Mode (%) | | | | | |
| Auto | 80.5 | 88.9 | 68.7 | 75.0 | 2.30 |
| Transit | 8.3 | 8.3 | 6.3 | 10.0 | |
| Walk | 5.6 | 0.0 | 12.5 | 10.0 | |
| Other | 5.6 | 2.8 | 12.5 | 5.0 | |
| ***OTHER RESIDENTS*** | | | | | |
| Distribution (%) | 14 | 2 | 1 | 11 | |
| Mode (%) | | | | | |
| Auto | 48.3 | 84.2 | 57.1 | 40.6 | 2.07 |
| Transit | 19.7 | 10.5 | 14.3 | 21.9 | |
| Walk | 23.8 | 0.0 | 28.6 | 28.1 | |
| Other | 8.2 | 5.3 | 0.0 | 9.4 | |

# EXHIBIT B

I-DEVINCENZI2

# Target Results Preview

## Initial Vision Scenario does two things:

### 1. Creates more housing and more affordable housing

This is all "good" news for the targets:

- Meets the housing target
- Improves jobs-housing-transit alignment
- Reduces housing costs for low-income households

### 2. Brings more people into the region

This is both "good" and "bad" for the targets:

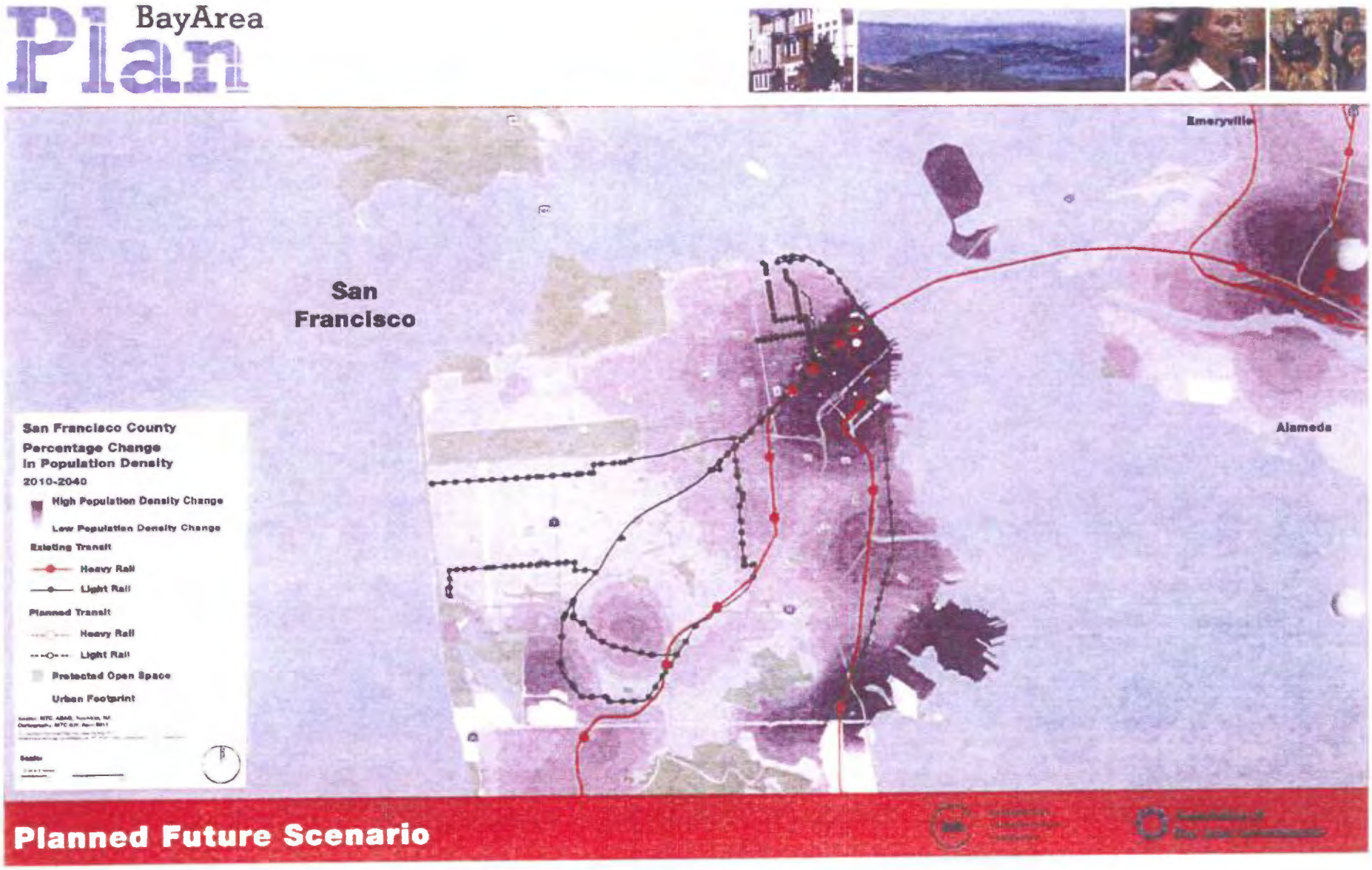
- New residents ride transit, walk and bike more than existing residents and GHG/capita and VMT/capita go down
- But they still drive. As a result, total VMT goes up, which increases collisions and particulate emissions from autos

I-DEVINCENZI2

# Initial Vision Scenario: How was it developed?

- **Housing Growth Distribution Criteria**
  - Locally identified growth in Priority Development Areas or new Growth Opportunity Areas
  - Additional housing units based upon a jurisdiction's selected Place Type for a PDA or Growth Area
  - Greater housing density proximate to significant transit investments (Existing Transit or Resolution 3434 Transit Expansions)
  - Major mixed-use corridors with high potential for transit-served, infill development

I-DEVINCENZI2



I-DEVINCENZI2



City & County of San Francisco

# San Francisco's Transit-Focused Neighborhoods

prepared for ABAG's *Focusing Our Vision* Priority Development Areas (PDAs) Program

**ABAG Priority Development Areas (PDAs)***

* Includes
- > Better Neighborhoods & Area Plans (Planning Department)
- > Port development areas (Port of SF)
- > Redevelopment areas (Redevelopment Age
- > Special redvlpmnt. areas (Mayor's Office,
- > 1/4 mile surrounding Neighborhood Commercial streets with high frequency transit service and within community plans
- > 1/4 mile radius around major rail/ferry stations within community plans

**Muni**

Bus network

Metro, streetcar, Central Subway (future)

Proposed Bus Rapid Transit (BRT)

**BART**

BART

**Caltrain**

Caltrain

**Ferries**

Ferry terminal

Proposed ferry terminal

**Regional Transit Center**

Transbay Transit Center

Data Sources: SFMTA, SFCTA, Planning Department, Redevelopment Agency, Mayor's Office, Port of SF, SFGOV
Date: 6/29/2007
Map: SFMTA, Long Range Planning

0 0.25 0.5 1 Mile

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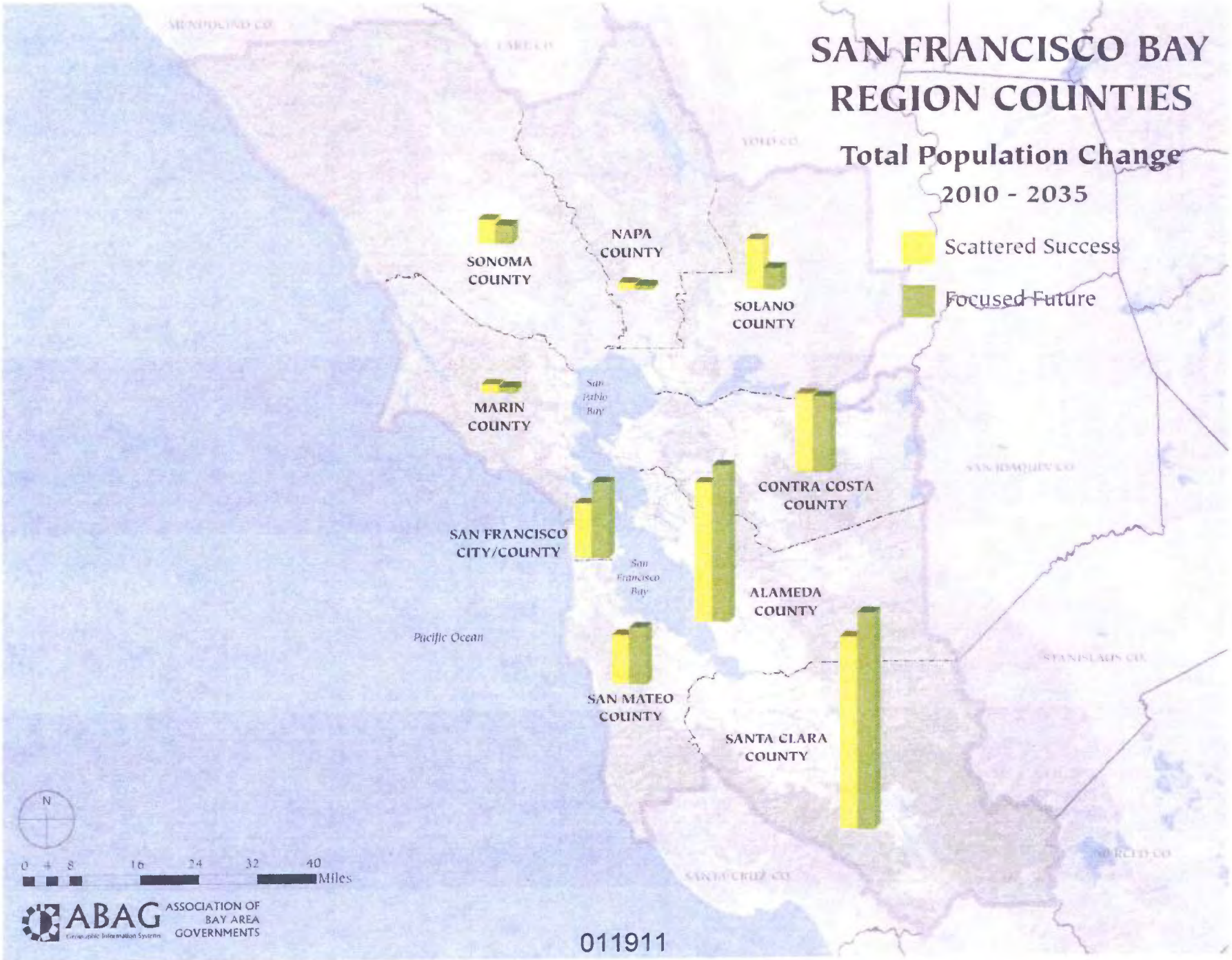


# EXHIBIT C

I-DEVINCENZI2



# TRANSPORTATION DEMAND MANAGEMENT

## TECHNICAL JUSTIFICATION

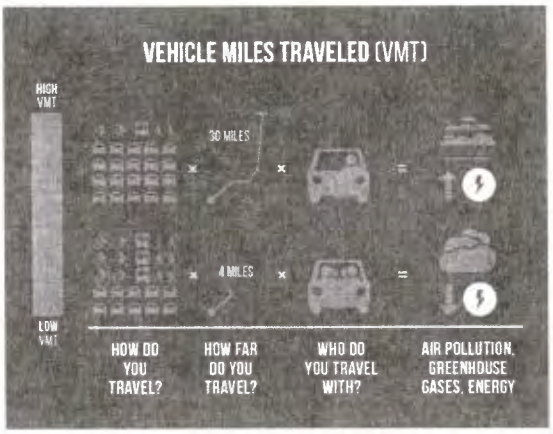
shift

JUNE 2016

SFMTA San Francisco Planning SAN FRANCISCO

### Vehicle Miles Traveled

Vehicle Miles Traveled measures the amount and distance vehicles would travel on the roadway as a result of a project or plan. An increase in Vehicle Miles Traveled results in an increase of emissions of air pollutants, including greenhouse gases, as well as increased consumption of energy. [4] Typically, development at a greater distance from other uses, located in areas with poor access to non-auto modes of travel, would generate more driving than one that is located proximate to other complementary uses and/or where there are transportation options other than the car.[5]




## Shift

**Encourage Sustainable Travel**. The Shift component of the Transportation Sustainability Program creates a TDM Program through an ordinance amending the Planning Code. TDM measures are recognized as effective in reducing Vehicle Miles Traveled generated by projects by supporting transportation choices, including walking, bicycling, public or private transit, car-share, carpooling and other sustainable modes. The TDM Program requires property owners to implement TDM measures that support project residents, tenants, employees, and visitors in making sustainable trip choices thereby reducing their Vehicle Miles Traveled.

The SHIFT component of the Transportation Sustainability Program is consistent with the approach being put forward by the Office of Planning and Research and SB 743, as well as numerous other local, regional, and state policies as described in Chapter 2 of the TDM Technical Justification. It is also consistent with best practices of other jurisdictions around the country, while being tailored to varying San Francisco settings.



[4] U.S. Environmental Protection Agency, *Our Built and Natural Environments 2nd Ed*, June 2013.
[5] Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 2016.

# Chapter 3

# Applicability and Targets

This chapter provides a justification for the TDM Program applicability, including exemptions and targets. In addition, this section describes a Cambridge, Massachusetts case study on which components of the TDM Program was modeled.

## Land Use Categories and Accessory Parking

Planning Code Section 169 lists the types of Development Projects that the TDM Program applies to. Each Development Project is required to meet a target. The target is based upon the land use(s) associated with the Development Project and the number of Accessory Parking spaces proposed for the land use. The more *Accessory Parking* proposed for a land use, the higher the target for the Development Project to achieve.

The rationale for tying the target to Accessory Parking is based on relevant literature and local data collection, discussed further in Chapter 4 of the TDM Technical Justification, which indicate that areas with more parking are associated with more overall vehicular traffic than areas with less parking. Similarly, as discussed further in Chapter 4 of the TDM Technical Justification, individuals who do not have dedicated offsite parking at their origins or destinations are less likely to drive than those who do. Therefore, more incentives and tools to support non-auto modes and disincentives to using personal vehicles are needed at a site with a greater amount of Accessory Parking spaces than a site with fewer Accessory Parking spaces to encourage sustainable travel and reduce Vehicle Miles Traveled. These incentives, disincentives, and tools that affect mode choice are TDM measures. This approach does not restrict the ability of a property owner to build Accessory Parking up to existing Planning Code requirements or allowances; instead, it provides flexibility to property owners in developing a TDM Plan to reduce Vehicle Miles Traveled that best fits the needs of the Development Project and neighborhood.

The purpose of trips made to land uses often varies. In order to simplify application of the TDM Program, definitions were classified into four land use categories based upon reducing Vehicle Miles Traveled from the primary trip generator associated with that land use.[14] The four land use categories were organized, based upon research, into categories representing a continuum from highest to lowest estimated number of vehicle trips per parking space provided for primary users (visitors and customers, employees, or residents): Land Use Category A represents uses with the highest rate of vehicle trips per parking space and Land Use Category D represents uses with the lowest rate of vehicle trips per parking space.



[14] Exceptions are schools and hospitals, where those trips and associated parking are much shorter in duration and are often a side trip within a larger tour. Therefore, the visitor/customer trips are more effectively influenced at the origin (e.g., home) and/or ultimate destination (e.g., work) of those tours. In addition, it may be necessary to accommodate driving trips for medical visits.

provision of off-street parking and the choice to drive among individuals traveling to or from the site (similar to the focus of one of the questions in the nine city United States study). Following data collection and an empirical review of the data, this research found that reductions in off-street vehicular parking for office, residential, and retail developments reduce the overall automobile mode share associated with those developments, relative to projects with the same land uses in similar contexts that provide more off-street vehicular parking.[51] In other words, more off-street vehicular parking is linked to more driving and that people without dedicated parking spaces are less likely to drive.

Based upon the recent research, besides Shuttle Bus Service, a reduced Parking Supply is the most effective TDM measure available in the menu. Therefore, for the purposes of the TDM Program, the maximum point value a Development Project could receive from the Parking Supply measure was assigned a high value of 11 points. Eleven options are provided for this TDM measure, depending upon the Development Project's parking supply compared to the neighborhood parking rate.

The neighborhood parking rate is number of existing Accessory Parking spaces provided per Dwelling Unit or per 1,000 square feet of non-residential uses for each transportation analysis zone within San Francisco. A full description of the methodology for estimating the neighborhood parking rate is included in Appendix B of the TDM Technical Justification document and may be refined over time. If a Development Project is parked at or below the neighborhood parking rate, the Development project would receive points for this TDM measure.[52]

Using the neighborhood parking rate as a basis for assigning points accounts for the variability in geography throughout San Francisco and the effect this can have on travel behavior. The purpose of the TDM Program is to reduce the Vehicle Miles Traveled that would be otherwise estimated to occur from new development (in SF-CHAMP or other transportation modeling software) based upon the new development's transportation analysis zone location. SF-CHAMP provides an estimate of Vehicle Miles Traveled at the geographic scale of a transportation analysis zone, but it does not include inputs for site level characteristics like TDM measures, including Accessory Parking supply. Although not an input into SF-CHAMP, based upon the recent research, the existing Accessory Parking supply within a transportation analysis zone has a relationship with the Vehicle Miles Traveled for that transportation analysis zone. Therefore, a new development would mostly likely not reduce Vehicle Miles Traveled as it relates to Parking Supply, if the new development is not parked at least at or below the neighborhood parking rate.

## Factors Rejected for Point Value Assignment

Other factors were considered in assigning point values, such as cost, other City policy goals, and Municipal Code requirements, but those factors were dismissed because they do not reflect the core purpose of the TDM Program of reducing Vehicle Miles Traveled. In regards to cost, the economics of each project will vary greatly as to whether the TDM measures selected for the project will result in an additional cost or cost savings. For example, the upfront cost of constructing a garage structure parking and underground parking is approximately $50,000 to $80,000 per space, respectively, in 2014

[51] Fehr and Peers, 2015b.

[52] In the future, as more research is conducted and as part of updates to the TDM Program Standards, Planning staff may recommend to the Planning Commission that Development Projects parked above the neighborhood parking rate should receive negative points.

# EXHIBIT D

I-DEVINCENZI2

San Francisco County Transportation Authority

1455 Market Street, 22nd Floor
San Francisco, California 94103
415.522.4800 FAX 415.522.4829
info@sfcta.org www.sfcta.org

# Memorandum

Date: 04.04.2016

To: Wade Wietgrefe, San Francisco Planning Department

Carli Paine, San Francisco Municipal Transportation agency

From: Drew Cooper, Michael Schwartz, San Francisco County Transportation Authority

Subject: Land Use Categories

The City and County of San Francisco recommends introduction of a Transportation Demand Management (TDM) ordinance which, if approved, will require developers to choose from a menu of improvements to reduce their project's impact on the transportation network through a reduction in vehicle miles traveled (VMT). While the goal of reduced VMT applies to all new development, the applicable measures and points target varies depending on the land use. With this in mind, the TDM Program (Program) has four (4) land use categories. Each use outlined in Section 102 of the Planning Code (Definitions) has been assigned to a category and must meet the requirements of that category.

The remainder of this memo describes the trips associated with the land use and parking spaces for each of the categories.

**Category A:** Land uses in Category A most closely reflect retail use. Sample land uses include formula retail, museums, entertainment venues, and grocery stores. Many Category A trips are associated with visitors and customers. These trips tend to be shorter in nature, and each parking space accommodates significantly more driving than parking spaces in other groups (see Attachment 1). TDM measures in this category are intended to reduce VMT from visitors and customers (as opposed to store employees), and the targets reflect the higher trip rate associated with each parking space.

**Category B:** Land uses in Category B most closely reflect office use. Sample land uses include Office, Child Care Facility, and School. While these uses may be associated with some visitor/customer trips, many of the trips will be made by employees and the TDM measures should focus on reducing employee related VMT. Since parking spaces associated with Category B land uses tend to have less turnover (and therefore lower VMT) than Category A, the Program assigns lower targets per parking space.

**Category C:** Projects in Category C reflect residential use. Parking spaces in Category C generate fewer trips than Category B, reflected in the Program targets. TDM measures for projects in this category target VMT reduction for residents.

**Category D:** Land uses in Category D are associated with the lowest amount of trip generation, due to lower employment density and a low rate of visitors/customers. Sample land uses in Category D include Manufacturing, Power Plant, and Shipyard. TDM measures for Category D target employee VMT reduction and Program targets are commensurately lower than all other categories.

Attachment

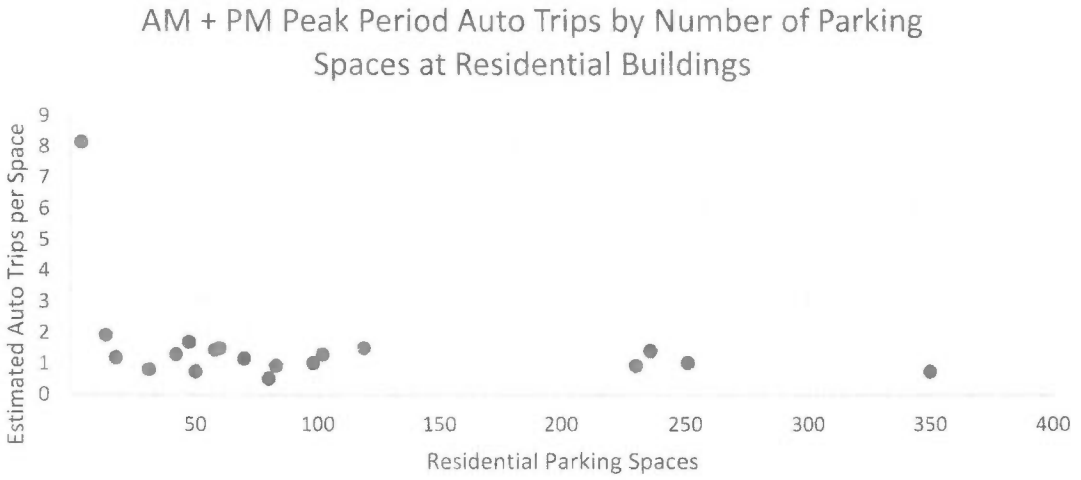
1. Estimated Auto Trips Per Parking Space by Land Use, Results of 2014/15 SF Field Survey

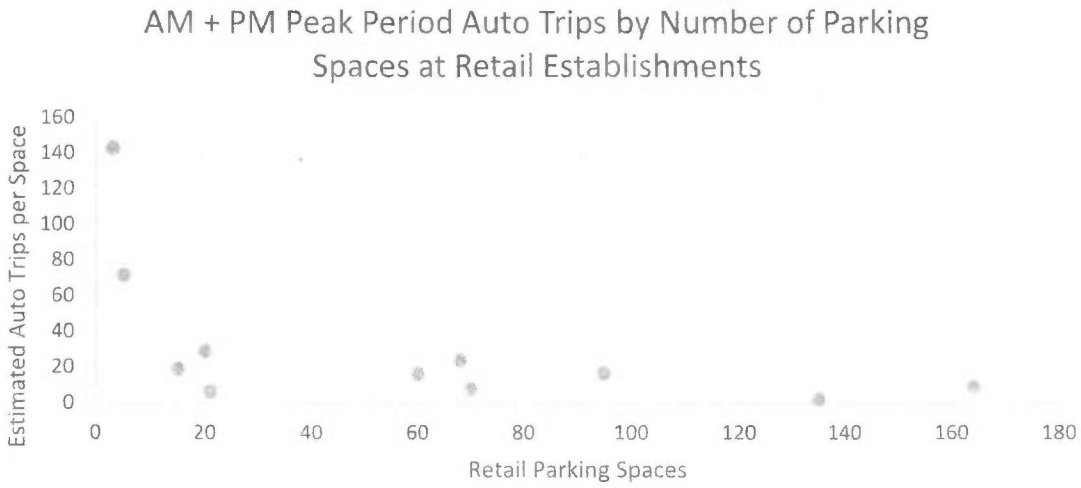
cc: A. Ben-Pazi, R. Schuett – Planning
M. Munowitch – SFMTA
S. Cleveland-Knowles, A. Ruiz-Esquide -- CAO
JC, RGR – File: TSP (TDM Ordinance)

Attachment 1

***Average Peak Period Auto Trips Per Parking Space***
***Summer 2014/15 SF Field Data Collection***

| | AM | PM | Combined |
|---|---|---|---|
| Residential | 0.37 | 0.50 | 0.87 |
| Retail | 3.75 | 9.87 | 13.61 |
| *Ratio -- Retail:Residential* | *10.03* | *19.71* | *15.58* |



# EXHIBIT E

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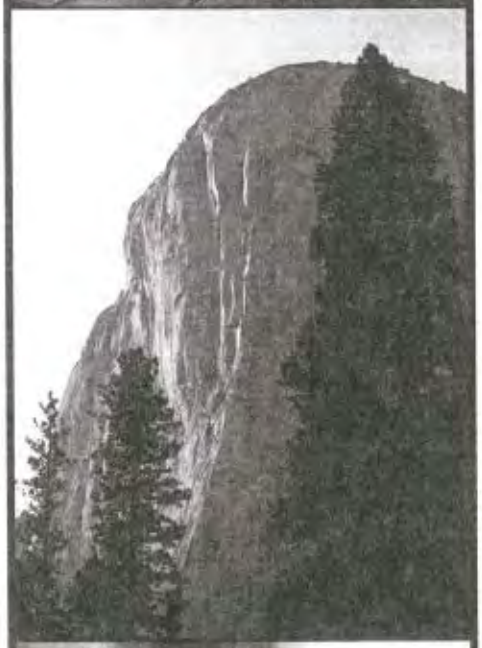
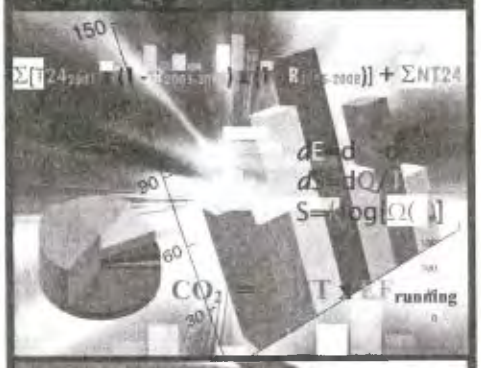
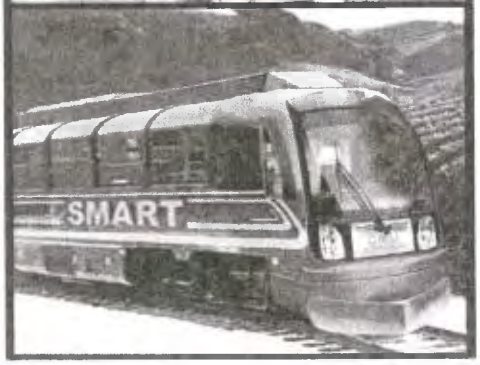
CAPCOA

CALIFORNIA
AIR
POLLUTION
CONTROL
OFFICERS
ASSOCIATION








# Quantifying Greenhouse Gas Mitigation Measures

A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures

August, 2010

***Lack of Detailed Information:*** The quantification methods provided in this report have been developed to allow them to be applied to a range of project conditions and still yield accurate and reliable results. In order to do this, the methods require data inputs that reflect the specific conditions of the project. Because the project has not yet been completed, however, certain information about the project will not be known and must be either estimated or assumed based on standard procedures. For example, at the time of the CEQA process a project proponent might know the number of residential dwelling units that will be in the project, but not know the actual square footage individual units will have. Similarly, while the project proponent may know a general type of non-residential land uses planned, these are often generalized categories such as retail and do not reflect the true diversity and range of source category parameters that would occur between the specific types of retail that the project eventually has. Nor can a project proponent predict specific appliances that will be in buildings or frequency of use. Further, most projects rely on generalized trip rate and trip lengths information that are not specific to the project; these estimates may over or underestimate the actual trip rates and trip lengths generated by the project. In each of these cases, estimates of future conditions are made based on accepted procedures and available data. This Report does not provide, or in any way alter, guidance on the level of detail required for the review or approval of any project. For the purposes of CEQA documents, the current CEQA guidelines address the information that is needed.[2]

The lack of precise and accurate data inputs limits the quality of the quantified project baseline and mitigated emissions, however. This limitation can be minimized to the extent the project proponent is able to provide better predictive data, or establish incentives, agreements, covenants, deeds, or other means of defining and restricting future uses to allow more precise estimates of the emissions associated with them. Some of these means of refining the data may also be creditable as mitigation of the project. The approval of any such enhancements of the data, or credit as mitigation, is at the discretion of the agency reviewing the project.

***Use of Case Studies:*** One method of enhancing the data available for a project is the use of case studies. Case studies generally have detailed information regarding a particular effect. However, there are limitations of using this information to quantify emissions in other situations since adequate controls may not have been studied to separate out combined effects. There may be features or characteristics in the case-study that do not translate to the project and therefore may over or underestimate the GHG emission reductions. For the most part, case studies were not used as the primary source in the development of the quantification methods in this report. Where case studies were used to enhance underlying data, the studies were carefully reviewed to ensure that appropriate controls were used and the data meet the quality requirements of this Report.

[2] See: California Natural Resources Agency: 2007 CEQA Guidelines – Title 14 California Code of Regulations, Sections 15125, 15126.2, 15144, and 15146.

at these levels based on empirical evidence.[4] Maximums are provided for the location/development type of the project. The Global Maximum values can be found in the top row of Chart 6-2.

These include:

- Urban: 75% VMT
- Compact Infill: 40% VMT
- Suburban Center (or Suburban with NEV): 20%
- Suburban: 15% (limited empirical evidence available)

*Specific Rules for Subcategories within Transportation-* Because of the unique interactions of measures within the Transportation Category, each subcategory has additional rules or criteria for combining measures.

❖ Land Use/Location Strategies – Maximum Reduction Factors: Land use measures apply to a project area with a radius of ½ mile. If the project area under review is greater than this, the study area should be divided into subareas of radii of ½ mile, with subarea boundaries determined by natural "clusters" of integrated land uses within a common walkshed. If the project study area is smaller than ½ mile in radius, other land uses within a ½ mile radius of the key destination point in the study area (i.e. train station or employment center) should be included in design, density, and diversity calculations. Land use measures are capped based on empirical evidence for location setting types as follows:[5]

- Urban: 65% VMT
- Compact Infill: 30% VMT
- Suburban Center: 10% VMT
- Suburban: 5% VMT

❖ Neighborhood/Site Enhancements Strategies – Maximum Reduction Factors: The neighborhood/site enhancements category is capped at 12.7% VMT reduction (with Neighborhood Electric Vehicles (NEVs)) and 5% without NEVs based on empirical evidence (for NEVs) and the multiplied combination of the non-NEV measures.

❖ Parking Strategies – Maximum Reduction Factors: Parking strategies should be implemented in one of two combinations:

- Limited (reduced) off-street supply ratios plus residential permit parking and priced on-street parking (to limit spillover), or
- Unbundled parking plus residential permit parking and priced on-street parking (to limit spillover).

[4] As reported by Holtzclaw, et al for the State of California. Note that CTR strategies must be converted to overall VMT reductions (from work-trip VMT reductions) before being combined with strategies in other categories.

[5] As reported for California locations in Holtzclaw, et al. "Location Efficiency: Neighborhood and Socioeconomic Characteristics Determine Auto Ownership and Use – Studies in Chicago, Los Angeles, and San Francisco." *Transportation Planning and Technology*. 2002, Vol. 25, pp. 1–27.

## 3.3 Parking Policy/Pricing

### 3.3.1 Limit Parking Supply

**Range of Effectiveness:** 5 – 12.5% vehicle miles travelled (VMT) reduction and therefore 5 – 12.5% reduction in GHG emissions.

**Measure Description:**

The project will change parking requirements and types of supply within the project site to encourage "smart growth" development and alternative transportation choices by project residents and employees. This will be accomplished in a multi-faceted strategy:

- Elimination (or reduction) of minimum parking requirements[52]
- Creation of maximum parking requirements
- Provision of shared parking

**Measure Applicability:**

- Urban and suburban context
- Negligible in a rural context
- Appropriate for residential, retail, office, industrial and mixed-use projects
- Reduction can be counted only if spillover parking is controlled (via residential permits and on-street market rate parking) [See PPT-5 and PPT-7]

**Baseline Method:**

See introduction to transportation section for a discussion of how to estimate trip rates and VMT. The $CO_2$ emissions are calculated from VMT as follows:

$$CO_2 = VMT \times EF_{running}$$

Where:

VMT = vehicle miles traveled
$EF_{running}$ = emission factor for running emissions

**Inputs:**

The following information needs to be provided by the Project Applicant:

- ITE parking generation rate for project site
- Actual parking provision rate for project site

[52] This may require changes to local ordinances and regulations.

**Mitigation Method:**

$$\% \text{ VMT Reduction} = \frac{\text{Actual parking provision} - \text{ITE parking generation rate}}{\text{ITE parking generation rate}} \times 0.5$$

**Assumptions:**

Data based upon the following references:

[1] Nelson\Nygaard, 2005. Crediting Low-Traffic Developments (p. 16) http://www.montgomeryplanning.org/transportation/documents/TripGenerationAnalysisUsingURBEMIS.pdf

All trips affected are assumed average trip lengths to convert from percentage vehicle trip reduction to VMT reduction (% vehicle trips = %VMT).

**Emission Reduction Ranges and Variables:**

| Pollutant | Category Emissions Reductions[53] |
|---|---|
| $CO_2e$ | 5 – 12.5% of running |
| PM | 5 – 12.5% of running |
| CO | 5 – 12.5% of running |
| NOx | 5 – 12.5% of running |
| $SO_2$ | 5 – 12.5% of running |
| ROG | 3 – 7.5% of total |

**Discussion:**

The literature suggests that a 50% reduction in conventional parking provision rates (per ITE rates) should serve as a typical ceiling for the reduction calculation. The upper range of VMT reduction will vary based on the size of the development (total number of spaces provided). ITE rates are used as baseline conditions to measure the effectiveness of this strategy.

Though not specifically documented in the literature, the degree of effectiveness of this measure will vary based on the level of urbanization of the project and surrounding areas, level of existing transit service, level of existing pedestrian and bicycle networks and other factors which would complement the shift away from single-occupant vehicle travel.

[53] The percentage reduction reflects emission reductions from running emissions. The actual value will be less than this when starting and evaporative emissions are factored into the analysis.

**Example:**

If the ITE parking generation rate for the project is 100 spaces, for a low range a 5% reduction in spaces is assumed. For a high range a 25% reduction in spaces is assumed.

- Low range % VMT Reduction = [(100 - 95)/100] * 0.5 = 2.5%
- High range % VMT Reduction = [(100 - 75)/100] * 0.5 = 12.5%

**Preferred Literature:**

To develop this model, Nelson\Nygaard [1] used the Institute of Transportation Engineers' *Parking Generation* handbook as the baseline figure for parking supply. This is assumed to be unconstrained demand. Trip reduction should only be credited if measures are implemented to control for spillover parking in and around the project, such as residential parking permits, metered parking, or time-limited parking.

**Alternative Literature:**

- 100% increase in transit ridership
- 100% increase in transit mode share

According to *TCRP Report 95, Chapter 18* [2], the central business district of Portland, Oregon implemented a maximum parking ratio of 1 space per 1,000 square feet of new buildings and implemented surface lot restrictions which limited conditions where buildings could be razed for parking. A "before and after" study was not conducted specifically for the maximum parking requirements and data comes from various surveys and published reports. Based on rough estimates the approximate parking ratio of 3.4 per 1,000 square feet in 1973 (for entire downtown) had been reduce to 1.5 by 1990. Transit mode share increased from 20% to 40%. The increases in transit ridership and mode share are not solely from maximum parking requirements. Other companion strategies, such as market parking pricing and high fuel costs, were in place.

**Alternative Literature Sources:**

[1] TCRP Report 95, Chapter 18: Parking Management and Supply: Traveler Response to *Transportation System Changes*. (p. 18-6)
http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_rpt_95c18.pdf

**Other Literature Reviewed:**

None

### 3.3.4 Require Residential Area Parking Permits

**Range of Effectiveness:** Grouped strategy. (See PPT-1, PPT-2, and PPT-3)

**Measure Description:**

This project will require the purchase of residential parking permits (RPPs) for long-term use of on-street parking in residential areas. Permits reduce the impact of spillover parking in residential areas adjacent to commercial areas, transit stations, or other locations where parking may be limited and/or priced. Refer to Parking Supply Limitations (PPT-1), Unbundle Parking Costs from Property Cost (PPT-2), or Market Rate Parking Pricing (PPT-3) strategies for the ranges of effectiveness in these categories. The benefits of Residential Area Parking Permits strategy should be combined with any or all of the above mentioned strategies, as providing RPPs are a key complementary strategy to other parking strategies.

**Measure Applicability:**

- Urban context
- Appropriate for residential, retail, office, mixed use, and industrial projects

**Alternative Literature:**

- -0.45 = elasticity of vehicle miles traveled (VMT) with respect to price
- 0.08% greenhouse gas (GHG) reduction
- 0.09-0.36% VMT reduction

*Moving Cooler* [1] suggested residential parking permits of $100-$200 annually. This mitigation would impact home-based trips, which are reported to represent approximately 60% of all urban trips. The range of VMT reductions can be attributed to the type of urban area. VMT reductions for $100 annual permits are 0.09% for large, high-density; 0.12% for large, low-density; 0.12% for medium, high-density; 0.18% for medium, low-density; 0.18% for small, high-density; and 0.12% for small, low-density. VMT reductions for $200 annual permits are 0.18% for large, high-density; 0.24% for large, low-density; 0.24% for medium, high-density; 0.36% for medium, low-density; 0.36% for small, high-density; and 0.24% for small, low-density.

**Alternative Literature References:**

[1] Cambridge Systematics. Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions. Technical Appendices. Prepared for the Urban Land Institute. http://www.movingcooler.info/Library/Documents/Moving%20Cooler_Appendix%20B_Effectiveness_102209.pdf

# EXHIBIT F

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# EXHIBIT G

SpotAngels
Find Free Parking On the Go
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# Laurel Village Shopping Center Parking

## 3445 California St, San Francisco, CA 94118, USA

PARKING OPTIONS (44)

- California Pacific Medical Center
  8 min walking
  Parking Garage
  $8
  for 2h
- 47-53 Manzanita Ave SF
  2 min walking
- 3490a California St SF
  2 min walking
  Free
- 3490a California St SF
  2 min walking
  Free
- 47-53 Manzanita Ave SF

# EXHIBIT H

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Article

# Death by a Thousand Curb-cuts: Evidence on the effect of minimum parking requirements on the choice to drive

*Transport Policy (2012)*

**Rachel R Weinberger**, *None*

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## Abstract

Little research has been done to understand the effect of guaranteed parking at home –in a driveway or garage—on mode choice. The research presented here systematically examines neighborhoods in the three New York City boroughs for which residential, off-street parking is possible but potentially scarce. The research is conducted in two stages. Stage one is based on a Google Earth© survey of over 2,000 properties. When paired with the City's tax lot database, that survey served as the basis to estimate on-site parking for New York City neighborhoods. With parking availability estimated, a generalized linear model based on census tracts as the unit of analysis, is used to estimate the maximum likelihood parameters that predict the proportion of residents who drive to work in the Manhattan Core. The research shows a clear relationship between guaranteed parking at home and a greater propensity to use the automobile for journey to work trips even between origin and destinations pairs that are reasonably well and very well served by transit. Because journey to work trips to the downtown, for most cities, and New York City is no exception, are the most easily served by transit we infer from this finding that non-journey to work trips are also made disproportionately from these areas of high on-site parking.

## Disciplines

Environmental Policy (http://network.bepress.com/social-and-behavioral-sciences/public-affairs-public-policy-and-public-administration/environmental-policy),
Infrastructure (http://network.bepress.com/social-and-behavioral-sciences/public-affairs-public-policy-and-public-administration/infrastructure),
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Urban Studies and Planning (http://network.bepress.com/social-and-behavioral-sciences/urban-studies-and-planning)

## Publication Date

2012

## Citation Information

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# EXHIBIT I

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# Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA

Implementing Senate Bill 743 (Steinberg, 2013)

January 20, 2016

**Residential and Office Projects**. A tour-based analysis is usually the best way to analyze VMT associated with residential and office projects. Where tour-based models are employed for office project analyses, because workplace location influences overall travel, either employee work tour VMT or VMT from all employee tours may be attributed to the employment center (and the same should be used to set the significance threshold). For this reason, screening maps (discussed in more detail below) using tour-based regional travel demand models can be used where they are available. Where tour-based tools or data are not available for all components of an analysis, an assessment of trip VMT can serve as a reasonable proxy. For example, where research-based evidence on the efficacy of mitigation measures is available for trip-based, then estimating the threshold, analyzing unmitigated project VMT, and mitigation would all need to be undertaken using a trip-based methods, for an apples-to-apples comparison. In this case, home based trips can be the focus for analysis of residential projects; home-based work trips can be the focus of the analysis for office projects.

For office projects that feature a customer component, such as a government office that serves the public, a lead agency can analyze the customer VMT component of the project using the methodology for retail development (see below).

Models and methodologies used to calculate thresholds, estimate project VMT, and estimate VMT reduction due to mitigation should be comparable. For example:

- A tour-based estimate of project VMT should be compared to a tour-based threshold, or a trip-based estimate to a trip-based VMT threshold.
- Where a travel demand model is used to estimate thresholds, the same model should also be used to estimate trip lengths as part of estimating project VMT
- Where only trip-based estimates of VMT reduction from mitigation are available, a trip-based threshold should be used

**Retail Projects**. Lead agencies should usually analyze the effects of a retail project by assessing the change in total VMT, because a retail projects typically re-route travel from other retail destinations. A retail project might lead to increases or decreases in VMT, depending on previously existing retail travel patterns.

**Considerations for All Projects**. Lead agencies should not truncate any VMT analysis because of political or other boundaries. CEQA requires environmental analyses to reflect a "good faith effort at full disclosure." (CEQA Guidelines § 15151.) Thus, where methodologies exist that can estimate the full extent of vehicle travel from a project, the lead agency should apply them to do so. Analyses should also consider both short- and long-term effects on VMT.

### General Principles to Guide Consideration of VMT Thresholds

The CEQA Guidelines set forth the general rule for determining significance:

> The determination of whether a project may have a significant effect on the environment calls for **careful judgment** on the part of the public agency involved, **based to the extent possible on scientific and factual data**. An ironclad definition of significant effect is not always possible because **the significance of an activity may vary with the setting**. For example, an activity which may not be significant in an urban area may be significant in a rural area.

(CEQA Guidelines § 15064(b) (emphasis added).) SB 743 directs OPR to establish specific "criteria for determining the significance of transportation impacts of projects[.]" (Pub. Resources Code § 21099(b)(1).)

As noted above, CEQA Guidelines Section 15064(b) confirms that context matters in a CEQA analysis. Further, lead agencies have discretion in the precise methodology to analyze an impact. (*See Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 409 ("the issue is not whether the studies are irrefutable or whether they could have been better" ... rather, the "relevant issue is only whether the studies are sufficiently credible to be considered" as part of the lead agency's overall evaluation).) Therefore, lead agencies may perform multimodal impact analysis that incorporates those technical approaches and mitigation strategies that are best suited to the unique land use/transportation circumstances and specific facility types they are evaluating. For example, pedestrian safety need not be addressed on the mainline portion of a limited access freeway that prohibits pedestrian travel. Likewise, where multimodal transportation is to be expected, analysis might address safety from a variety of perspectives.

To assist in the determination of significance, many lead agencies rely on "thresholds of significance." The CEQA Guidelines define a "threshold of significance" to mean "an identifiable **quantitative, qualitative or performance level** of a particular environmental effect, non-compliance with which means the effect will ***normally*** be determined to be significant by the agency and compliance with which means the effect ***normally*** will be determined to be less than significant." (CEQA Guidelines § 15064.7(a) (emphasis added).) Agencies may adopt their own, or rely on thresholds recommended by other agencies, "provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (*Id.* at subd. (c).) Substantial evidence means "**enough relevant information** and reasonable inferences from this information that a fair argument can be made **to support a conclusion**, *even though other conclusions might also be reached.*" (*Id.* at § 15384 (emphasis added).)

Thresholds of significance are not a safe harbor under CEQA; rather, they are a starting point for analysis:

> [T]hresholds cannot be used to determine automatically whether a given effect will or will not be significant. Instead, thresholds of significance can be used only as a measure of whether a certain environmental effect "will normally be determined to be significant" or "normally will be determined to be less than significant" by the agency. ... In each instance, notwithstanding compliance with a pertinent threshold of significance,

> the agency must still consider any fair argument that a certain environmental effect may be significant.

(*Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1108-1109.)

Finally, just as the determination of significance is ultimately a "judgment call," the analysis leading to that determination need not be perfect. The CEQA Guidelines describe the standard for adequacy of environmental analyses:

> An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to **make a decision which intelligently takes account of environmental consequences**. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is **reasonably feasible**. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The **courts have looked not for perfection** but for **adequacy**, **completeness**, and a **good faith effort** at full disclosure.

(CEQA Guidelines § 15151 (emphasis added).)

These general principles guide OPR's recommendations regarding thresholds of significance for vehicle miles traveled set forth below.

## D. Recommendations Regarding Significance Thresholds

Section 21099 of the Public Resources Code states that the criteria for determining the significance of transportation impacts must promote: (1) reduction of greenhouse gas emissions; (2) development of multimodal transportation networks; and (3) a diversity of land uses.

Various state policies establish quantitative greenhouse gas emissions reduction targets. For example:

- Assembly Bill 32 requires statewide greenhouse gas reductions to 1990 levels by 2020, and continued reductions beyond 2020.
- Pursuant to Senate Bill 375, the California Air Resources Board establishes greenhouse gas reduction targets for metropolitan planning organizations to achieve based on land use patterns and transportation systems specified in Regional Transportation Plans and Sustainable Community Strategies. Targets for the largest metropolitan planning organizations range from 13% to 16% reduction by 2035.
- Executive Order B-30-15 sets a GHG emissions reduction target of 40 percent below 1990 levels by 2030.
- Executive Order S-3-05 sets a GHG emissions reduction target of 80 percent below 1990 levels by 2050.
- Executive Order B-16-12 specifies a GHG emissions reduction target of 80 percent below 1990 levels by 2050 specifically for transportation.

than significant transportation impact. (In other words, a project that generates greater than 85 percent of regional per capita VMT, but less than 85 percent of city-wide per capita VMT, would still be considered to have a less than significant transportation impact.) Residential development in unincorporated county areas generating VMT that exceeds 15 percent below VMT per capita in the aggregate of all incorporated jurisdictions in that county, *and* exceeds 15 percent below regional VMT per capita, may indicate a significant transportation impact. These thresholds can be applied to both household (tour-based) VMT and home-based (i.e. trip-based) VMT assessments.

**Recommended threshold for office projects:** A project exceeding a level of 15 percent below existing *regional VMT per employee* may indicate a significant transportation impact.

Office projects that would generate vehicle travel exceeding 15 percent below existing VMT per employee for the region may indicate a significant transportation impact. In cases where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county. Tour-based analysis of office project VMT, for example development of a tour-based screening map, typically should consider either total employee VMT or employee work tour VMT. Where tour-based information is unavailable for threshold determination, project assessment, or assessment of mitigation, home-based work trip VMT may be used throughout the analysis to maintain and "apples-to-apples" comparison.

**Recommended threshold for retail projects:** A net increase in total VMT may indicate a significant transportation impact

Because new retail development typically redistributes shopping trips rather than creating new trips,[7] estimating the total change in VMT (i.e. the difference in total VMT in the area affected with and without the project) is the best way to analyze a retail project's transportation impacts.

By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Lead agencies generally, therefore, may presume such development creates a less than significant transportation impact. Regional-serving retail development, on the other hand, which can lead to substitution of longer trips for shorter ones, might tend to have a significant impact. Where such development decreases VMT, lead agencies may consider it to have a less than significant impact.

---

framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure").)

[6] As used in these recommendations, the term "regional" refers to the metropolitan planning organization or regional transportation planning agency boundaries within which the project would be located.

[7] Lovejoy et al. 2012.

accessibility created by transportation infrastructure investments (whether at the project or program level), the resulting changes in VMT might provide an appropriate basis for tiering.

*Mitigation and alternatives.*

Induced VMT has the potential to reduce or eliminate congestion relief benefits, increase VMT, and increase other environmental impacts that result from vehicle travel. If those effects are significant, the lead agency will need to consider mitigation or alternatives. In the context of increased travel induced by capacity increases, appropriate mitigation and alternatives that a lead agency might consider include the following:

- Tolling new lanes to encourage carpools and fund transit improvements
- Converting existing general purpose lanes to HOV or HOT lanes
- Implementing or funding travel demand management offsite
- Implementing Intelligent Transportation Systems (ITS) strategies to improve passenger throughput on existing lanes

Tolling and other management strategies can have the additional benefit of preventing congestion and maintaining free-flow conditions, conferring substantial benefits to road users as discussed above.

## F. Analyzing Safety Impacts Related to Transportation

Public Resources Code section 21099 suggests that while automobile delay is not an environmental impact, lead agencies may still evaluate project impacts related to safety. The CEQA Guidelines currently suggest that lead agencies examine projects' potential to "[s]ubstantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)".

As with any other potential impact, CEQA requires lead agencies to make a judgment call "based to the extent possible on scientific and factual data." (State CEQA Guidelines § 15064(b).) Also like any other potential impact, "the significance of an activity may vary with the setting." (Ibid.) Lead agencies must base their evaluations of safety on objective facts, and not personal or subjective fears. The purpose of this section is to review some relevant considerations in evaluating potential transportation-related safety impacts.

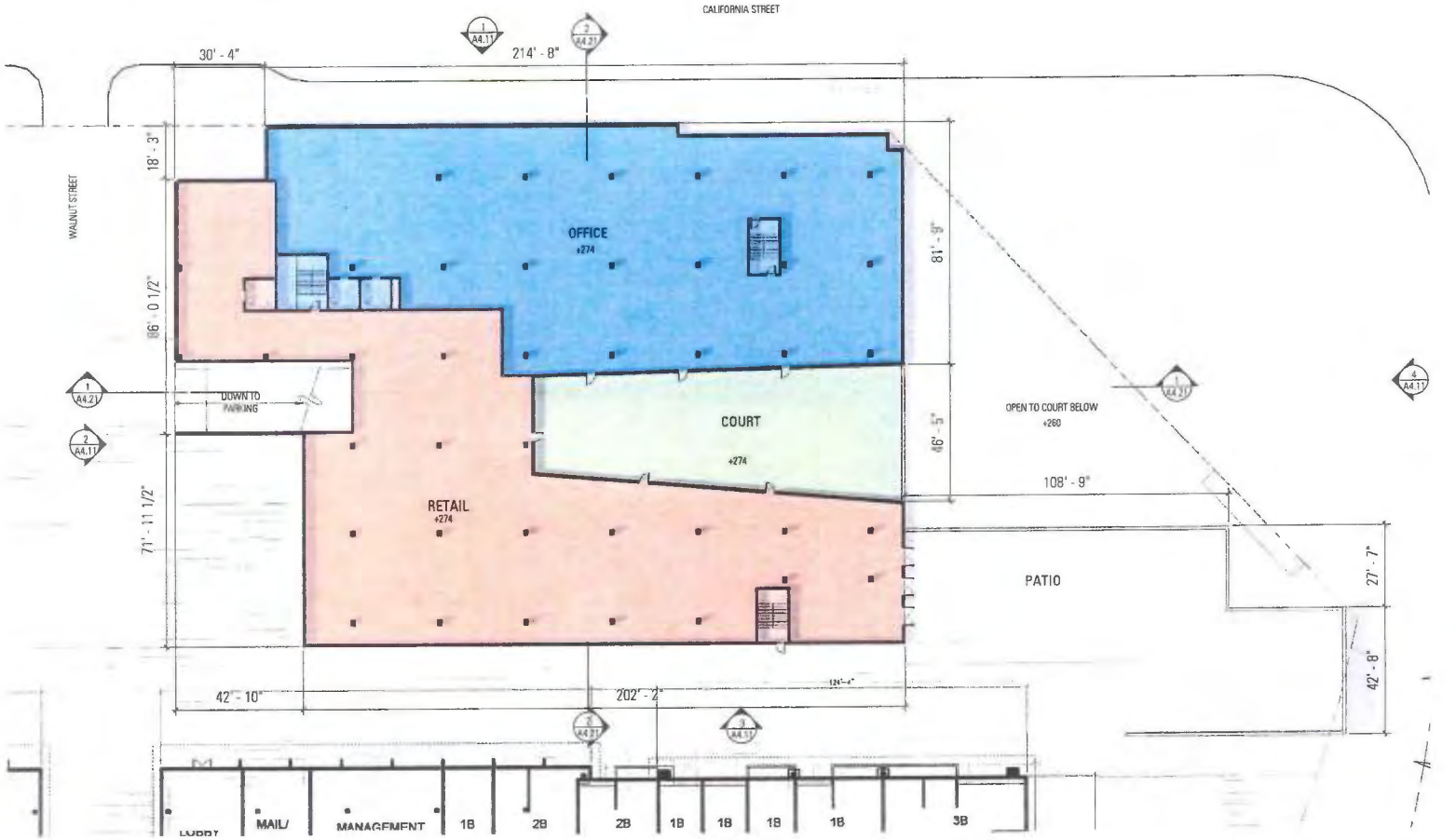
Transportation by its nature involves some degree of collision risk. Every project will affect transportation patterns, and as a result may involve some redistribution of that risk.

Lead agencies may consider whether a project may cause substantially unsafe conditions for various roadway users. This section is not intended to provide a comprehensive list of potential transportation safety risks, but rather guidance on how to approach safety analysis given numerous potential risks.

Generally:

- Safety analysis in CEQA should focus on risk of fatality or injury, rather than property damage.
- Lead agencies should focus on concerns that affect many people, not just an individual.

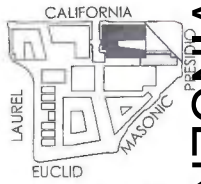
# EXHIBIT J




PLAN LEVEL 1 +274'

CHILDCARE USABLE
CHILDCARE B.O.H.
PARKING
RETAIL USABLE
RETAIL B.O.H.
OFFICE
OFFICE, CORE
RESIDENTIAL HOMES
RESIDENTIAL CORE
LANDSCAPED ROOF

LEGEND INTENDED FOR USE ONLY WHERE PLANS ARE REPRODUCED IN COLOR.




I-DEVINCENZI2

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

"WALNUT" BUILDING PLANS - LEVEL

SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

08.17.2017
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

**A4.03**

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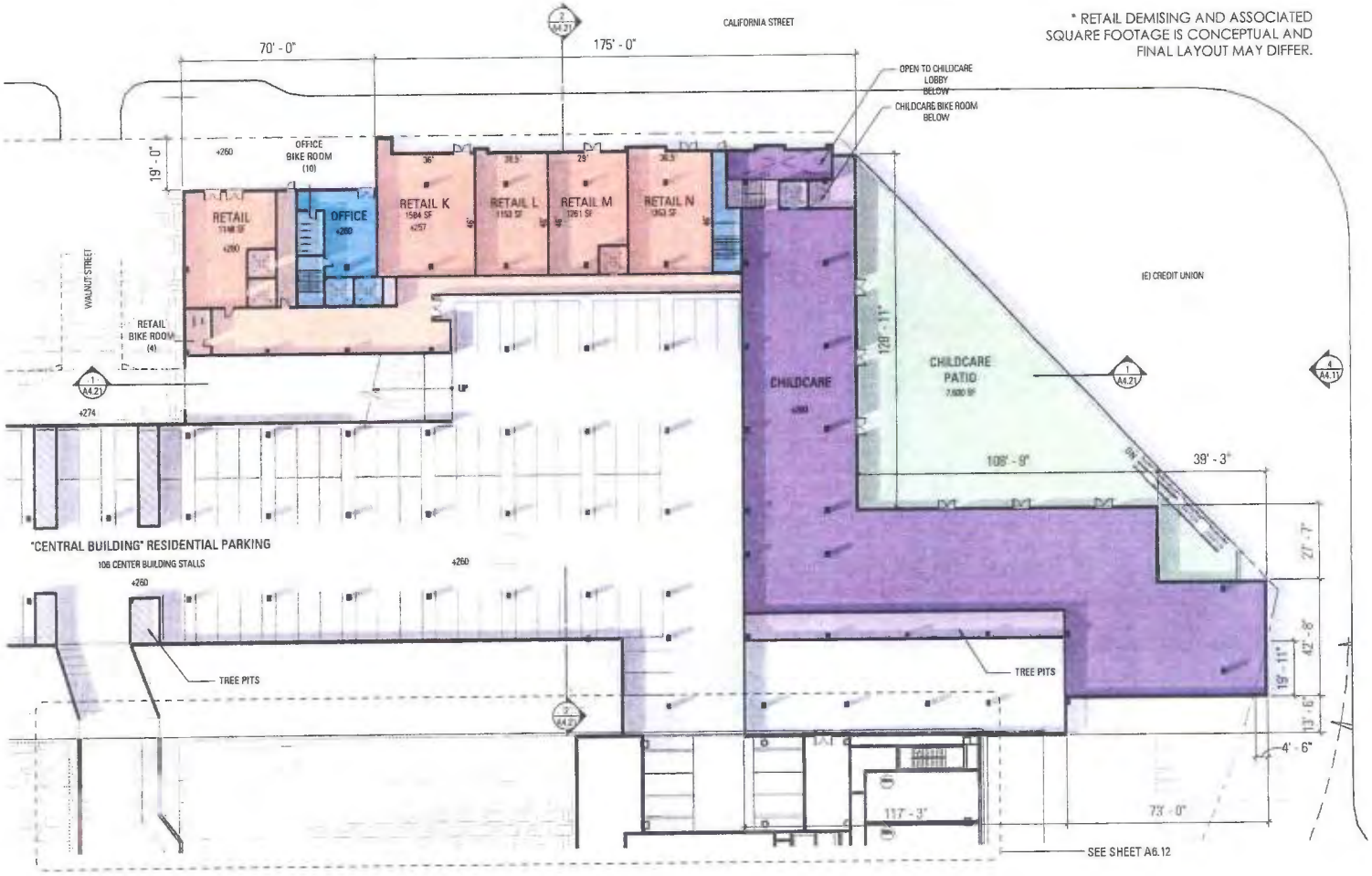


## PLAN LEVEL B1 +260'

SEE SHEET A1.03 FOR MORE INFORMATION

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

JAMES CORNER FIELD OPERATIONS | ARUP | BAR architects | JENSEN | SCB

"WALNUT" BUILDING PLANS - B

08.17.2017
PLANNING APPLICATION SUBMITTAL

0 10' 20' 40' 60'

A4.02

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3333 California Street, Mixed-use Project

Devincenzi Comments on Draft Environmental Impact Report

Planning Department Case No: 2015-014028ENV

# Exhibits to Transportation Comments Part 2, Exhibits K-V

# EXHIBIT K

CITY PLANNING COMMISSION

RESOLUTION NO. 4109

RESOLVED, That Proposal No. Z-52.62.2, an application to change the Use District Classification of the hereinafter described parcel of land from a First Residential District to a Commercial District, be, and the same is hereby APPROVED; subject to the stipulations submitted by the applicant and set forth herein:

Commencing at a point on the S/L of California Street distant thereon 187 feet west of the W/L of Presidio Avenue (produced), thence westerly on said line 707.375 feet to a curve to the left having a radius of 15 feet, thence 23.562 feet measured on the arc of the curve to the left to the E/L of Laurel Street, thence southerly on the E/L of Laurel Street 127.227 feet to the curve to the left having a radius of 60 feet, thence 77.113 feet measured on the arc of the curve to the left to a curve to the right having a radius of 120 feet, thence 149.153 feet measured on the arc of the curve to the right to a curve to the right having a radius of 4033 feet, thence 388.710 feet measured on the arc of the curve to the right to a curve to the left having a radius of 20 feet, thence 35.186 feet measured on the arc of the curve to the left to the northwest line of Euclid Avenue, thence N 73° 12' E on the northwest line of Euclid Avenue 312.934 feet to a curve to the left having a radius of 65 feet, thence 42.316 feet, measured on the arc of the curve to the left to the northwesterly line of Masonic Avenue (proposed extension), thence N 35° 54' E, 380.066 feet to the arc of a curve to the left having a radius of 425 feet, thence 254.176 feet measured on the arc of the curve to the left, thence N 52° 36' 29.74" W, 252.860 feet to the point of commencement. Being the major portion of Lot 1A, Block 1032, containing 10.2717 acres, more or less.

RESOLVED, FURTHER, That this change shall be and at all times remain contingent upon observance by the owner or owners and by his or their successors in interest of the conditions contained in the following stipulations as to the use of the land affected.

1. The character of the improvement for commercial purposes of the subject property, or any portion thereof, shall be limited to a building or buildings designed as professional, institutional or office buildings, including service buildings which are normally accessory thereto.

2. The aggregate gross floor area of all such buildings, calculated exclusive of cellars, of basement areas used only for storage or services incidental to the operation and maintenance of a building, and of indoor or other covered automobile parking space, shall not exceed the total area of the property allotted to such use.

3. For each five hundred square feet of gross floor area in such buildings, calculated as in stipulation 2, above, there shall be reserved and kept available on the property or the portion thereof allotted to such use, one off-street automobile parking space, or equivalent open space suitable for the ultimate provision of such parking space as needed for the accommodation of users of the premises.

4. No such building, other than a minor accessory building having a floor area of not more than 400 square feet, shall occupy any portion of the property which is within 100 feet of the line of the Euclid Avenue boundary thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

5. If the subject property, or any portion thereof, is developed as a site for residential buildings, such buildings shall be limited as follows:

a. No residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

b. No dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than thirty three hundred (3300) square feet, nor shall any such dwelling cover more than fifty percent (50%) of the area of such parcel or be less than twelve (12) feet from any other such dwelling, or be set back less than ten (10) feet from any presently existing or future public street, or have a height in excess of forty (40) feet, measured and regulated as set forth in pertinent section of the Building Code of the City and County of San Francisco.

c. No residential building in other portions of the subject property shall have a ground coverage in excess of fifty percent (50%) of the area allotted to such building.

6. Development of the subject property, or of any separate portion thereof, for commercial use as stipulated herein, shall include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building or buildings there shall be submitted to the City Planning Commission, for approval as to conformity with these stipulations, a site plan showing the character and location of the proposed

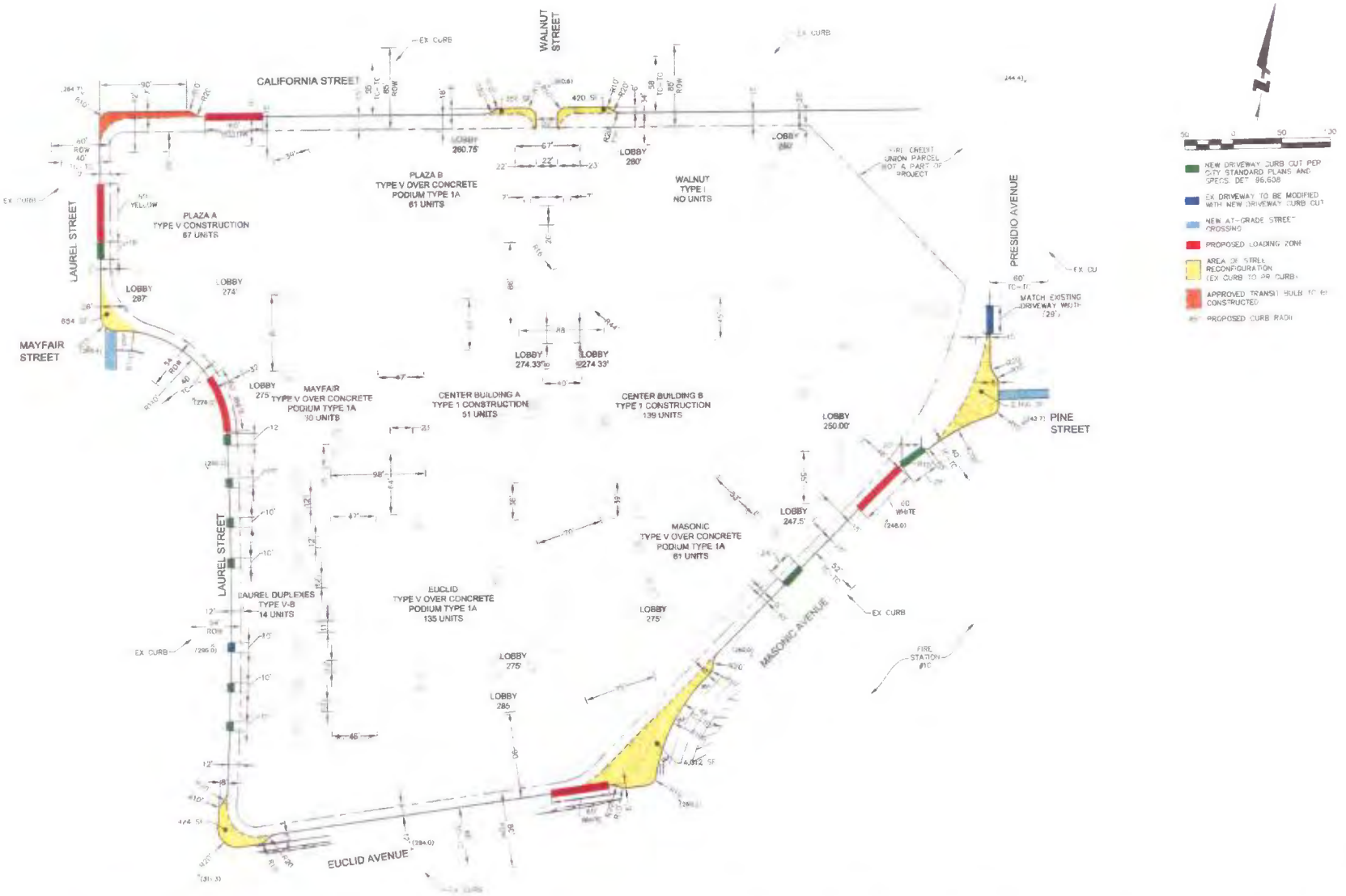
building or buildings, and related parking spaces and landscaped areas upon the property, or upon such separate portion thereof as is allotted to such building or buildings. It shall be understood that approval of any such plan shall not preclude subsequent approval by the Commission of a revised or alternative plan which conforms to these stipulations.

I hereby certify that the foregoing resolution was adopted by the City Planning Commission at its special meeting on November 13, 1952, and I further certify that the stipulations set forth in the said resolution were submitted in a written statement placed on file.

Joseph Mignola, Jr.
Secretary

Ayes : Commissioners Kilduff, Towle, Devine, Williams
Noes : None
Absent: Commissioners Brooks, Lopez, Prince
Passed: November 13, 1952

# EXHIBIT L




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

PROPOSED SITE PLAN AND HORIZONTAL CONTROL PLAN

08.17.2017
PLANNING APPLICATION SUBMITTAL

C2.02

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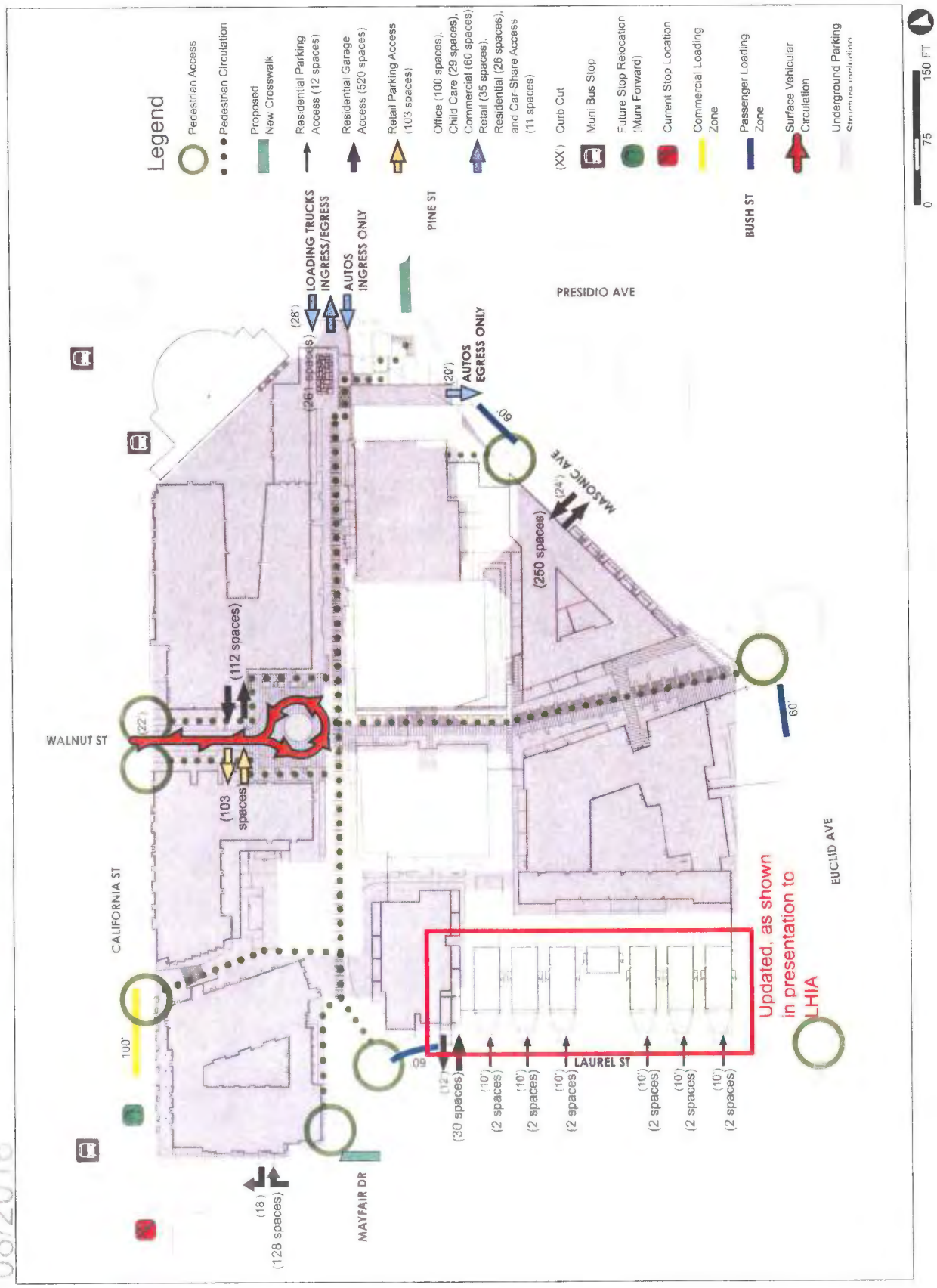


PRELIMINARY DESIGN
08/2018




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

JAMES CORNER FIELD OPERATIONS · ARUP · BAR architects · JENSEN · SCB

SITE DIAGRAM - SITE ACCESS

08.17.2017
PLANNING APPLICATION SUBMITTAL

0 25' 50' 100' 150'

L1.01

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# EXHIBIT M

Gmail

Kathy Devincenzi <krdevincenzi@gmail.com>

# Transportation analysis zones

2 messages

**Wietgrefe, Wade (CPC)** <wade.wietgrefe@sfgov.org>
To: "krdevincenzi@gmail.com" <krdevincenzi@gmail.com>

Fri, Nov 16, 2018 at 10:44 AM

Hello Kathy,

The below webpage includes documentation for the SF-CHAMP model, the model we use to estimate vehicle miles traveled by transportation analysis zone. The executive summary under model documentation discusses the transportation (aka traffic) analysis zones.

https://www.sfcta.org/modeling-and-travel-forecasting

**Wade Wietgrefe, AICP, Principal Planner**
**Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9050 | www.sfplanning.org

San Francisco Property Information Map

**Kathy Devincenzi** <krdevincenzi@gmail.com>
To: wade.wietgrefe@sfgov.org

Fri, Nov 16, 2018 at 12:05 PM

Thank you very much.
[Quoted text hidden]

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# San Francisco Travel Demand Forecasting Model Development

*Executive Summary*

# Final Report




*prepared for*
**San Francisco County Transportation Authority**

*prepared by*
**Cambridge Systematics, Inc.**

*Updated by:*
**San Francisco County Transportation Authority**

*October 1, 2002*

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# 1.0 Introduction

## Overview

The San Francisco County Travel Demand Forecasting Model (San Francisco Model) was developed for the San Francisco County Transportation Authority (SFCTA) to provide detailed forecasts of travel demand for various planning applications. These applications included developing countywide plans, providing input to microsimulation modeling for corridor and project-level evaluations, transit planning, and neighborhood planning. The objective was to accurately represent the complexity of the destination, temporal and modal options and provide detailed information on travelers making discrete choices. These objectives led to the development of an activity-based model that uses a synthesized population as the basis for decision-making rather than zonal-level aggregate data sources. The activity-based model has nine primary components.

Most of the model components were estimated using household survey data collected by the Metropolitan Transportation Commission (MTC) for San Francisco residents only. Each model component was calibrated using various observed data sources, then the full model was validated using traffic count and transit ridership data for each of five time periods. The model is applied as a focused model, which combines trip-making from the entire Bay Area (derived from the MTC's BAYCAST trip tables) with the travel demand from San Francisco residents produced by the activity-based model.

## Contents of this Report and Related Reports

This executive summary discusses all nine model components and provides an overview of the data required to run the model. It is designed to provide an overview of the process and a brief summary of the results. There were numerous technical reports developed during the process; these should be referred to for more detail. The primary reports are listed below:

- Data Development
- Population Synthesis
- Vehicle Availability Model
- Tour and Trip Generation and Time-of-day Models
- Destination Choice Models

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# 3.0 Data Development

There were three primary areas of data development: data collected as part of the stated preference survey, the development of the synthetic population data, and data used as input to the San Francisco model. There are individual reports for each of these areas. An overview of these data is provided below.

## Stated Preference Survey

The stated preference survey was conducted for 609 households in San Francisco in June, 1999 to collect data on transit and auto travel characteristics. The primary focus of the survey was to collect preference data on transit reliability, crowding and personal security and auto parking availability and cost. The survey was conducted by Corey, Canapary and Galanis and the design of the survey was completed by Mark Bradley Research and Consulting, with other members of the Cambridge Systematics team.

The purpose of the survey was to provide data that can be incorporated into the mode choice model estimation process, in the areas of transit reliability, crowding and personal security and auto availability and cost. The analysis of these data was conducted as part of the mode choice model process.

## Synthetic Sample Generation

A prototypical sample of persons and households was generated for San Francisco County using three primary data sources: the U.S. Census Public Use Microdata Sample (PUMS), the population and employment data developed for San Francisco County, and other socioeconomic data developed for the MTC. There is a hierarchy of zonal systems for these three datasets:

- Six Public Use Microdata Areas (PUMAs), containing
- 127 MTC Traffic Analysis Zones (MTAZs), containing
- 766 San Francisco Traffic Analysis Zones (SFTAZs).

Figure 3.1 shows the boundaries of the SFTAZs and MTAZs. The PUMAs are not shown because they are relatively large areas used to preserve the anonymity of long form respondents.

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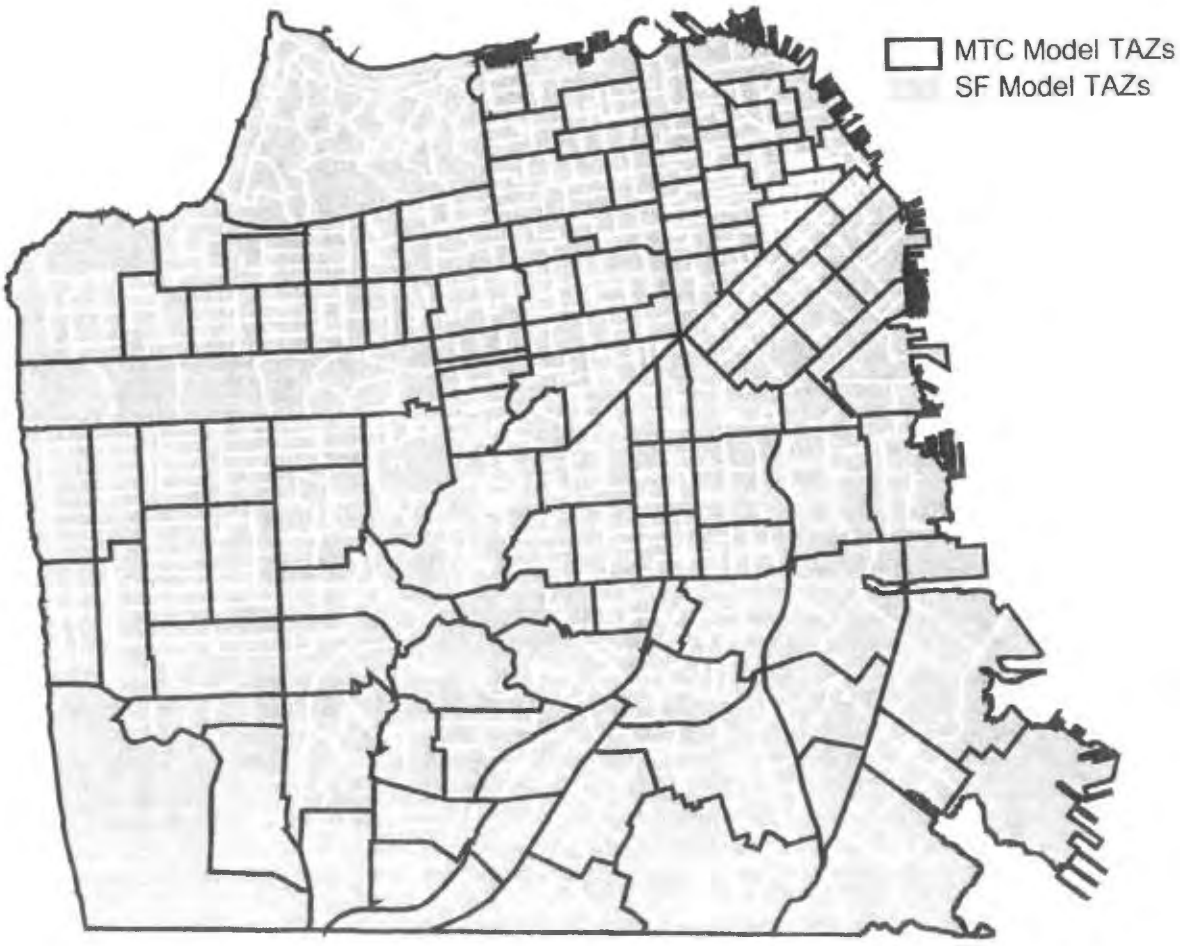
The prototypical sample contains marginal distributions across three dimensions:

- Household size and number of workers (nine categories);
- Household income (four categories); and
- Age of head of household (three categories).

There are a total of 108 possible combinations of the above dimensions (9x4x3). The nine categories for household size/number of workers were chosen because they efficiently distinguish between important household life-cycle groups. The specific breakdowns for income and age were chosen because they correspond to categories that are available in the MTC future year land use files, so updating the populations to future years can be kept consistent with MTC breakdowns within zones. Also, all of these categorizations are compatible with the Census tables available in the Census Transportation Planning Package (CTPP) Urban Element.

**Figure 3.1 Map of San Francisco Model & MTC regional model TAZ boundaries**



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# Other Model Data

## Aggregate Zonal Data

Some of the data used by the model components are aggregate zonal data developed as either necessary inputs or because these are desired for testing planning policies. Table 3.1 provides a list of these aggregate variables and the model components that use these variables. The socioeconomic data were developed from parcel-level data aggregated to traffic analysis zones and adjusted to match control totals, as follows:

- The San Francisco Planning Department provided a current parcel database and a current business and employment database. The parcel database provides current estimates of residential units at the block and lot level and the business and employment database contains current estimates of employment by type at the block and lot level. These are aggregated to the traffic analysis zones.
- The San Francisco Planning Department, the Presidio Trust, the San Francisco Redevelopment Agency and the Port of San Francisco maintain lists of new development projects under construction, approved, and under review, as well as information on development potential for major area plans. These are used to allocate forecast data by traffic analysis zone.
- The Association of Bay Area Governments' *Projections '98* was used as a control total for countywide forecasts of population and employment. The San Francisco Planning Department has subsequently updated these forecasts to reflect the *Projections 2000* data.

The employment data in San Francisco uses a different categorization compared to the MTC data. The original MTC databases classified employment by six categories – retail, service, other, agricultural, manufacturing and trade. The new San Francisco socioeconomic databases classified employment by a different set of six categories:

- Cultural, institutional and educational services (CIE),
- Medical and health services (MED),
- Management, information, and professional services (MIPS),
- Production, distribution and repair (PDR),
- Retail and entertainment (RETAIL), and
- Visitor (VISITOR).

These employment categories were defined by the San Francisco Planning Department in the 1998 Citywide Land Use Study. Most models retained the distinctive employment categories, but some used a common set of categories across all areas, where basic information on the SIC codes falling under each category was used to regroup the MTC categories into four San Francisco categories – PDR, MIPS, Retail and Service.

Pedestrian environment factors (PEF) were developed to evaluate urban design projects and estimate changes in pedestrian and bicycle modal options. PEFs will allow local planners to:

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## Vehicle Availability Model

The vehicle availability model is a multinomial logit model that predicts the vehicles available in each household for each San Francisco resident. Given the location of the household, the characteristics of the household members, and the primary work place location of each of its workers, the model estimates the probabilities of having none, one, two, or three or more vehicles available.

A large number of households (42.9%) in San Francisco in 1990 had only one vehicle and the average number of vehicles for all households was 1.16. The number of vehicles is defined as automobiles plus trucks; also available in the survey data are the numbers of motorcycles, mopeds and bicycles owned by the household, but these were not included in the number of vehicles available for household travel. The model was limited to four alternatives (0, 1, 2, or 3+ vehicles available) because of the relatively small number of households with four or more vehicles available (1.8%). The average number of vehicles in the fourth alternative (households with three or more vehicles available) was 3.36.

Information was assembled from a number of sources to create the estimation data set. For example, the household survey came from MTC, population and employment datasets were developed by the consultant team working with Planning Dept data, Pedestrian Environment Factors were developed by SFCTA staff with assistance from staff of other city departments and consultant team, and parking costs based on small survey undertaken by consultant team. The structure of this data set is a file with one record for each San Francisco household in the travel survey, with data on income, location, and the age and employment status of the various household members. (Driver's license status was not used in estimation, because it is not available in the PUMS Census data used to apply the models.) The household file was supplemented by adding zonal data, level of service data, and accessibility data. The zonal data included population, households, and employment by type, area in square miles, area type, pedestrian environment factor, and parking costs. The level of service data included both auto and transit travel times and costs between the residence zone and each household member's workplace. The accessibility data included measures of how many jobs of various types could be reached by transit or car in various travel time bands.

## The Full Day Pattern Models

As Table 4.1 indicates, the full day pattern model predicts:

- The purpose class of the primary home-based tour (work, education, other, or none)
- The trip chain type of the primary home-based tour (1 or more stops before, after, neither, or both)
- The number of home-based secondary tours (0, 1, or 2+)

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# 6.0 Model Validation

Details of the model validation results are in the corresponding model validation report. Highlights of these results are presented here for travel behavior and trip assignment.

## Travel Behavior Validation

Travel behavior was validated by comparing travel data in a household travel survey to related travel data in the travel demand forecasting model. For the validation of the 1998 SFCTA regional travel demand forecasting model, we compared the trip data in the 1990 Census, the 1990 MTC household survey data with the same data in the model.

The model components were calibrated individually using various observed data sources, including the decennial census, household surveys, observed traffic counts and transit ridership, vehicle registrations, and many other sources. The specific sources used to calibrate each individual model are described below. This effort involved calibrating each model separately, then reviewing highway and transit assignment results for each of the five time periods to make additional adjustments in the model components. The adjustments were all made to constants within the models, there were no adjustments to model coefficients. Highlights of results of the calibration are summarized below for each model component.

### Vehicle Availability

The vehicle availability model was calibrated primarily on two key variables, number of workers per household and super-district, using the 1990 Census as the primary source of observed data. A second validation test was used to evaluate the total number of vehicles estimated by the vehicle availability model compared to Department of Motor Vehicle (DMV) estimates of auto registrations. These data were different by 5 percent. Unfortunately, the 1990 MTC survey, which was used to estimate the model, contained different results for vehicle availability than the 1990 Census. Since, the 1990 Census has a much larger sample size; these data were used to calibrate the vehicle availability model. The results, therefore, have indirect effects on the market segmentation of autos and workers that were carried out in the mode split model.

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## Full-Day Pattern Tour Models

The full-day pattern tour models were calibrated by converting tours to trips and comparing these to the 1996 MTC household survey of San Francisco and Bay Area residents, expanded to match the 1998 population. The MTC survey trips were summarized as only those weekday trips in the survey that had an origin and destination within San Francisco County. The comparison of trips was developed from the full-day pattern tour model by reallocating the following "trips" from each "tour" for comparison purposes. The 1996 MTC Survey was used because the number of trips within San Francisco County was very low in the 1990 MTC Survey because of under-reporting of trips that occurred in this survey. The under-reporting of trips is not consistent across time periods or across trip purposes, which may have influenced model estimation that was based on the 1990 MTC survey. The differences between trips by time period was confirmed with initial assignments by time periods using the un-calibrated San Francisco model that revealed the off-peak time periods were significantly under-estimated compared to traffic counts. The vast majority of under-reporting of trips in the 1990 MTC survey were in other tours. A comparison of the calibrated San Francisco model trips to the 1996 MTC survey by tour type and time of day shows that the all trips by tour type and by time of day are within +/- 10 percent compared to the 1996 MTC survey.

Trip rates per household were compared by trip purpose and time of day. Trip rates overall are similar, but the trips per household by trip purpose are quite different. The San Francisco model differentiates between trips to work or school with an intermediate stop from those without an intermediate stop and thus has fewer trips identified as work or school trips and many more trips identified as non-home-based. The comparison of trip rates across time period is reasonable, except that early AM and evening time periods are somewhat under-estimated compared to the MTC survey. This is most likely a result of the model estimation process, which was based on the 1990 MTC survey that showed significantly fewer trips in these time periods.

## Destination (Primary and Intermediate Stop) Choice Models

The destination choice models were calibrated against the 1990 MTC survey data for primary destinations by purpose and trip length frequency distributions. The results reflect very reasonable allocation of destinations among four areas of the City and those destinations located outside the City. Another evaluation of work locations is the estimate of employment that results from the work location model compared to actual employment by neighborhood. Because some of these data were not actually observed, these results were considered reasonable when compared to estimated values by neighborhood. The biggest differences were the two neighborhoods in the Core business district, which were underestimating employment, but calibration results also show that the destinations in the core are within three percent for each tour type and are actually overestimated in these results.

The destination choice model was also calibrated by comparing trip length and duration frequency distributions. The observed trip lengths are derived from the 1990 MTC survey and reported as the average time and distance to/from the primary destination. These results

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show reasonable average trip lengths for all tour types. Trip duration frequency distributions were evaluated to determine reasonable by tour purpose. Observed and estimated values of trip duration by travel time increment reflect reasonable comparisons.

The validation of the intermediate stop choice model was challenging because similar models of destination choice have not included separate validation of the intermediate stop choice component for comparison. The validation test was to review the total tour length by tour purpose compared to the observed values. Distance was selected as the primary validation test for this model to isolate the location of the destination from the congestion effects during a particular time period. The results of this validation test are that both work and other tours are over-estimated slightly by the model, while work-based tours are under-estimated. Additional calibration adjustments to try and reconcile these differences were not pursued because further adjustments would have negatively impacted the results of the highway assignments by time period.

## Mode Choice (Tour and Trip) Models

The tour and trip mode choice models were calibrated by tour purpose. Alternative-specific constants for each mode were adjusted to match observed modal shares from the 1990 MTC Household Survey. The structure of the activity-based models require that tour models are calibrated first to match tours by mode and market segment, then trip models are calibrated to match trips by trip mode and tour mode. The trips resulting from applying the calibrated alternative-specific constants were then assigned to highway and transit networks and compared to observed traffic counts and transit boardings by mode. The calibration results for tour and trip modes show a very close match between estimated and adjusted observed tours and trips by mode and purpose.

Initially, estimated transit boardings were discovered to be much higher than observed boardings, particularly for local bus and MUNI Metro transit modes. There are four possible reasons for the transit over-estimation; there may be too many trips generated by the pattern models (too many trips going in to mode choice); the transfer rate may be too high; the calibration targets observed in the 1990 MTC survey may be incorrect; or, the observed transit boardings may be too low.

A comparison of estimated versus observed traffic volumes on the highway network confirmed that the number of trips generated by the pattern models was reasonable when compared to independent estimates of travel. An analysis of the estimated transfer rates also confirmed that the number of estimated transfers for San Francisco residents is reasonable. Therefore, it was concluded that either the transit calibration target values generated from the household survey were too high or the observed transit boardings are low. Because the transit boardings are calculated annually by MUNI, they were held constant and both the observed and estimated transit shares were adjusted to better match boardings.

# EXHIBIT N

San Francisco County Transportation Authority

PLAN. FUND. DELIVER.

## DATA

The SFCTA DataMart includes data and reports of interest to the technical as well as general community. SFCTA maintains this information as part of ongoing transportation planning activities. [*Disclaimer: This data should be used for planning purposes only.*]

## DATAMART CATEGORIES

- SF-CHAMP Model Documents and Data
- Statistics about San Francisco.
- Survey Data and Reports.
- Geographic Information System (GIS) maps and data.

For modeling and/or GIS related information, please send an email to data@sfcta.org (mailto:data@sfcta.org).

The Transportation Authority does not collect traffic counts nor maintain the City's GIS database.

Please contact MTA (http://www.sfmta.com/cms/rtraffic/trafficrelatedindx.htm) for traffic counts and datasf.org (http://datasf.org/) for GIS files for the GIS database.

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# SF-CHAMP 5 - FROGGER - San Francisco's Newly-updated Travel Model

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No notes for slide

WHAT IS SF-CHAMP? San Francisco's Chained Activity Modeling Process A regional, activity-based travel demand model SF-C...

- > Show the geometric expansion of years x #projects x version

> Don't want to spend a ton recoding the same project, exactly the same way, unnecessarily
People are very error-prone and often we had to re-run scenarios b/c of minor network coding inconsistencies (not even nec. Errors)
Dependencies need to be explicitly represented somewhere, as opposed to building a BRT (in the transit files) w/out the bus lane (in the highway files)

# EXHIBIT O

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

# Executive Summary
## Transportation Impact Analysis Guidelines – Update
### HEARING DATE: SEPTEMBER 28, 2017

| | |
|---|---|
| *Project Name:* | **Transportation Impact Analysis Guidelines for Environmental Review – Update** |
| *Staff Contact:* | Manoj Madhavan, (415) 575-9095<br>manoj.madhavan@sfgov.org |
| *Reviewed by:* | Wade Wietgrefe, (415) 575-9050<br>wade.wietgrefe@sfgov.org |
| *Recommendation:* | **None – Informational Only** |

## PURPOSE OF HEARING:

The Planning Department uses the Transportation Impact Analysis Guidelines for assessing project's transportation impacts as part of the California Environmental Quality Act. The department is undergoing comprehensive updates to the guidelines, which the department last updated in 2002. The purpose of this informational hearing is to provide an understanding on the transportation topics within the guidelines, a brief overview of the update, status of the update, feedback sought, and the anticipated outcomes and schedule.

The public can find more information and sign up to receive notifications from the department about updates here: http://sf-planning.org/transportation-impact-analysis-guidelines-environmental-review-update#resources.

## THE WAY IT IS NOW:

The Environmental Planning division within the Planning Department reviews projects for potential impacts on the environment, a process known as environmental review. The Planning Department conducts environmental review pursuant to the California Environmental Quality Act (CEQA). As part of environmental review, the Planning Department reviews background technical studies, such as transportation impact studies, to assess a project's effects on the physical environment.

These background technical studies support the conclusions of the environmental impact evaluation and guide decision-makers during project approval. To assist in the preparation of transportation impact studies, the Planning Department provides to consultants and city staff a guidance document, the Transportation Impact Analysis Guidelines. The Planning Department periodically updates the guidelines, with the last update in 2002.

The current guidelines updated and revised the Guidelines for Environmental Review: Transportation Impacts (July, 1991) and Interim Transportation Impact Analysis Guidelines for Environmental Review (January 2000). The current guidelines cover the following transportation topics (in the order presented in the guidelines):

- Traffic
- Transit
- Parking
- Pedestrian
- Bicycle
- Freight Loading and Service
- Passenger Loading
- Construction

To assess these impacts, the department estimates how many trips people in newer developments may take, the ways they travel, and their common destinations based on the findings of the Citywide Travel Behavior Survey - Employees and Employers (May, 1993); the Citywide Travel Behavior Survey - Visitor Travel Behavior (August, 1993); revolving five-year estimates from US Census, American Community Survey data; San Francisco County Transportation Authority San Francisco Chained Activity Model, which is based upon, among other sources, observed behavior from California Household Travel Survey (2010-2012), and major San Francisco transportation studies.

The guidelines are just that. The Planning Commission does not formally adopt the guidelines. The department may use the guidelines for multiple projects, but the department has discretion on applying specifics within the guidelines on a project by project basis. The guidelines provide basic details regarding methodologies and standards, but individual transportation study scopes of work are required to provide a level of detail tailored to fit the size and complexity of transportation issues associated with particular projects. Once the department approves a scope of work, the specific direction contained within that scope will provide a more precise focus than that which appears in the guidelines.

Since 2002, the department has instituted various updates to the conditions, data, and methodology within the guidelines. Records of these updates exist in various materials. One substantial example of updates that occurred was a March 2016 Planning Commission resolution that removed automobile delay from CEQA and added vehicle miles traveled as a transportation criterion. Since that time, the state has not issued subsequent guidance and the department has taken a leadership role in working with other jurisdictions on updates to their own transportation criteria. The state also changed the CEQA Guidelines to remove parking, by itself, as a significant impact under CEQA.

Also since that time, San Francisco has experienced changes in the demographics of the population, the types of new jobs, and the cost of housing, among other variables that affect travel behavior. Some of these changes create greater constraints on our transportation systems, including more competition for curb space. One of the major changes has been with emerging mobility services and technologies that have changed the way some people travel (using transportation network companies such as Uber and Lyft) and interact with goods (home deliveries). These changes also affect the percentages of how people travel (known as mode splits in the transportation analysis methodology). For example, we understand anecdotally that people may be shifting from using their own vehicles or transit to instead use transportation network companies such as Uber and Lyft.

## THE WAY IT WOULD BE:

The department is in the midst of updating the guidelines comprehensively. The purpose of the update is to achieve high quality deliverables, meaningful analysis, efficient reviews, and better project outcomes through clear standards, methodology, and criteria; understandable, transparent, and predictable process; updated mitigation measures, designs, outcomes, and policies; user-friendly figures; and illustrative examples of project analysis.

To address some of the changes since 2002 described in earlier paragraphs, San Francisco has undertaken a substantial amount of planning and policy work the last 15 years. For example, the San Francisco Municipal Transportation Agency was only three months old when the department last updated the guidelines; now the SFMTA includes a planning division. Over these years, interagency coordination to address issues has also improved. This includes coming together on things like transportation ordinances; developing land use and transportation area plans together; creating an inter-agency team that reviews projects compliance with the better streets plan; and embarking on a long-range transportation vision for San Francisco. Some of these planning and policies changes have affected the CEQA transportation review process. For example, our analysis has placed greater emphasis on safety, in reaction to San Francisco's Vision Zero commitments. On the other hand, the work of these agencies and some of these policies result in fewer projects with significant transportation impacts and sometimes avoid them altogether. Therefore, the department is focusing the guidelines updates on addressing CEQA issues and not focusing on other issues that San Francisco can better address through policies, programs, and projects.

### Potential Updates

This update may change process for transportation review, thresholds of significance, and analysis methodology concerning transportation impacts. It may also affect the transportation review process. At this point in time, staff is considering the following substantive updates to the following topics (in the order the department will present the topics in the guidelines):

- Process – scoping out topics from transportation review earlier in the process based upon the characteristics of the project, site, and surroundings (e.g., through a checklist)
- Walking/Accessibility– Assessing the need to conduct a quantitative capacity analysis and update definitions and examples of hazards and accessibility impediments.
- Bicycling– Assessing the need to update definitions and examples of hazards and accessibility impediments.
- Transit – Assessing the need to conduct a quantitative capacity analysis and revisiting the need, methodology and thresholds for transit delay.
- Emergency Access – Update definitions and examples of inadequate emergency access.
- Loading – Refine estimates of passenger and commercial loading demand, attempting to account for rise in for-hire vehicles and e-commerce deliveries.
- Vehicle Miles Traveled/Induced Auto Travel – Potential quantification of the relationship between parking supply and induced automobile travel.
- Traffic Hazards – Update definitions of types of traffic hazards as well and standards that can be implemented to potentially avoid traffic hazards (which may be incorporated into walking/accessibility and bicycling).
- Construction – Consideration of the effects of excavation on overall project construction and the resulting duration/intensity of construction phases.

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- Parking – Further updates that reflect Senate Bill 743, including potentially a checklist or map-based approach for when projects will not require a parking demand and supply estimate and secondary effect analysis.

## PROCESS

For this effort, the department is undertaking a few different efforts to inform the updates, as described below.

### Travel Demand

Substantial data collection and analysis is currently underway, primarily at newer development sites. This data collection will result in the creation of refined estimates of how many trips people in newer developments take, the ways they travel, and their common destinations.

The department contracted with a transportation consulting firm, Fehr &Peers, to develop a methodology for collecting data and updating the travel demand methodology used in the guidelines. Fehr & Peers has collected the following data and are in the process of analyzing and interpreting this data in order to update:

- The number of trips people in newer developments take using 24-hour person counts using cameras at all access points to 81 sites across San Francisco (including 19 office, 11 hotel, 30 retail, and 22 residential sites);
- The estimates of passenger and commercial loading demand, using 24-hour time lapse recordings (5-minute resolution) at one designated loading zone for 70 sites; and
- The way people travel (using transit, car, bike etc.) and their destinations, using PM peak period (3PM – 7PM) intercept surveys (i.e., by intercepting people to ask questions) at 72 sites.

The department will review the results of the analysis and determine what estimates to incorporate into the guidelines update or whether the department or others will need to collect additional data to provide such estimates.

### Kick-Off Meeting and Survey

The department held a kick-off meeting for the guidelines update on July 27, 2017. We invited several local and regional government agencies (i.e., the SF Fire Department, SF Police Department, SF Municipal Transportation Agency, SF Public Works, SF Public Utilities Commission, SF Department of Public Health, SF Office of Community Investment and Infrastructure, University of California – SF, Mayor's Office of Disability and Mayor's Office and Community and Workforce Development, SF County Transportation Authority, Caltrans, BART, Caltrain, SamTrans, and AC Transit) and environmental planning and transportation planning consultants.

At the meeting, the department presented an overview of the guidelines update and a topic by topic technical breakdown of current guidelines and what the department is considering updating in terms of analysis methodology and thresholds of significance. Following the presentation, attendees could attend breakout sessions for each topic to provide technical approach feedback. We also followed up with a survey soliciting general feedback, as well as adding questions soliciting specific technical feedback on each topic based on what we heard from attendees at the kick-off meeting. We received approximately 30 responses to the follow-up survey when we closed the feedback period on August 25, 2017.

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From the kick-off meeting and survey, we received feedback about some recurring themes, which are themes we regularly encounter from members of the public commenting on CEQA documents: how to analyze the impacts of Transportation Network Companies (e.g., loading and vehicle miles traveled), loading issues, particularly related to people with disabilities and senior citizens, and project's compliance with various codes and policies.

### Planning Commission Hearing

One of the basic purposes of CEQA is to inform decision makers and the public about the potential, significant environmental effects of activities *before* decision makers decide to approve or deny a project. The decision making process since 2002 has likely become more complicated. However, the fundamental purposes of CEQA have not changed. Therefore, a goal of the outcomes from the guidelines update is to provide informative analysis to the Planning Commission and the public regarding the CEQA transportation impacts of projects. For this hearing, we are soliciting feedback on how the department can do just that. Members of the public can provide feedback at the Planning Commission Hearing or by sending an email to CPC.TransportationReview@sfgov.org until by 5 PM on October 20, 2017.

### Future

Based upon feedback from the Planning Commission at this hearing, the public by October 20, and earlier outreach efforts, the department will summarize feedback received into a memorandum outlining which topics the department is considering as part of the guidelines update. The department will categorize feedback not related to CEQA and will forward that feedback to agencies who may be responsible for addressing it. In addition, the department will continue to engage on the guidelines updates consultants (e.g., brownbags) and San Francisco agencies, particularly the San Francisco Municipal Transportation Agency and San Francisco County Transportation Authority, and regional and state transportation agencies as relevant.

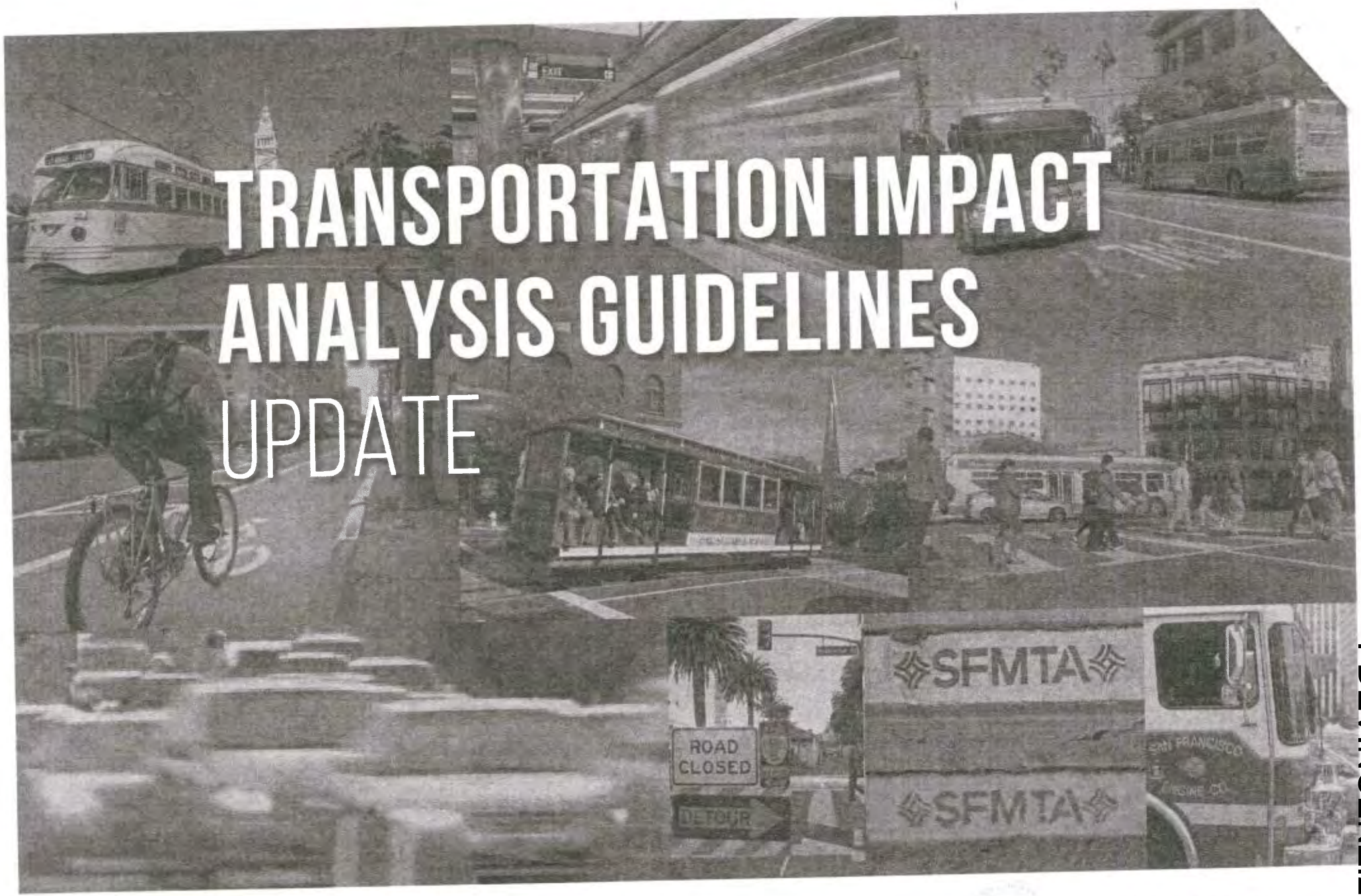
The department will issue a series of memorandums in 2017 and 2018 that provide updates to topics within the guidelines. Staff will be posting these memorandums, as well as other relevant materials, to this webpage: http://sf-planning.org/transportation-impact-analysis-guidelines-environmental-review-update#resources.

## REQUIRED COMMISSION ACTION

Informational item. No action required.

# EXHIBIT P

# TRANSPORTATION IMPACT ANALYSIS GUIDELINES UPDATE




**Wade Wietgrefe, AICP**
Transportation Team Manager

**Manoj Madhavan**
Transportation Team Lead Planner

San Francisco Planning

Planning Commission Informational Update: September 28, 2017

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# WHAT HAS CHANGED SINCE 2002





UBER

BAY AREA BikeShare

lyft

| | BETWEEN 1/1/2003 AND 1/1/2017 |
|---|---|
| SF Population | +92k |
| Bay Area Population | +900k |

Source: California Dept. of Finance



| | BETWEEN 10/2002 AND 9/2016 |
|---|---|
| SF Jobs | +149k |
| Professional/ Business | +75k |
| Education/ Health | +35k |
| Leisure/ Hospitality | +27k |

Source: SF City Scorecard





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# TRANSPORTATION NETWORK COMPANIES (TNCs)




TNCs are vehicles!

Icons Source: The Noun Project

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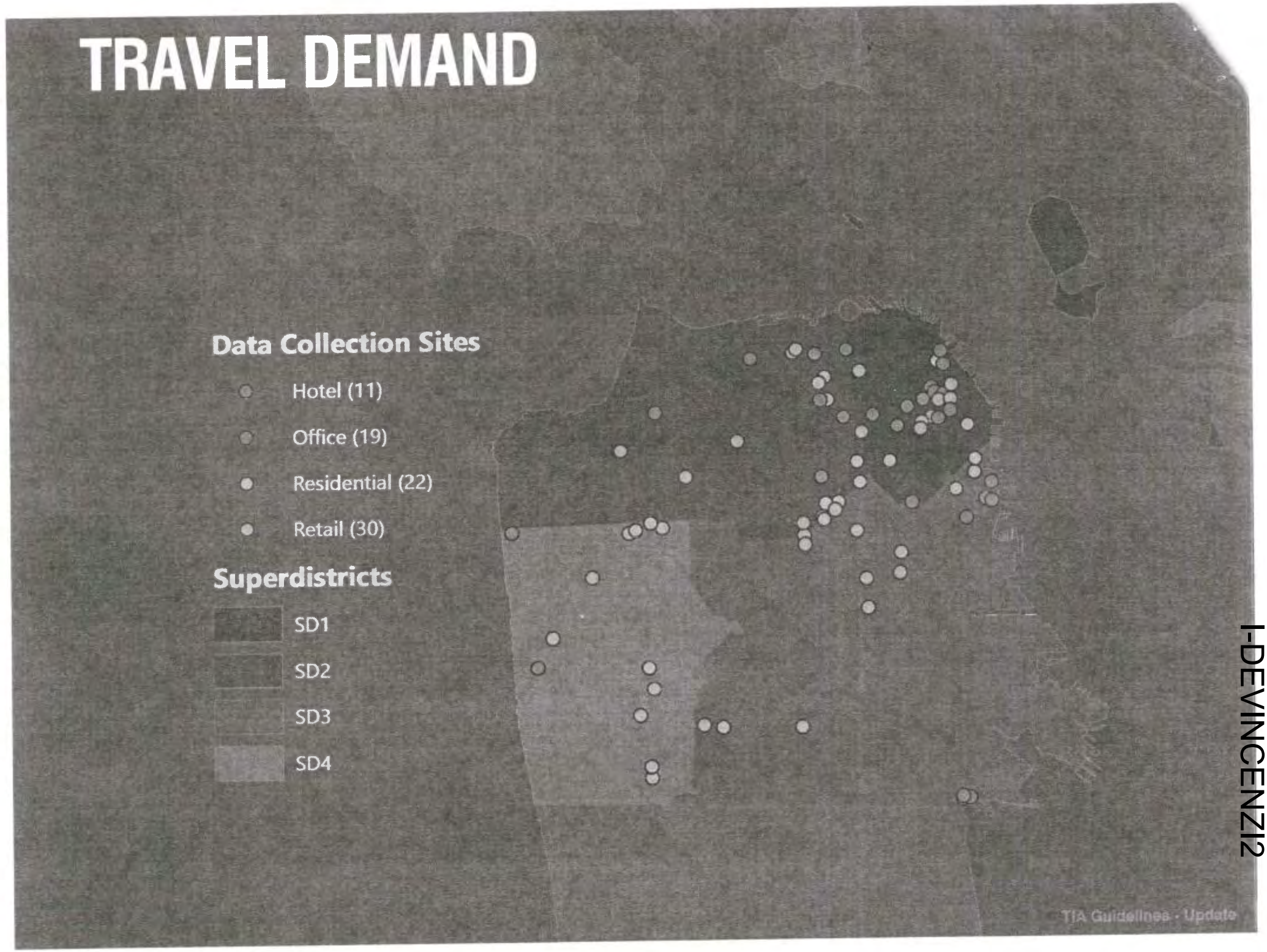
# TRAVEL DEMAND



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# EXHIBIT Q

San Francisco County Transportation Authority

PLAN. FUND. DELIVER.

EMERGING MOBILITY | TNCS AND CONGESTION

HOME (//WWW.SFCTA.ORG/EMERGING-MOBILITY)

EMERGING MOBILITY STUDIES (//WWW.SFCTA.ORG/EMERGING-MOBILITY/STUDIES)

FAQS (//WWW.SFCTA.ORG/EMERGING-MOBILITY/FAQ)

RIDE-HAIL/TNC STUDIES (//WWW.SFCTA.ORG/EMERGING-MOBILITY/RIDE-HAIL-COMPANIES)



## OVERVIEW AND KEY FINDINGS

"TNCs and Congestion" report provides the first comprehensive analysis of how Transportation Network Companies Uber and Lyft collectively have affected roadway congestion in San Francisco.

**Key findings in the report:**

The report found that Transportation Network Companies accounted for approximately 50 percent of the rise in congestion in San Francisco between 2010 and 2016, as indicated by three congestion measures: vehicle hours of delay, vehicle miles travelled, and average speeds.

Employment and population growth were primarily responsible for the remainder of the worsening congestion.

Major findings of the TNCs & Congestion report show that collectively the ride-hail services accounted for:

- 51 percent of the increase in daily vehicle hours of delay between 2010 and 2016;
- 47 percent of the increase in vehicle miles travelled during that same time period; and
- 55 percent of the average speed decline on roadways during that same time period.
- On an absolute basis, TNCs comprise an estimated 25 percent of total vehicle congestion (as measured by vehicle hours of delay) citywide and 36 percent of delay in the downtown core.

Consistent with prior findings from the Transportation Authority's 2017 TNCs Today report, TNCs also caused the greatest increases in congestion in the densest parts of the city - up to 73 percent in the downtown financial district - and along many of the city's busiest corridors. TNCs had little impact on congestion in the western and southern San Francisco neighborhoods.

The report also found that changes to street configuration (such as when a traffic lane is converted to a bus-only lane), contributed less than 5 percent to congestion.

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# TNCs & Congestion

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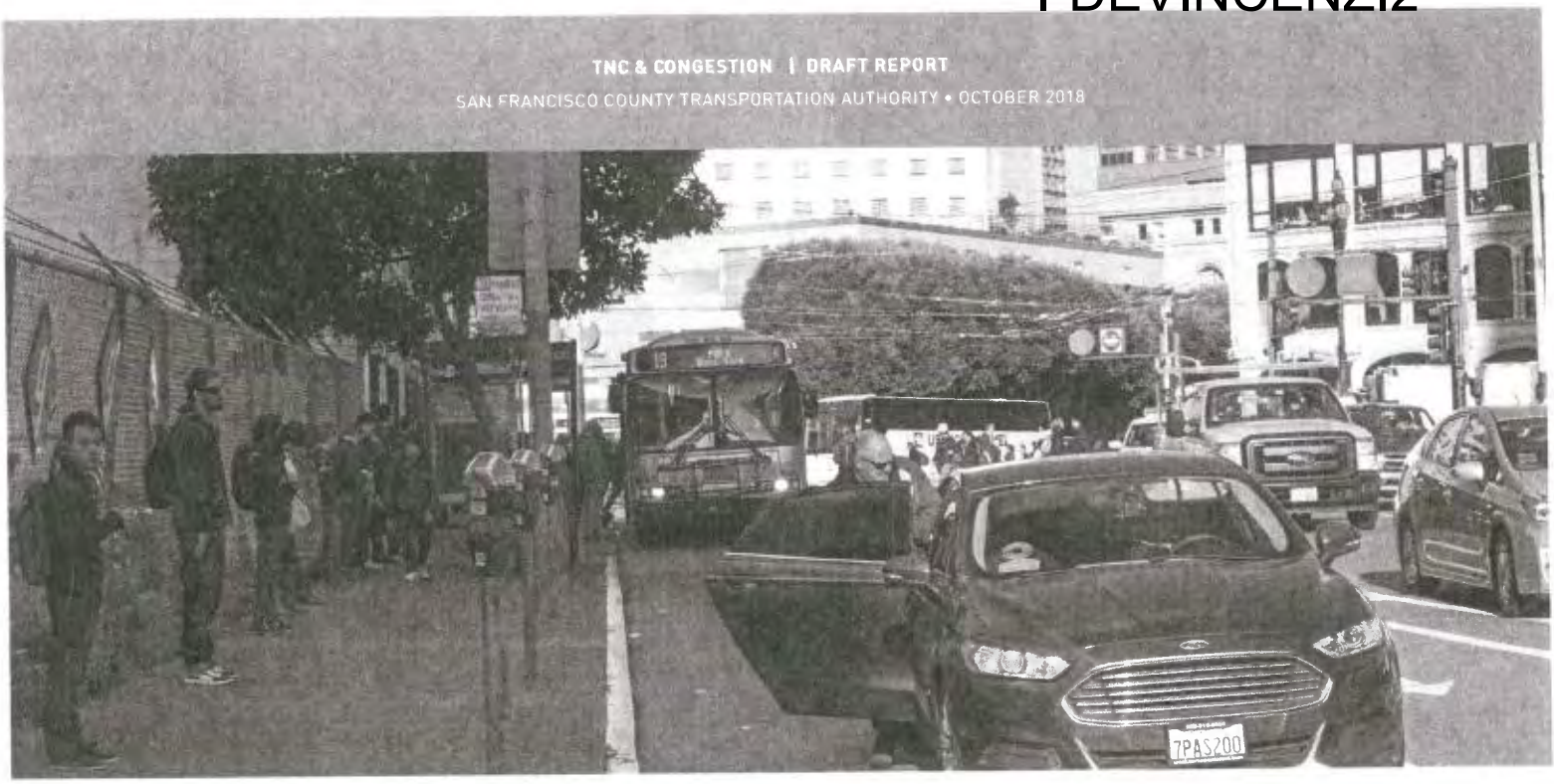


# Executive Summary

Congestion in San Francisco worsened between 2010 and 2016. The Transportation Authority's Congestion Management Program monitoring indicates that average AM peak arterial travel speeds decreased since 2009 by -26%, while PM peak arterial speeds have decreased by -27% during this same time period. Vehicle hours of delay on the major roadways increased by 40,000 hours on a typical weekday, while vehicle miles travelled on major roadways increased by over 630,000 miles on a typical weekday.

During this period significant changes occurred in San Francisco. Roadway and transit networks changed, including the implementation of transit red carpet lanes, the expansion of the bicycle network, and the opening of the Presidio Parkway (rebuilt Doyle Drive). San Francisco added 70,000 new residents and over 150,000 new jobs, and these new residents and workers added more trips to the City's transportation network. Finally, new mobility alternatives emerged, most visibly TNCs.

In recent years, the vehicles of transportation network companies (TNCs) such as Uber and Lyft have become ubiquitous in San Francisco and many other major cities. Worldwide, the total number of rides on Uber and Lyft grew from an estimated 190 million in 2014 to over 2 billion by mid-2016 (1). In San Francisco, this agency (the San Francisco County Transportation Authority or SFCTA) estimated approximately 62 million TNC trips in late 2016, comprising about 15% of all intra-San Francisco vehicle trips and 9% of all intra-San Francisco person trips that fall (2).

The rapid growth of TNCs is attributable to the numerous advantages and conveniences that TNCs provide over other modes of transportation, including point-to-point service, ease of reserving rides, shorter wait times, lower fares (relative to taxis), ease of payment, and real-time communication with drivers. The availability of this new travel alternative provides improved mobility for some San Francisco residents, workers and visitors, who make over one million TNC trips in San Francisco every week, though these TNC trips may conflict with other City goals and policies.

The purpose of this report is to identify the extent to which TNCs contributed to increased roadway congestion in San Francisco between 2010 and 2016, relative to other potential contributing factors including employment growth, population growth, and changes to the transportation system. This information is needed to help the Transportation Authority fulfill our role as the county Congestion Management Agency and inform our policy and planning work. As the Congestion Management Agency for San Francisco, the Transportation Authority is required by state law to monitor congestion and adopt plans for mitigating traffic congestion that falls below certain

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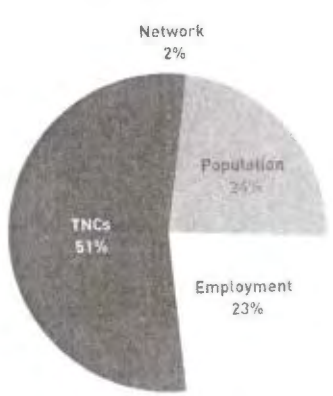
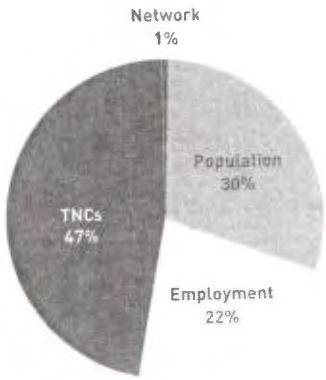
thresholds. The report is also intended to inform the Transportation Authority board which is comprised of the members of the San Francisco Board of Supervisors, as well as other state and local policy-makers, and the general public, on the relationship between TNCs and congestion in San Francisco.

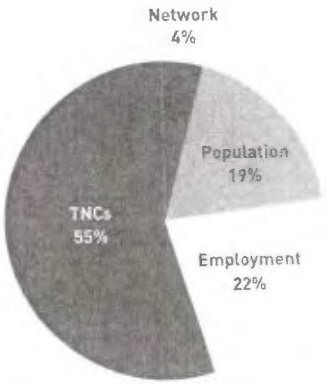
This document:

- Identifies common measures of roadway congestion;
- Discusses factors that contribute to roadway to congestion; and
- Quantifies the relative contributions of different factors, including population, employment, road network changes and TNCs, to observed changes in congestion in San Francisco between 2010 and 2016, by location and time of day.

The report utilizes a unique TNC trip dataset provided to the Transportation Authority by researchers from Northeastern University in late 2016, as well as INRIX data, a commercial dataset which combines several real-time GPS monitoring sources with data from highway performance monitoring systems. These data are augmented with information on network changes, population changes, and employment changes provided by local and regional planning agencies, which are used as input to the Transportation Authority's activity-based regional travel demand model SF-CHAMP.




## DO TNCs AFFECT CONGESTION?

Yes. When compared to employment and population growth and network capacity shifts (such as for a bus or bicycle lane), TNCs accounted for approximately 50% of the change in congestion in San Francisco between 2010 and 2016, as indicated by three congestion measures: vehicle hours of delay, vehicle miles travelled, and average speeds. Employment and population growth—encompassing citywide non-TNC driving activity by residents, local and regional workers, and visitors—are primarily responsible for the remainder of the change in congestion.

- Daily vehicle hours of delay (VHD) on the roadways studied increased by about 40,000 hours during the study period. We estimate TNCs account for 51% of this increase in delay, and for about 25% of the total delay on San Francisco roadways and about 36% of total delay in the downtown core in 2016, with employment and population growth accounting for most of the balance of the increased in delay.
- Daily vehicle miles travelled (VMT) on study roadways increased by over 630,000 miles. We estimate TNCs account for 47% of this increase in VMT, and for about 5% of total VMT on study roadways in 2016.
- Average speeds on study roadways declined by about 3.1 miles per hour. We estimate TNCs account for 55% of this decline.

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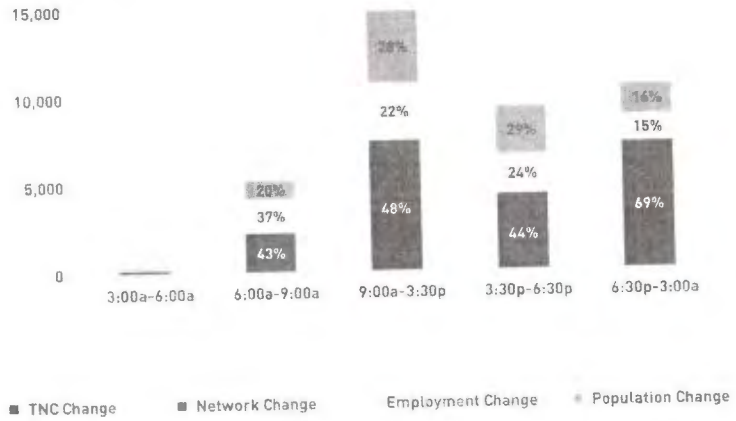
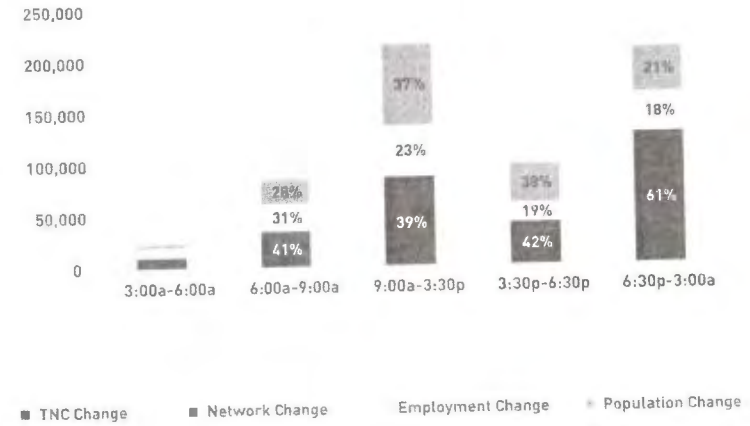
FIGURE 1: CHANGE IN VEHICLE HOURS OF DELAY BY TIME PERIOD BY FACTOR




## WHEN DO TNCS AFFECT CONGESTION?

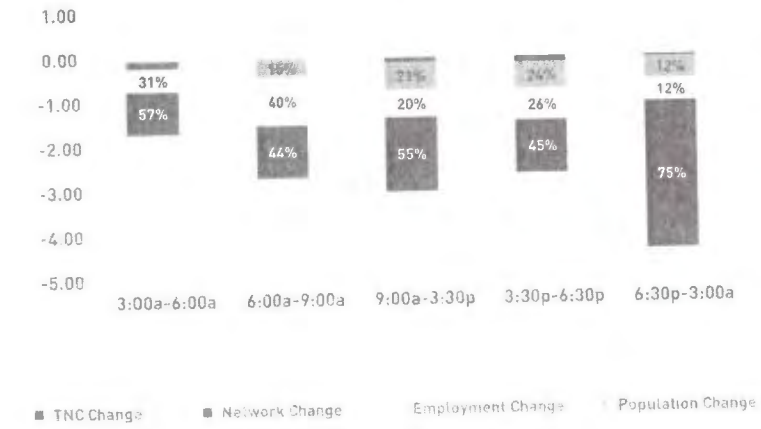
During the AM peak, midday, and PM peak periods, TNCs cause between 43% and 48% of the increased delay and account for about 20% of total delay during these time periods. Employment growth and population growth combined account for just over half of the increased delay. In the evening time period, TNCs are responsible for 69% of the increased delay, and for about 40% of the total delay.

FIGURE 2: CHANGE IN VEHICLE MILES TRAVELED BY TIME PERIOD BY FACTOR




Similarly, during the AM peak, midday, and PM peak periods, TNCs cause about 40% of the increased vehicle miles travelled, while employment and population growth combined are responsible for about 60% of the increased VMT. However, in the evening time period, TNCs are responsible for over 61% of the increased VMT and for about 9% of total VMT.

FIGURE 3: CHANGE IN SPEED (MILES PER HOUR) BY TIME PERIOD BY FACTOR




TNCs are responsible for about 45%-55% of the decline in average speed during most times of day, and are responsible for 75% of the declines in speed during the evening time period.

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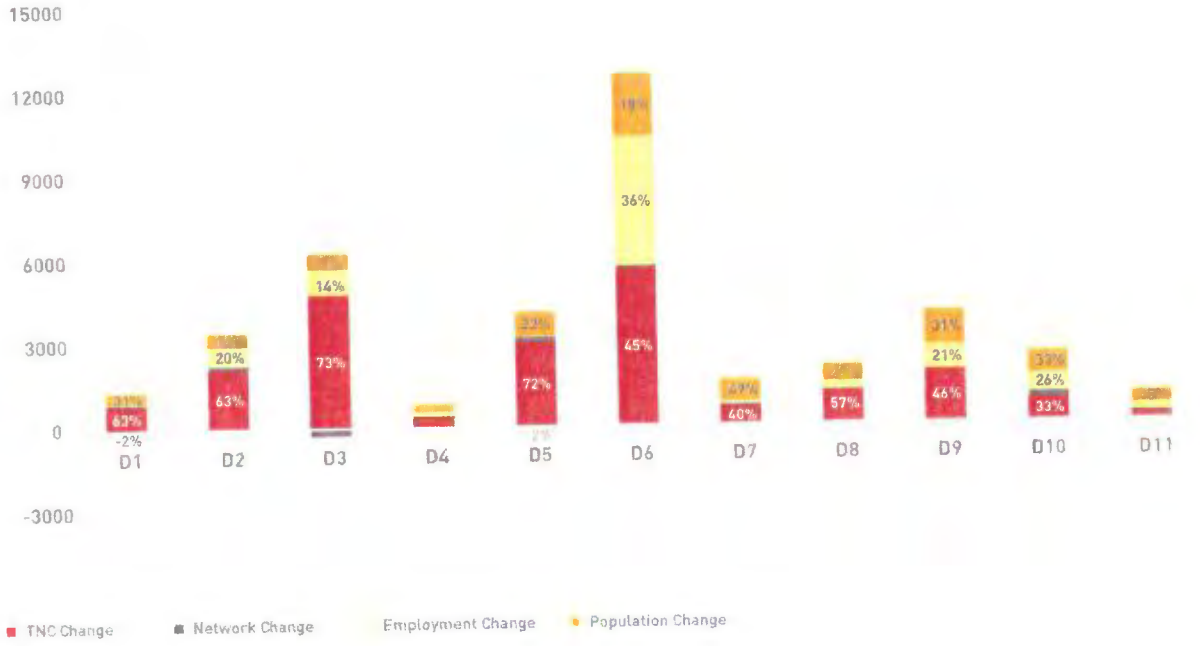
## WHERE DO TNCS AFFECT CONGESTION?

TNCs increase congestion throughout the city, but their effects are concentrated in the densest parts of the city, and along many of the city's busiest corridors, as shown in **Figure 4**. In Supervisorial District 6, TNCs add almost 6,000 daily hours of delay, accounting for about 45% of the increased delay, and 30% of total weekday delay. In District 3, TNCs add almost 5,000 daily hours of delay, accounting for almost 75% of the increased delay and about 50% of total delay. TNCs are responsible for approximately 40%-60% of increases in VMT in many areas of the city. District 6 and District 10 have experienced the greatest increases in VMT between 2010 and 2016, and TNCs account for 41% and 32% of the increases in these districts, respectively.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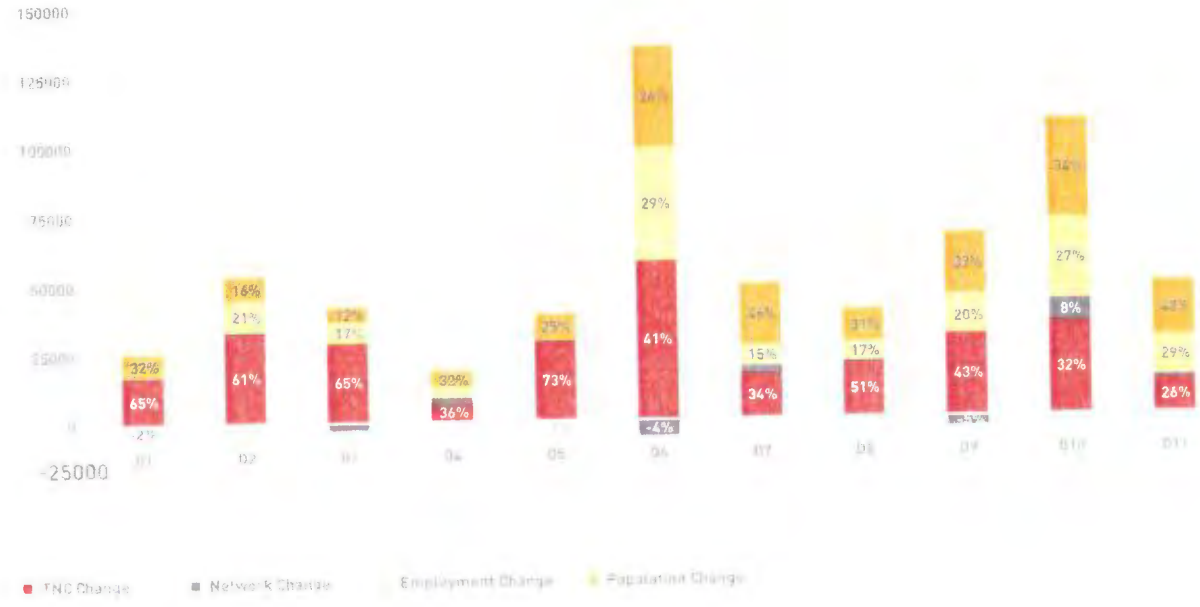
TNC Change
Network Change
Employment Change
Population Change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Population Change

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# What Factors Affect Congestion San Francisco?

## POPULATION AND EMPLOYMENT

Population and employment changes can directly affect roadway congestion. Increases in population will lead to increases in trip-making as people seek to participate in activities such as working, shopping, and going to school. Depending on travelers' choices of travel modes (such as walking, biking, taking transit, or driving), roadway motor vehicle congestion may be affected. Between 2010 and 2016, the population of San Francisco increased 8.8% from approximately 805,000 people to 876,000 (3). While about half of San Francisco trips are by walking, transit, and biking, a significant share of trips involve private vehicles, likely leading to increased congestion. Similarly, increases in employment lead to total travel as more people go to work. Between 2010 and 2016, employment in San Francisco increased significantly (28.4%) from approximately 545,000 jobs to over 700,000 jobs (4). According to the Census, approximately 48% of commute trips to, from or within San Francisco were by automobile.

## NETWORK CAPACITY

Changes to network capacities affect roadway congestion. Increases in roadway capacity may alleviate motor vehicle congestion, at least in the short term, while decreases in roadway capacity may increase congestion. The analyses in this paper capture capacity changes between 2010 and 2016 and therefore encompass network capacity changes such as the rebuilding of Doyle Drive and medium-term changes such as the reallocation of right-of-way to transit red carpet lanes and bicycle lanes. To a more limited extent, the analyses could reflect short-term changes in capacity, for example the effect on congestion of construction-related, permitted lane closures that may temporarily reduce capacity for a number of days or hours. However, there is no data on unpermitted short-term capacity reductions associated with construction, delivery or other activities, and thus they are not considered in this analysis. In addition to roadway network changes, changes to transit network capacities may influence roadway congestion by inducing people to shift modes or take new trips, and are included in this analysis.

## TNCS

As the TNCs Today report documents, TNCs comprise a significant share of intra-San Francisco travel. TNCs may decrease congestion by inducing mode shifts to more sustainable modes by providing first- and last-mile connections to transit services, or by reducing auto ownership levels and thus incentivizing people to make more transit, bike and walk trips. In addition, higher TNC

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vehicle passenger occupancies resulting from "ridesplitting" where TNCs are shared concurrently could, in theory, reduce the number of vehicles trips if they are replacing a trip that would otherwise be in a vehicle with fewer occupants. Conversely, TNCs may increase congestion if their convenience causes a walk, transit, or bike trip to shift to a TNC vehicle trip. According to recent studies, between 43% and 61% of TNC trips substitute for transit, walk, or bike travel or would not have been made at all (5,6,7,8). TNC passenger pick up and drop off activity may also result in increased congestion by disturbing the flow in curb lanes or traffic lanes. Finally, out-of-service miles (or "deadhead" miles) resulting from TNCs repositioning themselves to more optimal locations for getting new passengers, or from driving to pick up passengers who have reserved rides (whether single passenger or shared), also increases the amount of vehicular traffic and congestion.

## OTHER FACTORS

Given the rapid pace of technological change in the transportation sector, other factors may also be contributing to changes in congestion. For example, increased use of online shopping and delivery services might exacerbate roadway congestion due to an increase in delivery vehicle trips and loading durations. Conversely, if these deliveries are in place of multiple vehicle trips that would have been made by individuals, they may reduce roadway congestion. New emerging mobility alternatives such as dockless shared bikes and scooters may reduce congestion if they induce mode shifts away from vehicle trips, though if these trips are shifted from transit, walk, or bike their effect on congestion would likely be minimal.

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## EMPIRICAL ANALYSIS

This study is structured as a before-and-after assessment between 2010 conditions when TNC activity was negligible and 2016 conditions when it was significant. We derived measures of roadway conditions in both years from GPS-based speed data licensed from INRIX as previously described. We estimated the relationship between the change in TNC activity and the change in roadway travel time, assuming zero TNCs in 2010, and incorporating a 2016 "counterfactual" scenario in which TNCs do not exist.

We do this using a fixed-effects panel data regression model (9). The fixed-effects models estimate coefficients based on the change between 2010 and 2016 conditions. There is precedent for using both before-and-after analysis and panel data models in transportation analysis, including to study changes in congestion (10), TNC growth (11), and the effects of new technology (12).

We converted the observed travel times to implied volumes using volume-delay functions (VDFs). This time-implied volume is the model's dependent variable, and the conversion ensures that it is linearly related to the background volumes and TNC volumes. There is one observation for each directional roadway segment, for each time-of-day, with data in 2010 and in 2016 for each observation. To control for road and transit network changes, as well as changes in socioeconomic conditions, the model includes the background traffic volume as a variable, as estimated by SF-CHAMP version 5.2. Because SF-CHAMP version 5.2 does not account for TNCs, this background traffic reflects the expected traffic volume change with no TNCs. The model also includes measures of TNC activity for each observation, with those measures set to zero in 2010. **Table 1** shows the model estimation results.

The estimated parameter on the SF-CHAMP background volume is approximately 0.92, not significantly different than 1. This is logical, because we expect that each vehicle added in background traffic should have an effect on congestion of adding about 1 vehicle to the implied volume. The Presidio Parkway scaling factor accounts for major construction that was underway on those links in 2010 but not 2016.

We include two measures of time and location-specific TNC activity. The TNC volume parameter measures net effect of TNCs. If TNCs purely substitute for other car trips, the estimated TNC parameter should be 0 as they substitute for other vehicles already counted in the background volumes. Negative values would be consistent with TNCs reducing traffic, while a value of positive 1 would be consistent with TNCs purely adding itself to background traffic. The estimated coefficient of 0.69 can be interpreted as meaning that TNCs do not purely add to traffic through induced travel or shifts from non-vehicular modes.

TABLE 1 FIXED-EFFECTS PANEL ESTIMATION RESULTS

PARAMETER ESTIMATES

| Variable | Parameter | Standard Error | T-statistic |
|---|---|---|---|
| SF-CHAMP background volume | 0.9172 | 0.0541 | 16.952 |
| Presidio Parkway scaling factor | -0.3648 | 0.0189 | -19.327 |
| TNC Volume | 0.6864 | 0.0720 | 9.5387 |
| Average impact duration of TNC PUDO on major arterials (s) | 144.75 | 7.7195 | 18.751 |
| Average impact duration of TNC PUDO on minor arterials (s) | 79.486 | 12.114 | 6.5617 |

MODEL STATISTICS

| | |
|---|---|
| Number of Entities | 7081 |
| Number of Time Periods | 2 |
| R-squared between groups | 0.5819 |
| R-squared within groups | 0.2985 |

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# Conclusion

Congestion in San Francisco worsened between 2010 and 2016. The Transportation Authority's Congestion Management Program monitoring indicates that average AM peak arterial travel speeds decreased since 2009 by -26%, while PM peak arterial speeds have decreased by -27% during this same time period. Vehicle hours of delay on the study roadways increased by 40,000 hours on a typical weekday, while vehicle miles travelled on study roadways increased by over 600,000 miles on a typical weekday. In addition, travel times have become less reliable.

During this period significant changes occurred in San Francisco. Roadway and transit networks changed, including the rebuilding of Doyle Drive, the implementation of transit red carpet lanes, and the expansion of the bicycle network. San Francisco added 70,000 new residents and over 150,000 new jobs, and these new residents and workers add more trips to the city's transportation network. Finally, new mobility alternatives emerged, most visibly TNCs. TNCs have become an important travel option in San Francisco.

By late 2016, TNCs were estimated to generate over one million intra-San Francisco vehicle trips in a typical week, representing approximately 15% of all intra-SF vehicle trips, and the number and share of TNC trips in San Francisco has undoubtedly increased since 2016. The rapid growth of TNCs is attributable to the numerous advantages and conveniences that TNCs provide over other modes of transportation, and the availability of this new travel alternative has undeniably provided improved mobility for many San Francisco residents and workers.

TNC vehicle trips contribute significantly to increased congestion. After accounting for the effects of increased employment, increased population, and transportation network changes, TNCs are estimated to cause 51% of the increase in vehicle hours of delay, 47% of the increase in vehicle miles traveled, and 55% of the decline in speeds citywide between 2010 and 2016.

It is important to note that the effect of TNCs on congestion varies considerably by time-of-day. During most of the day, approximately 40% to 50% of the increase in vehicle hours of delay is attributable to TNCs, but in the evening, almost 70% of the increase in vehicle delay is due to TNCs. Similarly, during most of the day approximately 40% on the increase in vehicle miles traveled is due to TNCs, but in the evening TNCs account over 60% of increased VMT. Speeds declined by about 2 to 3 miles per hour during most of the day, with TNCs accounting for about 45% to 55% of this decrease. However, evening speeds declined by almost 4.5 miles per hour on study roadways, and TNCs are estimated to cause 75% of this decrease.

The effects of TNCs on congestion also varies significantly by location. The greatest increases in vehicle hours of delay occurred in Supervisorial Districts 3, 5 and 6, with over 70% of the increase in delay in Districts 3 and 5 due to TNCs, and about 45% of the increase in delay in District 6 due to TNCs. Vehicle miles traveled increased most significantly in Districts 6 and 10, with TNCs accounting for 41% and 32% of the increased VMT in these districts, respectively. While the total increase in VMT in Districts 3 and 5 were less than observed in other districts, the share of this increase attributable to TNCs in these districts was between 65% and 75%, the highest in the city. Average speeds have declined in all districts, with the greatest relative declines occurring in Districts 3, 6, 5 and 9.

# EXHIBIT R

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# Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States

Regina R. Clewlow, Ph.D. (corresponding author)
Gouri Shankar Mishra, Ph.D.

**FOR MEDIA OR OTHER INQUIRIES:**

Regina Clewlow, Research Affiliate
(rclewlow@ucdavis.edu)

Stephen Kulieke, Communications
(skulieke@ucdavis.edu)

Keywords: shared mobility, carsharing, ridesharing, ride-hailing, Uber, Lyft, travel behavior

RECOMMENDATION CITATION:
Clewlow, Regina R. and Gouri S. Mishra (2017) Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States. Institute of Transportation Studies, University of California, Davis, Research Report UCD-ITS-RR-17-07

- Among adopters of prior carsharing services, 65% have also used ride-hailing. More than half of them have dropped their membership, and 23% cite their use of ride-hailing services as the top reason they have dropped carsharing.

## Vehicle Ownership and Driving

- Ride-hailing users who also use transit have higher personal vehicle ownership rates than those who only use transit: 52% versus 46%.
- A larger portion of "transit only" travelers have no household vehicle (41%) as compared with "transit and ride-hail" travelers (30%).
- At the household level, ride-hailing users have slightly more vehicles than those who only use transit: 1.07 cars per household versus 1.02.
- Among non-transit users, there are no differences in vehicle ownership rates between ride-hailing users and traditionally car-centric households.
- The majority of ride-hailing users (91%) have not made any changes with regards to whether or not they own a vehicle.
- Those who have reduced the number of cars they own and the average number of miles they drive personally have substituted those trips with increased ride-hailing use. Net vehicle miles traveled (VMT) changes are unknown.

## Ride-hailing and Public Transit Use

- After using ride-hailing, the average net change in transit use is a 6% reduction among Americans in major cities.
- As compared with previous studies that have suggested shared mobility services complement transit services, we find that the substitutive versus complementary nature of ride-hailing varies greatly based on the type of transit service in question.
- Ride-hailing attracts Americans away from bus services (a 6% reduction) and light rail services (a 3% reduction).
- Ride-hailing serves as a complementary mode for commuter rail services (a 3% net increase in use).
- We find that 49% to 61% of ride-hailing trips would have not been made at all, or by walking, biking, or transit.
- Directionally, based on mode substitution and ride-hailing frequency of use data, we conclude that ride-hailing is currently likely to contribute to growth in vehicle miles traveled (VMT) in the major cities represented in this study.

# EXHIBIT S

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# TNCs Today

## A Profile of San Francisco Transportation Network Company Activity

FINAL REPORT | JUNE, 2017

# Executive Summary

Transportation network companies (TNCs) such as Uber and Lyft are an increasingly visible presence on San Francisco streets, but there has been no comprehensive data source to help the public and decision-makers understand how many TNC trips occur in San Francisco, how much vehicle travel they generate, and their potential effects on congestion, transit ridership, and other measures of system performance. The California Public Utilities Commission (CPUC) regulates TNCs and requires data reporting by TNCs, but will not share these data with local jurisdictions and the public.

The purpose of this report is to provide information on TNC activity in San Francisco, in order to help the San Francisco County Transportation Authority (Transportation Authority) fulfill its role as the Congestion Management Agency for San Francisco County. The report is also intended to inform the Transportation Authority board which is comprised of the members of the San Francisco Board of Supervisors, as well as state and local policy-makers in other arenas, and the general public, on the size, location and time-of-day characteristics of the TNC market in San Francisco.

The information presented is a profile of estimated local TNC usage (trips made entirely within San Francisco) from mid-November to mid-December of 2016. The TNC data was originally gathered by researchers at Northeastern University from the Application Programming Interfaces (APIs) of Uber and Lyft and then shared with the Transportation Authority. The Transportation Authority's data team cleaned and analyzed the data for presentation here.



While this document provides a broad range of descriptive information about TNC trips, it does not evaluate the effects of these TNC trips on the performance of the San Francisco transportation system, nor does it explain TNC customer trip purposes, demographic characteristics, or longer term effects on vehicle ownership and residential and employment location. This report does not identify the extent to which TNCs affect congestion. Many factors contribute to increased congestion—population and employment growth, construction activity, increased delivery and other transportation services, and TNCs.

Subsequent reports and studies by the Transportation Authority and others will address these important analytic and policy topics in depth, including the effects of TNCs on roadway congestion, public transit operations and ridership, disabled access, and equity.

The report is structured around six primary questions:

## HOW MANY TNCS OPERATE IN SAN FRANCISCO TODAY?

- The San Francisco Treasurer's Office estimates that 45,000 Uber and Lyft drivers may operate in San Francisco, and in 2016 sent notices requiring them to register their business with the city.
- Almost 21,000 drivers are estimated to have complied with the requirements to register their business with the city. Of that number, only 29% are San Francisco residents.
- On a typical weekday, over 5,700 TNC vehicles operate on San Francisco streets at peak times, with the peak period occurring between 6:30pm and 7:00pm. On Fridays, over 6,500 TNC vehicles are on the street during the peak of 7:30pm to 8:00pm. This is over 15 times the number of taxis on the street at these times of day.

## HOW MANY TNC TRIPS ARE OCCURRING IN SAN FRANCISCO?

- On a typical weekday, TNCs make over 170,000 vehicle trips within San Francisco, which is approximately 12 times the number of taxi trips, and 15% of all intra-San Francisco vehicle trips. This represents a conservative estimate of total TNC trips in San Francisco because the study's dataset does not include trips with a regional origin or destination.
- Assuming TNC occupancy rates are similar to taxi occupancy rates, it is estimated that at least 9% of all San Francisco person trips use TNCs.

## WHEN ARE TNC TRIPS OCCURRING IN SAN FRANCISCO?

- Significant numbers of TNC vehicle trips occur on both weekdays and weekends, with the highest number on Fridays with over 222,500 trips, and the lowest number on Sundays with approximately 129,000 trips.
- On weekdays, TNC usage is concentrated during the AM and PM peak periods when congestion is greatest, and extends into the evenings on Friday. Saturday and Sunday TNC trips occur primarily in the afternoon and evening.

## WHERE ARE TNC TRIPS OCCURRING IN SAN FRANCISCO?

- TNC trips are concentrated in the densest and most congested parts of San Francisco including the downtown and northeastern core of the city. At peak periods, TNCs are estimated to comprise 25% of vehicle trips in South of Market.
- TNC trips are concentrated on the busiest arterials, yet also operate extensively on neighborhood streets, including along major public transit lines.

## HOW MANY VEHICLE MILES TRAVELED (VMT) DO TNCS GENERATE WITHIN SAN FRANCISCO?

- Intra-SF TNC trips generate approximately 570,000 vehicle miles of travel (VMT) on a typical weekday, comprising as much as 20% of intra-SF-only VMT, at least 6.5% of average total weekday VMT citywide, and may account for more than 10% of weekend VMT, primarily during the AM peak, PM peak, and early evening time periods. These estimates include both in-service and out-of-service vehicle miles.
- Approximately 20% of total TNC VMT are out-of-service miles. This is significantly lower than the more than 40% of taxi VMT that are out-of-service miles. The greater efficiency of TNCs is likely due to the higher number of TNC vehicles and more efficient technology.

## DO TNCS PROVIDE A HIGH DEGREE OF GEOGRAPHIC COVERAGE THROUGHOUT THE ENTIRE CITY?

- TNCs provide broader service across the city than taxis, particularly in the western neighborhoods.
- TNCs provide fewer trips per population and employment in southern and southeastern areas of the city, which may reflect the presence of fewer TNC vehicles, or neighborhood preferences or demographics.

For more information, or to obtain a downloadable file of Transportation Authority processed data, visit the TNCs Today website at www.sfcta.org/tncstoday.



# Introduction

Transportation network companies (TNCs) such as Uber and Lyft are visible presences on San Francisco's streets, in both the downtown core as well as in the city's neighborhoods. These companies allow people to use a smartphone app to request and pay for rides sourced from a pool of available drivers. These services are taxi-like in that they provide point-to-point transportation primarily in private vehicles. The success of TNCs in attracting rides in San Francisco and other cities reflects the high unmet demand for premium services and the extensive benefits they provide to users who can afford their services. Initially TNCs offered some distinct advantages over taxis including the ability to easily reserve a ride, the ability for both driver and passenger to contact each other and to know the location of the other using GPS, ease of payment, cheaper fares, shorter wait times, and more availability at all times of day due to a larger supply of vehicles. Taxis now offer some of these features, although the supply of taxis is still significantly smaller than TNCs, and taxi fares are higher.

The advantages of TNCs over taxis and other transportation modes are in part a result of the technological innovation of directly connecting travelers and drivers, but are also in part an outcome and reflection of the relatively light regulatory requirements under which TNCs operate, relative to taxis and other for-hire vehicles. The biggest difference between TNCs and other modes is the significantly lower barrier for drivers to enter the market. California state law grants municipalities the ability to regulate taxis, and in San Francisco, the taxi medallion system limits the number of taxi vehicles that can serve the city. In addition, taxis are subject to price controls, must provide access to all areas of the city, must provide service to people with disabilities, have greater insurance requirements, and are subject to driver background checks and vehicle inspections. In contrast, there is no limit on the number of TNCs that may operate on San Francisco streets, no price controls, no geographic service area requirements, minimal disabled access requirements, limited driver background checks and few vehicle inspection or driver training requirements (TRB 2015).

There is a perception that TNC vehicles now comprise a significant number of the vehicles on San Francisco streets, having increased rapidly since TNCs started operating in the city seven years ago. However, there has been little data to either confirm or refute this perception. The California Public Utilities Commission (CPUC), which regulates TNCs due to the inter-city, non-hail nature of the service they provide, requires TNCs to report to the CPUC an extensive set of information on service provision including where and when trips are starting and ending, the availability of disabled-accessible vehicles, traffic incidents, and hours and miles logged by drivers. However, the CPUC has refused to share these TNC data with San Francisco, stating that it is authorized to withhold official information if disclosure of the information is against the public interest (CPUC Letter to the Transportation Authority, 2017). However, recent SFMTA Travel Decisions Survey results indicate that TNCs are growing in significance as a share of overall San Francisco travel, doubling in mode share served between 2014 and 2015 (SFMTA 2014, SFMTA 2015). In addition, it has been noted that Uber reported an annual tripling of trips in San Francisco (TRB 2015). However, these data sources provide no reliable estimates of the true number of TNC trips occurring in San Francisco, where TNC trips are occurring, or when TNC trips are occurring.






# Purpose

The purpose of this report is to provide information on TNC activity in San Francisco, in order to help the San Francisco County Transportation Authority (Transportation Authority) fulfill its role as the Congestion Management Agency for San Francisco County. The report is also intended to inform the Transportation Authority board which is comprised of the members of the San Francisco Board of Supervisors, as well as state and local policymakers in other arenas, and the general public, on the size, location and time-of-day characteristics of the TNC market in San Francisco.

This document provides estimates of how many TNCs are operating in San Francisco during all times of day and days of week, imputes the number, location, and timing of intra-San Francisco TNC trips based on TNC driver trip acceptance information (referred to in this report as pick-ups) and TNC driver drop off information (referred to as drop-offs). The report estimates the amount of daily vehicle miles travelled (VMT) generated by TNCs, and contextualizes these relative to the other travel modes operating in San Francisco, including private vehicles, public transit, walking and biking. TNC trips between San Francisco and other counties (regional TNC trips) are not included in these estimates, and as a result these numbers represent a lower-bound estimate of the number of actual TNC vehicles and trips operating in San Francisco. Note that the data on which this report is based does not include any information on TNC trip purposes, travel party size, fares paid, traveler attributes such as gender, income, disability, mode choice shifts, or induced travel.

The information presented is a profile of local TNC usage in San Francisco from mid-November to mid-December of 2016, excluding dates around the Thanksgiving 2016 holiday. The TNC data was originally gathered by researchers at Northeastern University from the Application Programming Interfaces (APIs) of Uber and Lyft which show the locations of available vehicles to mobile apps, and then was shared with the Transportation Authority through a research collaboration over the past year. The other data referenced in the report come from a variety of sources including Caltrans, the San Francisco Municipal Transportation Agency (SFMTA), and the Transportation Authority's SF-CHAMP travel demand model.

This document does not evaluate the near-term impacts of TNCs on the performance of the San Francisco transportation system, nor does it explain potential longer-term effects of TNC provision on vehicle ownership or residential and employment location.

This report does not identify the extent to which TNCs affect congestion. Many factors contribute to increased congestion—population and employment growth, construction activity, increased delivery and other transportation services, and TNCs. Subsequent reports by the Transportation Authority through this project and the larger Emerging Mobility Services and Technology (EMST) policy framework and the Connect SF long-range planning process, both being undertaken in coordination with other City agencies, will address these important analytic and policy questions in depth.

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# Methodology

This research team developed and applied multiple procedures to estimate TNC trips within San Francisco. First, the team acquired data on TNC vehicle locations that was gathered from the Uber and Lyft APIs. The research team then cleaned this location data, removing unnecessary, anomalous, or redundant information. Finally, the team identified trips and imputed missing attributes.

## DATA COLLECTION

In order to provide real-time information to drivers and passengers, Lyft and Uber expose certain data through public-facing APIs. This information includes nearby vehicle locations, estimated times-to-pickup, and sometimes, estimated costs. The data exposed through the APIs also includes, among other things, a vehicle identifier associated with a sequence of time-stamped coordinates, and the service types associated with that vehicle, such as UberX or UberPOOL. Sending a request to the API returns a text file response containing this information for the nearest available vehicles. When a vehicle becomes unavailable, either because the driver has turned off their app or they have accepted a ride request, the vehicle disappears from the datastream. Similarly, when the vehicle becomes available, either because the driver has turned on their app or they have completed a ride request, it reappears in the datastream. Researchers at Northeastern University implemented a systematic method for collecting this datastream such that it geographically covers all of San Francisco. The Northeastern University researchers collected information on vehicle locations every five seconds for approximately six weeks. The data collection methodology has no impacts on either drivers or riders.

## DATA CLEANING

The research team collected data by sampling available TNC vehicles using a geographic grid that covers all of San Francisco. This sampling procedure means that any available Uber or Lyft vehicle may be detected by multiple sampling locations. Furthermore, because data is being collected almost continuously in time for each sampling location, the same vehicle will often appear repeatedly in the datastream for each individual sampling location. The first step in the data preparation process involved cleaning the information in the datastream. In addition, the raw data may at times contain anomalous data, which was also screened out to ensure the reasonableness of the GPS traces. The result was a set of unique GPS traces for each TNC vehicle.

## TRIP IDENTIFICATION, TRIP MATCHING AND ATTRIBUTE IMPUTATION

Cleaning resulted in a set of unique "pre-trip" vehicle trajectories that reflect when a vehicle became available (due to the driver dropping off a passenger or starting a shift) and when the vehicle became unavailable (due to the driver accepting a passenger or ending a shift). Once pre-trips and pickup and drop-off locations were defined, "trips" were imputed by linking the pickup and trip drop-off locations. Lyft trips were created first because the Lyft API reveals a persistent vehicle identifier, with which it is possible to build an aggregate matrix of Lyft flows from pickup locations to dropoff locations by detailed time-of-day. This matrix of flows is used to estimate the vehicle miles traveled generated by TNCs. Uber's API does not have persistent identifiers that are necessary to connect pickup and dropoff locations, so the research team used the Lyft matrix of pickup and dropoff flows by travel analysis zone (TAZ) and time-of-day as a starting point, and then proportionally fitted the matrix to match Uber trip pickup locations and drop-off locations by time-of-day.

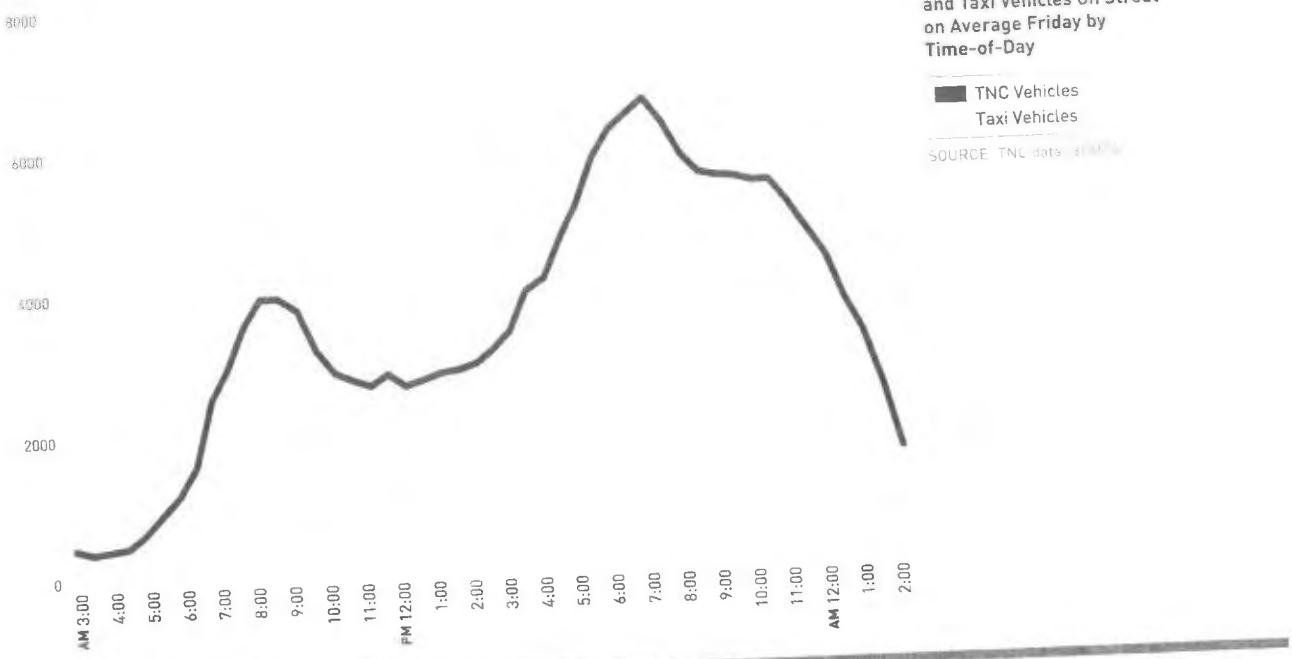
A unique aspect of the Uber and Lyft driver labor market is that drivers may drive for both services simultaneously. As a result, these driver vehicles may appear in both the Uber and Lyft datastreams. It is necessary to identify these "matched pre-trips" in order to avoid double-counting of TNC pre-trips and trips. Matched pre-trips were identified by comparing the start and end times of the pre-trips and selecting only those pre-trips whose start and end times both occurred within a limited time window, as well as selecting only pre-trips that traversed the same set of network links in the same sequence. The pre-trip (and associated trip) were then assigned to either Lyft or Uber, based on which pre-trip ended first, representing the first platform on which a driver accepted the trip.

For pre-trips, out of service travel times and distances could be calculated directly from the cleaned and processed datastream. For Lyft trips, trip travel times could be derived from the datastream. Because the datastream does not contain the information on the actual paths used by TNCs on trips, it was necessary to impute distances between observed pickup and dropoff locations using information from the Transportation Authority's SF-CHAMP model. For Uber trips, both travel times and distances were imputed from the model system.

## DATA LIMITATIONS

It must be emphasized that the TNC information documented in this report does not represent direct observa-

Figure 2. Intra-SF TNC and Taxi Vehicles On Street on Average Friday by Time-of-Day



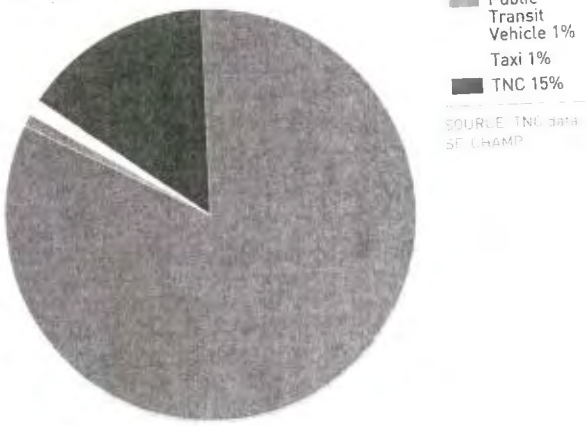

SOURCE: TNC data, SFMTA

## HOW MANY TNC TRIPS ARE OCCURRING IN SAN FRANCISCO?

Two types of TNC trips were estimated: vehicle trips and person trips. The number of TNC vehicle trips is important because more vehicle trips generally leads to increased congestion and conflicts with other street users, while more person trips may indicate enhanced mobility. Again, only those trips with both pickup and drop-off location within San Francisco are considered in the following summaries.

"Vehicle trips" in Table 2 refers to movements by motor vehicles with origins and destinations entirely within San Francisco. Vehicles may carry different numbers of people, or may be public transit vehicles or taxis. Trucks are excluded. Approximately 170,000 TNC vehicle trips are estimated to occur within San Francisco during a typical weekday. This represents approximately 15% of all weekday vehicle trips that both start and end within the city, as shown in Table 2. There are approximately 12 times as many TNC trips as taxi trips during a typical weekday.

Figure 3. Average Wednesday Intra-SF Vehicle Trips by Mode




SOURCE: TNC data, SF CHAMP

**Table 2. Weekday Intra-SF Vehicle Trips by Mode**

| MODE | VEHICLE TRIPS | % |
|---|---|---|
| Private Auto | 940,000 | 83% |
| Public Transit Vehicle | 11,000 | 1% |
| Taxi | 14,000 | 1% |
| TNC | 170,000 | 15% |
| **TOTAL** | **1,135,000** | **100%** |

TNC data, SF CHAMP travel model, SFMTA

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Person trips refers to movements by people with origins and destinations in San Francisco. Person trips are different than vehicle trips because person trips include walking and biking trips (which don't require motor vehicles), and also because private vehicles, public transit vehicles and taxis may carry more than one person. For TNCs and taxis, vehicle trips were converted to person trips using an assumed occupancy rate of 1.66, based on observed taxi data (Schaller, 2017). This assumed occupancy rate affects the TNC share of overall travel. Use of a lower occupancy rate would result in lower TNC person trip mode shares. Approximately 290,000 TNC person trips are estimated to occur within San Francisco during a typical weekday. This represents approximately 9% of all weekday person trips within the city, as shown in Table 3.

**Figure 4. Average Weekday Intra-SF Person Trips by Mode**

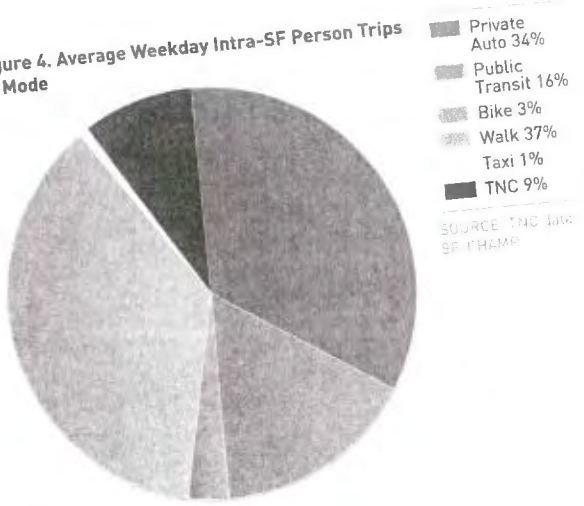



**Table 3. Weekday Intra-SF Person Trips by Mode**

| MODE | PERSON TRIPS | % |
|---|---|---|
| Drive | 1,099,000 | 34% |
| Public Transit | 512,000 | 16% |
| Bike | 103,000 | 3% |
| Walk | 1,193,000 | 37% |
| Taxi | 24,000 | 1% |
| TNC | 283,000 | 9% |
| **TOTAL** | **3,214,000** | **100%** |

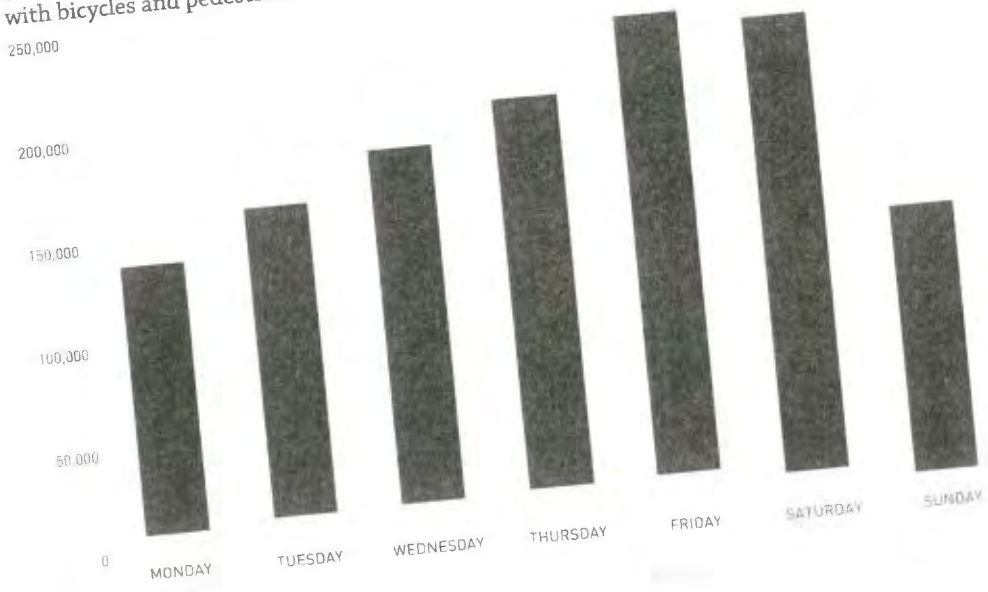
Source: TNC data; SF-CHAMP travel model; SFMTA

## WHEN ARE TNC TRIPS OCCURRING IN SAN FRANCISCO?

The timing of TNC trips is important because trips that occur during peak periods and weekdays are more likely to exacerbate congestion and delay on roads, affecting both general traffic, surface public transit as well as conflicts with bicycles and pedestrians.

Figure 5 shows the total number of estimated TNC vehicle trips and taxi trips by day-of-week. It shows that TNC trips increase as the week progresses, reaching their peak volume on Friday and hitting their lowest volume on Sunday. This indicates that TNCs are serving both the weekday and

**Figure 5. TNC and Taxi Intra-SF Trips by Day-of-Week**



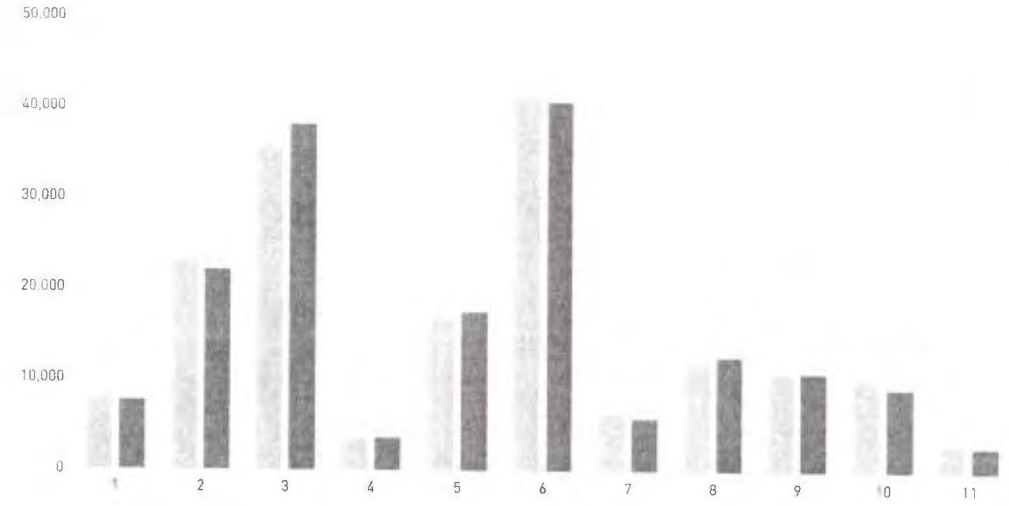



**Figure 14. Weekday Pickups and Dropoffs by Supervisorial District**

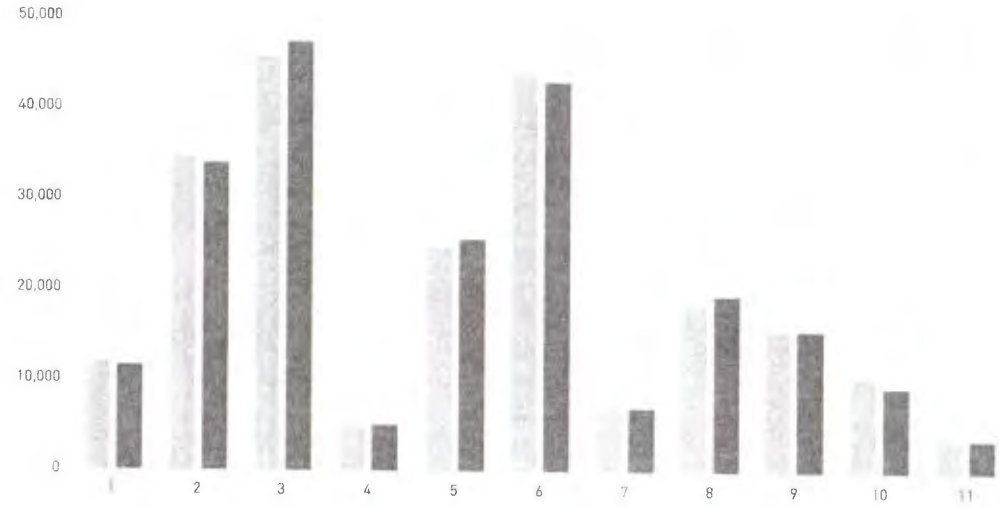



**Figure 15. Saturday Pickups and Dropoffs by Supervisorial District**

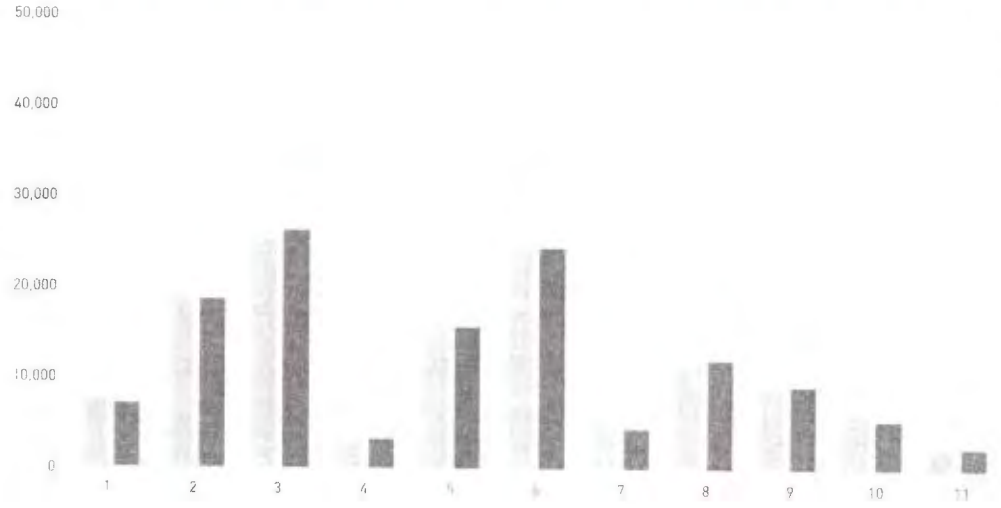



**Figure 16. Sunday Pickups and Dropoffs by Supervisorial District**

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## HOW MUCH VMT DO TNCs GENERATE WITHIN SAN FRANCISCO?

The amount of VMT, or vehicle miles travelled, that is generated by TNCs is important because VMT is a fundamental measure of transportation system performance. Higher levels of VMT are associated with greater levels of emissions of greenhouse gases such as $CO_2$ as well as other pollutants. In addition, higher levels of VMT are also associated with greater roadway congestion and conflicts. For TNCs and taxis, two types of VMT are important, in-service VMT and out-of-service VMT. In-service VMT refers to the vehicle miles traveled when transporting a passenger. Out-of-service VMT refers to the vehicle miles traveled while circulating to pickup a passenger.

Tables 4–6 show the total trips, total VMT, average total trip length, in-service trip length, out-of-service trip length, and percent out-of-service trip length by day-of-week for local TNCs and taxis. These tables indicate that TNCs and taxis are generally similar in terms of average in-service trip length. However, a notably smaller share of TNCs' total trip lengths are out-of-service miles, while a significant share of total taxi trip length (over 40%) are out-of-service miles. The greater efficiencies of TNCs, as reflected in a lower share of out-of-service miles, are likely primarily a reflection of the larger fleets of TNC drivers operating on the road at any given time, enabling shorter distances to pickup locations. In addition, TNCs' routing software may be more efficient than the taxi dispatch systems. Most critically, Table 4 indicates that the estimated TNC total VMT on a typical weekday is approximately 570,000 VMT, and this estimate is clearly conservative given that it:

- Includes only intra-SF TNC trips (such as trips to and from San Francisco International Airport).
- Underestimates out-of-service VMT because it excludes the additional distance from acceptance location to where the passenger is actually picked up.
- Excludes VMT associated with TNC drivers commuting to SF from non-SF home origins.

This TNC VMT estimate indicates that intra-SF TNCs generate as much as 20% on weekday VMT for intra-SF vehicle trips and at least 6.5% of total weekday VMT in San Francisco, given Caltrans' most recent estimate of weekday VMT traveled on San Francisco streets and highways (Caltrans 2014). Saturday roadway volumes are lower than weekday volumes, yet Saturday TNC VMT is even greater than average weekday TNC VMT. It is possible that TNCs may account for approximately 10% of VMT on Saturdays.

**Table 4. Average Weekday Intra-SF Trip Lengths**

| | TNCS | TAXIS |
|---|---|---|
| Trips | 170,400 | 14,400 |
| VMT | 569,700 | 65,900 |
| Average Total Trip Length | 3.3 | 4.6 |
| Average In-service Trip Length | 2.6 | 2.6 |
| Average Out-of-service Trip Length | 0.7 | 2.0 |
| % Out-of-service Trip Length | 21.0% | 43.6% |

**Table 5. Average Saturday Intra-SF Trip Lengths**

| | TNCS | TAXIS |
|---|---|---|
| Trips | 220,700 | 12,300 |
| VMT | 703,600 | 53,600 |
| Average Total Trip Length | 3.2 | 4.4 |
| Average In-service Trip Length | 2.6 | 2.4 |
| Average Out-of-service Trip Length | 0.6 | 1.9 |
| % Out-of-service Trip Length | 18.6% | 44.1% |

**Table 6. Average Sunday Intra-SF Trip Lengths**

| | TNCS | TAXIS |
|---|---|---|
| Trips | 129,100 | 6,700 |
| VMT | 471,200 | 31,900 |
| Average Total Trip Length | 3.7 | 4.8 |
| Average In-service Trip Length | 2.9 | 2.6 |
| Average Out-of-service Trip Length | 0.8 | 2.2 |
| % Out-of-service Trip Length | 20.7% | 45.5% |

Figure 20 (next page) illustrates the amount of estimated in-service and out-of-service VMT generated by local TNCs and taxis for typical weekdays, Saturdays and Sundays. TNCs generate more than 10 times as many VMT as taxis on a typical weekday, while generating 12 times as many trips.

Figure 21 (next page) shows the distribution of weekday VMT by time-of-day for TNCs and taxis. It indicates that most of the VMT generated by TNCs occurs during the AM peak and PM peak hours, with significant VMT also occurring during the evening hours, following the PM peak. VMT generated during periods of peak demand likely exacerbates existing peak period congestion.

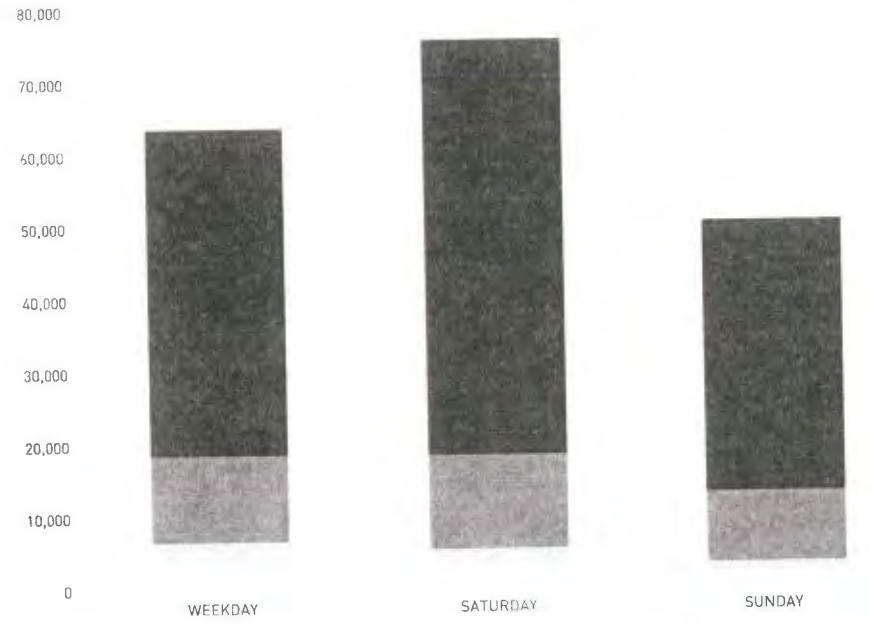


**Figure 20. Intra-SF TNC and Taxi Vehicle Miles Traveled (VMT)**

TNC In-Service
TNC Out-of-service
Taxi In-Service
Taxi Out-of-service

SOURCE: TNC data

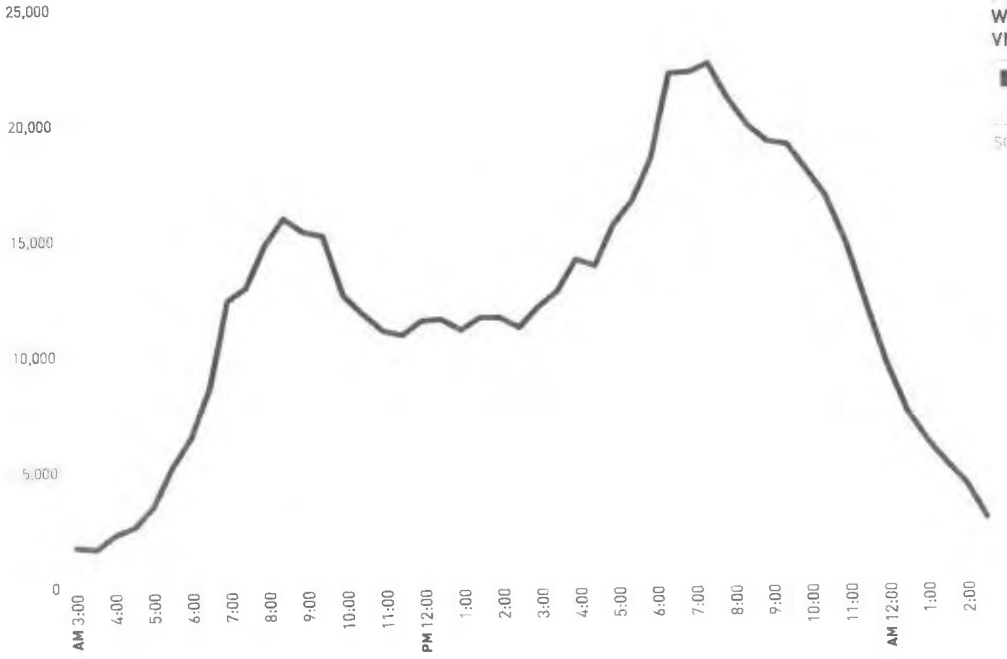


**Figure 21. Intra-SF Weekday TNC and Taxi VMT by Time-of-Day**

TNC VMT
Taxi VMT

SOURCE: TNC data

# EXHIBIT T

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1455 Market Street, 22nd Floor
San Francisco, California 94103
415.522.4800 FAX 415.522.4829
info@sfcta.org www.sfcta.org

# *Memorandum*

Date: 04.06.2016

To: Wade Wietgrefe, San Francisco Planning Department

From: Drew Cooper, SFCTA

Subject: General Non-Residential Off-Street Parking Rate Estimation for San Francisco

The purpose of this memo is to document the estimation of a generalized non-residential off-street parking rate to be used in the TDM program in order to evaluate the parking requirements for new development at a fine-grained spatial level. The Transportation Authority did not make any attempt to separate or consider the distinctions of the various types of non-residential land uses, due to complications in relating off-street publicly available parking to the particular land uses it serves, although this analysis could be done if deemed desirable.

## METHODOLOGY

The Transportation Authority estimated a general non-residential off-street parking rate as the number of public and private off-street parking spaces per 1000 square feet of non-residential land use. For each TAZ, we summarize the non-residential square footage and off-street parking supply for the TAZ and other nearby TAZs within 0.75 miles of network-based walking distance, with decreasing weight given to more distant TAZs.[1] We did this in order to derive a parking rate that is representative of the neighborhood and is not artificially truncated at arbitrary TAZ boundaries, and because parking for land uses within the TAZ may actually be located outside of the TAZ.

Land Use Data: Land use data were provided at a parcel level by the San Francisco Planning Department for 2013, and summarized to Traffic Analysis Zones (TAZs), which are the geographic unit used by SF-CHAMP travel demand model. Table 1 describes the types of land use included.

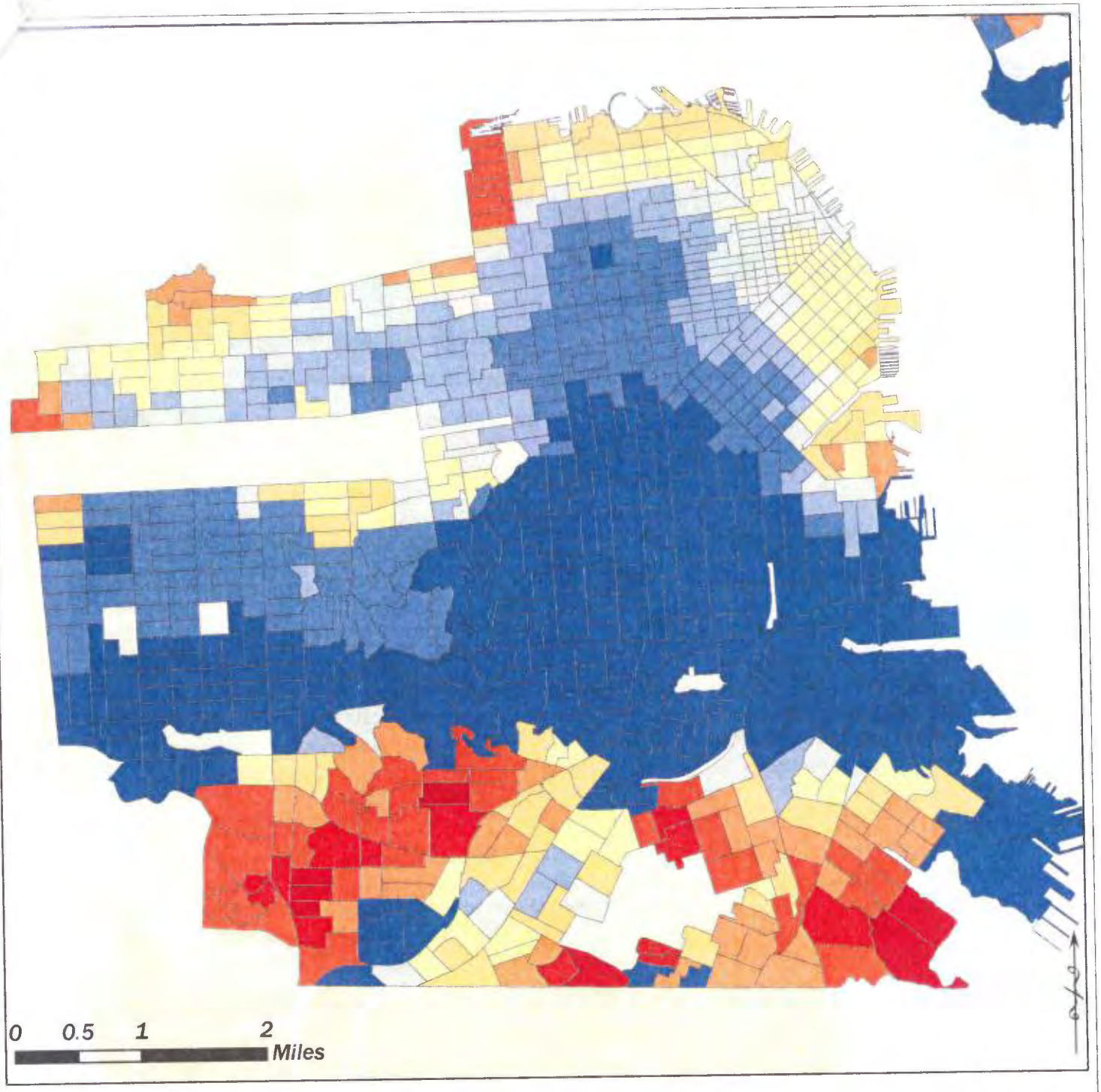
Table 1: Non-Residential Land Uses for Parking Rate Estimation

| LAND USE CATEGORY | DESCRIPTION |
|---|---|
| CIE | Cultural, Institutional & Educational Services |
| MED | Medical and Health Services |
| MIPS | Management, Information & Professional Services |
| PDR | Production, Distribution & Repair |
| RETAIL | Retail / Entertainment |
| VISITOR | Visitor Lodging |

[1] The weight is a function of distance in the formula w = e^-11.8d, where d is the distance in miles.

Parking Data: Off-street, publicly available parking data were available through SFPark. Off-street, private parking estimates were taken from the Transportation Authority's Parking Supply and Utilization Study.

Network Data: Pedestrian network-based walking distances were taken from SF-CHAMP 2012 Base Year model run.




Non-Residential Parking Supply Rate (Parking Spaces per kSF)

0.00 - 0.10 | 0.11 - 0.26 | 0.27 - 0.43 | 0.44 - 0.59 | 0.60 - 0.87 | 0.88 - 1.34 | 1.35 - 1.98 | 1.99 - 2.97 | 2.98 - 4.74 | 4.75 - 6.32

# Non-Residential Parking Supply Estimated from SF Park Data

This map shows TAZ-level estimates of parking supply rates for San Francisco, based off-street parking supply from SFPark and scaled up by 3% to match citywide totals to match the estimated supply from the PSUS parking estimation model

SAN FRANCISCO COUNTY TRANSPORTATION AUTHORITY
1455 Market Street, 22nd Floor, San Francisco, CA 94103
TEL 415.522.4800 FAX 415 522 4829
EMAIL info@sfcta.org WEB www.sfcta.org

Source: 2013 Parcel Land Use and Zoning District Methodology, San Francisco Planning Department

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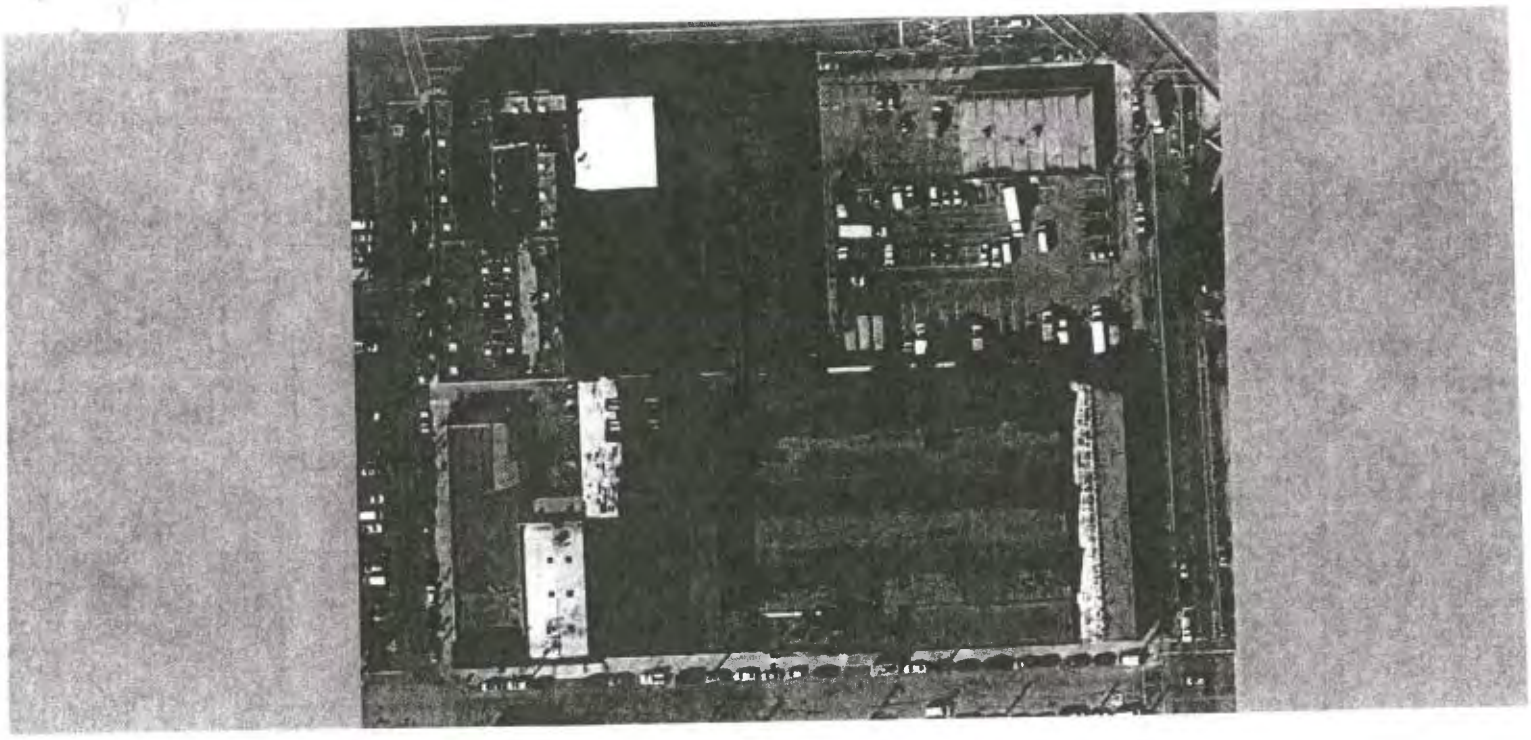
# EXHIBIT U

I-DEVINCENZI2



# Draft Environmental Impact Report

# 901 16th Street and 1200 17th Street Project

PLANNING DEPARTMENT
CASE NO. 2011.1300E

STATE CLEARINGHOUSE NO. 2015022048

| | |
|---|---|
| Draft EIR Publication Date: | August 12, 2015 |
| Draft EIR Public Hearing Date: | September 17, 2015 |
| Draft EIR Public Comment Period: | August 13, 2015 to September 28, 2015 |

Written comments should be sent to:
Sarah B. Jones Environmental Review Officer | 1650 Mission Street, Suite 400 | San Francisco, CA 94103
or Sarah.B.Jones@sfgov.org

I-DEVINCENZI2



## Table IV.A-7 – Person-Trip Rate and Generation

| Site Use | Area (SF)/ Units | Trip Rate | | Trip Generation | | | Total |
|---|---|---|---|---|---|---|---|
| | | Daily Rate | PM Peak Hour | Daily Person | PM Peak Hour In | PM Peak Hour Out | PM Peak Hour Total |
| ***1200 17th Street Retail*** | | | | | | | |
| Restaurant (Composite) | 4,650 | 0.600 | 13.5% | 2,790 | 181 | 196 | 377 |
| ***901 16th Street Retail*** | | | | | | | |
| General Retail | 2,600 | 0.150 | 9.0% | 390 | 17 | 18 | 35 |
| Community market | 15,218 | 0.297 | 7.3% | 4,520 | 158 | 172 | 330 |
| Restaurant (Composite) | 2,500 | 0.600 | 13.5% | 1,500 | 97 | 105 | 203 |
| **Total Retail** | **24,968** | ***0.368*** | ***10.3%*** | **9,200** | **453** | **491** | **944** |
| ***Residential (Both Buildings)*** | | | | | | | |
| Residential (Studio) | 53 | 7.5 | 17.3% | 398 | 46 | 23 | 69 |
| Residential (1-bedroom) | 182 | 7.5 | 17.3% | 1,365 | 157 | 79 | 236 |
| Residential (2-bedroom) | 146 | 10.0 | 17.3% | 1,460 | 168 | 85 | 253 |
| Residential (3-bedroom) | 14 | 10.0 | 17.3% | 140 | 16 | 8 | 24 |
| **Total Residential** | **395** | **8.513** | **17.3%** | **3,363** | **387** | **195** | **582** |
| ***New Person Trips*** | | | | **12,563** | **840** | **686** | **1,526** |
| Existing Land Use Credit | | | 10.4% | -202 | -6 | -15 | -21 |
| ***Net New Person Trips*** | | | | **12,361** | **834** | **671** | **1,505** |

Source: DKS Associates, 2014

Notes:

1. Trip generation rates, PM peak hour percentages, and inbound/outbound splits from City's SF Guidelines Table C-1 and C-2.

**Table IV.A-8 – Mode Split and Daily Trip Generation by Trip Type**

| Land Use | Daily Person Trips | | | | | | | | | Average Vehicle Occupancy | Total Vehicle Trips[1] |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Auto | | Transit | | Walk | | Other | | Total Trips | | |
| | % | Trips | % | Trips | % | Trips | % | Trips | | | |
| Retail (Work)[1] | 71 | 262 | 20 | 74 | 6 | 21 | 3 | 11 | 368 | 1.23 | 213 |
| Retail (Non-Work)[1] | 64 | 5,661 | 12 | 1,033 | 22 | 1,978 | 2 | 159 | 8,832 | 1.90 | 2,980 |
| Residential[2] | 38 | 1,284 | 30 | 1,017 | 17 | 561 | 15 | 501 | 3,363 | 1.08 | 1,193 |
| *Trip Credit* | *75* | *-152* | *0* | *0* | *25* | *-50* | *0* | *0* | *-202* | *1.00* | *-152* |
| ***Project Total*** | **57** | **7,055** | **17** | **2,124** | **20** | **2,510** | **5** | **671** | **12,361** | **1.67** | **4,233** |

Source: DKS Associates, 2015

**Notes:**

1 – Retail mode splits and AVO are based on *SF Guidelines Appendix E;* retail, community market, and restaurant uses combined.

2 – Residential mode splits and AVO are based on an average of the *American Community Survey for Census Tracts 607 and 227.04, Appendix J.*

**Table IV.A-9 – PM Peak Hour Trip Generation by Trip Type and Mode**

| Land Use | PM Peak Hour Person Trips | | | | | | | | | Average Vehicle Occupancy | Total Vehicle Trips[1] |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | Auto | | Transit | | Walk | | Other | | Total Trips[2] | | |
| | % | Trips | % | Trips | % | Trips | % | Trips | | | |
| Retail (Work)[1] | 71 | 27 | 20 | 8 | 6 | 2 | 3 | 1 | 38 | 1.23 | 22 |
| Retail (Non-Work)[1] | 64 | 581 | 12 | 106 | 22 | 203 | 2 | 16 | 906 | 1.90 | 306 |
| *Trip Credit* | *100* | *-21* | | | | | | | *-21* | *1.00* | *-21* |
| Residential[2] | 38 | 222 | 30 | 176 | 17 | 97 | 15 | 87 | 582 | 1.08 | 206 |
| ***Project Total*** | **54** | **809** | **19** | **290** | **20** | **302** | **7** | **104** | **1,505** | **1.58** | **513** |

Source: DKS Associates, 2015

**Notes:**

1 – Retail mode splits and AVO are based on *SF Guidelines Appendix E;* retail, community market, and restaurant uses combined.

2 – Residential mode splits and AVO are based on an average of the *American Community Survey for Census Tracts 607 and 227.04, Appendix J.*

*Trip Distribution*

The trip distribution in **Table IV.A-10** shows the trip distribution patterns assumed for the proposed project and would include origins or destinations within San Francisco, the East Bay, North Bay, South Bay, and beyond. San Francisco trips are separated into four "Superdistrict" areas of San Francisco as shown in Appendix M in the TIS as 1, 2, 3, and 4. Each Superdistrict corresponds to a quadrant of San Francisco. The project site is located in Superdistrict 3, but the proposed project would include trips to other Superdistricts as described further below.

**Table IV.A-10 – Trip Distribution Patterns**

| Origin/ Destination | Retail (Work) | Retail (Non-Work) | Residential | Aggregate PM peak hour |
|---|---|---|---|---|
| Superdistrict 1 | 8% | 6% | 60% | 27% |
| Superdistrict 2 | 11% | 9% | 5% | 8% |
| Superdistrict 3 | 24% | 61% | 10% | 40% |
| Superdistrict 4 | 8% | 5% | 5% | 5% |
| East Bay | 16% | 6% | 6% | 6% |
| North Bay | 6% | 2% | 2% | 2% |
| South Bay | 28% | 11% | 12% | 12% |
| **Total** | **100%** | **100%** | **100%** | **100%** |

**Source:** DKS Associates, 2014; SF Guidelines, 2002.

As shown in **Table IV.A-10**, a majority of the non-work, retail trips would travel within San Francisco with the largest percentage of those, 61 percent, traveling within Superdistrict 3, where the project is located. Outside San Francisco, most retail trips would travel to or from the South Bay area. The distribution of residential work and non-work trips correspond to the general distribution of employment in San Francisco, with 60 percent of trips destined to greater downtown San Francisco (SD-1) and the remaining 40 percent split between outlying San Francisco neighborhoods and surrounding areas.

These trip distribution patterns have been applied to the vehicle trip generation for the existing and proposed uses on the project site. This process produces a weighted or aggregate trip distribution pattern based on the total PM peak hour vehicle trips each land use would generate and are shown in **Table IV.A-10**.

*Freight and Service Loading Demand*

The longest truck expected to be accessing the project site would be 45 feet. Based on the service vehicle type distribution, loading demand for approximately 76 percent of the time would be in the form of shorter vehicles (cars, pickups, vans, and small delivery trucks), whose length would be 20 feet or less.

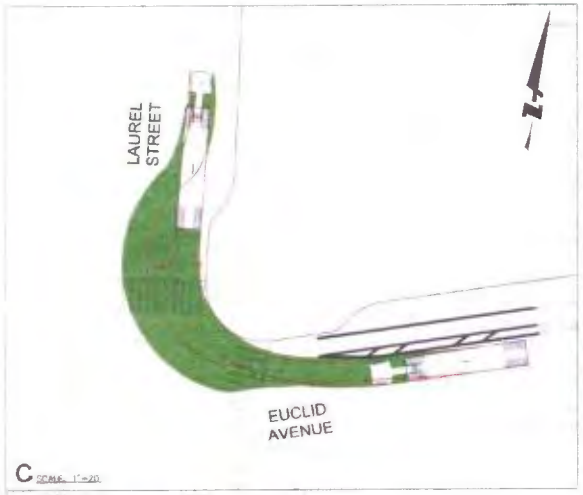
As shown in **Table IV.A-11**, it is estimated that less than one daily truck trip would be generated for the proposed general retail use, about 26 trips for the proposed restaurant use, 20 trips for the community market use, and 14 daily truck trips would be generated for the residential use, for a total of 59 daily truck trips. It is estimated that the proposed project's loading demand would be approximately three loading trips during an average hour and approximately four loading trips during the peak hour.

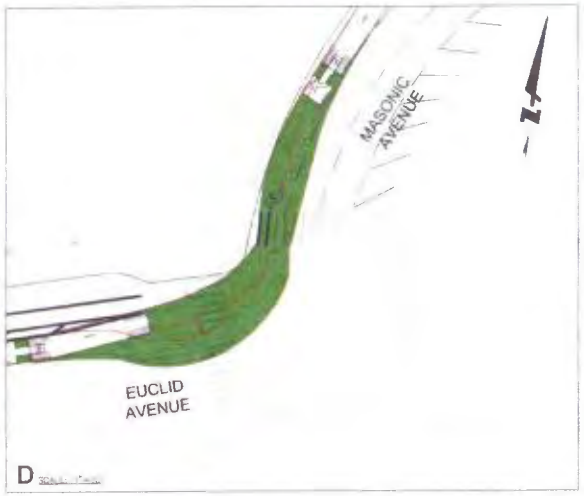
# EXHIBIT V

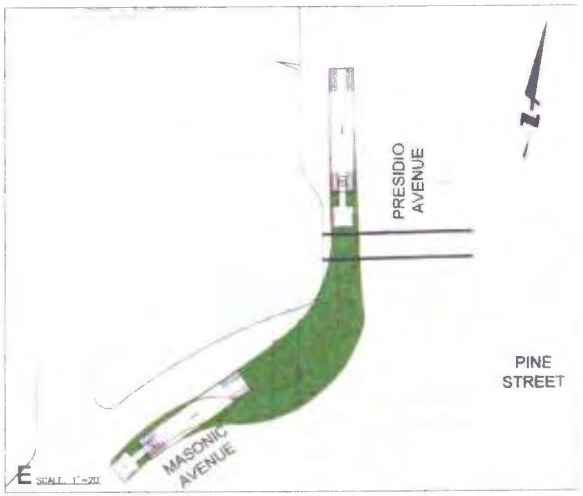


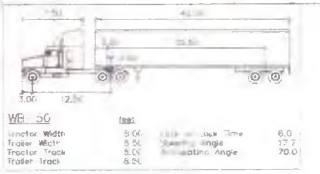






3333 CALIFORNIA

WB-50 CIRCULATION EXHIBIT

BkF 100 YEARS ENGINEERS SURVEYORS PLANNERS

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

TRUCK TURNING WB-50

08.17.2017
PLANNING APPLICATION SUBMITTAL

C4.03

I-DEVINCENZI2




3333 CALIFORNIA

BUS-40 CIRCULATION EXHIBIT

BkF 100 YEARS ENGINEERS . SURVEYORS . PLANNERS

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

08.17.2017
PLANNING APPLICATION SUBMITTAL

TRUCK TURNING BUS-40

C4.06

I-DEVINCENZI2

**KATHRYN R. DEVINCENZI**
22 IRIS AVENUE
**SAN FRANCISCO, CALIFORNIA 94118-2727**
Telephone: (415) 221-4700
E-mail: KRDevincenzi@gmail.com

BY HAND

January 8, 2019

RECEIVED
JAN 0 8 2019
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

San Francisco Planning Department
Attn: Kei Zushi, EIR Coordinator
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: Draft EIR for 3333 California Street, San Francisco, CA 94118
Planning Department Case No: 2015-014028ENV
State Clearinghouse No: 2017092053

In these comments, the term "project" shall include the proposed project and the proposed project variant, unless otherwise indicated.

**1. The DEIR Fails to Adopt Feasible Mitigation Measures for the Significant Impact From Construction Noise.**

1 (NO-4)

The Draft EIR (DEIR) admits that construction of the proposed project or project variant would expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels. DEIR p. 4.D.36. Despite this significant impact, the DEIR fails to adopt feasible mitigation measures required by the California Environmental Quality Act (CEQA). The DEIR is inadequate because it proposes only that the project sponsor prepare a noise control plan at a later time that would be approved by the Planning Department, and the DEIR does not specify the required contents of the plan and does not adopt a specific performance standard for mitigation of the significant noise impact.

The following mitigation measures are feasible and must be adopted to substantially reduce the significant impact from construction noise:

**MITIGATION MEASURE - NOISE-1: COMPLIANCE WITH SAN FRANCISCO NOISE ORDINANCE**

1. As a condition of approval of the project, contractors or representatives of the project sponsor shall comply with the provisions of Article 29 of the San Francisco Police Code as to Regulation of Noise, except as indicated herein.

**MITIGATION MEASURE - NOISE-2: SPECIFIC NOISE CONTROL MEASURES**

2. As a condition of approval of the project, the noise control plan for the proposed project shall include all of the construction noise control measures described in Mitigation Measure M-NO-1: Construction Control Measures set forth at DEIR pp. 4.D.42-51. Notwithstanding the foregoing, the monitoring noise stations shall be required to provide continuous noise monitoring at the nearest potentially impacted receptors whenever construction activities are being conducted and not merely from 7 am to 3 pm on Saturdays. 1 (NO-4) cont'd

Also notwithstanding the foregoing, night noise permits shall not be sought except in an emergency and at the time that any night noise permits are requested, the Construction Manager shall also provide written copies of the application for a night noise permit and all accompanying writings to the Laurel Heights Improvement Association by email to KRDevincenzi@gmail.com and frfbeagle@gmail.com or such other email address as LHIA may provide for notice.

**MITIGATION MEASURE - NOISE-3: PROHIBITION ON NIGHT CONSTRUCTION WORK EXCEPT IN EMERGENCY**

3. At the 3333 California Street site, construction work shall not be performed at night during the hours of 8:00 pm of any day and 7:00 am of the following day except in an emergency.

**MITIGATION MEASURE - NOISE-4: PROCEDURES FOR NOTICE TO RESIDENT ASSOCIATION OF APPLICATION FOR A PERMIT TO PERFORM CONSTRUCTION WORK AT NIGHT**

4. A complete copy of any application for a special permit to perform construction work at night pursuant to section 2908 of the San Francisco Police Code or any other law or regulation must be provided by contractors or representatives of the project sponsor to the Laurel Heights Improvement Association (LHIA) at the same time as it is submitted to the Department of Public Works (DPW) or the Department of Building Inspection (DBI) or any other government agency, and DPW, DBI and any other government agency shall consider comments and/or objections made by LHIA as to any such application. Representatives of the project sponsor shall provide complete copies of any such application to LHIA by email to KRDevincenzi@gmail.com and to frfbeagle@gmail.com or to such other email addresses as LHIA may provide for notice.

**MITIGATION MEASURE - NOISE-5: PROVISIONS FOR NOISE MEASUREMENTS**

1 (NO-4) cont'd

5. As a condition of approval of the project, the Department of Public Health Noise Prevention and Control Officer shall arrange for a qualified noise measurement professional(s) to be on call to travel to 3333 California Street and take noise measurements upon complaint about the level of noise by any resident of the area. The qualified noise professional shall arrive at the 3333 California Street site and commence the noise measurements within 15 minutes of receipt by the City of any complaint about the level of noise emanating from the project. The cost of such noise measurement and all related work and travel shall be assessed against the project sponsor as a condition of approval of this project. Receipt of a noise complaint by the City shall include without limitation initial receipt of a noise complaint by DBI, DPW, the Department of Public Health, the Police Department, 311, or any other government agency to which a noise complaint may be made. Copies of all writings regarding noise measurements made by such qualified noise measurement professional(s) and remedial action required or recommended shall be provided immediately to the Laurel Heights Improvement Association at the email addresses described above.

In the event the qualified noise measurement professional retained by the Department of Public Health fails to arrive at the 3333 California Street site and take noise measurements in accordance with this provision, the project sponsor shall deposit the sum of $20,000.00 (twenty thousand dollars) with the Laurel Heights Improvement Association, and that Association shall be entitled to use these funds to retain a qualified noise professional to perform all the measurements and activities described in this provision. As said sums are drawn down to $2,000, the project sponsor shall deposit additional $10,000 payments with said Association for ongoing noise measurements and mitigation in accordance with this provision. The project sponsor hereby grants permission for any qualified noise professional described in this provision to enter onto the 3333 California Street site and take noise measurements and monitor noise conditions and mitigation measures.

**MITIGATION MEASURE - NOISE-6: PROHIBITION ON VARIANCES TO NOISE REGULATIONS**

6. In relation to construction or operational noise that occurs at 3333 California Street, the Directors of Public Health, Public Works, Building Inspection, or the Entertainment Commission, or the Chief of Police or any other government representative, may **not** grant variances to noise regulations, over which they have jurisdiction pursuant to Section 2916 of the SF Police Code. The variance procedure provided by section 2910 of the SF Police Code shall not apply to construction or operational noise that occurs at 3333 California Street.

**MITIGATION MEASURE - NOISE-7: STORAGE AND IGNITION OF**

**CONSTRUCTION EQUIPMENT IN UNDERGROUND GARAGE**

7. To the greatest extent feasible, project sponsor shall store all construction equipment in the existing underground garage located on the project site at all times when such equipment is not in use, and all construction workers shall start up, turn on or perform ignition of all construction equipment in that underground garage.

**MITIGATION MEASURE - NOISE-8: PROOF OF USE OF MUFFLERS AND SOUND ATTENUATING DEVICES**

8. Project sponsor shall provide to the Laurel Heights Improvement Association (LHIA) written evidence that impact tools and equipment shall have intake and exhaust mufflers recommended by the manufacturers thereof and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation, and written evidence that pavement breakers and jackhammers shall also be equipped with acoustically attenuating shields or shrouds recommended by the manufacturers thereof and approved by the Director or Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation, as described in section 2907 of the SF Police Code. Project sponsor shall provide such written evidence to LHIA by email to the addresses described above for each impact tool or equipment to be used at the 3333 California site at least 48 hours prior to use of any such impact tool(s) and equipment on the site.

**MITIGATION MEASURE - NOISE-9: NOTICE TO RESIDENTS' ASSOCIATION OF NOISE COMPLAINTS AND REPORTS**

9. The Construction Manager or other designated person will provide copies of the noise monitoring log on a weekly basis to the Laurel Heights Improvement Association at the email addresses herein. The log shall include any complaints received, whether in connection with an exceedance or not, as well as any complaints received through calls to 311, DBI, or any other government agency if the contractor is made aware of them (for example, via a DBI notice, inspection, or investigation). The Construction Manager or other designated person shall also contemporaneously submit to the Laurel Heights Improvement Association copies of all reports submitted to the Planning Department Development Performance Coordinator.

1 (NO-4) cont'd

**2. The DEIR Is Inadequate Because It Fails to Analyze and Mitigate the Proposed Project's Significant Adverse Impact on a Scenic Vista, Substantial Damage to Scenic Resources and Substantial Degradation of the Existing Visual Character or Quality of the Site and Its Surroundings.**

2 (CEQA-3)

2 (CEQA-3) cont'd

Page V.C-11 of the Final EIR for the 2004 and 2009 Housing Element states that a project would have a significant effect on the environment is it would:

1. Have a substantial adverse effect on a scenic vista;

2. Substantially damage scenic resources, including, but not limited to, trees, rock outcropping, and other features of the built or natural environment which contribute to a scenic public setting;

3. Substantially degrade the existing visual character or quality of the site and its surroundings, or

4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties.

Since the project site was determined eligible for the National Register of Historic Places and has been listed in the California Register of Historical Resources, its aesthetic qualities are protected by CEQA and are not exempt from CEQA review. Both the existing office building and its integrated landscaping are historically significant resources. (Ex. A, final version of nomination that was approved by State Historical Resources Commission)

**A. The Proposed Project Would Have a Substantial Impact on Scenic Vistas.**

The project site is atop Laurel Hill and commands valued scenic vistas of the downtown and eastern portion of the City and also of the Golden Gate Bridge and other neighborhoods of the City to the northwest. During my years living in the neighborhood, I have seen innumerable members of the public enjoy these views during daytime as well as during nighttime. I have seen jubilant crowds of people view lunar eclipses from the sidewalks atop Laurel Hill at the corner of Laurel Street and Euclid Avenue and from the landscaped green spaces surrounding the main office building. Some photographs I have taken which show the existing condition of some of these views are attached hereto. (Ex. B , photographs taken on October 24, 2017 and January 7, 2019) These photographs show that the portions of the Bank of America Building, Transamerica Pyramid, Salesforce Building and Golden Gate Bridge can be seen from the high ground at Laurel Street and Euclid Avenue, from the landscaped green spaces surrounding the main office building and from public sidewalks along Laurel Street and Euclid Avenue. Also, the historically significant architecture of the main building can be seen across the landscaping on the perimeter of the site, and the site was designed so that the building and landscaping would function as an integrated composition.

3 (CR-1)

The public has used the green landscaped areas surrounding the main building as

4 (PD-5)

recreational space for many years, and the public has acquired a permanent right of recreational use in these areas. (Ex. D, letter of attorney Fitzgerald) 4 (PD-5) cont'd

The proposed project would construct new buildings on the south site of the site near Euclid Avenue and Masonic Avenue and on the western portion of the site near Laurel Street that would obstruct these public scenic vistas and obstruct the public view of the historically significant main building as viewed from the surrounding landscaping. Also, the proposed new buildings constructed on the landscaped areas surrounding the site would block public access to such vistas. In addition, the project proposes to add new trees/shrubs near the perimeter of the south side of the site and also street trees at this location that would also impair and/or obstruct these scenic vistas. (Ex. E, developer's renderings) 5 (CEQA-2)

The Final EIR for the 2004 and 209 Housing Element acknowledges that new residential housing could result in an impact related to scenic vistas if it would be developed in a manner that obstructs views from a scenic vista from a public area or introduces a visual element that would dominate or upset the quality of a view. (Ex. F. p. V.C-11) Figure V.C-1 shows street views of an important building in the area of the 3333 California site. Does this Figure describe a streetview of the main building at 3333 California Street as an important building?

The Community Preservation Alternative/Variant would avoid this significant impact on public vistas because it would retain the existing landscaped areas largely in their present form and existing public vistas from sidewalks and open space used by the public. Also, DEIR Alternatives B and C would retain the existing landscaped areas largely in their present form and avoid this significant impact on public vistas. DEIR 6.35 and 6.67. 6 (AL-2) 7 (AL-3)

Under CEQA, the City may not approve the Proposed Project/Variant, because a feasible alternative is available that would avoid or substantially reduce the project's significant impact upon scenic resources.

**Mitigation Measure:** Approve an alternative that would preserve the existing landscaped areas surrounding the main building on the southern and western portions of the site in their present form and do not locate any new construction on these areas.

**B. The Proposed Project Would Substantially Damage Scenic Resources, Including but not Limited to Trees, Slopes of Laurel Hill and other Features of the Built or Natural Environment Which Contribute to a Scenic Public Setting.** 8 (CEQA-3)

The Final EIR for the 2004 and 2009 Housing Element acknowledges that: "New construction could result in impacts related to damaging scenic resources if new housing would directly affect environmental features, such as topographic features, landscaping, or a built

landmark that contributes to a scenic public setting," and that "2009 Housing Element Policy 11.6 preserves landmark buildings, some of which could be considered a scenic resource of the built environment." Ex. F, p. V.C-24-25. As previously stated in my comments of June 8, 2018 on the Initial Study for 3333 California Street, which are incorporated by reference herein, the proposed project would excavate and remove substantial portions of the topography and existing slope of Laurel Hill (a scenic high point known for its scenic vistas), the historically significant landscaping and the historically significant built environment that contributes to a scenic public setting. The proposed project would remove 185 onsite trees, including 19 onsite Significant Trees (i.e. trees within 10 feet of the public right-or-way that meet specific height, trunk, diameter, and canopy width requirements) and 15 protected street trees along California Street. (Initial Study p. 69.) The project would remove significant portions of the landscaping surrounding the main building and all of the Terrace designed by the renowned landscape architecture firm of Eckbo, Royston and Williams. Also, new buildings constructed on presently landscaped areas would obstruct public views of the historically significant main building that contributes to the scenic setting as a significant example of modern architecture in the International Style.

8 (CEQA-3) cont'd
9 (GEO-1)
10 (CR-1)

The Mitigation Measure above would avoid or substantially reduce this significant impact on the environment.

### C. The Proposed Project Would Substantially Degrade the Existing Visual Character or Quality of the Site and Its Surroundings.

11 (CEQA-3)

The Final EIR for the 2004 and 2009 Housing Element acknowledges that new construction could result in impacts related to visual character if new housing would be developed with greater densities or heights than surrounding land uses or introduce incompatible uses in such a way as to substantially degrade the character or quality of the site. (Ex., p. 25.)

The proposed density of the project would be over twice the predominant density of the surrounding residential areas (which are predominantly RH-2 areas) and would add two-three stories to the main building to increase its height to 80 and 92 feet, which would be over twice the scale of the existing neighborhood, which has a predominant 40-foot height limit. The proposed project would fail to comply with 2009 Housing Element Policy 1.1, that requires housing projects to respect existing neighborhood character. (See, for example, Ex. G, photographs of residences along western side of Laurel Street). For the reasons stated above, the proposed project would develop the site with densities and heights that are substantially greater than the densities and heights of the surrounding land uses and would construct new buildings where historically significant landscaping integrated with the main building now exists, thereby substantially degrading the connection between the building and the existing landscaping. The Mitigation Measure set forth above would avoid this significant impact on the environment.

**D. The Proposed Project Could Create a New Source of Glare or Substantial Light Which Could Adversely Affect Day or Nighttime Views in the Area or Which Could Substantially Impact Other People or Properties.** 11 (CEQA-3) cont'd

The Final EIR for the 2004 and 2009 Housing Element acknowledges that new housing could result in impacts related to glare and light if new housing would introduce new sources of glare or light that are unusual for an urban area, and that new housing could introduce new sources of glare and glare if reflective glass or if bright, decorative or security lighting is used. Renderings of the project show a predominant glass-design, and security lighting would be needed along the proposed pathways and other areas on site. Since the exact type of materials and lighting is not known, the project has the potential to produce significant impacts on light and glare, which the DEIR failed to address. The following mitigation measures would reduce the potential impacts if incorporated as conditions of approval of the proposed project.

**MITIGATION MEASURE.** The project must comply with City Resolution 9212 (or any successor or similar regulation adopted to reduce glare), which prohibits the use of highly reflective or mirrored glass in new construction.

**MITIGATION MEASURE.** The project will not use bright, decorative or security lighting.

**3. The EIR's Statement of Project Objectives Is Unreasonably Narrow, and the DEIR is Inadequate Because It Lacks a Reasonable and Accurate Statement of Project Objectives.** 12 (PD-6)

The DEIR's statement of "Objectives" of the proposed project is unreasonably narrow, and biased toward the developer's proposed project concept, and inaccurately characterizes the proposed project/variant and its potential impacts on the environment. As a result, the DEIR fails to provide a reasonable or accurate statement of project objectives under CEQA standards.

The DEIR's allegation that the developer's proposal would redevelop an underutilized commercial site into a new mixed-use community is inaccurate. The 446,490 square-foot site is currently mixed-use commercial and retail (café) and is completely utilized for a 362,000 square foot commercial main structure which contains an 1,183 assignable square foot café and an 11,500 gsf childcare center (455,000 gsf office building minus 93,000 gsf of largely below grade parking garage), a 14,000 gsf service building, historically significant landscaping throughout the site and approximately 93,000 square feet of largely below grade parking. (DEIR p. 2.1; Ex. H, café permit; Ex. I, census data describing project site as "MIXED" land use with existing retail use) Under Resolution 4109/Stipulation as to Character of Improvements, the aggregate gross floor area is limited to the total area of the property (approximately 435,600 square feet, according to Dean Macris). (Ex. J, Dean Macris MEMO dated June 25, 1986.) According to the 13 (PD-3) 14 (PP-1)

DEIR, the aggregate gross floor area of the existing buildings totals approximately 376,000 square feet, which is 84.2 percent of the size of the project site, so at present only 15.8 % of the site may be covered by additional buildings. In addition, since the site zoning changed to R-4 in 1960 and then to RM-1 in 1978, while the prior stipulations of Resolution 4109 continue to apply, the property became a nonconforming use under the Planning Code, so the "total floor area in commercial use may not be expanded." (Ex. J, Macris MEMO and Ex. K, Passmore February 22, 1981 letter to John Cloudsley, Jr.) Under the current RM-1 zoning, office uses are generally not permitted, and retail uses are generally not permitted. (Ex. L, March 5, 2015 Letter of Determination; see also San Francisco Planning Code section 209.2 and Table 209.2, Zoning Control Table for RM Districts) 14 (PP-1) cont'd

The DEIR is also inaccurate, because it does not acknowledge that the site is now highly walkable, with pathways throughout that lead out to Walnut, Mayfair, Laurel and Euclid/Masonic Streets. The EIR fails to acknowledge that there is currently a pathway that leads from the front of the existing office building, through the building to the Eckbo Terrace and out onto Masonic/Euclid streets. 15 (PD-4)

The City's Preliminary Project Assessment specified that the proposed Walnut "walk" " would not be an extension of a City street but would be an internal pathway. (See June 8, 2018 comments by Kathryn Devincenzi on Initial Study for 3333 California Street, Ex. M. p. 15, stating as to measurement of height "curb along the Walnut street extension may not be used as the base of measurement because the Walnut street extension is not a public right-of-way.") The same analysis applies equally to the proposed Mayfair "extension." Thus, the DEIR inaccurately described the project's objectives as extending the "surrounding street grid into the site through a series of pedestrian and bicycle pathways and open spaces."

Also, since the plans do not specify the size of the proposed new retail uses, it cannot be determined whether the type of retail provided would be of a size that is neighborhood-serving, and some portions of the proposed retail space are very large and could accommodate on-local retail uses. (See August 17, 2017 plan sheet A4.03, and compare with sheet A4.02). Also, by its nature, the proposed 54,000 square feet of retail uses are of a size that would attract customers from areas that are not in the neighborhood. Moreover, the proposed 9,826 square feet of composite food and beverage retail uses (DEIR p. 4.C.54) would attract substantial numbers of persons from outside the neighborhood and are one step up from fast food. 16 (PD-6)

The project's objective to create complementary designs is inaccurate, because the design and architectural character of the proposed project/variant buildings would not be compatible with the scale or character of any of the neighborhoods surrounding the project site. Another objective acknowledges the incompatibility, acknowledging the "diverse surrounding context." Also the Preliminary Project Assessment stated that the architectural design should be made high quality, but the plans have not been revised to do so.

The description of the objective of creating a green, welcoming space that will encourage the use of the outdoors and community interaction is not applicable to the proposed project, which would create a concrete jungle with mostly strip planted beds constructed over underground concrete garage structures, in the place of natural, verdant expanses of lawns, shrubs, plants and trees planted into the ground. Also, the paved pathways proposed in the project fails to comply with the requirements of Planning Code section 135, which requires that "[u]sable open space shall be composed of an outdoor area or areas designed for outdoor living, recreation or landscaping." Proposed concrete pathways are inaccurately designated as open space on August 19, 2017 plan sheet L0.01. 16 (PD-6 (cont'd)

The fact the proposed project/variant inaccurately characterized proposed paved pathways as open space is acknowledged by the objective to incorporate open space that would maximize pedestrian accessibility.

Also, the DEIR fails to acknowledge that the objective to integrate the existing office building into the development is inaccurate since the proposed project proposes to divide it in two and demolish its executive wing.

In addition, the DEIR and project plans do not specify the type and amount of affordable housing that might be constructed on site, and the San Francisco Planning Code allows a development agreement to increase or decrease the amount of affordable housing otherwise required by the Planning Code. Thus, the DEIR contains no evidence that the proposed project/variant would achieve the objective of providing on-site affordable units consistent with ABAG's Regional Housing Needs Allocation for the City of San Francisco. The DEIR fails to specify how the proposed project/variant would achieve such ABAG allocation or evaluate the manner in which the proposed project/variant and alternatives would actually meet such ABAG allocation for all income levels.

In addition, the DEIR fails to identify the following conflicts between the developer's proposed project/variant and the requirements of Resolution 4109/Stipulation as to Character of Improvements. Those requirements provide that: (a) no residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended, (b) no dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than 3300 square feet, nor shall any such dwelling cover more than fifty percent of the area of such parcel or be less than twelve feet from any other such dwelling, or be set back less than 10 feet from any presently existing or future public street, or have a height in excess of forty (40) feet, and ( c) no residential building in other portions of the subject property shall have ground coverage in excess of 50% of the area allotted to such dwelling. The developer's proposed Euclid Building and proposed Laurel duplexes violate these provisions, and the 17 (PP-1)

developer's proposed buildings on other portions of the site violate provision ( c) because they have ground coverage in excess of 50% of the area allotted to such dwelling. Do you dispute that the developer's proposed project/variant would violate each of these provisions in the manner set forth above? The DEIR is inaccurate as to the proposed project's conflict with applicable laws

17
(PP-1)
cont'd

In addition, under Resolution 4109/Stipulation as to Character of Improvements, development of the property was required to include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building, a site plan was required to be submitted to the City Planning Commission showing the character and location of the proposed building or buildings and related parking spaces and landscaped areas upon the property, or upon each separate portion thereof as is allotted to such building or buildings. Such site plan was to be submitted to the City Planning Commission for approval as to conformity with these stipulations. The DEIR fails to discuss or provide for analysis the site plan that was approved by the City Planning Commission pursuant to this provision, and the EIR must be revised to provide this information.

It is also important to note that under Planning Code section 174, Stipulations as to Character of Improvements become portions of the Planning Code, so only the Board of Supervisors can modify the Stipulations as to Character of Improvements that are recorded against this site. Section 174 provides that:

> " Every condition, stipulation, special restriction and other limitation imposed by administrative actions pursuant to this Code, whether such actions are discretionary or ministerial, shall be complied with in the development and use of land and structures. All such conditions, stipulations, special restrictions and other limitations shall become requirements of this Code, and failure to comply with any such condition, stipulation, special restriction or other limitation shall constitute a violation of the provisions of this Code. Such conditions, stipulations, special restrictions and other limitations shall include but not be limited to the following:
>
> (a) Conditions prescribed by the Zoning Administrator and the City Planning Commission, and by the Board of Permit Appeals and the Board of Supervisors on appeal, in actions on permits, licenses, conditional uses and variances, and in other actions pursuant to their authority under this Code;
>
> (b) Stipulations upon which any reclassification of property prior to May 2, 1960, was made contingent by action of the City Planning Commission, where the property was developed as stipulated and the stipulations as to the character of improvements are more restrictive than the requirements of this Code that are otherwise applicable. Any such stipulations shall remain in full force and effect under this Code. (Planning Code section 174)

The DEIR inaccurately claims that a project objective would be to incorporate open space

in an amount equal to or greater than that required under the current zoning. DEIR 6.3. However the DEIR fails to acknowledge that this objective conflicts with the current zoning restrictions stated in Resolution 4109/Stipulation as to Character of Improvements require 100-foot landscaped set backs along the property's boundary with Euclid Avenue and along Laurel Street up to its intersection with Mayfair Drive. The EIR must be revised to state the amount of open space required under the current zoning applicable to the site (including Resolution 4109) and recirculated for public comment.

17 (PP-1) cont'd

In addition, the Resolution 4109/Stipulation as to Character of Improvements requires one parking space for each 500 square feet of gross floor area in the commercial buildings on the site. The developer's proposed project/variant fail to comply with these provisions, and the DEIR fails to discuss this conflict.

**4. The DEIR Inaccurately States the Characteristics and Impacts of Alternatives to the Proposed Project/Variant and Fails to Analyze Adequately a Reasonable Range of Alternatives.**

18 (AL-1)

The DEIR inaccurately compares alleged characteristics and impacts of the alternatives with those of the proposed project or project variant and inaccurately evaluates the comparative merits of the alternatives and the ability of each alternative to meet most of the basic project objectives. Due to these inaccuracies and the DEIR's failure to analyze a reasonable range of alternatives, the DEIR fails to foster informed decision making and public participation.

Contrary to the impression created in the DEIR, there was no *public* scoping process that considered various site plans, building retention programs, building heights, views of the character-defining features, land use programs, or feedback from the Architectural Review Committee of the San Francisco Historic Preservation Commission prior to publication of the DEIR. DEIR 6.9. The Planning Department failed to inform the public or the Laurel Heights Improvement Association, which nominated the site for listing on the National Register, of the Architectural Review Committee hearing that considered a range of alternatives on March 21, 2018. The Planning Department went out of its way to exclude the public and LHIA from the formulation of alternatives that would be evaluated in the DEIR.

After the DEIR was published, LHIA and members of the public advocated for a Community Preservation Alternative at a December 5, 2018 hearing of the San Francisco Historic Preservation Commission. The San Francisco Historic Preservation Commission's December 11, 2018 letter to the San Francisco Planning Department expressed interest in seeing the Community Preservation Alternative. (See Ex. 2 to LHIA's transmittal of Treanor SOIS evaluation) Also, the terms of the approved nomination of the site control the nature of the character-defining features of the resource, but the DEIR inaccurately characterizes them as expert opinion.

The DEIR acknowledges that "alternatives with excavation and building construction programs scaled down from that of the proposed project or project variant and taking a shorter period of time to build would result in fewer overall occurrences of adverse construction noise impacts. Although a reduced development alternative would limit the ability to fully achieve some of the basic project objectives, it could reduce the duration of construction noise as well as the overall amount of development, and associated residential, employment, and parking rate increases that generate significant transportation impacts." DEIR 6.9. However, the DEIR omits a reasonable explanation of the manner in which a reduced development alternative would limit the ability to fully achieve some of the basic project objectives, and in this respect presents an unsupported conclusion that is inadequate. A reduced development alternative could still achieve basic project objectives by providing a lesser amount of development on the site.

The DEIR claims that its analysis of alternatives is "qualitative relative to the identified impacts of the proposed project or project variant" but such a facile characterization does not justify the ambiguities and unsupported conclusions that are contained in the inadequate alternatives analysis. DEIR p. 6.10.

18 (AL-1) cont'd

The DEIR claims that alterations that are not entirely in conformance with *The Secretary of Interior's Standards for the Treatment of Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* (Secretary's Standards) may, or may not result in a significant impact under the "material impairment" significance standard of CEQA Guidelines Section 15064.5(b)(1). DEIR p.

However, Rehabilitation Standard 6 states that "deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and where possible, materials. DEIR p. 6.11. The DEIR states that if there are character-defining features identified in the preservation alternatives that would be retained, they would be repaired or replaced in conformance with Standard 6. *Ibid.* However, this claim is inaccurate because Alternative C would not replace the glass curtain walls with new windows that match the old in design, color, texture and materials.

19 (AL-3)

**Alternative F: "Code Conforming" Alternative**

20 (AL-1)

The DEIR inaccurately claims that its Code Conforming Alternative addresses neighborhood requests for an "all-residential" alternative. The neighborhood actually requested an alternative that would comply with the Existing Zoning ,which includes Resolution 4109, which bans retail on the site. However the Planning Department contorted this request into an alternative that does not reflect the zoning approvals that exist for the site. Instead, the Planning Department conceived of a non-existing zoning alternative that proposes uses that the applicant could apply for but have not been granted. ;Since application for conditional uses and other

permissions has not yet been considered by the Planning Commission or Board of Supervisors, it cannot be determined whether the Planning Commission or Board of Supervisors would grant the exceptions or approvals requested in the Code Conforming Alternative. 20 (AL-1) cont'd

The City unreasonably configured the so-called Code Conforming Alternative to avoid analyzing the alternative of constructing all new residential buildings in accordance with the RM-1 zoning that applies to the site along with Resolution 4109. For example, the DEIR acknowledges that under Planning Code section 304(d)(5), planned unit developments within residential districts may include commercial uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to limitations for neighborhood commercial cluster (NC-21) districts. DEIR p. 6.10. The DEIR inaccurately claims that the Code Conforming Alternative includes limited ground-floor commercial uses because of the existence of this section, but the Planning Commission has not considered whether commercial uses are necessary to serve residents of the immediate vicinity, and a plan sheet shows a large proposed retail space that could be used for non-local retail. The project site is now amply served by retail uses, as it is immediately adjacent to the two-block Laurel Village Shopping Center (which contains two independent grocery stores and a wide range of commercial stores), one block from the Sacramento Street commercial corridor which contains many restaurants, one block from a Trader Joe's grocery store, and approximately one-two blocks from the City Center which includes a Target Store and other stores, and one-two blocks from the Geary Boulevard commercial corridor, and is within walking distance of the Clement Street commercial corridor. Thus, there is a reasonable possibility that, upon consideration of the facts, the Planning Commission would find that commercial uses on the project site are not necessary to serve residents of the immediate vicinity. Importantly, the DEIR lacks any land use or zoning studies discussing the types of commercial uses in the nearby established commercial centers that would support the DEIR's conclusion that any new commercial use is necessary to serve residents of the immediate vicinity.

**Alternative A: No Project Alternative**

The DEIR is inaccurate in claiming that Alternative A: No Project Alternative would not achieve any of the project objectives. The site currently includes office uses, a childcare center and a café (which is considered a type of retail use) Census data states that the site is mixed use. (Ex. I) Thus, Alternative A would meet the objective of having a mixed use development, although not to the same degree as the proposed project/variant.

**Alternative B: Full Preservation - Office Alternative**

Alternative B: Full Preservation - Office is unreasonably configured in the DEIR to include only 167 residential units and to construct a one-level vertical addition on the roof to expand the usable space for office uses. Given the City's housing needs, a reasonable alternative

would be configured to reuse the existing office building to provide residential uses. Also, in Alternative B, the Plaza B and Walnut buildings are set back to retain brick perimeter wall along California Street, which could be changed to provide more space for residential uses. DEIR pp. 6.28. Alternative B is also unreasonably configured to eliminate the existing childcare center and fails to mention the existing café in the main building. Also, the Annex could be re-purposed and expanded vertically to accommodate residential use, instead of being kept in its existing state in Alternative B. 20 (AL-1) cont'd

THE DEIR inaccurately states that pedestrians would not be able to walk through the site to Presidio, Masonic, or Euclid Avenues under Alternative B. In fact, there is an existing passageway through the main office building that leads to the Eckbo Terrace and exits onto Euclid/Masonic. If reasonably configured, Alternative B could include signage would explain that pedestrians would be allowed to use this north/south throughway. In addition, pedestrians can now walk through the site and exit through the Mayfair or Laurel gate and walk from those points to Euclid Avenue.

Alternative B would excavate for a two-level California Street parking garage DEIR p. 6.29, 49. With a construction program limited to the northern portion of the site, and a shorter, single-phase construction schedule, the number of temporary construction-related noise events that could affect off-site sensitive receptor locations would be reduced from those under the proposed project or project variant. However, construction activities would be similar, e.g., the use of excavators with hoe rams to fracture and remove bedrock as part of the excavation for the California Street garage. Therefore, the potential to generate substantial temporary and periodic noise increases of at least 10 dBA or greater increase over ambient noise levels at off-site locations would remain. The DEIR admitted that under Alternative B, off-site sensitive receptors along the west side of Laurel Street would be exposed to similar, but slightly lower, noise levels due to less construction along Laurel Street and the south side of the project site, and that off-site sensitive receptors along the east side of Presidio Avenue and along the south side of Euclid Avenue would not be as directly exposed to the temporary, construction-related noise increases because of the greater distance from, and the more limited nature of, the construction activities. The DEIR concluded that as a result of the proximity of construction activities to off-site sensitive receptors along California and Laurel Streets, the nature of the construction activities and the potential for encountering bedrock, construction noise impacts under Alternative B (although more limited in terms of the number of noise events) would be significant and would require implementation of Mitigation Measure M-NO-1. DEIR p. 6.49.

**Alternative C: Full Preservation - Residential Alternative** 21 (AL-3)

Alternative C demolishes the Annex building and concludes that the character-defining features of the existing building are "mostly retained." DEIR p. 6.65. Site and landscape features contributing to the corporate campus setting are mostly retained. Most prominent views of the

project site are retained with minimal change. *Ibid.*

The DEIR unreasonably configured Alternative C: Full Preservation - Residential Alternative to have 534 residential units and 44,306 square feet of ground-floor retail space. Alternative C would have 24 less residential units than the proposed project, but if reasonably configured would construct 24 residential units in some of the ground-floor space proposed for retail uses.

21
(AL-3)
cont'd

Alternative C is also unreasonably configured to have a new exit-only driveway onto Masonic Avenue near the intersection with Pine Street for the California Street Garage and the retained parking garage under the adaptively reused building (residential, retail, commercial, daycare, and car-share parking spaces). This exit near the intersection of Masonic with Pine Street would create a potential traffic hazard on a Major Arterial that serves substantial traffic in the P.M. peak hour. This Alternative unreasonably bars automobiles from exiting on Presidio Avenue, which is one of the principal means of egress from the existing underground garage, while Alternative C has three exits onto Laurel Street. DEIR p. 6.71. A reasonable configuration of Alternative C would allow automobile ingress and egress from all existing points of entry that are retained.

The DEIR inaccurately claims that under Alternative C, pedestrians would not be able to travel through the site to, or access the site from, Masonic and Euclid avenues. DEIR p. 6.73. As previously stated herein, there is an existing north/south passageway through the main building that leads from the northern entrance of the building, through the building, opens onto the Eckbo Terrace and leads to Masonic and Euclid avenues, which can be marked with signage as open to the public.

The DEIR states that under Alternative C, solid waste would be collected at the off-street refuse staging area adjacent to the off-street freight loading dock in the California Street Garage and compacted for offsite transport. DEIR 6.74. The DEIR's meaning is unclear. Please clarify whether the proposed off-street refuse and staging area and the adjacent off-street freight loading dock would both be located inside the proposed garage.

As to construction duration, how much time would it take to construct the first phase of Alternative C described at DEIR p. 6.75 (consisting of demolition of the circular garage ramp structures and the northerly extension of the east wing of the existing office building and alterations to the existing office building)?

How much time would it take to construct the second phase of Alternative C described at DEIR p. 6.75 (consisting of demolition of the existing annex building and the surface parking lots on the north and west portions of the site, excavation and site preparation for construction of the California Street buildings and the Mayfair Building and associated garages)?

21
(AL-3)
cont'd

The DEIR p. 6.75 states that as with the proposed project or project variant excavation under Alternative C would extend to a depth of approximately 40 feet below ground surface and would encounter bedrock, and site disturbance would occur in an area of know soil and groundwater contaminants from historic uses. Under the proposed project, project variant and Alternative C, please describe which portions of the site would be excavated to a depth of approximately 40 feet below ground surface, which portions of the site would be occupied by underground levels, and state the number of levels of underground garage or other underground structure that would be constructed in each location. It appears from the DEIR that excavation to a depth of approximately 40 feet below ground surface that would encounter bedrock would occur in locations other than under the proposed Walnut building. Also, how long do you expect that it would take to remediate the know soil and groundwater contaminants from historic uses and explain what is known to date about the potential methods of remediation and provide all writings describing the potential methods and duration of remediation and measures that would be taken to protect the public from exposure.

In addition, what is the estimated cost of demolishing the northerly extension of the east wing of the existing office building, repairing and/or supporting the remaining structure in this location, and the estimated duration of that demolition? Also, what is the estimated cost of dividing the existing main building and its southern wing (including any reinforcement needed)? What is the estimated cost of strengthening the existing main building to be able to support additional stories? Note that this information is relevant to the feasibility of alternatives.

Alternative C is also unreasonably configured because it would have 210 fewer residential units than the project variant. A variant of Alternative C could have been developed that constructed residential units in some of the space that Alternative C proposes to use for retail uses.

Please explain why Alternative C would allegedly provide fewer activated neighborhood-friendly spaces along the adjacent streets than the proposed project or project variant. DEIR p. 6.75. Please explain how Alternative C would provide a high quality and varied architectural and landscape design, utilizing the site's topography and other unique characteristics. DEIR p. 6.75. The information provided in the DEIR does not explain this statement. Please explain how Alternative C would construct some open spaces such as the plazas and Mayfair Walk that would be usable to project residents and the public, but not as many as the proposed project or project variant. DEIR p. 6.75. Please explain how Alternative C would partially meet Objective C by providing code-required open space and how each component of such space could be used for recreational purposes.

The DEIR fails to acknowledge at p. 6.76 that Alternative C would retain the views of prominent character-defining features of the property. Alternative C would retain public vistas from the landscaped green spaces along Euclid Avenue and Laurel Street to the integrated

window-walled building and to the Downtown and other areas of the City, which are also prominent character-defining features of the property. So are views of large trees and other landscaping visible from the public ways.

21
(AL-3)
cont'd

Please explain exactly what the EIR means by replacing the existing glass curtain wall system with "compatible residential window wall system," how the new system would be different, and whether the system would retain the geometric patterns which the existing window walls have. DEIR p. 6.76. The DEIR only states that the replacement windows would have "small panes divided by a mullion and muntins."

Also, please explain the nature of the materials proposed for the vertical addition in Alternative C that would appear visually subordinate to the historic portion of the building. DEIR. pp. 6.77-78. Please explain the nature of the contemporary design that would distinguish the proposed rooftop addition from the original building.

The DEIR states at p. 6.77 that under Alternative C, the rooftop mechanical penthouse would be removed. Please explain the location at which such equipment would be relocated including whether it would be on the exterior of the building and the nature of the equipment. DEIR p. 6.78 states that the existing mechanical penthouse would be replaced, and if replacement on the rooftop is intended, please explain the proposed location of the replacement and the location, height and materials proposed to be used in any proposed screening.

The DEIR inaccurately neglects to mention that under Alternative C, the existing green spaces and lawns used by the public that run along Laurel Street and the landscaped beds along Laurel Street would be retained in addition to such areas along Euclid Avenue, although the drawing on DEIR p. 6.72 shows that these areas would be retained except for the area at which the new proposed Mayfair Building would be constructed.

At page 6.77, the DEIR states that under Alternative C, the proposed addition would increase the height of the existing building (by approximately 12 feet for a total height of approximately 67 feet), but at page 6.78, it describes the addition as a "**two-story, stepped vertical addition**." (Emphasis added) Please clarify this discrepancy and confirm that under Alternative C, the proposed addition would be one-story and state the amount of additional height that it would have.

The DEIR inaccurately claims that the best examples of the integration of the character-defining features of the site occur on the southern and eastern portions of the site, whereas elsewhere, it identifies the concrete pergola and landscaped beds along Laurel Street as character-defining features. DEIR p. 6.80. The DEIR fails to acknowledge that the landscaping along Laurel Street is also integrated with the main building.

Alternative C is unreasonably configured because the DEIR lacks any explanation or justification for the conclusion that Alternative C would provide retail parking at a higher rate per square footage of retail space than the proposed project and project variant, respectively. DEIR p. 6.82. The proposed project would provide 54,117 square feet of retail uses, but Alternative C would provide only 44,306 gsf of retail space. Please explain why Alternative C could not provide retail parking at the same rate per square footage of retail as the proposed project and project variant, respectively. 21 (AL-3) cont'd

Also, the DEIR inaccurately claims at page 6.85 that pedestrians would not be able to travel through the site to Masonic and Euclid Avenues because the southern half of the north-south Walnut Walk would not be developed. As previously explained, there is an existing pathway that runs through the office building and opens onto the Eckbo Terrace and runs therefrom to Masonic and Euclid avenues through a gate. Signage could identify this passageway as a public throughway. Also, pedestrians can travel through the Walnut gate and through the site and exit onto Mayfair or Laurel streets. The same comments apply to bicycle access under Alternative C.

DEIR p. 6.97 states that all new construction would be subject to the "Historical Building codes." Please explain exactly what codes are meant by this statement and please provide citations to all such applicable codes.

**5. The DEIR is Inaccurate or Incomplete in Numerous Respects.**

The DEIR states that centralized trash rooms "with combined chutes or bins for recyclable, compostable and trash would be located within each residential building on every floor. The combined chutes would terminate into separate recyclable, compostable, and trash bins using tri-waste sorters and would be held within trash collection rooms." DEIR p. 2.78. Please state the amount of noise expected to be generated by the tri-waste sorters, the times of day during which such noise would be generated; also, please state whether such noise was included in the DEIR's analysis of operational noise and describe the details of the analysis that took into account such noise. Please also describe in detail the amount of space that would be occupied by the proposed tri-waste sorters and the trash collection rooms in each proposed location in the proposed project. 22 NO-3

The DEIR indicates that the Transportation Demand Program measures supplied for the proposed project/variant, subject to refinement during the planning review process for project entitlements, would include delivery supportive amenities. TDM Measure Delivery-1 states that an area for the receipt and temporary storage of package deliveries would be provided in the off-street loading areas or other locations on the project site. DEIR p. 2.79. Please describe in detail the potential other locations on the project site that could be provided for these delivery supportive amenities and how they would operate. 23 (TR-10)

The DEIR states that a proposed 4,000 square-foot open space called a corner plaza would be constructed near the intersection of Masonic and Euclid avenues and this open space would be activated by the proposed retail use in the adjacent Euclid Building, and the residential lobby and amenity spaces in the adjacent Masonic and Euclid buildings. DEIR p. 2.80. Please describe in detail the nature of the potential amenity spaces that could be placed in the adjacent Masonic and Euclid buildings. 24 (PD-3)

THE DEIR claims that the proposed project would retain approximately 53 percent of the overall lot area (approximately 236,000 square feet, excluding green roofs) as open area with portions to be developed with a combination of common and private open space. DEIR p. 2.83. Please provide the calculation of this proposed open space, including without limitation the amount of open space that could be provided in each component of the open space and state whether each component of the open space would be paved or planted into soils that drain toward groundwater. In this calculation, please specify the location and square footage of such open space that would consist of paved pathways or other paved areas and state how each component of such proposed "open space" meets the requirements of the Planning Code as to usable open space. The DEIR indicates that the proposed Cypress Stairs and Walnut Walk (excluding the Walnut Street "extension," roundabout and walkway between Center Building A and Center Building B) would constitute open space; please explain in detail why the walkway between Center Building A and Center Building B would not constitute open space, including without limitation under the San Francisco Planning Code. (DEIR pp. 2.83)

The DEIR states that access to the proposed Euclid Green would be developed at the corner of laurel Street and Euclid Avenue. These spaces would be designed to be compliant with the Americans with Disabilities Act. DEIR pp. 2-76-2.77. The DEIR and plan sheets do not explain the changes proposed to the Euclid Green. The DEIR acknowledges that the existing green lawns at the corner of Euclid Avenue and Laurel Street (23,600 square feet) and along Presidio Avenue (10,700 square feet) are accessible to the general public. DEIR p. 2.9. Please describe in detail each and every change that the developer proposes to make to the existing green spaces that currently exist along Euclid Avenue and Laurel Street. The City's Urban Design Team review notes state that "Euclid Park seems to show retaining walls and other interruptions. It seems strongest as a single zone of lawn." (Ex. M, November 16, 2017 UDAT Notes) Please describe in detail what was meant by this statement and what document(s) the Planning Department reviewed before it made this comment. The DEIR and plan sheets submitted to the City do not show any such proposed modifications to the existing lawn and landscaped spaces along Euclid Avenue or Laurel Street.

In addition, if there is a possibility of any portion of the site being used for a community garden, please explain the proposed location and size of the proposed community garden and which existing site features would be changed to install it. If there is a possibility of any portion of the site being used for a farmer's market at any time, please explain the proposed location and

size of the proposed farmer's market and the anticipated times of operation. 24 (PD-3) cont'd

**Conclusion**

The DEIR must be revised to correct the inadequacies described herein, and the revised EIR circulated for public comment. 25 (GC-1)

Very truly yours,

Kathryn R. Devincenzi

Kathryn R. Devincenzi

ATTACHMENTS: Exhibits A-M

# EXHIBIT A

NPS Form 10-900
OMB No. 1024-0018

**United States Department of the Interior**
National Park Service

# National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form.* If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

## 1. Name of Property

Historic name: Fireman's Fund Insurance Company Home Office
Other names/site number: University of California at San Francisco Laurel Heights Campus
Name of related multiple property listing:
N/A
(Enter "N/A" if property is not part of a multiple property listing

## 2. Location

Street & number: 3333 California Street
City or town: San Francisco 94118 State: CA County: San Francisco 075
Not For Publication: ☐ Vicinity: ☐

## 3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

**___national ___statewide ___local**

Applicable National Register Criteria:

**___A ___B ___C ___D**

**Signature of certifying official/Title:** **Date**

**State or Federal agency/bureau or Tribal Government**

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

**Signature of commenting official:** **Date**

**Title :** **State or Federal agency/bureau or Tribal Government**

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

## 4. National Park Service Certification

I hereby certify that this property is:

___ entered in the National Register
___ determined eligible for the National Register
___ determined not eligible for the National Register
___ removed from the National Register
___ other (explain:) _____

Signature of the Keeper Date of Action

## 5. Classification

**Ownership of Property**

(Check as many boxes as apply.)

| | |
|---|---|
| Private: | [x] |
| Public – Local | [ ] |
| Public – State | [ ] |
| Public – Federal | [ ] |

**Category of Property**

(Check only **one** box.)

| | |
|---|---|
| Building(s) | [x] |
| District | [ ] |
| Site | [ ] |
| Structure | [ ] |
| Object | [ ] |

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

**Number of Resources within Property**
(Do not include previously listed resources in the count)

| Contributing | Noncontributing | |
|---|---|---|
| 2 | | buildings |
| 1 | | sites |
| | | structures |
| | | objects |
| 3 | | Total |

Number of contributing resources previously listed in the National Register 0

**6. Function or Use**
**Historic Functions**
(Enter categories from instructions.)
COMMERCE/TRADE Business

**Current Functions**
(Enter categories from instructions.)
EDUCATION Research Facility

## 7. Description

**Architectural Classification**
(Enter categories from instructions.)
MODERN MOVEMENT International Style
MODERN MOVEMENT

**Materials:** (enter categories from instructions.)
Principal exterior materials of the property:
Foundation: concrete
Walls: glass
Walls: aluminum
Walls: brick
Walls: concrete
Roof: asphalt
Other: metal
Landscape walls: brick
Gates in landscape walls: metal
Sidewalks: exposed aggregate concrete
Terraces and patios: exposed aggregate concrete divided into panels by inlaid rows of brick
Circular tree beds: modular sections of concrete

**Narrative Description**
(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

**Summary Paragraph**

The Fireman's Fund Insurance Company Home Office is a 10.2-acre property in a central, predominantly residential area of San Francisco called Laurel Heights. From the property there are views in various directions to distant parts of San Francisco. The property consists of two buildings and a landscape that were designed to function as a single entity. The main building, referred to in this nomination as the Office Building, is a large three- to seven-story building

located in the center of the property. There is also a much smaller, one-story Service Building in the northwest corner of the property. The two buildings were designed to complement each other in character and materials. The Office Building is a glass walled building with an open character. The Service Building is a brick building with a closed character. The Office Building is an International Style building which despite its size is built into its sloping hillside site in such a way as to minimize its presence. Its four wings, each built for different functions, range from three floors to seven floors. It is characterized by its horizontality, its bands of windows separated by the thin edges of projecting concrete floors, and brick trim. The wings of the building frame outdoor spaces whose landscape design connects the outdoors with the indoors both functionally and conceptually. The landscape design includes outdoor spaces for use by employees, parking lots, circulation paths, and vegetation. The principal outdoor spaces are the Entrance Court, the Terrace, and small areas around the Auditorium.

## Narrative Description

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## SETTING

The Fireman's Fund Home Office property is located in a central area of the north half of the City of San Francisco near the intersection of two principal streets, California and Presidio. The property occupies almost all of a large irregular block bound by California Street on the north, (continuing clockwise) Presidio Avenue on the east, Masonic Avenue on the southeast, Euclid Avenue on the south, and Laurel Street (in straight and curved sections) on the west. Fireman's Fund occupies about 10.2 acres—the entire block except for a small triangular parcel at the corner of California and Presidio. (See Map 1 and Map 4)

The site itself slopes down from about 300 feet in elevation in the southwest corner to about 225 feet in the northeast corner. It is part of a cluster of low hills associated with Lone Mountain whose several high points were developed as cemeteries in the nineteenth century. The Fireman's Fund site was previously a portion of the Laurel Hill Cemetery, and was long recognized for its views. Today there are distant views from the property to the southeast and downtown, to the northwest and a partial view of the Golden Gate Bridge, and to the west into the Richmond District.

The property is surrounded on all sides by thoroughly developed parts of the City of San Francisco. The site itself is at a junction of several different historical developments. To the east and north, the streets are laid out in a modified extension of the original grid of the city. Across Presidio Avenue on the east the neighborhood is called the Western Addition, characterized by a mix of middle-class homes built in the nineteenth century, and by flats and apartments built in

the years after the earthquake and fire of 1906. To the north, Presidio Avenue is the dividing line between two of San Francisco's wealthiest late-nineteenth- and early twentieth-century neighborhoods, Pacific Heights to the east and Presidio Heights to the west. To the west along California Street is Laurel Village, a post-World War II strip shopping center. To the west and south is Laurel Heights, a post-World War II residential development of houses and apartments. To the southeast across Masonic Avenue is Station 10 of the San Francisco Fire Department.

## BUILDINGS

There are two buildings on the Fireman's Fund property. The Office Building, which is by far the larger of the two and is sometimes referred to as the main building, is located in the center of the property and is surrounded by lawns, gardens, and landscaped parking lots. The Service Building, referred to as the Annex since 1985, is a relatively small building located at the northwest corner of the property. Although different in size and function, the two buildings were designed to relate to each other as part of the overall design of the property. The materials and character of the two buildings express these relationships which are simultaneously contrasting and complementary. The character of the Office Building is dominated by its extensive exterior use of glass for walls, which form long bands between the thin exposed edges of its reinforced concrete floors. Brick is used as a secondary material in the building, but also as a visual connector to features of the landscaped grounds and to the Service Building. The Office Building, clad in glass, provides views of the city for its occupants and presents a transparent character to the outside. The almost windowless Service Building encloses its machinery and utilitarian work space.

### Office Building

The Office Building as it exists today is the product of two principal periods of construction. The original building was completed in 1957 with the design of its siting, plan, and structure intended to accommodate future expansion. Between 1963 and 1967, a major expansion was undertaken in three phases. Other than these, during the period of ownership of the property by Fireman's Fund, there were many alterations made to the configuration of interior spaces, as was intended in a building with a flexible office plan. All of these changes were designed by the original architect or his successor firm and built by the original general contractor. (See Map 2)

Since Fireman's Fund sold the building in 1983, there have been extensive changes to interiors but only two important changes to the exterior—a new main entry and a darkening of the windows.

*Plan*

Today, the 354,000 square foot office building occupies a footprint consisting of four rectangular wings. Three of these wings are at right angles to each other and to the principal surrounding

streets—to California Street, Presidio Avenue, and the grid plans of the Western Addition, Pacific Heights, and Presidio Heights. The fourth wing is at an angle to the others but is parallel to Euclid Avenue.

These four wings have been named in various ways but for the purposes of this nomination are named as follows. The Office Wing (north), parallel to California Street, and the Office Wing (east), parallel to Presidio Avenue, together described as the Office Wing, were designed to house the principal employee work areas and associated functions. With levels of parking partially below ground (referred to as sub-levels), the Office Wing (east) is sometimes called the Garage Wing. The Executive Wing, parallel to Euclid Avenue, was designed for executive offices (and sometimes has been called the Administrative Wing). The Cafeteria Wing, parallel to Laurel Street, which connected the Office Wing and the Executive Wing, was designed to house the cafeteria and other employee services.

Considerations in the arrangement of the four wings of the building included the relation to their functions, the topography of the site, views to and from the building, relationships to the surrounding neighborhoods, access to the site, relationships to outdoor spaces framed by the wings of the building, and parking.

The largest and tallest part of the building—the combination of the Office Wing (north) and the Office Wing (east)—is situated on the lowest elevation, an arrangement that minimizes its visual presence on the surrounding streets and from afar. The lowest part of the building, the Executive Wing, is on the highest ground, which is a way of being the least conspicuous in the most visible location. As much as feasible for a very large building, the Fireman's Fund Home Office blends into its site and its largely residential setting. The horizontality of its design intentionally emphasizes its connection to its site.

The principal entrances to the building are on California Street and Laurel Street. From California Street, the Employee Entrance was designed primarily to provide access for workers in the Office Wing, and the Auditorium entrance was for workers and visitors to the Auditorium and nearby offices. From Laurel Street, the Executive and Visitor Entrance, near the north end of the Cafeteria Wing, was originally the principal entrance both for executives and visitors to the building. Secondary entrances along the east side of the Cafeteria Wing, provide access to the Terrace Garden from the Cafeteria and the employee's lounge.

The Office Wing (east) and the Garage on which it sits altogether is seven stories in height. It consists of three sublevels for parking and four office floors above. The parking garage extends further to the north and west than the office floors but because of the topography and landscaping is not highly visible. The most visible feature of the garage is its pair of circular entrance and exit ramps north of the rest of the structure. On the south side of this wing is a rectangular auditorium

that extends beyond the volume of the main structure. The north end of the office floors of this wing is raised above the top of the parking garage on concrete piers so that there is a covered driving and parking area. Inside, this wing was designed as open office space with scattered enclosed offices for departmental managers.

The Office Wing (north) is a four-story building. Both California Street entrances are in this wing, one leading back to the Auditorium and the other, which is generally on axis with the entrance gate on California Street. This entrance was altered in 1984–1985 with a remodeled interior lobby and a new entranceway structure on the outside (described below under alterations). Inside, this wing was designed with a central circulation and service core surrounded by generally open office areas on each floor. Scattered on the periphery of the open office areas were a few enclosed offices for departmental managers.

The Cafeteria Wing is a three-story building—the lower story is built into the hillside so that it is exposed only on the east side adjacent to the Terrace. Employee service functions are on the Terrace level where there is access to outdoor gardens and there are distant views to the east. The Executive and Visitor Entrance is on the second level adjacent to the Entrance Court on the west side.

The Executive Wing is a three-story building with its lower story partially built into the hillside. Inside, central corridors originally opened onto private offices for executives on each side. At the east end, offices at the junction with the Cafeteria Wing were originally for the president and the chairman of the Board of Directors of the company; nearby were board rooms, secretaries' offices, and service spaces. Upstairs above the president's office an original penthouse with a lounge, dining room, and outdoor deck was replaced by the 1963–4 addition.

*Structure, Materials, and Mechanical Systems*

At the most general level, the structure and materials of the building consist of concrete pile foundations, a mix of steel and reinforced concrete columns, concrete floors and roof, and exterior curtain walls of glass except for limited areas where walls are brick.

Because of the original 1957 plan of the Office Wing (north), special steel columns were designed for this section. The Office Wing was designed with a central reinforced concrete service core surrounded by open office space. To create an office space with a minimum of columns, the concrete roof spanned fifty-five feet from the core to the perimeter. Forty feet from the core were steel columns, beyond which the concrete roof was cantilevered. Ordinary steel columns could not practically be made to support these loads, so special columns were designed with steel channels fastened together as columns. This method produced slimmer columns than other approaches, minimizing their visual presence in the open office areas. When the Office

Wing (east) was added in 1966–1967, this same structural system was employed to provide a similar interior arrangement.

To produce concrete floors with narrow cantilevered outer edges, which would enhance the appearance of the building as a glass box, floor structures are built of one-way concrete girders and joists. Beyond the line of the windows, the concrete floor structures serve as platforms for washing windows.

Between the concrete floor structures interior spaces are enclosed by continuous horizontal bands of windows. The windows themselves are in regular vertical rectangular units. Extruded aluminum frames hold large middle panels of clear glass above bottom panels of ceramic coated glass, originally blue in color. In alternate window units, there are two types of operable panels at the junction of the top and bottom panels.

Red brick laid in running bond is used in scattered locations for a mix of both functional and aesthetic reasons. It is used at the principal entrances on California and Laurel Streets to make their locations clear. It is used at the west end of the Executive Wing to present a more domestic face to the houses that are near-by on Laurel Street—this brick wall also blocks the afternoon sun from overheating the interior and prevents glare seen from the west. Brick is used for the auditorium extension on the south side of the Office Wing. And, brick is used at the east end of the building on the exposed level of the mostly underground parking garage to screen the parking area from view.

The principal structural features of the auditorium are grouted brick walls and two deep reinforced concrete roof beams. The walls are formed of brick inner and outer surfaces with rebar and grout in between. The angled brick bays of the walls and the plaster over some interior surfaces were used for acoustical reasons.[1]

*Architecture*

The design of the building is associated with the International Style and the idea that form follows function. The simple structural concept is clearly evident in the appearance of the building. By virtue of its consistent design and use of materials, the building reads visually as a single structure. At the same time, the functions of its different wings are expressed in their size, context, and relationships to the gardens, lawns, and parking areas around the building and to the views to and from the building. The four-story Office Wing accommodates the largest number of workers, originally in open offices. From its open-office floors, there are wide views of the city of San Francisco. The smaller Executive Wing accommodates a relatively small number of

[1] N. C. Stone, "In the News: Fireman's Fund Building Has Unique Acoustic," *Architect and Engineer* 210, No. 3 (September 1957): 43. Robert Cosby, Telephone conversation with Michael Corbett, 3 February 2018.

workers, originally in private offices. The smaller scale of this wing is oriented to the Entrance Court on the north and a wide lawn on the south.

**Service Building**

The Service Building, described on original 1955 plans as a Garage and Service Building, has had two substantial additions within the period of significance. Both were designed by the original architect and built by the original general contractor. The brick exterior of the additions matches that of the original building and that used on the Office Building.

As originally designed, the Service Building had an L–shaped footprint of two slightly overlapping rectangles enclosing 10,500 square feet. The larger rectangle was occupied as a garage and the smaller as a maintenance shop. As altered, the footprint is now an irregular cluster of attached rectangles enclosing 13,000 square feet for mechanical and maintenance functions.

The Service Building is a steel frame and reinforced concrete structure enclosed in brick. Its openings are limited to glass and aluminum doors, a few window openings, and ventilating louvers in the boiler room.

## LANDSCAPE

### Landscape Features Associated with the Mid-1950s Design

The landscape was an integral part of the original design for the new corporate headquarters commissioned by Fireman's Fund in the mid-1950s. The San Francisco-based firm of Eckbo, Royston, and Williams (ERW) was the landscape architect for the original landscape design, completed in 1957, and its successor firm Eckbo, Dean, Austin, and Williams (EDAW) designed the landscape associated with the mid-1960s additions. The landscape setting around the modernist Office Building integrates functional needs (such as parking lots and internal circulation) with large areas of lawns and structured outdoor spaces (the Terrace, Entrance Court, and the Auditorium's outdoor spaces). The landscape is designed to promote the integration between architecture and landscape and uses forms and materials that are characteristic of modernist designs from the mid-twentieth century. (See Map 2 and Map 3)

*Brick Wall*

A brick wall, which takes different forms, provides a continuous and unifying element around the edges of the site. It exists as a retaining wall along the perimeter of the property's northeast, north, and west sides. Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—are integrated into these sections of the wall. Each of these three entrances has a separate vehicular and pedestrian opening framed by brick pillars and secured by a double-leaf, metal rail gate when the property is closed. On the south side of the Executive/Visitor Gate, the perimeter wall is transformed into low retaining

walls that define a series of planting beds along the west end and south side of the Executive Wing. The wall continues along the outer edge of the Terrace garden, along the bank that parallels Masonic Avenue, and then reconnects to the southeast corner of the Office Wing (east). Here rectangular brick planting beds have been incorporated into the wall, creating a zig-zag alignment similar to that found in other locations (i.e., on the bank along Laurel Street in the vicinity of the Entrance Court, on the southwest side of the Terrace, and in the bench wall that frames the eastern side of the Terrace).

*Parking Lots and Internal Circulation*

Two parking lots occupy the land in front (north) of the Office Building. The East Parking Lot and the West Parking Lot sit on either side of the entry drive, which aligns with the Employee Gate and an employee entrance (E2) into the Office Building.

The entry drive from California Street branches near the front of the Office Building; it continues to the east to provide access into the East Parking Lot and the circular ramps to the Garage. The western branch provides access to the West Parking Lot, and exits at the Laurel Street Service Gate. A short service road connects this branch of the entry drive to the Entrance Court parking lot and provides access to a service area at the west end of the Office Wing.

*Topography in Relationship to the Spatial Organization and Function of the Site*

The site slopes downward from its southwest corner, at the intersection of Euclid and Laurel streets. Grading has modified the topography so that the main outdoor spaces are located at different levels of the Office Building, as appropriate to their functions. Although the East and West Parking Lots are at a slightly lower elevation than the Office Building, the design of the landscape links these directly to its first floor. The Terrace garden, framed by the Office and Cafeteria Wings and originally intended to provide employees an outdoor setting for lunch and breaks, provides a direct connection into the Cafeteria Wing. And the Entrance Court, which originally provided parking for the executives and visitors, is at the same grade as the Executive/Visitor Entrance.

*Major Vegetation Features*

Lawns create the setting for the Office Building along the west and south sides of the property (and create a compatible connection between the property and the surrounding residential neighborhood) and slope downward toward California and Masonic Streets, respectively.

Some of the large trees which were part of the Laurel Hill cemetery vegetation were saved and ERW incorporated these into planting islands in the East and West Parking Lots in their mid-1950s design. Two Monterey cypress trees on a low mound in the East Parking Lot and a blue gum eucalyptus and several Monterey cypress in the West Parking Lot are remnants of this design feature. Monterey cypress, which were planted at some point after the addition of the

Garage in the mid-1960s, occupy the land between the East Parking Lot and California Street. These trees, and the brick perimeter wall, buffer views of the parking lots from the street and lessen the apparent size of the Office Building.

Landscaped banks along the west and southeast sides of the site provide a transition between different elevations of the land within the property and the surrounding streets. The presence of these landscaped banks (planted mainly with grass, some larger shrubs, and several trees) help to reduce the need for tall retaining walls and also increase the amount of green space around the edges of the property.

*Entrance Court*

The Entrance Court on the west side of the Office Building—in the outdoor space between the Office, Cafeteria, and Executive Wings—provides parking and access to the building's Executive/Visitor Entrance and was one of the two structured outdoor spaces in ERW's mid-1950s design. A narrow, rectangular planting bed (10' x 55') at the center of the asphalt paving creates a U-shaped drive, which connects to the Executive/Visitor Gate on Laurel Street. Sidewalks (exposed aggregate concrete) and narrow planting beds (with Japanese maple trees, azaleas, rhododendron, New Zealand flax, and decorative rocks) line the sides of the Entrance Court's parking lot.

*Terrace*

In ERW's mid-1950s design, the principal structured outdoor space was the Terrace, which was intended as a place for employees to sit outside during lunch and at breaks. The Terrace is framed by the south side of the Office Wing and the east side of the Cafeteria Wing, where it is protected from the prevailing west wind and provides views to the east and south of San Francisco. This garden area has two levels. The lower level contains a biomorphic-shaped lawn and a paved patio, which wraps around the lawn's north and east sides. Steps along the east side of the upper-level terrace connect down to the lower level of the garden. Both the terrace and patio are paved with exposed aggregate concrete which is divided into rectangular panels by inlaid rows of red brick aligned with the window frames of the building. A brick retaining wall runs along the east and north sides of the lower-level patio. A raised planting bed, to the east of this wall, provides a visual boundary along the Terrace garden's east side. Three raised, circular beds (one on the upper-level terrace, one at the western edge of the lawn, and one at the north end of the lawn) each contain a tree; the sides of these circular beds are constructed of modular sections of pre-cast concrete. (See Map 3)

The plan for the Terrace provides a classic modernist composition. The biomorphic-shaped lawn contrasts with the rectilinear pattern of the pavement and the geometric form of the three, circular tree beds, the zig-zag alignment of the wall along its eastern edge, and the curved arch of

hedge in the raised planting bed along its eastern edge. The triangular relationship between the three circular tree beds adds yet another level to the geometry of the composition.

Benches, which appear to have been custom-built for the mid-1950s design, are attached to the interior face of the wall along the Terrace's east side. The wooden boards for the seat and back are attached by metal bolts to a metal frame, which is attached to the wall; both the wood and metal are painted black. Benches of a similar design (three wood boards mounted on a bent metal frame) are mounted onto the patio at various places along its inner edge.

**Landscape Features Associated with the Mid-1960s Design**

EDAW, the successor firm to the ERW partnership which was dissolved in 1958, prepared the landscape design that accompanied the mid-1960s additions to the Office Building. Just as the mid-1960s architectural additions were intended to be compatible with the original Office Building's design vocabulary, EDAW's design was intended to compliment and reference the original, mid-1950s ERW design. The key parts of the mid-1960s landscape design included the addition of paved features around the east, south, and west sides of the new Auditorium—to create outdoor sitting areas and to facilitate pedestrian circulation—and rebuilding a portion of the brick perimeter wall along Masonic Avenue. These two outdoor sitting areas—one on the east side of the Auditorium and one on its west side—connect to entrances into the Auditorium. (See Map 3)

The Auditorium is located below and to the east of the Terrace. A ramp begins on the south side of the Terrace and leads down to the Auditorium. The ramp bisects the landscaped bank that extends from the Terrace down to Masonic Avenue. The ramp, a part of the original mid-1950s design, is paved in the same exposed aggregate concrete as the Terrace, but lacks the inlaid rows of brick.

The outdoor area on the Auditorium's west side is paved with exposed aggregate concrete divided into panels by a double row of inlaid brick that references, but is not identical to, the pavement in the mid-1950s Terrace. Black metal benches are mounted along the eastern and western sides of the pavement. A raised circular tree bed (with concrete walls identical to the three circular tree beds at the Terrace) is located on its western side.

The outdoor area on the Auditorium's east side is paved with concrete divided into rectangular panels by wood inserts. The east and south sides of this area are enclosed by rectangular brick planting beds which are incorporated into the Masonic Avenue brick perimeter wall. The arrangement of these beds creates a zig-zag alignment for the wall, which is similar to that found in other locations (i.e., the brick perimeter wall along Laurel Street below/west of the Entrance Court, in the retaining wall at the southwest corner of the Terrace, and along the bench wall that frames the east side of the Terrace).

The landscape along the east side of the property—which is at the same grade as Presidio Avenue—consists of a row of redwood trees planted across the eastern façade of the building, a level lawn between the building and street, and the Presidio Avenue Service Drive which provides access to the sub-level three of the Garage.

## CHRONOLOGY OF DEVELOPMENT

### Overview

The Fireman's Fund Home Office was built in five principal phases. The first four phases were under the ownership of the Fireman's Fund Insurance Company, and the buildings in these first four phases were designed by the same architect and structural engineer and were built by the same general contractor. The grounds were designed within these first four phases by the same landscape architectural firm and its successor firm. The fifth phase was carried out under a new owner—3333 Investors—who purchased the property from Fireman's Fund.

In addition, there have been many interior alterations throughout the life of the building, many within the period of significance and many outside of the period of significance. These are addressed in a general way after the five phases of construction below.

### Buildings

*Phase I: Original Construction 1955–1957*

The Fireman's Fund Insurance Company bought the site of its future headquarters in March 1953 for $650,000 from the San Francisco Unified School District.

Among many stated reasons that Fireman's Fund chose the site were access to public transportation, room on the site to expand, the cost of the site and the cost to build a low structure rather than a tall building downtown. An interview with the architect noted that the site "lent itself to a low-level building, which studies proved was preferable for efficient operation of the company's business."[2] In 1953–1954, in-depth preliminary studies of operations and work flow were undertaken by the architect, Edward B. Page, working with Nicholas Begovich, head of Management Services for Fireman's Fund. In April 1954, Page showed plans of the building to the Laurel Heights Improvement Association which was pleased with "a most attractive building and landscaping."[3]

In mid-June 1955, Edward B. Page submitted applications for building permits for both the Office Building and the Service Building. Plans submitted with the applications were dated 1

[2] Robert George Higginbotham, "Fireman's Fund Building," Student project for Architecture 2N-4, University of California, 1958. Northern Regional Library Facility of the University of California.

[3] Laurel Heights Improvement Association, Correspondence between Harry Thompson and Bernard Kernfeld, 18 April 1954. Archives of the Laurel Heights Improvement Association.

June 1955. For both buildings, the designers working with the architect were, the structural engineering firm of John J. Gould and H. J. Degenkolb; R. Rolleston West, mechanical engineer; Clyde E. Bentley, electrical engineer; Maurice Sands, interior decorator; and Eckbo, Royston, & Williams, landscape architects. The general contractor for the buildings was MacDonald, Young, & Nelson. The landscape contractor was Watkin & Sibbald.

According to an article in the *San Francisco Chronicle*, the company began moving into the Office Building on 17 June 1957. The dedication of the building on 9 July 1957 was attended by San Francisco Mayor George Christopher and many local business dignitaries. The final cost of the buildings was $4.5 million, including $80,000 for the Service Building, plus $600,000 for the furniture and $300,000 for the landscaping.

The company stressed that the buildings were designed both for efficient operation and to provide a pleasant working environment, recognizing that insurance companies were noted for high employee turnover and hoping that comfortable and attractive surroundings would help retain employees. Some of the means of establishing these conditions were providing good light and air, views, access to outdoor gardens, recreation facilities, a cafeteria, comfortable furniture, thoughtful choice of colors, and plentiful parking.

While there is no evidence of a master plan, the company and its designers anticipated the future need to expand. According to the general contractor at the time the building was first built, "The Building has been planned for an expansion factor of thirty percent. Future needs will be satisfied by adding a complete floor above the present floors or by adding a wing."[4] Guided by City Planning Commission Resolution 4109, the expansions, which occurred in several phases between 1963 and 1967, were made in a way that would not change the character of the main building or harm the attractive environment created by the landscaped grounds and the relationships between the landscaping and the buildings.

The Fireman's Fund Home Office was the subject of wide popular and professional press coverage when it was first completed. In addition to numerous articles in the San Francisco press, *Business Week* ran an article on the company to coincide with the completion of the building.[5] The principal west coast architectural periodical, the *Architect and Engineer*, ran a long cover story on the building.[6] And, the prominent French journal, *Architecture d'aujourd hui*, devoted two pages to the architecture and landscape design of the property in a special issue

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[4] Graeme K. MacDonald, "New Fireman's Fund Building Incorporates Many Construction Innovations and Ideas," *Architect and Engineer* 210, No. 3 (September 1957), 16.

[5] The most complete San Francisco newspaper article was *San Francisco Chronicle*, "Fireman's Fund Shows New Home," 9 July 1957; *Business Week*, "Casualty Insurer Faces the Music: Fireman's Fund, hardest hit by disasters of 1956, is pushing a comeback program that others may have to copy," 27 July 1957, pp. 92-98.

[6] MacDonald, 11-19.

on office buildings around the world.[7] Fireman's Fund was the only American building featured among forty-three buildings in sixteen countries on three continents.

*Phase II: One-story Addition 1963–1964*

On 15 November 1963, Fireman's Fund applied for a building permit to add one story to a portion of the original building at a cost of $800,000. This would add a floor to the Executive Wing, the Cafeteria Wing, and a portion of the west end of the Office Wing (north) with a total of 27,000 square feet. Construction began on 2 March 1964 and was completed in December 1964. The addition matched the original building in its design, materials, and details visible on the exterior.

The architect for this addition was the same as for Phase I and the structural engineer was H.J. Degenkolb & Associates, the successor to the original firm following the death of John Gould. The mechanical engineer was K.T. Belotelkin & Associates and the electrical engineer was Charles M. Krieger & Associates.

*Phase III: Parking Garage, Auditorium, and Office Addition 1965*

In the first half of 1965, Fireman's Fund initiated work on two related additions carried out under separate building permits, one for work that was much larger than the other. On 19 February 1965, the company applied for a permit for an addition on the east side of the Service Building and to build a new underground service tunnel between the Service Building and the main building. The addition was a rectangular block with a flat roof, the same size as the existing Service Building and clad in matching brick on the exterior.

The company applied for a second permit on 24 June 1965, for a large, partially underground, three-level addition whose primary purpose was a parking garage, but which also included more office space and an auditorium. The permit was issued on 24 August 1965 for work to cost $1,500,000. The footprint of this new 120,000 square foot building was irregular, but the main part of it could be enclosed by a rectangle parallel to Presidio Avenue and at a right angle to the existing California Wing of the Main Building. At the north end of this building were two cylindrical ramps for access to the parking levels from the roof at the level of the previous parking area. The garage provided parking for 271 vehicles. At the south end of the structure was the auditorium which had seating for 300 people. The auditorium was entered at the first sub-level of the structure, one level below the ground floor of the original office building.

This addition was of reinforced concrete construction. The exposed north end of the garage was undisguised concrete. The exposed east side of the first and second sub-levels of the structure

[7] V. Janson de Fischer, "Le Siege d'une Compagnie d'assurance, a San Francisco," *Architecture d'aujourd'hui* 30, No. 82 (January 1959), 82-83.

was clad in brick with glass clerestories on the second sub-level and in the same aluminum frame and glass window wall as in the original building on the first sub-level. The auditorium was enclosed in brick.

The architect and engineers for this phase were all the same as in Phase II.

*Phase IV: Parking Garage Superstructure and Fourth Floor Additions 1966–1967*

On 14 February 1966, Fireman's Fund notified the Laurel Heights Improvement Association that it was seeking approval for the completion of the fourth floor addition from Phase II and the construction of a three-story office building on the roof of the parking garage built in Phase III. The permit for this work, to cost $2,000,000, was issued 24 March 1966 and the work was completed in 1967. These changes were in the same materials and details as the original so that the character of the 1957 building remained intact.

Another addition was made under this permit to the Service Building. This was small rectangular building to serve as a new boiler room. Like the previous addition, this was clad in the same brick as on the original.

The architect and engineers for this work were the same as in Phases II and III.

*Interior Alterations 1958–1982*

Building permits were issued for many interior alterations to the building during its ownership by Fireman's Fund. Until the last couple of years, most of these were small jobs involving office spaces, sprinklers, and service features. In 1968–1969 and in 1975–1976, office areas throughout the building were renovated. The flexibility of the large open office areas of the original design anticipated reorganizations and remodelings of these spaces.

Until 1968, the architect for all of this work was Edward B. Page. Beginning in 1968, the work was done by his successor firm of Page, Clowdsley, & Baleix. Until 1970, the general contractor for the work was always MacDonald, Young, & Nelson and its successor firm of MacDonald & Nelson. Beginning in 1971, the contractor for many interior alterations was Herrero Brothers.

*Overcrowding*

By 1970, the building was running out of space. A new three-story office building was proposed about a half block away on Masonic Avenue near Geary, but was never built. Subsequently, planning began for a large new office building and data center on Lucas Valley Road in Marin County for 800 "technical and clerical" employees and for the company's large IBM computers.

According to the San Francisco Chronicle, this move was necessary because, "Height limitations prevented adding to the existing building."[8]

Beginning in 1977, the corporate owner of Fireman's Fund since 1968, American Express, occupied space in the building and sometimes hired different contractors. By 1982, when portions of the building were leased to outside tenants, interior spaces were remodeled by different teams of designers and builders.

**Landscape**

The site was previously a portion of the Laurel Hill Cemetery, which closed in the late 1930s. Prior to construction of the Fireman's Fund Home Office, debris from the cemetery was cleared, taking care to leave several large trees which were incorporated into the landscape design.

*Phase I: 1955–1957*

The firm of Eckbo, Royston, and Williams (ERW) prepared the landscape design and worked with the architects on the site plan that determined the location of the building and the arrangement of the parking, internal roads, and outdoor spaces.[9] Garrett Eckbo's description of the challenges of the design process for a building and site, found in his book *Urban Landscape Design,* provide insights into the resolution of the design for the Fireman's Fund property.

> *[T] he site is a piece of real estate, variable in size, form, and topography, produced by land subdivision . . . Thus the landscape design problem is to achieve the best possible development of a space or series of spaces determined by the relationship between the building and the site boundaries. Within these, the specific demands of the program must be satisfied. Problems of orientation and climate control—sun, wind, heat, glare, reflection—must be resolved. Visual demands created by the form and height of the building and the size and position of glass areas must be satisfied. The exterior landscape, beyond the site*

[8] *San Francisco Chronicle*, "Massive New Data Center," 30 May 1975.

[9] Typically, one of the ERW partners would take the lead on a specific project and then oversee all phases of the work. The plans for the ERW design were not located during the research for this nomination, and the lead ERW partner for the Fireman's Fund landscape design could not be determined. A caption for a photograph, in a 1969 article in the *San Francisco Sunday Examiner and Chronicle* (Adams 1969), attributed the design to Ed Williams. This attribution seems reasonable for several reasons. Logistically, the Fireman's Fund project would have been handled by the San Francisco office under the direction of one of the two San Francisco-based partners—Ed Williams and Robert Royston; Garrett Eckbo operated out of their southern California office. Second, Eckbo attributed the Fireman's Fund design to Eckbo, Dean, Austin, and Williams (EDAW), the successor firm to ERW, in his 1964 book *Urban Landscape Design.* In other places in this book, he attributed designs prepared by Royston while an ERW partner (Krusi Park [1954] and Mitchell Park [1956]) to Royston's firm (Royston, Hanamoto, and Mayes) and would have done so with Fireman's Fund if Royston had been the lead designer. Finally, the landscape design for the mid-1960s additions to the Fireman's Fund office building were undertaken by EDAW, which supports the assumption that one of the partners who remained with EDAW being the designer for the original, mid-1950s plan.

*boundaries, must be analyzed and included or excluded by judicious screening or framing elements. Finally yard spaces which do not relate to building or specific function must be developed in meaningful forms. All of this will be more difficult if the building has been conceived as a self-sufficient unit, and less difficult if the organization of building and site spaces is conceived as one coherent pattern at one time.*[10]

Eckbo considered the Fireman's Fund site to be an example of this approach for the design process between a building and its site and included a description, site plan, and nine photographs of Fireman's Fund as one of the five projects he used to illustrate the "Building and Site" chapter of the book.

The connections between the Fireman's Fund office building and its landscape were a critical part of the image that the company was promoting with its new headquarters. Descriptions of the property in contemporary articles emphasized the "park-like setting" for the building and parking, which together occupied less than half of the site's 10.2 acres. The description in the *Architect and Engineer* in April 1956, noted that "the structure, which will overlook San Francisco, has been designed to relate to its park-like setting."[11] An extensive article on the new headquarters, in the *Architect and Engineer* in September 1957, explained that "The building itself occupies 1.74 acres, and there are 2.75 acres of off-street parking for more than 250 cars. On the rest of the land area, a truly superb job of landscaping has been done. This includes 110 varieties of trees, plants and ground cover that give the area surrounding the building a park-like aspect."[12] Eckbo made a similar point (" . . . leaving the major portion of the site for gardens") in his description in *Urban Landscape Design.*[13]

The size (10.2 acres), topography and location of the site (sloping downward from the southwest corner and with a panoramic vista of downtown), and the location of existing large trees influenced arrangement of the site features. Garrett Eckbo, describing the design process for the landscape, in *Urban Landscape Design*, wrote that "considerable care was taken in the arrangement of the building, parking areas, and levels [grading] to save all the existing trees."[14] These mature trees, which were mainly in the large parking lots to the north of the Office Building, helped to frame the building in views from California Street and provided vegetation that was proportional to the three original stories of the building's north façade.

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[10] Garrett Eckbo, *Urban Landscape Design* (New York: McGraw-Hill Book Company, 1964), 45.

[11] Fred W. Jones, "Ten Years of Building and Engineering Construction," *Architect and Engineer*, 205, No. 1 (April 1956), 12.

[12] MacDonald, "New Fireman's Fund Building," 17.

[13] Eckbo, *Urban Landscape Design*, 47.

[14] Ibid.

The Office Building was conceived as a series of wings set at right angles to each other, which, in turn, divided the land next to the building into outdoor spaces designed to provide connections between the architecture and the landscape. Additionally, the horizontality of the architecture both in its long, low wings, and in the specific design features of the wings—the division of floors by continuous thin edges of concrete and the walls of the floors consisting of long repetitions of similar window units—helped to balance the massing of the Office Building with the surrounding landscape. The exterior glass walls provided views into the landscape of the outdoor spaces and at certain times of day reflected landscape features (trees, lawn, walls, patterned pavement, etc.), adding yet another level of integration between interior and exterior spaces.

The principal outdoor space—the Terrace—was set on the east side of the building, framed by the Office and Cafeteria Wings, where it was "protected from the prevailing west wind" and on a portion of the site that had been graded to provide "a good view of a large part of San Francisco."[15] Here a biomorphic-shaped lawn was framed on its west, north, and east sides by a patio, whose exposed aggregate pavement was divided by rows of brick that aligned with the window frames of the building. Benches attached to the niches of the zig-zag of the seat wall, which enclosed the eastern side of the Terrace, provided places for employees "to relax in the sun during lunch or coffee breaks."[16]

The Entrance Court on the west side of the Office Building—framed by the Office, Cafeteria, and Executive Wings—provided access to the Executive/Visitor Entrance into the building. A narrow, 80-foot-long, rectangular reflection pool at the center of the paving (asphalt divided by rows of red brick inset into the pavement) created a U-shaped drive. Arbor-covered sidewalks lined the outer edges of the pavement, with parallel parking next to the sidewalks.

A brick wall, which took several different forms, provided a continuous and unifying element around the edges of the site. It created a boundary wall along the property's northeast, north, and west sides, and the three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—were integrated into these sections of the wall. It was transformed into low retaining walls that defined a series of planting beds along the west end and south side of the Executive Wing, and continued—again as a boundary wall—along the outer edge of the Terrace and the parking lot to the east of the building. The brick in the various sections of this wall and in the pavement patterns of the Terrace and Entrance Court was the same as that used in the Office Building and Service Building and helped to integrate the architecture and landscape.

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[15] Ibid., 48.

[16] Ibid., 49.

Lawns, the iconic symbol of the landscape in post-World II suburban design, created the setting for the Office Building along the west and south sides of the property and provided an appropriate interface with the surrounding residential neighborhood. In *Urban Landscape Design*, Eckbo noted that plant materials were chosen based on the existing trees on the site and the climatic conditions. Live oak and red-flowering eucalyptus were the primary species planted, with "secondary themes . . . carried by the Monterey cypress, olives, redwoods, and Bishop pines" that were planted.[17] Shrubs and groundcovers were chosen to add color, fragrance, and "to provide interesting combinations of foliage, color, and texture, so that at all times of the year there will be something of special interest for the passerby to see."[18]

*Phase II: 1963–1964*

There were no additions or major changes to the ERW landscape design during Phase II.

*Phases III and IV: 1965–1967*

EDAW, the successor firm to the ERW partnership which had been amicably dissolved in 1958, prepared the landscape design that accompanied the mid-1960s additions to the Office Building. Just as the architectural additions were intended to be compatible with original Office Building's design vocabulary, EDAW's design was intended to compliment and reference the original, mid-1950s ERW design. The portion of the parking lot that wrapped around northeast corner of the site and a portion of the original brick perimeter wall along the eastern edge of this lot were removed when the office wing extension, garage, and auditorium were built. The planting islands within the remaining portion of the east parking lot were rearranged to accommodate a new parking pattern. A service drive was added from Presidio Avenue to the ground floor of the Garage. The brick wall, along Masonic Avenue, was rebuilt to accommodate the additions to the building and new service drive. A row of redwood trees were planted across the new eastern façade of the newly extended office wing, and the level land between the building and the street was planted with grass. Paving was added around the east, south, and west sides of the new Auditorium to create outdoor sitting areas and to facilitate pedestrian circulation.

EDAW designed an entrance terrace on the west side of the Auditorium, paved with exposed aggregate concrete divided by rows of inlaid brick that referenced the paving found in the original, mid-1950s Terrace. The new concrete-paved landing on the east side of the Auditorium provided a second, but smaller, outdoor sitting area; this area was enclosed on its east side by rectangular brick planting beds which were incorporated into a new section of the brick wall. The brick in the new planting beds and the new wall section was similar to that of the original wall.

[17] Ibid., 47.
[18] Ibid., 48.

**3333 Investors**

*Phase V: Presidio Corporate Center 1984–1985*

About 1983, Fireman's Fund sold the property to a new owner called 3333 Investors. In 1984 and 1985, 3333 Investors took steps to transform the property into the Presidio Corporate Center, an office building open to leasing by multiple tenants. Apart from numerous relatively minor interior office alterations, this owner made two distinctive changes visible on the exterior of the building.

In the spring of 1984, the aluminum window frames throughout the building were painted a dark color and the glass in the windows including the blue bottom panels of each window unit was darkened. The tinting of these windows was said to have a fifteen year life expectancy.[19]

In permits dated 6 October 1984 and 8 January 1985, the original entrance lobby on California Street was remodeled and a new exterior entrance gateway structure was built. Apart from serving to mark the entrance and to represent a new owner and a new use, it is not clear that this structure had any function. The architect for the new entrance structure was CRS Sirrine of Houston in association with EPR of San Francisco.

**University of California**

In February 1985, 3333 Investors sold the property to the Regents of the University of California to be used as the Laurel Heights Campus of the University of California, San Francisco. Since it has owned the property, the university has made minor exterior alterations and extensive interior alterations. The principal exterior alterations have been a project begun in 1986 that added a loading dock on Presidio Avenue and another that added rooftop screens to hide added mechanical equipment.

During the ownership of the University of California, space in the building has been occupied by the California Department of Transportation as well as by the University of California, San Francisco.

In preparation for a move to the new Mission Bay Campus and elsewhere, in 2012 the university began investigating options for the site. On 13 March 2015, the university signed a ground lease with Laurel Heights Partners, a development firm with plans to make extensive changes to the site. In April 2018, Laurel Heights Partners stated that they recently became the fee owner of the property.

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[19] University of California, San Francisco, *Office of the Chancellor with the assistance of Ira Fink Associates, University of California, San Francisco – Laurel Heights Site Development Plan: Draft Environmental Impact Report,* ([Berkeley]: Regents of the University of California, 1986), 73.

## INTEGRITY

For the period of significance 1957–1967, alterations to the property are addressed below for the buildings and the landscape separately, followed by an evaluation of integrity of the property as a whole.

### Buildings

The two buildings of the Fireman's Fund Home Office have a high degree of integrity. Although the original 1957 buildings were altered with major additions in 1963–1967, the changes were all within the period of significance and all were carried out by the same primary team of the architect, the engineer, and the general contractor.

After the period of significance additions and alterations to the buildings have been relatively minor in the context of the whole. Altogether, these changes, which are described herein, have had a limited effect on the character of the buildings.

The principal changes after the period of significance to the Office Building were the addition of two service entrances, a gateway in front of the Employees Entrance on California Street, the darkening of the glass walls, and the addition of rooftop screens to hide mechanical equipment. The most significant of these are the darkening of the windows and the addition of the entrance gateway.

The entrance gateway was built in 1984–1985. It is a two-story structure that frames the path of entry from the street and also the existing walkway along the front of the North Wing. The ground level of this structure is clad in the same brick that is used elsewhere in the building. The second level, which spans brick supports on both sides, is glazed. The use of glass here is compatible with the glass windows that dominate the exterior surface of the original building in the Fireman's Fund era, but is different in its details and character. At present, the gateway is partially hidden by trees, lessening its impact.

Also in 1984–1985, the windows were darkened. This change involved tinting of the glass itself, the aluminum frames of the units of the windows, and the blue bottom panels of the window units. This change affects the character of the building as a whole but does not alter its essential features or design as a glass box open to its immediate landscape and to distant views.

Other alterations visible on the exterior are less important. A service entrance consisting of a roll-up door and loading area was added at either end of the Office Building, accessible from the service drive parallel to Laurel Street at the west end and from Presidio Avenue at the east end. The rooftop screens around mechanical equipment evoke the penthouses on the roofs of the Executive Wing and the Office Wing (north), which were removed in the additions of 1963-1967. They do not have a significant impact on the character of the building.

Interior changes since the Fireman's Fund era have altered the interior for new uses. As the headquarters of a national insurance company, the interior was designed to provide offices and support services for clerical workers, managers, executives, and others in a mix of open office areas, private offices, meeting rooms, public rooms, and rooms for office machines. For its current use by the University of California (for academic and administrative offices, office-based instruction, and social and behavioral research) open offices have been partitioned, old partitions have been removed or changed, and spaces have been created for specialized purposes. In 1987, a large MRI center was built on the ground floor of the California Street Wing. Along with these changes, for security reasons the building has been divided inside into sections that do not communicate and lobby areas have been remodeled as security checkpoints. These changes alter the visual relationship between the design of the building and its structure. These altered conditions are apparent to occupants and users of the building but cannot be seen from outside the building or by the general public.

The Service Building has been altered with three additions, each in the character of the original, each in the same brick as the original, and all within the period of significance.

**Landscape**

The landscape is an integral part of the design for the corporate headquarters commissioned by Fireman's Fund in the 1950s and to the additions to this facility from the 1960s. The ERW/EDAW design retains a high degree of integrity and continues to create a landscape setting around the International Style Office Building. The landscape design continues to promote the integration between interior and exterior space on the site, and the original forms and materials of its key features, which were characteristic of modernist designs from the mid-twentieth century, remain in place.

The Terrace, which was designed as the "centerpiece" of the landscape, continues to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco). The Terrace retains its characteristic biomorphic-shaped lawn surrounded by a paved terrace and patio, and there have been only minor alterations since the end of the period of significance. One tree (likely an oak) at the south end of the lawn has been cut down, and new benches and tables have been added. Some of the original shrubs and flowering plants—described by Eckbo in his book *Urban Landscape Design*—are no longer present; however, the locations of the plants and their general character (trees in circular beds and flowering shrubs and groundcovers in planting beds) remain.

The Entrance Court was altered both during and after the period of significance. Sometime during the period of significance, the reflecting pool at the center of the parking lot was removed and converted into a planting bed; a review of aerial photographs indicates that this alteration occurred between 1961 and 1968. Several other changes occurred after the end of the period of

significance. Between 1993 and 2001, the distinctive brick stripes in the parking lot pavement were paved over, and the arbors that covered the sidewalks on the north, east, and south sides of the parking lot were removed; the arbor on the west side was left in place. The exposed aggregate concrete paving for the sidewalks was also redone at this time. In the late 1990s, the configuration of the concrete pavement and the arrangement of the custom-built mid-1950s benches to the north of the parking lot were altered. However, the general design and function of the Entrance Court—as an outdoor connection between the Executive/Visitor Gate and the entrance to building on the west side of the Cafeteria Wing—are still evident, and the Entrance Court continues to contribute to the overall integrity of the landscape design.

The short service drive to the west of the Office Building was altered both during and after the period of significance. During the period of significance, the west side of the road was widened to provide additional parking; this change occurred between 1961 and 1968. After the period of significance, a portion of the east side was also widened for parking. However, the original alignment of this short road and its function within the overall landscape design remain. The service drive continues (1) to connect the entry drive and Entrance Court and (2) to provide access from a service area on the west side of the Office Building to the Laurel Street Service Gate. Additionally, the overall design of the internal circulation system (with the two parking lots in front of the Office Building and internal roads) remains intact.

A new feature was added in 2000–2001 (after the end of the period of significance) when a fenced outdoor child care/play area was built on the south side of the Office Building; this area had previously been planted with grass and was part of the large lawn along the south side of the property. As part of this change, a new pedestrian entrance was created for the Terrace's southwest corner by removing a part of the brick retaining wall along the outer, southern side of the Terrace and adding a metal gate. A new sidewalk and pedestrian ramp were added to provide access between Euclid Street and this new entrance. However, the overall design of the Terrace was not altered by the addition of this play area. Additionally, enough of the lawn remains to convey the original landscape setting along the south side of the property.

Some of the materials associated with the vegetation features have been changed. Specifically, most of the original shrubs, groundcovers, and smaller plants have been replaced. Most of these changes to materials likely occurred incrementally, after the end of the period of significance, when plants reached the end of their lifespan, when certain species did not thrive in a specific location, or when the popularity of species changed. However, the major vegetation features retain their original locations and functions within the landscape design and continue to contribute to the historic character of the landscaped setting of the Fireman's Fund property.

The key materials and workmanship of the landscape structures and site furnishings remain including the brick used in the walls throughout the landscape; the exposed aggregate concrete

for sidewalks; the exposed aggregate concrete divided into panels by rows of brick in the pavement at the Terrace and in the Auditorium's west-side sitting area; the metal for the entrance gates; the custom-designed wood benches found in the Terrace and at the Entrance Court's outdoor sitting area; and the circular tree beds constructed of modular sections of concrete found in the Terrace and in the Auditorium's west-side sitting area.

**Combined Buildings and Landscape**

Together the buildings and landscape of the Fireman's Fund Home Office constitute a single resource that possesses integrity as measured by the seven aspects of integrity, as follows:

1) Location: The property is in its original location. It has not been moved.
2) Design: The property retains the essential elements of its design and the relationship between the parts of the design. Alterations to the design since the period of significance are relatively minor. It retains integrity of design.
3) Setting: The setting of the property is the same in all major respects as at the time it was first built. It retains integrity of setting.
4) Materials: The materials used in the buildings and landscape during the period of significance are all present. The property retains integrity of materials.
5) Workmanship: Evidence of workmanship, both from craftsmanship (brick and landscape features) and industrial processes (glass manufacture, concrete finishing, extrusion of aluminum) are all present. The property retains integrity of workmanship.
6) Feeling: Because the property as a whole—its buildings and landscape—are little altered and have been well-maintained, it retains integrity of feeling from the period of significance.
7) Association: Apart from the lettering on the outside wall near two entrance gates with the name of the current occupant of the property, the property is almost indistinguishable from the time of its ownership by Fireman's Fund Insurance Company. Thus it retains integrity of association.

**CHARACTER DEFINING FEATURES**

**Office Building**

Plan of the building with wings open along the sides to the immediate landscape and to views of the distant city

Horizontality of massing

Horizontal lines of projecting edges of concrete floors

Horizontal bands of nearly identical window units

Uninterrupted glass walls

Window units of aluminum and glass

Circular garage ramps

Exposed concrete piers over the Garage

Wrought iron deck railings that match gates in the landscape

Brick accents and trim

**Service Building**

Massing of rectangular volumes

Brick walls with a minimum of openings

**Landscape**

Terrace, as the "centerpiece" of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east, and west sides by narrow planting beds; exposed aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

Auditorium's two outdoor sitting areas—one on the east side of the Auditorium and one on its west side—that connect to entrances into the Auditorium; key character-defining features for the area on the west side of the Auditorium include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete; and metal benches; key character-defining features for the area on the east side of the Auditorium include the pavement (concrete divided into panels by wood inserted into expansion joints).

Brick wall (constructed of red brick set in running bond pattern similar in appearance to brick used in exterior of main building) that takes several forms and which forms a continuous and unifying element around the edges of the site.

Three gated entrances—one for the employees on California Street and the service and executive/visitor entrances on Laurel Street—that are integrated into the brick perimeter wall.

Internal Circulation System (entrance drive, service drive, East and West Parking lots)

Vegetation features that helps to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West Parking Lots, (2) the lawns on the west, south, and east sides of the property, and (3) the planted banks along Laurel and Masonic streets.

## 8. Statement of Significance

**Applicable National Register Criteria**
(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- [x] A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- [ ] B. Property is associated with the lives of persons significant in our past.
- [x] C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- [ ] D. Property has yielded, or is likely to yield, information important in prehistory or history.

**Criteria Considerations**
(Mark "x" in all the boxes that apply.)

- [ ] A. Owned by a religious institution or used for religious purposes
- [ ] B. Removed from its original location
- [ ] C. A birthplace or grave
- [ ] D. A cemetery
- [ ] E. A reconstructed building, object, or structure
- [ ] F. A commemorative property
- [ ] G. Less than 50 years old or achieving significance within the past 50 years

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

**Areas of Significance**
(Enter categories from instructions.)
ARCHITECTURE
LANDSCAPE ARCHITECTURE
COMMUNITY DEVELOPMENT
COMMERCE

**Period of Significance**
1957–1967

**Significant Dates**
1957
1964
1965
1967

**Significant Person**
(Complete only if Criterion B is marked above.)

**Cultural Affiliation**

**Architect/Builder**
Edward B. Page, Architect
John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, Structural Engineer
Eckbo, Royston, & Williams (ERW)/Eckbo, Dean, Austin, & Williams (EDAW), Landscape Architects

**Statement of Significance Summary Paragraph** (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations

The Fireman's Fund Insurance Company Home Office is eligible for the National Register under Criteria A and C at the local level. Under Criterion A, it is significant in the area of Commerce for its association with the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present. In particular, it represents the postwar boom in San Francisco's insurance industry when many companies built new office buildings. At that time, Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquartered in San Francisco. It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location. Under Criterion A, the Fireman's Fund Home Office is significant in the area of Community Planning and Development as one of the principal embodiments of the postwar decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting and it was the first whose design was fully adapted to the automobile. Under Criterion C, the Fireman's Fund Home Office is significant as the work of three masters, the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston, & Williams (ERW)/Eckbo, Austin, Dean, and Williams (EDAW). As a modernist, through his experiences in Paris in 1930, Edward Page had direct links to the birth of modern architecture and to its development in the United States. The Fireman's Fund Home Office is his best known and most important work. The Fireman's Fund Home Office—with its innovative structural design that provided open floors with minimal columns and exterior walls of glass—represents the beginning of the reputation of the Gould and Degenkolb engineering firms as among the leading structural engineers in San Francisco in the post-World War II period. ERW/EDAW was recognized as one of the country's leading landscape architectural firms during the period of significance, and their designs and writings contributed to the popularization of the modernist landscape design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs within a broad range of settings. The Fireman's Fund Home Office represents an example of the firm's mastery of modern design within a corporate landscape context. Additionally, the Fireman's Fund Insurance Company Home Office, a single property including both architectural and landscape architectural elements which were designed to complement each other, is significant under Criterion C as an example of a corporate headquarters in San Francisco that reflects mid-twentieth-century modernist design principles. The period of significance is 1957 to 1967, covering the period from the year when the first phase of the buildings and landscape were completed (1957) to the year the final phase of construction was undertaken (1967) by Fireman's Fund. The Fireman's Fund company continued

on this site as a leading insurance company in San Francisco and nationally until it sold the property in 1983. Although there are numerous alterations, these alterations do not alter the essential character of the property and it retains a high level of integrity.

**Narrative Statement of Significance** (Provide at least **one** paragraph for each area of significance.)

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## CRITERION A: COMMUNITY PLANNING AND DEVELOPMENT

For at least twenty-five years after World War II ended in 1945, there was an accelerated general movement of population and growth in the United States out of the central cities and into outlying areas. This regional decentralization and suburbanization took place in housing, retail, office, industrial, and institutional developments. In the San Francisco Bay Area, the two largest urban centers—San Francisco and Oakland—lost population as new housing and other

developments boomed on agricultural land and sparsely settled areas of Marin, San Mateo, Santa Clara, Alameda, and Contra Costa Counties. While there were many reasons for this movement, a primary factor was the growing use of motor vehicles. In contrast to the densely concentrated older cities, these new suburban areas were spread out, a development facilitated by construction of bridges across the bay in the 1930s to 1950s and the beginning of the construction of freeways.

San Francisco itself experienced its own internal version of this movement. While the City and County of San Francisco shared the same boundaries and much of its expanse was occupied by traditionally dense urban development, there were substantial areas outside the core—but within the city boundaries—that had never been developed or, because of changing conditions, were newly available for development.

Little new industry entered San Francisco in these years, but every other major land use was expanded. The spectrum of new developments of this period did not simply replicate old patterns of development. Instead, they were shaped by the forces that drove suburbanization elsewhere. In addition to motor vehicles, which were used for private transportation, for hauling goods for business and industry, and in competition with streetcars and other forms of transit, cheap energy and plentiful water played a fundamental role. Also, social forces such as a growing middle class, and "white flight" from perceived overcrowding and changing population demographics in central cities were major factors.

Between 1945 and the late 1960s, years that included the construction of the Fireman's Fund Home Office in Laurel Heights, many of the principal developments of the city itself were part of this movement. The developments of these years were different in fundamental ways from what had been built before. The cumulative effort of all these changes changed the character of the city as a whole. By the end of this period, San Francisco was not the dense pedestrian and streetcar city that grew up in the nineteenth and early twentieth centuries. It had become a mix of the earlier city and the "New City," a term used by University of California scholar James Vance to describe these changes.[20] The co-existence of these two types of urban development in one city introduced new benefits and new problems. The city could better accommodate changing social and economic conditions, but it was plagued with traffic congestion, lack of parking, decreased support for mass transit, air pollution, proliferation of one-way streets, and construction of freeways.

Fireman's Fund was among several large and notable developments of San Francisco's postwar New City. Three of these developments were built on adjacent properties in the southwest corner

[20] James Vance, *Geography and Urban Evolution in the San Francisco Bay Area* (Berkeley: University of California, Institute of Governmental Studies, 1964), 68.

of the city. Park Merced, a residential development by the Metropolitan Life Insurance Company of New York consisting of garden apartments and thirteen-story towers on almost 200 acres, was begun just before the war but mostly was built after it, opening in 1950. Stonestown, a complex that included a shopping mall, ten-story towers and garden apartments, and a medical office building on 67 acres, was built in 1949–1952. San Francisco State College (now University), although planned before the war, was built in 1949–1954 on 140 acres. Across town in the southeast corner of the city, Candlestick Park, a 44,000 seat professional sports stadium, was built in 1958–1960. Residential tracts in the central and western parts of the city with hundreds of new homes and housing units, like Lakeshore Park, Laurel Heights, Anza Vista Heights, Midtown Terrace, and Country Club Acres, filled up most of the last open land in San Francisco in the 1940s and 1950s. Also in this period, planning began by the San Francisco Redevelopment Agency for Diamond Heights, a 300-acre site in the center of the city for retail, housing, schools, and other neighborhood functions.

In addition to these large projects, smaller new developments of every kind throughout the city were also shaped by the same conditions. Strip shopping districts (like Laurel Village), new branch libraries, churches, small office buildings, motels, drive-in restaurants, and other types of development were built on in-fill sites and in new areas. A common feature of all of these was the accommodation of automobiles including on-site parking garages and the placement of new buildings with parking lots around them.

As San Francisco was affected by decentralization and suburbanization, both within its borders and in nearby counties, traditional patterns of development persisted as well. One of the strongest traditional patterns was the location of large office buildings downtown. Between 1946 and 1967, twenty-one large office buildings were built in San Francisco. Nineteen of these were medium or high rise buildings on restricted lots downtown.

Despite the strength of the downtown, two major office buildings were built in central areas far from the traditional core of the city. The Fireman's Fund Insurance Company Home Office, originally a 194,000 square-foot building (equivalent to a twenty-story skyscraper on a downtown lot), was a sprawling low-rise building on a 10.2-acre site surrounded by landscaping and parking; it was built in a predominantly domestic-scale residential area. The Jack Tar Hotel and Office Building of 1960, including landscaped grounds, was built in a central location on Van Ness Avenue in a dense urban neighborhood of apartment buildings and multistory automobile dealerships; this large complex included an eight-story hotel and a twelve-story office building of 214,422 square feet.

While Fireman's Fund and the Jack Tar were the only major office developments in this period to locate outside of the traditional downtown but still within the city of San Francisco, they were

also part of a larger movement that saw new corporate office buildings and other large developments located in suburban areas outside of the city.

**Evaluation**

The Fireman's Fund Insurance Company Home Office is eligible for the National Register under Criterion A as one of the principal embodiments of the post World War II decentralization and suburbanization of San Francisco. Fireman's Fund was the first major office building to be built outside of downtown in a suburban setting and it was the first whose design was fully adapted to the automobile.

**CRITERION A: COMMERCE**

Two conditions of San Francisco's early history and growth, namely its reliance on maritime commerce and its frequent large and destructive fires, quickly gave rise to an insurance industry. This industry would play an important role in the local economy as an employer and as a source of investment money in the region. Because insurance companies had a significant presence in San Francisco from the beginning, the city became a center for the insurance industry on the west coast that has diminished since the 1980s but still continues to the present day.

The first of the two conditions was the isolation of San Francisco and its overwhelming dependence on maritime transportation. For the first twenty years of the American period, the most important means for the delivery of goods and people to California was by ship. While the completion of the transcontinental railroad in 1869 introduced another means of transport, San Francisco Bay remained a major world port until after World War II and still remains a significant port today. Ships owned by people and companies in other places came from all over the world to San Francisco. The owners of these ships and their cargos purchased insurance against loss from companies in the eastern United States and Europe. Very early in the period of American control of California, in 1849, insurance companies headquartered in distant places opened offices in San Francisco. In the next ten years, numerous companies from New York, London, Germany, and elsewhere opened San Francisco offices initially for the sale of marine insurance.

The second early condition that gave rise to the San Francisco insurance industry was an outcome of the rapid growth of the city, the haphazard construction of its buildings in flammable materials; these resulted in the destruction by fire six times in the 1850s of large parts of the city.

In response to both of these conditions insurance was provided at first only by distant companies and fire insurance was available only at exorbitant rates if it was available at all. High insurance rates were a primary factor in the improvement of building practices. Under the influence of insurance companies, building laws were enacted and continually strengthened and new buildings in the central commercial district were required to be built in fire-resistant materials.

Within a few years, local companies emerged in competition with outside companies primarily to sell two primary forms of insurance—marine insurance and fire insurance. Among more than thirty local insurance companies formed in San Francisco in the 1850s–1860s, Fireman's Fund Insurance Company was formed in 1863. Many of these lasted only briefly before they were bought by rivals or went out of business. Fireman's Fund was among the few San Francisco companies that became well-established and among these it was the only one left in business by 1895.[21]

Fireman's Fund succeeded where other local companies failed for a number of reasons. Among these, the company quickly established branch agencies in distant places and sold insurance throughout the United States and abroad, it paid its claims in a number of high risk and high profile situations which gave it a reputation for honesty and reliability, it had wealthy owners who could provide enough capital to survive in more than one case, and it made key innovations on a number of occasions that proved to be influential within the industry.

When the company was founded by local businessmen in 1863, its initial plan was to pay volunteer fire companies ten percent of the company profits for a charity associated with the Fire Department, and came up with the name "Fireman's Fund" for that reason. The idea of the company founders was that firemen would be more conscientious in putting out fires at buildings insured by Fireman's Fund, Fireman's Fund would prosper, and the charity would prosper. The idea didn't work, but the company kept the name.

Within five years of its founding, the company had branch agencies all over California and in New York and Chicago. By the time of the disastrous Chicago fire of 1871, which wiped out much of the central business district, Fireman's Fund covered many buildings there. The company might have gone under like many others did, but by collecting assessments from its stockholders, raised enough money to pay all claims and stay in business. With this action Fireman's Fund became the leading locally based insurance company in San Francisco, a position that it never relinquished.

In 1867, the company built an imposing headquarters in a prestigious location at the southwest corner of California and Sansome Streets. Situated among the leading banks and financial institutions of San Francisco on the principal street of the financial district of that time, the location itself was a statement of the ambitions of the company for success.

For the rest of the nineteenth century, the company prospered while taking over other San Francisco insurance companies and expanding its operations. The company paid claims after big

[21] William Bronson, *Still Flying and Nailed to the Mast: The First Hundred Years of the Fireman's Fund Insurance Company* (Garden City, New York: Doubleday & Company, 1963), 63.

fires in Boston and Virginia City, solidifying its reputation. By 1895, it had branch offices for its four regional departments around the country. At the end of the century, the company insured ships and enterprises associated with the high-risk environment of the Klondike Gold Rush in Alaska and Canada. By 1905, the company had regional department offices in Chicago, Boston, New York, Macon, Georgia, and London and had expanded internationally, with "general agents" in Hong Kong, Manila, Singapore, and Honolulu.

Fireman's Fund was by far the leading local insurance company at the time of the 1906 earthquake and fire. Despite the loss of its building and all records, and claims far exceeding the assets of the company, it paid all claims by again assessing its stockholders and by paying in installments. Within six years, the company had fully recovered and increased its assets from about $3 million to $9 million.

The importance of the various insurance companies, both home-grown and out-of-town, in San Francisco after the 1906 disaster was reflected in their buildings. Because of the nature of their business and the nature of the disaster, the location, design, and construction of buildings for the San Francisco insurance industry were particularly important. Like the most prestigious banks, San Francisco insurance companies preferred to locate on California Street near Montgomery, and as close as possible to that intersection on nearby streets. Fireman's Fund repaired and re-occupied its old building at the southwest corner of California and Sansome Streets; in 1915 the company completed a new building on the old site. The new building was in the form of a Roman temple. Located across California Street from another Roman temple, the oldest and most prestigious San Francisco bank, the Bank of California, the Fireman's Fund Building asserted the wealth, stability, and historic roots of the Fireman's Fund Insurance Company. The Liverpool & London & Globe Insurance Company, a British company in San Francisco since 1852, built a variation of a classical temple across California Street from Fireman's Fund in the same block in 1912. Another British company, The Royal Globe Insurance Company which was also in San Francisco since the 1850s, built an eleven-story office building at the corner of Sansome and Pine Streets, a block south of Fireman's Fund. Other insurance companies occupied other office buildings in this area.

As the insurance industry prospered, this area was strengthened as its center. In 1913, the Insurance Exchange, a centerpiece of the local insurance industry, opened a new eleven-story exchange and office building next door to Fireman's Fund's headquarters. Later, in 1924, Fireman's Fund built a new eight-story office building next door at 233 Sansome Street, enlarged with another five stories in 1929. In 1927, the sixteen-story Insurance Center Building was built at the northeast corner of Pine and Sansome Streets. All of these insurance company buildings from the years after 1906 were designed by prominent architects of the time. Collectively they asserted the importance of the industry and its associations with San Francisco history and finance.

Fireman's Fund's leading place in the competitive world of San Francisco insurance was partly due to various innovations and early adoptions of business ideas which gained advantages over rivals. In the nineteenth century, Fireman's Fund was a pioneer in the sale of insurance for grain, cotton, and other agricultural products. In the twentieth century, the company was early to sell automobile insurance. It made money with "war-risk" insurance during World War I. Among companies in San Francisco, it was early to enter new fields like life insurance and health and accident insurance. In the 1920s, Fireman's Fund grew substantially and was known as " 'the Tiffany' of the insurance world."[22]

The insurance industry throughout the country was fundamentally changed by a United States Supreme Court decision in 1943 that for the first time defined insurance as interstate commerce. This changed the structure of most insurance companies, including Fireman's Fund. This reorganization coincided with the general postwar economic boom, which for some companies including Fireman's Fund, was accompanied by large and rapid growth.

From 1946 to 1954, Fireman's Fund's income from the premiums of policy holders increased from $67 million to $191 million. The company benefitted from the introduction of a Special Home Owners policy in 1951 that was a prototype for the standard "all risk" home insurance that became universal within a few years. A historian of the company described 1954 as "one of the most interesting and successful years in the Company's history" during which "an unusual number of aggressive steps [were] initiated... to expand operations and introduce new forms of insurance." In that year the company bought the National Surety Corporation in "one of the largest transactions of its kind ever made."[23]

By the time of World War II, Fireman's Fund was spread out among several buildings in downtown San Francisco. The growth of the postwar years resulted in even more employees and produced a great need to consolidate in one location. Thus, in the booming years after the war the company bought the site for its new headquarters in Laurel Heights in 1953 and built the building that was completed in 1957. A factor in the company's interest in the site was its address on California Street. Although twenty-six blocks west of its traditionally prestigious downtown location, it still had a coveted California Street address.

This was a period of growth for San Francisco's insurance industry in general. Between 1950 and 1960, seven major insurance companies built new office buildings in San Francisco: Home Insurance Company (1950), Pacific Mutual Life (1954), Equitable Life (1955), America Fore (1956), California Union Insurance (1957), John Hancock (1959), and Occidental Life (1960). All of these were tall buildings downtown and none were as large as Fireman's Fund. Other

[22] Ibid., 147.
[23] Ibid., 163.

slightly later insurance company buildings were Hartford Insurance (1964), the Pacific Insurance Company (1971), and Aetna Life & Casualty Company (1969); the Hartford and Aetna buildings were about the same size as Fireman's Fund after its expansions of the mid 1960s. The best-known and largest building of this period associated with the insurance industry was the Transamerica Pyramid, completed in 1971 two blocks from the heart of the traditional downtown center of San Francisco's insurance industry for the Transamerica Corporation, a holding company for insurance companies and other kinds of financial businesses.

The opening of Fireman's Fund's new building was not accompanied by a slowing of the company's growth. An important and newsworthy source of new business was in the category of inland marine insurance which "will insure any insurable interest against all perils anywhere in the world."[24] This covered motion pictures and their casts, rodeo performers, professional athletes, and other types of activity. Fireman's Fund was second internationally to Lloyd's of London in providing this type of insurance and was often in the news for this line of work.

In 1963, Fireman's Fund combined with the American Insurance Company of Newark, New Jersey, with Fireman's Fund becoming a holding company and changing its name to Fireman's Fund American Insurance Companies. In 1964, a company advertisement stated that "Today, Fireman's Fund American is the largest property and casualty insurance company headquartered in the West. It offers every basic line of insurance for both personal and commercial coverage... through more than 25,000 agents and brokers..."[25] In this period, substantial additions to the Laurel Heights building were made. In 1968, Fireman's Fund and American Express were combined, with American Express moving many employees to Laurel Heights.

**Evaluation**

The Fireman's Fund Insurance Company Building is eligible for the National Register under Criterion A for its association with the growth and development of the San Francisco insurance industry, an important industry in the history of the city from the Gold Rush to the present. In particular, it represents the post World War II boom in San Francisco's insurance industry when many companies built new office buildings. At that time, Fireman's Fund was one of the largest insurance companies in the United States. It was the only major insurance company headquartered in San Francisco. It was a leader among all insurance companies in San Francisco in its embrace of new ideas, symbolized by its move away from downtown to an outlying location.

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[24] Ibid., 186.

[25] Fireman's Fund American Insurance Companies, "How a San Francisco Insurance Company Became a Pacesetter in the Industry" [advertisement], *San Francisco Chronicle*, 7 January 1964.

## CRITERION C: DESIGNERS

The Fireman's Fund Insurance Company Home Office was designed by a team under the leadership of the architect, Edward B. Page. The members of the design team including the architect, structural engineer, and landscape architect are presented below, followed by an evaluation.

### Architect: Edward B. Page

Edward B. Page (1905–1994) was an architect who fit the description of many identified by Pierluigi Serraino in his book, *NorCalMod: Icons of Northern California Modernism*, as largely forgotten but important players in a vital period of architectural practice after World War II.[26] Like many in that period, Page was trained in the Beaux-Arts method and exposed to traditional ideas about planning and style. But in his own work Page was a modernist. He is remembered today largely for his design of one building, the Fireman's Fund Home Office in San Francisco, but in his day was well-recognized for his expertise and for the designs of a number of buildings.

Edward Bradford Page was born in Alameda, a member of the fourth generation of his family in the Bay Area. His great grandfather was a physician from Philadelphia who practiced medicine in Chile, acquired Rancho Cotati in Sonoma County in 1850, and designed a utopian plan for the town of Cotati. Edward Page was one of five brothers and the son of Charles R. Page who became president of the Fireman's Fund Insurance Company in 1937 and served as Chairman of the Board of Directors from 1943 to 1962.

Edward Page studied engineering at the Sheffield Scientific School at Yale and upon graduation in 1928 started another undergraduate course of study in architecture at the Yale School of Fine Arts. He was critical of the program and was encouraged to take a leave of absence. He spent the year 1930 traveling and studying architecture in Europe. Living mostly in Paris, his inclinations toward architectural modernism were confirmed by a brief disillusioning experience working on a competition entry for the Grand Prix de Rome for Jean Labatut at the Ecole des Beaux Arts. He also studied at the Ecole Americaine at Fontainebleau.

Describing himself in later years, as recorded in an interview at the Environmental Design Archives of the University of California at Berkeley, he rejected the traditions of the Beaux Arts and learned as much as he could about modernism. He said that the most valuable part of his education at that time was in Paris cafes, particularly Les Deux Magots which was renowned as a center for artists, writers, and other cultural figures and had an "architects' table"—"you sat there long enough and every architect in the world who came to Paris would come by." In this way he

[26] Pierluigi Serraino, *NorCalMod: Icons of Northern California Modernism* (San Francisco: Chronicle Books, 2006), 8-20.

met prominent and experienced architects from all over, people who as a young student he would have had no opportunity to talk with otherwise. "We were all rebels," he said, "well into the Modern world of architecture, sneering at the Beaux Arts."[27]

After a year he returned to Yale and, in 1932, received a degree in architecture. He returned to San Francisco at the worst part of the Depression. There was no work in architecture but he got a job as a laborer building the Bohemian Club, an experience that gave him a ground level view of construction and corresponded to one of the essential elements of an education at the Bauhaus.

From 1934 to 1936, Page worked as a junior draftsman for Arthur Brown, Jr., San Francisco's pre-eminent Beaux-Arts architect. In that job, he prepared full size details of pediments, cornices, and other decorative features used in the Department of Labor–Interstate Commerce Commission complex in Washington, D.C. Contrary to his expectations, he came to admire Brown and his work. Without giving up his Modernist ideals, he later modeled his own practice in part on the observation that Brown "did things with pride, never turned out anything second class," and never let considerations of money affect the level of his efforts.[28]

In 1936, Page moved across the hall on the eighth floor of 251 Kearny Street to the office of Bakewell & Weihe. John Bakewell, Jr. was a distinguished Beaux-Arts architect and had been Arthur Brown's partner, and Ernest Weihe was also educated in Paris in the Beaux-Arts method. When business was slow in the office, Page was allowed to work there on his own projects and in 1937–1938 was a draftsman for the Golden Gate International Exposition (G.G.I.E.). Later in life he remembered his design for the Island Club (demolished) at the G.G.I.E. with particular pride. In that job he met John J. Gould and Henry J. Degenkolb with whom he formed a close friendship.[29] Later, Gould and Degenkolb's postwar firm would be the structural engineers for the Fireman's Fund Home Office and Page and Degenkolb worked on several projects together in the course of their careers.

After receiving his architectural license in 1938, Page worked for himself and for others on small projects from 1939 to 1942. On one of these projects, for Lewis Hobart, another prominent Beaux-Arts architect, he worked on drawings for the floor of Grace Cathedral. From 1942–1947, he worked as the Chief of Architecture and Engineering for San Francisco architect Wilbur D. Peugh supervising wartime projects for U.S. Naval Operations.

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[27] Edward B. Page, Interview by Michael Corbett, 4 April 1980. Environmental Design Archives, University of California, Berkeley.

[28] Ibid.

[29] Loring Wylie, Telephone conversation with Michael Corbett, 1 February 2018; Bob Cosby, Telephone conversation with Michael Corbett, 3 February 2018.

In 1947, Page opened his own office in San Francisco. Many of his early projects were in association with others, including the Glen Crags Housing Project with Wilbur D. Peugh in 1951 and two schools with Cantin & Cantin in 1952. His design for the 1954 Mason B. Wells house in Belvedere won an Award of Merit from the Northern California Chapter of the American Institute of Architects.

As Serraino observed, many Modernist architects of the postwar generation in the Bay Area, did not seek publicity and, despite the quality and success of their work were not well recognized and have not been remembered. Edward Page's approach to his practice fit this profile. He did not seek publicity, he intentionally kept his office small so he would have control over his own projects, and he obtained work largely through referrals. "I operated by selling trust," he said, which was gained by "achieving competence" in dealing with client's needs from listening and responding.[30]

When Page was hired in 1954 to design the Fireman's Fund Home Office, his father was Chairman of the Board of Directors. He insisted however, that he earned the job over many competitors through a series of small projects for the company. One lead to another over a period of time and when the big job came up, he had gained the trust and respect of company managers. On the Fireman's Fund project, Page coordinated the contributions of all. He was described as "the master" by Loring Wylie, an engineer in the Degenkolb office who had a major role working on the additions of the 1960s. Wylie remembered Page's deep involvement with and lead in solving issues with expansion joints as representative of his high level of competence and control.[31] On another technical matter, he designed an innovative system of dispersed lighting for Fireman's Fund in an effort to provide better working conditions.[32]

Following the success of the first phase of the Home Office in 1957, Page designed three subsequent additions in 1963–1967, and branch offices in Fresno, Riverside, San Jose, and Los Angeles. He also consulted on the designs of branches outside of California including those in New York, New Orleans, and Atlanta, where he advised primarily on matters related to the way the insurance business works. Apart from Fireman's Fund, his later projects included his own residence in Sausalito, a garage at the San Francisco airport, and the Faculty Club at Stanford University.[33]

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[30] Page, interview.

[31] Wylie, telephone conversation.

[32] Cosby, telephone conversation.

[33] Page's interests extended to history and preservation. With three others including the engineer John J. Gould, he founded the Fort Point Museum Association in 1959. The association initiated efforts to preserve Fort Point, now a part of the Golden Gate National Recreation Area.

In the work of Edward Page, the Fireman's Fund building was the high point of his career in several ways. It was his largest and best-known building. Its success led to work on at least seven other buildings for Fireman's Fund over the next fifteen years – Fireman's Fund would be the most important client in the history of the firm. Page's success with Fireman's Fund also opened the door to work for other corporate clients.

The International Style design of the Fireman's Fund building represented Page's personal experience of the formative period of modernism in Europe before the Bauhaus was closed by the Nazis and its leaders scattered to the United States and elsewhere. Modernism in America was initially shaped largely by immigrant architects from Europe and by Americans who studied in the United States with European immigrants like Walter Gropius, Mies van der Rohe, and Le Corbusier. Page was among a small number of Americans whose travels and encounters with modernist architects in Europe directly shaped his ideas about architecture. As his largest and best-known building, the Fireman's Fund building is the foremost example in Page's work of this experience.

The core of Bauhaus teachings was about more than the appearance and style of buildings. It was also about the process of design, the relationship of architecture and engineering, the fundamental role of engineering in architecture, and the role of the architect as the master of a collaborative effort. The Fireman's Fund building represents these things in the work of Edward Page. Working with a team that included distinguished engineers, designers, and contractors, Page was recognized and admired as the master in charge whose vision and principles were realized under his leadership.

In 1968, Edward Page took on two partners, John U. Clowdsley, Jr. and John Baleix, long-time employees who had both been hired when the work on the Fireman's Fund Home Office began. The firm of Page, Clowdsley & Baleix continued as the architects for all work on the Home Office, all of which was for interior remodelings, as long as Fireman's Fund owned the property. The principal work of the firm was for Fireman's Fund and remodeling downtown office buildings.[34]

**Engineers: John J. Gould & H. J. Degenkolb, Structural Engineers**

The structural engineer for the original 1957 phase of the Fireman's Fund Home Office was the firm of John J. Gould & H. J. Degenkolb. Henry J. Degenkolb had been an employee of Gould until he became a partner in 1956. Fireman's Fund was the first big project of the new

[34] John U. Clowdsley, Jr. (1926–2013), grew up in Stockton, the son of an architect. John Baleix (1928–2014) grew up in Oakland. Both studied architecture at the University of California at Berkeley. Both spent their entire careers with Edward B. Page and Page, Clowdsley & Baleix except for three months in 1959 when Baleix worked for Reid, Rockwell, Banwell & Tarics.

partnership. After Gould died in 1961, the firm continued as Henry J. Degenkolb & Associates. The Degenkolb firm designed the principal additions to the Fireman's Fund Home Office in the period 1963–1967.

John J. Gould (1898–1961) was born in Switzerland and studied at the Engineering School in Zurich. He worked in Switzerland, Germany, France, the Middle East, and New York City before coming to San Francisco in 1925. From 1933 to 1935 he worked for the State Division of Architecture where he was involved with issues of seismic safety for schools. In 1935 he became the Chief Structural Engineer for the Golden Gate International Exposition. In 1940 he started his own firm. He was active in professional organizations and served as president of the Structural Engineers Association of Northern California. He had a particular interest in the effects of seismic forces on buildings and in designing safely in relation to those forces.

Henry J. Degenkolb (1913–1989) received a B.S. degree in civil engineering from the University of California in 1936. In 1937–1938 he worked for John J. Gould at the San Francisco Bay Exposition Company designing facilities for the Golden Gate International Exposition. During World War II he worked in various industries and in 1946 he was hired by John J. Gould as the firms's chief engineer. Looking back on his career in 1986 he said, "John [Gould] ran the office—that is, the business, the contracts, the management—and I was the center of the back room. I ran the drafting and the design and everything like that."[35] From this, it appears that Degenkolb was the principal structural designer of the Fireman's Fund Home Office in all its phases.

The Firm designed many of San Francisco's major structures of the 1940s–1960s including Park Merced, the International Building, the Bank of California tower, expansion of the San Francisco airport, parking garages at St. Mary's Square and the Civic Center, and many branches of the Bank of America and Pacific Telephone. The Firemans' Fund Home Office was the first large project of the firm after Degenkolb became a partner. According to the National Academy of Engineering, Henry J. Degenkolb "was responsible for the structural design of some of the most distinctive structures in California."[36]

Henry J. Degenkolb was a man of enormous energy and accomplishment. He was an "earthquake chaser" who traveled to earthquake sites around the world to better understand the effects of seismic forces on buildings. He was active in many professional groups, especially those concerned with seismic issues and building codes. At the time of the completion of the Fireman's

[35] Henry J. Degenkolb, *Henry J. Degenkolb: Connections*, The EERI Oral History Series, an oral history conducted 1984-1986 by Stanley Scott, Institute of Governmental Studies, and the Regional Oral History Office, University of California, Berkeley, CA (Oakland: Earthquake Engineering Research Institute), 1994.

[36] William J. Hall, "Henry J. Degenkolb, 1913-1989," *Memorial Tributes: Volume 4* (Washington: National Academies of Sciences, Engineering, and Medicine, 1991), 46.

Fund Home Office in 1957 he was president of the Structural Engineers Association of Northern California. He was also a lecturer in engineering at the University of California from 1946 to 1961.

The Fireman's Fund building was the first major project of the firm of John J. Gould and H.J. Degenkolb, which later became Henry J. Degenkolb & Associate. The firm is noted for its innovative designs in a long-lived practice that has included many of San Francisco's major structures during the initial design and subsequent expansions of the Fireman's Fund building and continuing up to the present day. The Fireman's Fund building—with its innovative structural design that provided open floors with minimal columns and exterior walls of glass—was a successful debut for the partnership of John J. Gould and Henry J. Degenkolb and for Degenkolb's role as principal designer of the partnership and his subsequent practice after Gould's death. Fireman's Fund represents the beginning of the reputation of Gould and Degenkolb as among the leading structural engineers in San Francisco in the post-World War II period.

**Landscape Architects: Eckbo, Royston, and Williams (ERW)/Eckbo, Dean, Austin, and Williams (EDAW)**

In 1945, Garrett Eckbo, Robert Royston, and Ed Williams—three of the pioneers of modern landscape architecture—formed the partnership of Eckbo, Royston, and Williams (ERW). The firm was responsible for the original mid-1950s landscape design for the Fireman's Fund site, which embodied the characteristics of the modern movement in landscape architecture after World War II. The firm's projects (1945–1958) helped to expand the profession of landscape architecture beyond the scale of the individual residential garden and contributed to the popularization of the modernist landscape design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs. The American Society of Landscape Architects (ASLA), in a history that accompanied an award presented to EDAW (its successor firm), noted that ERW "established a compelling portfolio of modernist landscapes."[37] The partnership soon became "one of the leading firms in the country, highly regarded for its advanced planning, innovative modern vocabulary, and its quality of execution,[38] and in 1950, ERW was awarded the Gold Medal in Landscape Architecture by the New York Architectural League.[39]

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[37] ASLA, *EDAW: Firm History*, accessed 4 January 2018, http://www.asla.org/uploadedfiles/EDAW_History.pdf.

[38] Marc Treib and Dorothee Imbert, *Garrett Eckbo: Modern Landscapes for Living* (Berkeley: University of California Press, 1997), 49.

[39] *New York Times*, "Arts Awards Announced, Architectural League Gives Medals in Gold Medal Show," 2 June 1950.

ERW actively promoted its work and was regularly written about in popular magazines, professional journals, and newspapers of the era; examples include *Sunset*, *House Beautiful*, *House & Garden*, *Architectural Review*, *Progressive Architecture*, and *Architectural Record.* Additionally, ERW designs were regularly used to illustrate a reoccurring feature on modern residential landscape design that ran in the *Los Angeles Times* during the 1950s. The firm gained additional exposure in the early 1950s after Eckbo's book *Landscape for Living,* which was illustrated with examples of ERW's work, was published. The book defined "the modern discipline of landscape architecture for his professional peers and a broader readership"[40] and placed these ideas within the context of the post-World War II society.

As was true of all landscape architectural practices during the early years after the war, ERW was heavily involved in creating residential gardens. By the early 1950s, ERW had "hundreds of completed gardens in four states," with more than 50 located in Marin County alone and others in virtually all of the developing suburban communities in the Bay Area.[41] The firm was a pioneer in expanding the practice of landscape architecture into the scale of neighborhood and community design.[42] The Standard Oil Rod and Gun Club in Richmond (1949) was Royston's (and the firm's) first major park commission. "The facility was an immediate success and attracted the attention of Bay Area planners representing several municipalities."[43] Other park and playground projects soon followed, "many of which gained attention in the national media."[44] The firm worked on numerous new housing projects in both northern and southern California. The 258-acre cooperative housing project of Ladera on the San Francisco peninsula featured an innovation design with "a linear park which tied together the residential clusters and separated automobile and pedestrian circulation."[45] This was an early application of Royston's concept for the "landscape matrix," which was his term for the use of connective or continuous open space around which the balance of the design was oriented.[46] The implementation of this concept into community planning was a major innovation within the profession.[47]

In addition to Fireman's Fund, ERW worked on a range of public outdoor spaces in San Francisco in the post-World War II era including the Venetian Room Roof Garden at the

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[40] The Cultural Landscape Foundation, *Garrett Eckbo,* accessed 4 December 2017, http://tclf.org/pioneer/garrett_eckbo.

[41] *Marin Independent Journal*, "Prize-Winning Landscape Firm," 19 January 1952.

[42] Peter Walker and Melanie Simo, *Invisible Gardens: The Search for Modernism in the American Landscape* (Cambridge, MA: MIT Press, 1994), 141.

[43] Reuben M. Rainey and J.C. Miller, *Robert Royston*, accessed 4 December 2017, https://tclf.org/pioneer.

[44] Ibid.

[45] Ibid.

[46] John Wallace, *Robert Royston, Landscape Architect* (University of California, Thesis, May 1992), 25.

[47] Rainey and Miller, *Robert Royston.*

Fairmont Hotel (1946), the entrance court to the Palace of the Legion of Honor (1950), Portsmouth Square (1954), and St. Mary's Park (1957). St. Mary's was one of the earliest large-scale roof-top gardens in the city and sat atop a parking garage in the Chinatown neighborhood. ERW was the landscape architect for Stonestown, a retail, residential, and office complex in the suburban western part of San Francisco (built between 1949 and 1952).

In 1946, Eckbo moved to Los Angeles and opened a second office. This move "expanded the firm's opportunities and gave each partner more breathing space."[48] Royston and Williams, both of whom lived in Marin County, remained in the San Francisco office. Although each partner typically took the lead on a specific project and then oversaw all phases of the work, the designs were generally a combination of individual and collaborative input. Williams, describing the partners working methods in a 1952 profile in the *Marin Independent,* stated that "although we work as individuals—there is a complete exchange of ideas."[49] Another profile of the firm, in the September 1946 issue of the *Architect and Engineer*, explained that the three met as needed in Paso Robles, which was the halfway point between their two offices, "to continue and extend the original ideal of their association which is based upon the premise that three minds are better than one if the best each one has to offer is brought to the fore."[50]

In their history of this pioneering firm in the book *Invisible Gardens: The Search for Modernism in the American Landscape*, Peter Walker and Melanie Simo noted that "although each [partner] was unquestionably capable of running his own firm . . . the three achieved greater strength and flexibility in partnership. Eckbo, the preeminent theorist and reformer, not only led the firm intellectually but also had a broad vision of the potentialities of the field—perhaps broader than any other practitioner at the beginning of the postwar era in the United States. Royston, a gifted designer with a fascination for formal exploration, remained deeply committed to the social purposes of his built work, particularly the private gardens, neighborhood parks, and playgrounds."[51] Williams was "an open space enthusiast who, long before the environmental movement, saw the importance of managing urban growth and conserving natural environments."[52]

In 1958, the ERW partnership was amicably dissolved. Robert Royston formed a new firm with Asa Hanamoto and David Mayes, two associates at ERW. Eckbo and Williams along with Francis Dean, who had become an ERW partner in 1953, formed Eckbo, Dean, and Williams.

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[48] Walker and Simo, 132.

[49] *Marin Independent Journal*, "Prize-Winning Landscape Firm," 19 January 1952.

[50] *Architect and Engineer*, "Landscape Architecture A Professional Adventure in Use of Outdoor Space," (September 1946), 11.

[51] Walker and Simo, 118.

[52] Fay Sweet, *The Bigger Picture* (London: Blackdog Publishing, 2009), 6.

With the addition of Don Austin, in 1964, the partnership became Eckbo, Dean, Austin, and Williams (EDAW). The firm officially became known as EDAW in 1973.

During the 1960s, landscape architectural firms became involved in planning and analysis for entire regions not just individual communities. EDAW, "guided by a progressive vision of the leadership role of landscape architecture,"[53] took on these larger scale projects and was at the forefront of this expansion of the profession. The firm prepared California's first state-wide open space study and followed this with a similar plan for the State of Hawaii.[54] During this period, EDAW began to work on international projects, and as a result of this work, EDAW is recognized as having made a significant contribution to opening the door for western design and planning firms to work in Asia. As it expanded the scale and complexity of its work, EDAW added new professional skills to its capabilities and became recognized for its environmental resources planning and management and its visual analysis capabilities.[55]

By the 1990s, EDAW had grown into a 400-person firm with sixteen offices, including ones in London, Sydney, and Hong Kong that accommodated the needs of its growing international presence. Its expertise ranged from "urban planning and urban regeneration to environmental management and resort design."[56] Examples of three projects that illustrate the scope of the firm's work include a plan for the restoration of the Everglades, Washington, D. C.'s Monumental Core Framework Plan, and the Jinji Lake Waterfront, a masterplan for a new 600,000-person community, in Suzhou, China.[57]

In 2005, EDAW, was acquired by AECOM Technology Corporation, "an expanding family of companies offering integrated services in engineering, transportation, planning and environmental expertise."[58] The firm continued to operate as a distinct entity, as EDAW AECOM, until 2009. At that time, the EDAW name was retired as AECOM fully merged the identities of all its subsidiary firms under the AECOM logo.[59] In recognition of the firm's contributions to the profession of landscape architecture ASLA awarded EDAW the Landscape Architecture Firm Award in 2009.[60]

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[53] The Cultural Landscape Foundation, *EDAW,* accessed 4 December 2017, https://www.tclf.org/pioneer.

[54] EDAW, *Open Spaces* (San Francisco, CA: Diablo Press, 1969), back cover.

[55] Sweet, 6-9 and 220; ASLA, *EDAW: Firm History.*

[56] Sweet, 9.

[57] Sweet, 6-9 and 220; ASLA, *EDAW: Firm History*; The Cultural Landscape Foundation, *EDAW.*

[58] Sweet, 9.

[59] *World Landscape Architect,* "EDAW is now fully merged into AECOM," accessed 4 January 2018, http://worldarchitect.com.

[60] Sweet, 9; ASLA, *EDAW: Firm History.*

*Garrett Eckbo*

Garrett Eckbo (1910–2000) was born in New York but moved with his family to Alameda, California in 1912, where he spent the remainder of his childhood. He studied landscape architecture at the University of California, Berkeley and graduated in 1935. After a one year stint designing residential landscapes for a nursery business in Los Angeles, Eckbo placed first in a nationwide design competition and received a scholarship to Harvard's Graduate School of Design; he graduated with a Masters in Landscape Architecture in 1938. While at Harvard, Eckbo chafed at the restrictive Beaux Arts education that dominated the landscape design department. He found more in common with the idea that "architecture and design had a social role and could help improve the quality of life," which was being put forth by Bauhaus founder Walter Gropius and architect/designer Marcel Breuer, both of whom came to Harvard after fleeing Nazi Germany.[61] It was during this period that Eckbo began his life-long practice of writing about his ideas and pushing to expand the boundaries of the landscape architecture profession. In 1938–39, he published, with Harvard classmates Dan Kiley and James Rose, three articles in *Pencil Points* (a leading architectural journal) that described their modernist design ideals and laid out how society, ecology, and landscape architecture were interrelated; these essays became known as the "Harvard Revolution" and helped to usher in the modern era of landscape design.[62]

Eckbo directly influenced several generations of practitioners through his teaching—first at the University of Southern California (1946–58) and then at the University of California, Berkeley (1963–1969) where he was chair of the Department of Landscape Architecture—and through his writing. His book *Landscape for Living*, first published in 1950 and illustrated with examples of work by ERW, defined "the modern discipline of landscape architecture for his professional peers and a broader readership"[63] and put these ideas into the context of the post-World War II society. Eckbo went on to write additional books, each of which continued the themes of his first book within different contexts. He devoted the last ten years of his life to "theoretical study and publication."[64] His last book, *People in a Landscape*, was published in 1998 and continued reoccurring themes of his professional life that landscape design can be an agent of societal change[65] and that "landscapes can link society and nature."[66]

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[61] Sweet, 6.

[62] Treib and Imbert, 25-28 and 182-183; University of California Berkeley Environmental Design Archive, *Garrett Eckbo*, accessed 4 December 2017, http://archives.ced.berkeley.edu/collections/eckbo-garrett.

[63] The Cultural Landscape Foundation, *Garrett Eckbo*.

[64] Treib and Imbert, 185.

[65] Dorothee Imbert, *Garrett Eckbo*, accessed 4 December 2017, https://tclf.org/pioneer.

[66] Julie V. Iovine, "Garrett Eckbo Is Dead at 89," *New York Times*, 18 June 2000.

In his numerous residential designs of the 1950s, Eckbo developed a "contemporary vocabulary drawn from the arts of painting and sculpture" that resulted in "spaces and forms that viewers read immediately as modern."[67] A sampling of his other major design contributions—which illustrate the breadth of his work—include his collaboration (1939–1942) with architects Vernon DeMars and Burton Cairns and landscape architect Francis Violich in applying modernist ideas to the design of approximately 50 migrant worker's camps for the Farm Security Administration; the widely-publicized ALCOA Forecast Garden (1952–1966) where Eckbo demonstrated the multiple uses for aluminum in the landscape; the Fulton Mall (completed in 1964) which redesigned Fresno's central business district into a pedestrian mall in an effort to retain its viability as a regional retail center; and the Union Bank Square in Los Angeles (1968), a three-acre plaza next to the 40-story Union Bank headquarters where the design's "biomorphic and organic forms recall paintings by Joan Miro."[68]

In their book *Garrett Eckbo: Modern Landscapes for Living*, that accompanied an exhibition on his life, work, and influences on the profession at the University Art Museum in Berkeley in the late 1990s, Marc Treib and Dorothy Imbert wrote that Eckbo "played a central role in the formation and practice of modern landscape architecture"[69] and is considered ". . . one of the most influential landscape architects of this century, fitting design to the needs and desires of contemporary life. His contribution [was] distinct for addressing in equal measure society, the natural landscape, art, and technique."[70] He was awarded the American Society of Landscape Architects (ASLA) Medal (1975), the highest honor bestowed on an individual by the society. In 1998, he became the first person to be named a Distinguished Alumnus at the University of California, Berkeley's College of Environmental Design.

*Robert Royston*

A California native, Royston (1918–2008) was raised on his family's walnut ranch in the Santa Clara Valley and received his degree in landscape architecture from the University of California, Berkeley in 1940. After serving in the United States Navy during World War II, Royston returned to the Bay Area and joined Eckbo and Williams to form ERW in 1945. In 1958, Royston separated from ERW and formed Royston, Hanamoto, and Mayes (RHM. The Royston firm had a number of different partnership structures and names through the years before becoming Royston, Hanamoto, Alley, and Abey (RHAA) in 1979. RHAA continues to exist today and maintains offices in San Francisco and Mill Valley.

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[67] Treib and Imbert, 94-95.

[68] The Cultural Landscape Foundation, *Union Bank Square*, accessed 4 December 2017, https://www.tclf.org/landscapes/union-bank-square.

[69] Treib and Imbert, inside cover.

[70] Treib and Imbert, viii.

Royston played a major role in the development of the post-World War II landscape in the Bay Area, and, as noted in a profile in the *San Francisco Chronicle* in 2006, "it's hard to spend a day in the Bay Area without seeing a landscape designed by the firm."[71] Royston's firm designed the landscapes associated with civic buildings, numerous education campuses and planned communities, and over sixty parks.[72] His early suburban park projects—undertaken between 1946 and 1965—are considered among the most important achievements of his career. In their book *Modern Public Parks: Robert Royston and the Suburban Park,* Reuben Rainey and J. C. Miller made the following assessment of this contribution: "During this twenty year period Royston and his professional partners created a series of suburban parks of varying scale that pioneered new directions in American park design. These projects were innovative in their spatial organization, design details, and materials, creatively reshaping American park design traditions to meet the unprecedented needs of postwar suburban expansions. They attracted national attention in design periodicals and earned a number of design awards from the American Society of Landscape Architects."[73]

By the time he retired in 1998, Royston was widely recognized as one of the pioneers in modern landscape architecture. He influenced the profession through his design innovations in the 1950s and 1960s, the collaborative work of his firm, and his impact on future landscape architects as an educator at his alma mater and other institutions. Royston was awarded numerous awards during his career including ASLA Fellow (1975), the AIA Medal (1978), and the ASLA Medal (1989), the highest honor awarded by the organization.[74] In 2000, he was named a Distinguished Alumnus at the University of California, Berkeley's College of Environmental Design.

*Ed Williams*

Ed Williams (1914–1984) was born in Pittsburg, Pennsylvania in 1914 but moved with his family to Berkeley in 1929. He was a classmate and friend of Eckbo's at UC Berkeley and graduated with his degree in landscape architecture 1935. The range of his work, cited in a profile of ERW in the *Architect and Engineer* in 1946, highlighted both William's interests and the expanding breadth of the profession of landscape architecture; the article stated that he had designed parks and playgrounds, had worked on preparing a post war program of public works for San Mateo County that "served as a model for other counties and communities," and had experience in zoning, transit surveys, master planning, subdivision design, private gardens, and

[71] Dave Weinstein, "Painting an Abstract Landscape . . .," *San Francisco Chronicle*, 2 December 2006.

[72] Reuben M. Rainey and J.C. Miller, *Modern Public Parks: Robert Royston and the Suburban Park* (San Francisco, CA: William Stout Publishers, 2006), 140.

[73] Rainey and Miller, *Modern Public Parks*, ix.

[74] The Cultural Landscape Foundation, *Robert Royston.*

estates. During World War II, he became the head of the mechanical engineering section at Western Pipe and Steel.[75]

In 1940, he and Eckbo founded their first partnership. Williams went on to be a founding partner in the two important twentieth century landscape architecture firms—ERW and EDAW—that evolved from this initial partnership. Williams remained in the EDAW partnership through the rest of his career. In a profile on the ERW in *Invisible Gardens: The Search for Modernism in the American Landscape*, Peter Walker and Melanie Simo noted that Williams was a "skillful designer" who had "placed second in the national competition that sent Eckbo to Harvard."[76] However his real impacts on the profession were in his work in environmental planning and his management abilities that nurtured the growth of EDAW from a small firm to a large corporation with offices around the globe. Walker and Simo noted that "as the firm grew, Williams assumed more responsibilities in management and planning. For his partners and younger associates, he remained a stabilizing influence—a rock of integrity in a fluid, changing world."[77] In the 1960s, Williams became the partner in charge of EDAW's large-scale planning efforts and was at the forefront of expanding the profession into environmental planning. He directed EDAW's efforts for California's first state-wide open space study in the mid-1960s and a similar plan for the State of Hawaii.[78] Williams was made a Fellow of ASLA for his designs and for his service to the profession.[79]

**Evaluation**

The Fireman's Fund Insurance Company Home Office is significant under Criterion C as the work of three masters, the architect Edward B. Page, the engineering firm of John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates, and the landscape architectural firm of Eckbo, Royston, & Williams (ERW)/Eckbo, Austin, Dean, and Williams (EDAW).

Edward B. Page was a member of the postwar generation of architects in the Bay Area who introduced modernism on a large scale to the area. He was also a direct link through his experience as a young man, to the architectural ferment over modernism in Europe. The Fireman's Fund Insurance Company Home Office was his largest and best-known project and is the best representative of his career and work.

John J. Gould & H.J. Degenkolb/Henry J. Degenkolb & Associates and its successor Degenkolb Engineers has been one of the leading structural engineering firms in California from its

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[75] *Architect and Engineer*, "Landscape Architecture A Professional Adventure in Use of Outdoor Space," 20-22.

[76] Walker and Simo, 133.

[77] Walker and Simo, 133.

[78] EDAW, *Open Spaces*, back cover.

[79] ASLA, *EDAW: Firm History*; ASLA, *Fellows Data Base*.

founding to the present day. The Fireman's Fund building—with its innovative structural design that provided open floors with minimal columns and exterior walls of glass—represents the beginning of the reputation of Gould and Degenkolb as among the leading structural engineers in San Francisco in the post-World War II period.

ERW was established in 1945 by three of the pioneers of modern landscape architecture—Garrett Eckbo, Robert Royston, and Ed Williams. ERW was responsible for the original mid-1950s landscape design for the Fireman's Fund site, and its successor firm EDAW designed the landscape features associated with the mid-1960s additions. During the period of significance, ERW /EDAW was recognized as one of the country's leading landscape architectural firms. Their designs and writings contributed to the popularization of the modernist landscape design vocabulary and to modernism as an approach to creating outdoor spaces that addressed contemporary needs within a broad range of settings. The Fireman's Fund site is significant as an example of the firm's mastery of modern design within the corporate landscape context.

## CRITERION C: ARCHITECTURE/LANDSCAPE ARCHITECTURE

The Fireman's Fund Insurance Company Home Office is a single property that has significant components of architecture and landscape architecture, each of which has a specific context. These contexts are presented below followed by an evaluation of the property as a whole.

### Modern Architecture

The design of the Fireman's Fund Home Office Building drew on the main stream of the history of Modern Architecture, beginning with its European origins: the Bauhaus and the International Style. At the same time, it was influenced by the forces that translated European modernism for the United States.

The Bauhaus, founded by Walter Gropius in 1919, was a school of the arts that sought to heal the division that many saw between the arts and craftsmanship, a division that was an outgrowth of capitalism and the industrialization of western society. The school taught a great variety of crafts and building construction along with theory of art. All of these things could be brought together in architecture, unofficially the first among equals. Unlike the Arts and Crafts Movement, the Bauhaus taught that good design, which was the product of this education, should be applied to mass production and that this was necessary in a modern highly technological society. The mass production of well-designed products including building parts and buildings was an important means of addressing the need for housing and other social issues. The creation of beautiful and useful products in a technological society required collaborative efforts that combined art, craftsmanship, and engineering.

As an emblem of its ideals, in 1926 the Bauhaus moved from Weimar to a new building in Dessau. The building was a composition of rectangular wings, all but one of them two to four

stories in height, at right angles to each other. Each wing was functionally differentiated from the others and they were arranged so that they framed outdoor spaces. In this way the building and its outdoor spaces functioned together as one. The building was a modern structure of reinforced concrete with steel sash windows. No ornament was applied to the building apart from the lettering of its name.

The idea of the International Style was based in large part on the example of the Bauhaus and the work of its teachers and students. The style was named in a 1932 book, *The International Style* by Henry-Russell Hitchcock and Philip Johnson, who wrote it as a follow-up to an exhibition they curated at the Museum of Modern Art in New York. In 1964, Hitchcock said that the term, "defines a type of architectural design which came into existence in the early 1920s, developed at the hands of a few leaders to classic expression by 1930, and from that time on found wider and wider acceptance throughout the world." Its three principal elements, he said, were "[1] a new conception of architecture as volume rather than as mass,... [2] regularity rather than axial symmetry ... as the chief means of ordering design," and [3] a proscription against "arbitrary applied decoration." [80] The idea was not that the International Style was a single style but that it was a way of responding to technology that should be the same in any country and that it represented a viable way of addressing the needs for housing and other social problems.

Politics in Germany closed the Bauhaus in 1933 and many of its leaders came to the United States. Walter Gropius went to Harvard, Mies van der Rohe, the head of the Bauhaus at the time it closed, went to the Illinois Institute of Technology, and others went to various parts of the country. Other European modern architects not connected to the Bauhaus—Richard Neutra, Rudolph Schindler, Erich Mendelsohn, and Serge Chermayeff—went to California. These architects and Americans who were influenced by their work brought the International Style to the United States. Before World War II, the number of International Style buildings in the United States was extremely limited.

After World War II as it took hold in the United States, the International Style was embraced in varying degrees for different types of buildings and clients, perhaps most of all for corporate office buildings. In the process of its popularization, the designers and builders of the style omitted the social goals that were part of its original rationale. The style came to represent the values of modern corporations including faith in technology and solving problems based on reason and science. The design of International Style buildings depended on physical features like new technologies and materials. It also depended on a deep understanding of the purpose of buildings and on research on how they are to be used.

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[80] Gerd Hatje, ed., "International Style," *Encyclopedia of Modern Architecture* (New York: Harry N. Abrams, 1964), 151-155.

In San Francisco, the best-known early examples of the International Style were a few houses designed by Richard Neutra in the 1930s. After the war, Erich Mendelsohn designed the Maimonides Health Center in 1950. The office of Skidmore, Owings, & Merrill opened in San Francisco in 1945 and designed International Style buildings like Mount Zion Hospital in 1950, the Greyhound Maintenance Facility (now California College of the Arts) in 1951, and the Naval Post Graduate School in Monterey in 1954.

The most concentrated area of new corporate office buildings was in downtown San Francisco where the principal builder of these buildings was the insurance industry. Most but not all of these buildings were in the International Style. Of fifteen corporate office buildings downtown built between 1946 and 1965, thirteen were in some version of the International Style, one was in the Moderne Style, and one was based on Independence Hall in Philadelphia, an eighteenth-century Georgian Style brick building. Nine of the fifteen buildings including the Georgian Style building were for the insurance industry.

Modern Architecture had to do with more than the look of buildings. It had to do with the process of the design of buildings, with the adoption of new technologies and materials, and with the relationship of buildings to their surroundings, both their immediate surroundings and their greater surroundings—with their own site and with the city. It also had to do with the expression of the relationship between structure and technology, represented by Louis Sullivan's statement that "form follows function."

The architect of the Fireman's Fund Home Office Building, Edward Page, absorbed ideas about modernism from architectural journals, conversations with architects from many countries in Paris cafes, travel around Europe in 1930 to see early buildings of the Modern Movement, and from fellow architects of his generation. His experience, and that of the architectural profession in the United States in general during World War II reinforced many elements of the Modern Movement—the role of engineers, the use of new technologies and materials, designing without ornament, an economy of means, and the primacy of function as a generator of design.

According to Serraino, writing about San Francisco's modern architects in the 1940s–1960s, "Each took a stance on what being modern meant, and each practiced accordingly."[81] Edward Page's approach to modernism put a premium on technology and sophisticated accommodation of function. Among the best-known figures of Modern Architecture, Page admired Eero Saarinen above all others because "he was the only one who understood that sixty percent of a modern

[81] Pierluigi Serraino, *NorCalMod: Icons of Northern California Modernism* (San Francisco: Chronicle Books, 2006), 8.

building was mechanical equipment, electrical, and air-conditioning." Frank Lloyd Wright, Mies van der Rohe, and Le Corbusier did not understand this, he said.[82]

While there is no known evidence of any direct connection, the Fireman's Fund Home Office echoes the design of several of the most influential International Style buildings. Its basic organizational concept is like that of the Bauhaus itself, an arrangement of low-rise perpendicular wings with separate functions and with the wings framing outdoor areas that function with the building. Like the famous property of Philip Johnson, one of the authors of *The International Style*, with its Glass House and its Brick House that were completed in 1949, one of the buildings of the Fireman's Fund Home Office is glass and the other is brick. Like the General Motors Technical Center in Warrren, Michigan, designed by Eero Saarinen and built 1953–1955, the Fireman's Fund Home Office represents a radical departure from most contemporary corporate offices as a low-rise building on landscaped grounds in a suburban location.

**Modernism in the Landscape**

American landscape design during the late nineteenth and early twentieth centuries was based on ideals of the Ecole des Beaux-Arts. Books, such as *An Introduction to the Study of Landscape Design* by Henry Hubbard and Theodora Kimball (first published in 1917), codified an appropriate spatial organization, style, and features for various types of landscapes and emphasized that the designer's skill or creative input should be focused on how to adapt these standards or patterns to a particular site. Until the latter part of the Great Depression, all university landscape architecture programs in the country taught within this Beaux-Arts framework, and landscape designers absorbed this viewpoint during their training and put it into practice when they graduated. They typically selected or adapted structures, planting arrangements, and details, such as site furnishings, from multiple eras and European traditions to create a formal organization of landscape space with an eclectic mix of historical references.[83]

By the late 1930s, a Modernist sensibility to landscape design had just begun to evolve. In 1938, Harvard professor and designer Christopher Tunnard published *Gardens in the Modern Landscape* in which he asserted that "the old values and the old forms . . . could no longer satisfy contemporary artistic and planning needs."[84] He believed that the right style for the twentieth century was no style at all but rather a new conception of planning the human environment.[85] Tunnard was reacting against the lack of connection between landscape design within the

[82] Page, interview.

[83] The Cultural Landscape Foundation, *Beaux Arts/Neoclassical*, accessed 4 December 2017, https://tclf.org.

[84] Marc Treib, "Axioms for a Modern Landscape Architecture" in *Modern Landscape Architecture: A Critical Review* (Berkeley, CA: University of California Press, 1997), 36.

[85] Christopher Tunnard, "Modern Gardens for Modern Houses . . .," *Landscape Architecture* 32 (January 1942).

predominant Beaux Arts tradition and the realities of modern life. Through his writing and teaching at Harvard, Tunnard championed a modern landscape commensurate in its conceptual and aesthetic authority to the best of modern architecture.[86]

Modernism in the landscape first appeared in residential garden design[87], and during the 1940s, California designer Thomas Church became one of the leading interpreters of modernist tenets within this setting. The importance of California to the development of the modern landscape design movement continued after World War II. The explosion of residential landscape commissions that accompanied the postwar suburban housing boom provided landscape architects with increased opportunities to apply the tenets of modernism to gardens. *Sunset Magazine*, headquartered in Menlo Park, played a major role in popularizing a version of modernism suited to the California climate and lifestyle through its ongoing articles that showed the general public what a modern garden (and house) could look like and how it could function. Dianne Harris, in her article "Writing a Modern Landscape: Thomas Church as Author," noted that historians and theoreticians have recognized the essential role played by the popular press in publicizing modern design and in helping to promote a new way of seeing "that became essential to the formation of Modernism in design."[88] Modern design became an accepted expression of California's "age of abundance," historian Kevin Starr's characterization of the state's post World War II economic boom.[89]

Garrett Eckbo, one of the principal theorists of modern landscape design, wrote that the "modernist approach to landscape architecture was concerned with the relationship of the landscape to modern architecture and the relationship within the site between space, materials, and people."[90] Modernism in landscape architecture reflected a concern for the specific site or space rather than an adherence to established patterns based on historical forms, which emphasized the Beaux-Arts principles of balance, symmetry, proportionality, and axiality. Designers rejected the axis and symmetry and instead used geometric and biomorphic forms for arrangements of hardscape, circulation, and planting which together often created abstract spatial compositions. In the residential designs where modernism was first expressed, there was a strong functional and visual relationship between interior and exterior space, as expressed in buildings featuring large expanses of windows, courtyards being framed by the buildings, and patios that

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[86] Catherine Howlett, "Modernism and American Landscape Architecture," in *Modern Landscape Architecture* (Berkeley, CA: University of California Press, 1997), 32.

[87] Treib, 53.

[88] Dianne Harris, "Writing a Modern Landscape . . .," in *Thomas Church Landscape Architect* (San Francisco, CA: William Stout Publishers, 2003), 178.

[89] Kevin Starr, *Golden Dreams: California in an Age of Abundance, 1950-1963* (New York: Oxford University Press, 2009).

[90] Walker and Simo, 7.

extended living spaces into the outdoors. Additionally, the same materials used for buildings were often used in the landscape's structures (such as walls or arbors) and paving. Rather than merely being a decorative element, plants were used to define outdoor space. The lawn became a symbol of the landscape in post-World II suburban communities and was used in small and large settings—individual homes, parks, commercial and educational campuses, and civic spaces—as an organizing element of space.[91]

Modern landscapes were intended for people to use and were adapted to the real lives and needs of the times. For example given the supremacy of the automobile in the post-World War II suburban environment, parking lots were incorporated as a conscious part of designs. The expanding post-World War II economy provided landscape architects with a multitude of opportunities to adapt the modernist vocabulary for gardens to the new parks, educational and commercial campuses, and civic spaces being developed in the post war economic boom. This expansion in the profession of landscape architecture was led by a new generation of landscape architects, which included at its forefront Garrett Eckbo, Robert Royston, and Ed Williams—the three partners in the firm responsible for the landscape design of the Fireman's Fund site.

**Landscape of the Corporate Headquarters**

A new type of cultural landscape, created by a synthesis of modernist buildings and landscape design, developed during the post-World War II era as corporate headquarters moved out of the central city. Louise A. Mozingo, professor of landscape architecture at the University of California, Berkeley and the author of several articles and a book on this development, has noted that corporations moved out of the urban core for a number of reasons. First and foremost, the larger sites available in the suburbs allowed corporations to construct new buildings that fit their current management structure and operational needs. "Efficient office organization now required flexible, expandable offices with movable partitions rather than fixed walls. The dense, constricted downtown became untenable."[92]

By the early 1950s, insurance companies had spearheaded this exodus from the central business district to the peripheral residential areas of the city or to suburban sites. An article in *Business Week* in 1951, quoted by Mozingo in her article "The Corporate Estate in the USA, 1954–1964," noted that there were not enough downtown spaces "in the right places" to meet companies' needs for expansion. The management of these insurance companies believed that it was hard to "hire first class personnel" to work in downtowns that were viewed as undesirable environments. ("Management thinks workers will be happier looking at trees instead of grimy buildings and

[91] David Streatfield, "Where Pine and Palm Meet . . .," *Landscape Journal* 4, No. 2 (Fall 1985), 68; Treib, 53-59.

[92] Louise A. Mozingo, "Campus, Estate, and Park . . .," in *Everyday America: Cultural Landscape Studies After J.B. Jackson* (Berkeley, CA: University of California Press, 2003), 258.

listening to birds instead of honking taxis."[93]) The integration of the architecture and landscape typically featured a low-rise, centrally-sited, modernist building(s), an entry drive and large parking lots which were a reflection of the domination of the automobile as the preferred means of transportation for employees and visitors, and an enveloping landscape setting or "green surround" which was often designed to resemble an idealized suburban space.[94] The buildings and parking lots occupied only a fraction of a site's acreage and the landscaped lawns and outdoor spaces contributed to the "seamlessness between the interior and exterior space, which was a common goal of the modernist architectural aesthetic."[95] Mozingo noted that corporations "considered the designed landscape essential to the functioning of their management facilities."[96] This new type of corporate headquarters—with its modernist architecture and landscape—became a part of the effort to "reconceive the white-collar workplace, retain targeted employee groups, and signal eminent corporate standing,"[97] and resulted in what became an "identifiable place, creating a tangible symbol of the corporate persona."[98]

During the 1950s, landscape architects incorporated these new corporate headquarters in their practices. They became partners—with architects—in the creation of these new corporate environments and developed designs that established connections between the building, the site, and the surrounding landscape.[99] The site planning, automobile approaches, different hierarchies of entrances, parking lots, and lawns used to create an interface between the building and the surrounding landscape, and the outdoor spaces of the post-World War II corporate landscapes all exemplified the functionalism of mid-20th century modernism.[100]

The development and design of the Fireman's Fund Home Office, located on a 10-acre site on California Street outside of the traditional urban core of the city, was an example of this new corporate environment in San Francisco that exhibited all of these characteristics. An article in the *San Francisco Chronicle,* published to coincide with the official dedication on 9 July 1957, noted that architect Edward B. Page designed the Fireman's Fund building "from inside out" to meet the specific nature of the insurance company's work flow within and between departments. The article emphasized the building's modern sensibility as expressed through the design and materials of the architecture, the company's concern for the working environment, and an

[93] Louise A. Mozingo, "The Corporate Estate in the USA, 1954-64 . . .," *Journal of Garden History & Designed Landscapes* 20, No. 1 (April 2000), 28.

[94] Ibid., 34.

[95] Ibid., 44.

[96] Ibid., 28.

[97] Mozingo, "Campus, Estate, and Park," 266.

[98] Mozingo, "The Corporate Estate," 26.

[99] Eckbo, *Urban Landscape Design*, 4.

[100] The Cultural Landscape Foundation, *Corporate Office Park*, accessed 4 December 2017, https://tclf.org.

identification with a suburban—rather than urban—landscape setting. This article noted that the new headquarters was "designed to provide efficient business operation and a maximum of light, air, and good morale."[101] The article described the contemporary nature of the building (its "glass, steel, and aluminum structure; the "ceiling to floor windows that permit sweeping vistas of the city's skyline"; a "feeling of spaciousness") while noting a range of amenities that acknowledged the needs of the employees including ample parking, a large cafeteria, and "lounges, reading rooms, guest rooms, and a sheltered outdoor terrace"—all of which were set within "extensive lawns and gardens."[102] Fireman's Fund came to be recognized as a local expression of the modern suburban corporate headquarters.[103] It appeared in a 1969 article in the *San Francisco Sunday Examiner-Chronicle* that provided local examples of corporate plazas and landscapes that contributed to the common good while creating an identifiable image for the company. This article noted that "whereas insurance companies suffer chronically from a high rate of employee turnover, that problem has been minimal since Fireman's Fund's 1200 workers began enjoying the company park."[104]

**Evaluation**

The Fireman's Fund Insurance Company Home Office, a single property including both architectural and landscape elements which were designed to complement each other, is significant under National Register Criterion C as an example of a corporate headquarters in San Francisco which reflects mid-twentieth-century modernist design principles. The property is a synthesis of International Style buildings and mid-twentieth century modernist landscape features which reflect key characteristics of a post-World War II suburban corporate headquarters. As an example of the International Style, the building itself expresses the use of new technologies and materials, designing without ornament, an economy of means, a focus on function, an orientation to the landscape, and a process of design that resulted in a characteristic expression in glass and concrete. Key characteristics of a post-World War II suburban corporate headquarters are expressed in the design's centrally-sited modernist building within a park-like setting that accommodates the automobile as the primary form of transportation and through the arrangement of the office building's low-rise perpendicular wings which frame outdoor spaces designed to function with the building. The design expresses mid-twentieth century modernist landscape forms and materials including the combination of geometric and biomorphic forms in the design of the Terrace, the use of brick and concrete materials in landscape structures and paving to promote the integration between architecture and landscape, and the presence of a

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[101] *San Francisco Chronicle*, "Fireman's Fund Shows New Home, 9 July 1957.

[102] Ibid.

[103] An article (6 February 1964) by *San Francisco News-Call Bulletin* columnist Guy Wright described Fireman's Fund as a "refreshing example" of the type of corporate headquarters that the city should be promoting.

[104] Gerald Adams, "Clearings in the Concrete Jungle," *San Francisco Chronicle*, 30 November 1969.

broad lawn—an iconic feature in suburban corporate landscapes during the post-World War II era—along the west side and south sides of the property.

## BACKGROUND HISTORY OF THE PROPERTY

### Laurel Hill Cemetery

The Fireman's Fund Insurance Company Home Office is located on the southeast corner of the site of the Laurel Hill Cemetery. The entire cemetery was in a multi-block area bound by Parker Avenue, California Street, Presidio Avenue, and a diagonal line from a point on Presidio Avenue between Sutter and Post Streets to a point near the intersection of Parker and Euclid Avenues.

Laurel Hill Cemetery was begun in 1854 as Lone Mountain Cemetery, one of four cemeteries established in the 1850s and 1860s in central San Francisco as Yerba Buena Cemetery and others further downtown filled up. The name was changed to Laurel Hill Cemetery in 1867. It was referred to as the "Pioneer Cemetery" and was the most prestigious San Francisco burial place for several decades.[105] The design of the cemetery followed the example of parklike cemeteries first built in the eastern United States in the 1830s-1840s with winding paths and landscaped grounds.

Among notable people buried there were Andrew Hallidie, inventor of the cable car; Charles Crocker, one of the Big Four builders of the transcontinental railroad; William Ralston and William Sharon of the Bank of California; and eleven U.S. senators. In addition to these and many other prominent people, there were 107 people in the Japanese Cemetery and an unknown number in the Serbian Cemetery. Altogether there were about 47,000 burials in Laurel Hill Cemetery.

A long effort to move all cemeteries out of San Francisco included banning of future burials in the city beginning 1 August 1901; a law requiring removal of cemeteries from San Francisco that was signed 17 January 1914; an eviction order from the City of San Francisco in November 1937; and removal of burials beginning 26 February 1940.

### Laurel Heights

The cemetery land was purchased from the cemetery association by a real estate developer, Heyman Brothers, who announced in April 1941 plans to develop "an exclusive $10,000,000 home district, including some 600 residential sites, as well as a million dollar business district"[106] on the site. The original intention was to offer five acres to the city for a park or playground. The residential neighborhood would be called Mayfair Terrace and the business district would be

[105] Michael Svanevik and Shirley Burgett, *City of Souls: San Francisco's Necropolis at Colma* (San Francisco: Custom and Limited Editions, 1995), 43.

[106] *San Francisco Chronicle*, "Laurel Hill: Tract Plans are Revealed," 21 April 1941.

called Mayfair Village. Development of the property was delayed by World War II. When work resumed in 1947-1948, the residential area was called Laurel Heights and the business district was called Laurel Village. According to the builder, 75% of the home lots were developed by October 1949.[107] By April 1951, a citizen's group called the Laurel Heights Improvement Association had been formed to address neighborhood issues.

**San Francisco Unified School District Proposed Site of Lowell High School**

Around the time of the end of the war, on 27 June 1945, when the cemetery was gone and the revived development of the neighborhood was imminent, the San Francisco Board of Education initiated action to purchase a portion of the Heyman Brothers property as the site for a new Lowell High School campus. On 28 June 1946, the school district bought about twelve acres, about one fifth of the total area of the cemetery, in the northeast corner of the property for $194,690. The site of the school property was shown on a November 1947 map called "Map of Resubdivision of a Part of Laurel Heights, San Francisco, Calif." By mid-1950, however, the Board of Education had selected another site for Lowell High School and announced its intention to sell the Laurel Heights property.

The school district offered the site to the San Francisco Department of Parks and Recreation as it was required to do, but preferred to sell it at the highest price possible, with the understanding that it could get $450,000 for residential development and $650,000 for commercial development. Zoned for residential use, prolonged and complicated negotiations were necessary to win approval from the City Planning Commission for a rezoning of the site for commercial use.

Taking an active role in the controversy, the Laurel Heights Improvement Association expressed concern that commercial use of the property would diminish property values and the quality of the neighborhood. Referring to the official map that was a reference for those who purchased residential lots, and the designation of the "Future Location of Lowell High School" on the map, the association stated to the City Planning Commission: "Purchasers had every right to believe that in the construction of this school the architecture would be of modern and attractive design, with proper setback lines, well landscaped grounds, open recreation fields, and off-street parking."[108] On 21 June 1951, the City Planning Commission granted the request of San

[107] *San Francisco Chronicle*, "Hansen Homes...," 22 October 1949.

[108] Laurel Heights Improvement Association, "City-Owned Land Bounded by Laurel, Euclid, Presidio and California Streets," a statement presented to the San Francisco City Planning Commission, 9 May 1951.

Francisco's Director of Property to withdraw the application which the City had filed on 27 April 1951 for reclassification of the property from First Residential District to Commercial District.[109]

During a two-year period reports and rumors in the press, in newspapers, and in public documents and meetings indicated that interested parties in the property included unnamed potential builders of a tall office building, the federal government, and Fireman's Fund Insurance Company. In October 1952, San Francisco's Director of Property "asked for a speedy rezoning to escape Federal condemnation of the land."[110] Also during this period, the city took approximately two acres from the southeast corner of the twelve-acre property for streets and a fire station.

Ultimately, after presentation of the drawings of an unnamed architect to interested neighbors, an agreement was reached for rezoning of the property for commercial use. This agreement, City Planning Commission Resolution No. 4109 of 13 November 1952, included six stipulations for any development of the site. These are, briefly: 1) that only professional, institutional, or office buildings and associated service buildings were allowed; 2) the total floor area of buildings was limited; 3) off-street parking was required in relation to the number of employees and visitors; 4) setbacks were required on the west and south except for minor service buildings; 5) any development for residential use was subject to planning guidelines; and 6) there must be "appropriate and reasonable landscaping of the required open spaces." Because of this rezoning agreement, all development plans for the property have had to be approved by the City Planning Commission to insure compliance with these requirements.[111]

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[109] San Francisco Department of Planning, Letter from Paul Oppermann, Director of Planning to Mr. Eugene J. Riordan, Director of Property, 25 June 1951.

[110] *San Francisco News*, "School Board Asks Action on Rezoning," 24 October 1952.

[111] San Francisco, County Recorder, "Stipulation as to Character of Improvements on that portion of Lot 1A, Block 1032 Affected by Zoning Proposal Z-52.62.2", filed 8 January 1953.

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**Previous documentation on file (NPS):**

____ preliminary determination of individual listing (36 CFR 67) has been requested
____ previously listed in the National Register
____previously determined eligible by the National Register
____designated a National Historic Landmark
____ recorded by Historic American Buildings Survey #_____
____recorded by Historic American Engineering Record # _____
____ recorded by Historic American Landscape Survey # _____

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

**Primary location of additional data:**

____ State Historic Preservation Office
____ Other State agency
____ Federal agency
____ Local government
_x_ University
____ Other
Name of repository: _____

**Historic Resources Survey Number (if assigned):** _____

---

**10. Geographical Data**

**Acreage of Property** 10.2

Use either the UTM system or latitude/longitude coordinates

**Latitude/Longitude Coordinates (decimal degrees)**
Datum if other than WGS84:_____
(enter coordinates to 6 decimal places)

1. Latitude: Longitude:
2. Latitude: Longitude:
3. Latitude: Longitude:
4. Latitude: Longitude:

**Or**
**UTM References**
Datum (indicated on USGS map):

☐ NAD 1927 or ☐ NAD 1983

| | | |
|---|---|---|
| 1. Zone: | Easting: | Northing: |
| 2. Zone: | Easting: | Northing: |
| 3. Zone: | Easting: | Northing: |
| 4. Zone: | Easting : | Northing: |

**Verbal Boundary Description** (Describe the boundaries of the property.)

The Fireman's Fund Insurance Company Home Office occupies Block 1032 Lot 3 as shown on the Assessor's Parcel Map (Map 4 and Map 5). The property occupies most of its block, a total of approximately 447,361 square feet or 10.2 acres. Its irregular shape can be described, clockwise, by California Street on the north, the boundary with an adjacent property (Block 1032 Lot 2) measuring 232.859 feet in length, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street.

**Boundary Justification (Explain why the boundaries were selected.)**

The property includes the entire parcel that was purchased by Fireman's Fund Insurance Company in 1953, all of which was developed by the company for its use.

---

**11. Form Prepared By**

name/title: Michael R. Corbett, Architectural Historian and
Denise Bradley, Landscape Historian for

organization: Laurel Heights Improvement Association of San Francisco, Inc.
street & number: 2161 Shattuck Avenue #203
city or town: Berkeley state: California zip code: 94704
e-mail mcorbett@lmi.net
telephone: 510-548-4123
date: 19 April 2018

**Additional Documentation**

Submit the following items with the completed form:

- **Maps:** A **USGS map** or equivalent (7.5 or 15 minute series) indicating the property's location.
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)

**ATTACHMENTS**

Map 1 Location Map
Map 2 Sketch Map
Map 3 Sketch Map Detail
Map 4 Assessor's Parcel Map
Map 5 Property Boundary Coordinates
Map 6 Photo Key
Figure 1 Perspective drawing of Fireman's Fund Home Office
Figure 2 Site Plan showing features ca. 1957–1963
Figure 3 Photo of Terrace taken ca. 1957–1963, view east
Figure 4 Photo of Terrace taken ca. 1957–1963, view southwest
Figure 5 Photo of Entrance Court taken ca. 1957–1963, view west
Figure 6 Photo of Entrance Court taken ca. 1957–1963, view east
Figure 7 Photo of landscape along the south side of Office Building
Figure 8 Aerial view of Fireman's Fund property in 1961
Figure 9 Aerial view of Fireman's Fund property in 1969

**Photographs**

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

**Photo Log**

| | |
|---|---|
| Name of Property: | Fireman's Fund Insurance Company |
| City or Vicinity: | San Francisco |
| County: | San Francisco |
| State: | CA |
| Photographer: | Michael R. Corbett and Denise Bradley |
| Date Photographed: | 28 November 2017, 19 December 2017, and 2 February 2018 |

Description of Photograph(s) and number, include description of view indicating direction of camera:

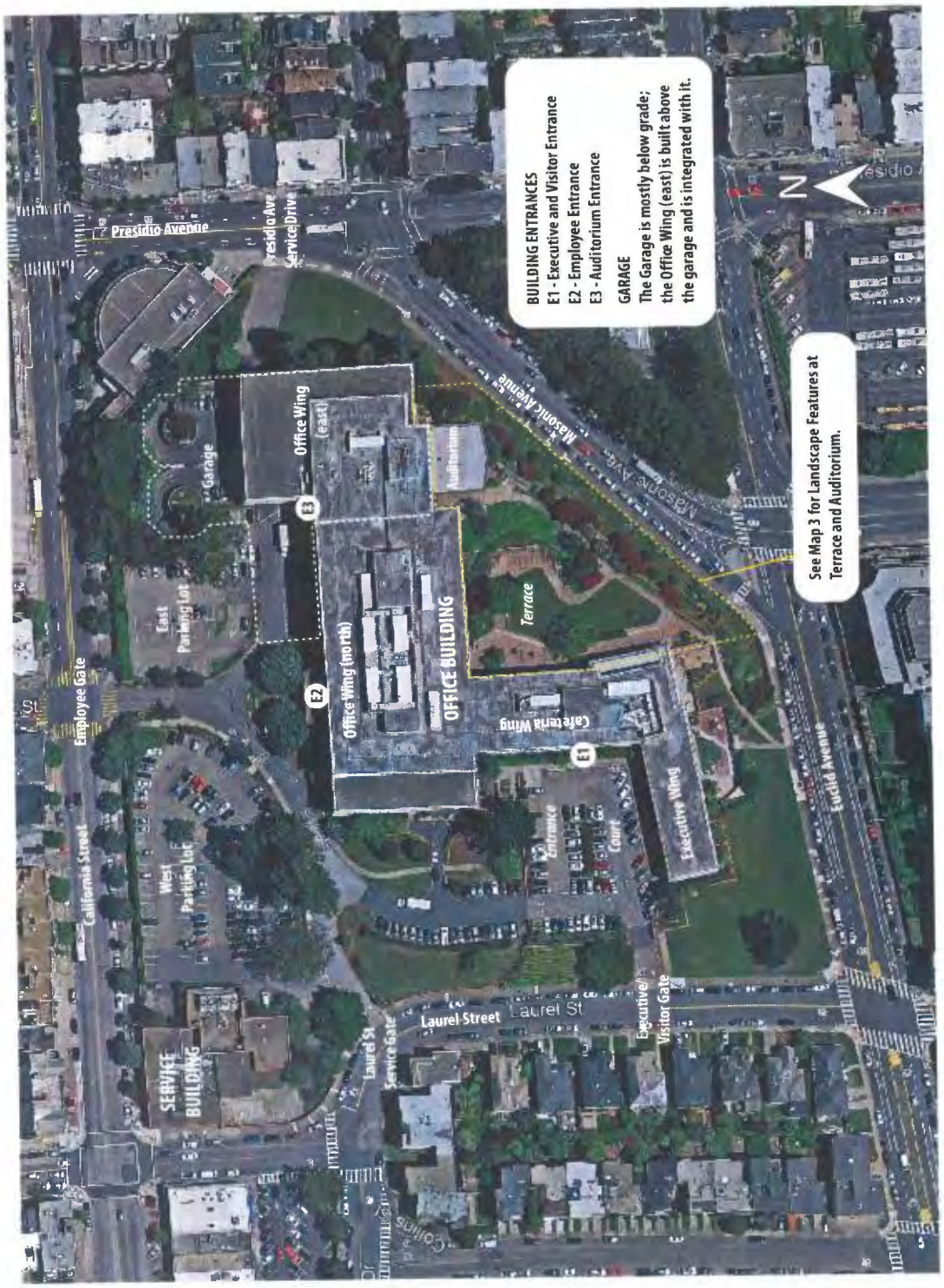
1 of 36. Office Building (Executive Wing) and Landscape Setting, camera facing northeast.
2 of 36. Office Building (Executive Wing) and Landscape Setting, camera facing north.
3 of 36. Office Building (Cafeteria Wing) and Terrace, camera facing north.
4 of 36. Office Building (Office Wing) and Terrace, camera facing north.
5 of 36. Office Building (Office Wing) and Terrace, camera facing northeast.
6 of 36. Terrace, camera facing west.
7 of 36. Office Building (Executive Wing) and landscape along Masonic Avenue, camera facing northwest.
8 of 36. Office Building (Auditorium) and landscape along Masonic Avenue, camera facing northwest.
9 of 36. Auditorium (outdoor area on west side), camera facing north.
10 of 36. Auditorium (outdoor area on east side), camera facing southwest.
11 of 36. Office Building (Office Wing East) and landscape along Presidio Avenue, camera facing west.
12 of 36. Office Building (Office Wing East/Garage), camera facing southwest.
13 of 36. Office Building (Office Wing East), camera facing east.
14 of 36. Office Building (Office Wing East/Garage), camera facing northeast.
15 of 36. Garage (1965 Addition), camera facing northwest.
16 of 36. Garage (1965 Addition), camera facing south.
17 of 36. Office Building (Office Wing North and Entry Structure), camera facing east.
18 of 36. Office Building Entry Structure (1984–1985) Interior, camera facing west.
19 of 36. Office Building (Office Wing North), camera facing east.
20 of 36. Entrance Court, camera facing southeast.
21 of 36. Office Building (Cafeteria Wing), camera facing northeast.
22 of 36. Office Building (Executive/Visitor's Entrance), camera facing east.
23 of 36. Entrance Court (Outdoor Sitting Area), camera facing southwest.
24 of 36. Entrance Court (Arbor at west end), camera facing northwest.
25 of 36. Service Building, camera facing west.
26 of 36. West Parking Lot, camera facing northeast.
27 of 36. Employee Gate on California Street, camera facing south.
28 of 36. Brick wall and landscape setting from California Street, camera facing southeast.
29 of 36. Service Building and brick wall from Laurel Street, camera facing northeast.

30 of 36. Brick wall along Laurel Street, camera facing southeast.
31 of 36. Laurel Street Service Gate, camera facing east.
32 of 36. Brick wall and landscape along Laurel Street, camera facing south.
33 of 36. Executive/Visitor Gate, camera facing east.
34 of 36. Office Building (Executive Wing), camera facing east.
35 of 36. Office Building (Executive Wing detail), camera facing east.
36 of 36. Office Building (typical window detail), camera facing north.

**Paperwork Reduction Act Statement:** This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).
**Estimated Burden Statement**: Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management. U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.



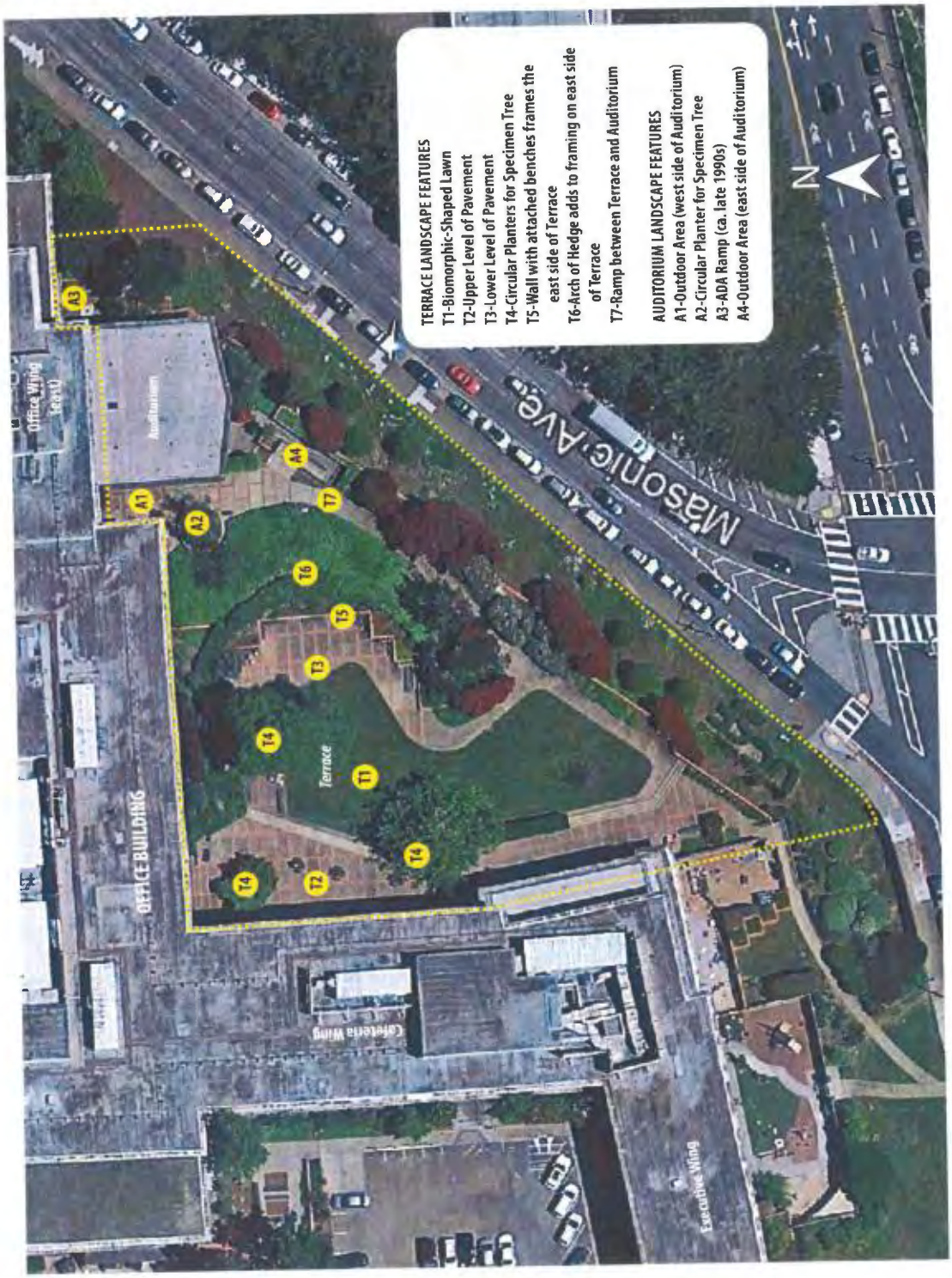

Map 1. Location Map. Source: USGS San Francisco North Quadrangle, 1995.




Map 2. Sketch Map. Source: Google Earth, photo taken April 2016, annotated by Denise Bradley and Michael Corbett

Fireman's Fund Insurance Company
Name of Property

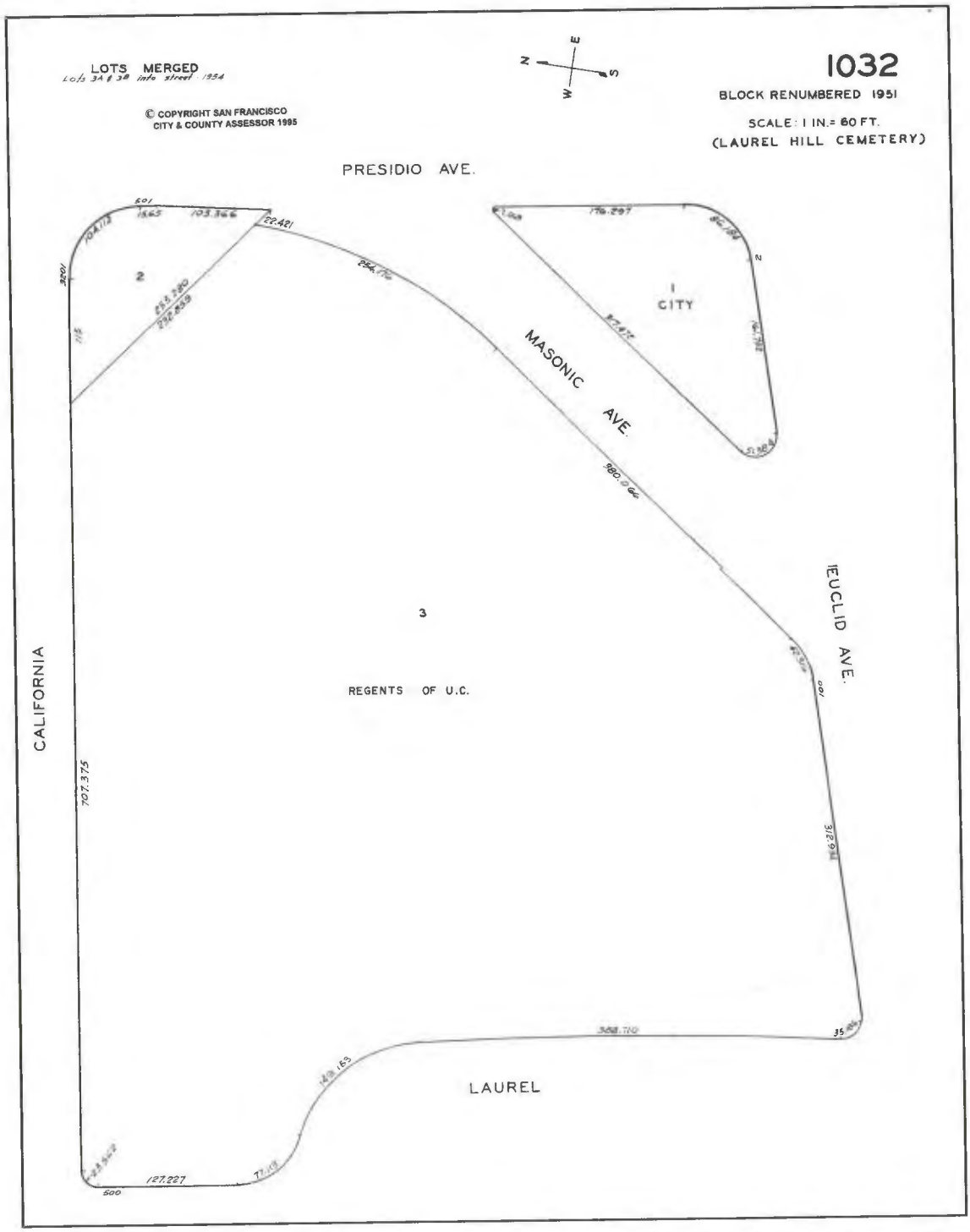
San Francisco, CA
County and State




Map 3. Sketch Map, Detail. Source: Google Earth, photo taken April 2016, annotated by Denise Bradley and Michael Corbett

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State




Map 4. Assessor's Parcel Map showing Fireman's Fund property in Block 1032, Lot 3. Source: City and County of San Francisco Assessor

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State

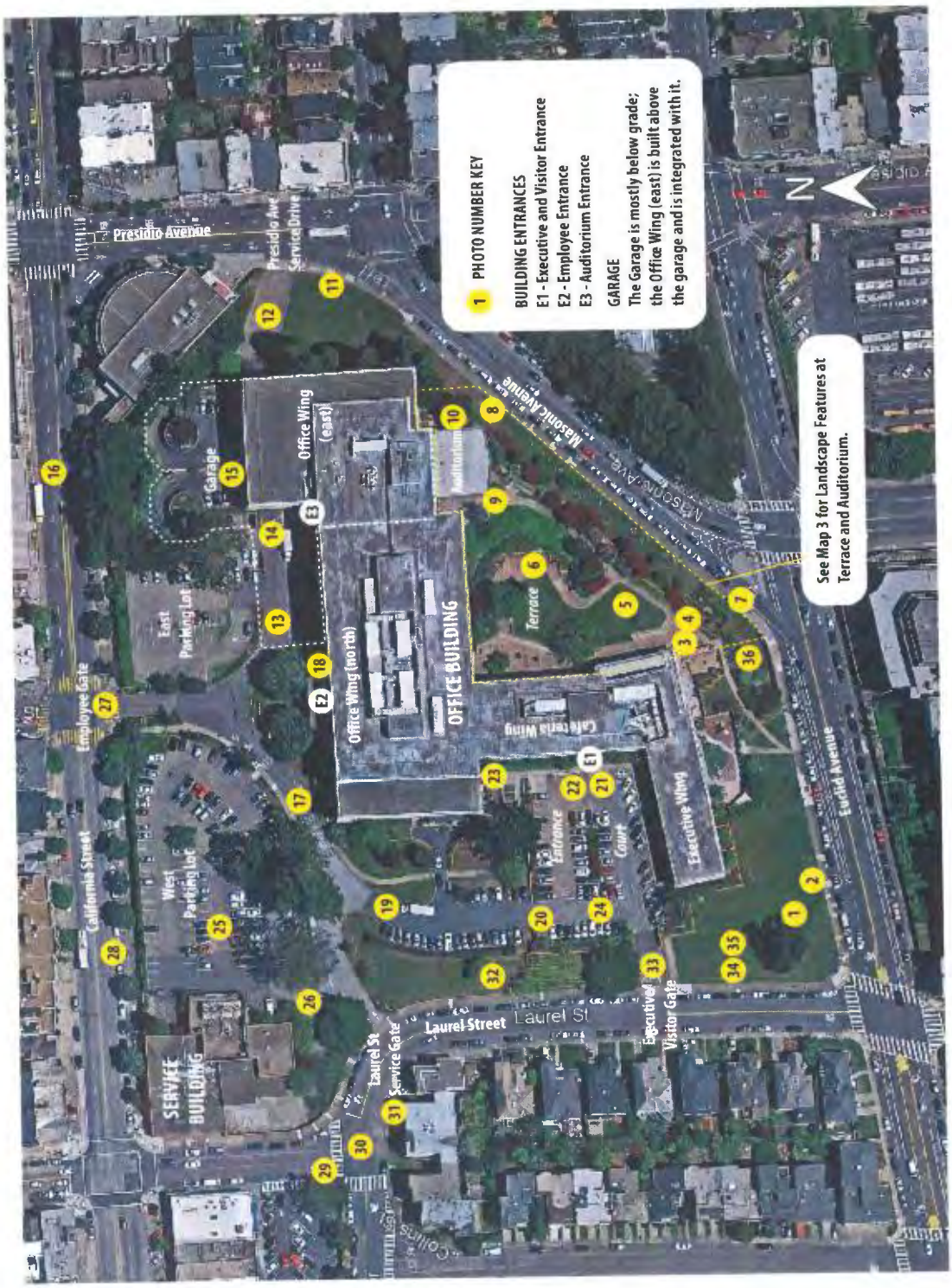



Map 5. Property Boundary Coordinates. Source: Google Earth, photo taken September 2017, annotated by Denise Bradley and Michael Corbett

United States Department of the Interior
National Park Service / National Register of Historic Places Registration Form
NPS Form 10-900 OMB No. 1024-0018

Fireman's Fund Insurance Company
Name of Property

San Francisco, CA
County and State




Map 6. Photo Key. Source: Google Earth, photo taken April 2016, annotated by Denise Bradley and Michael Corbett

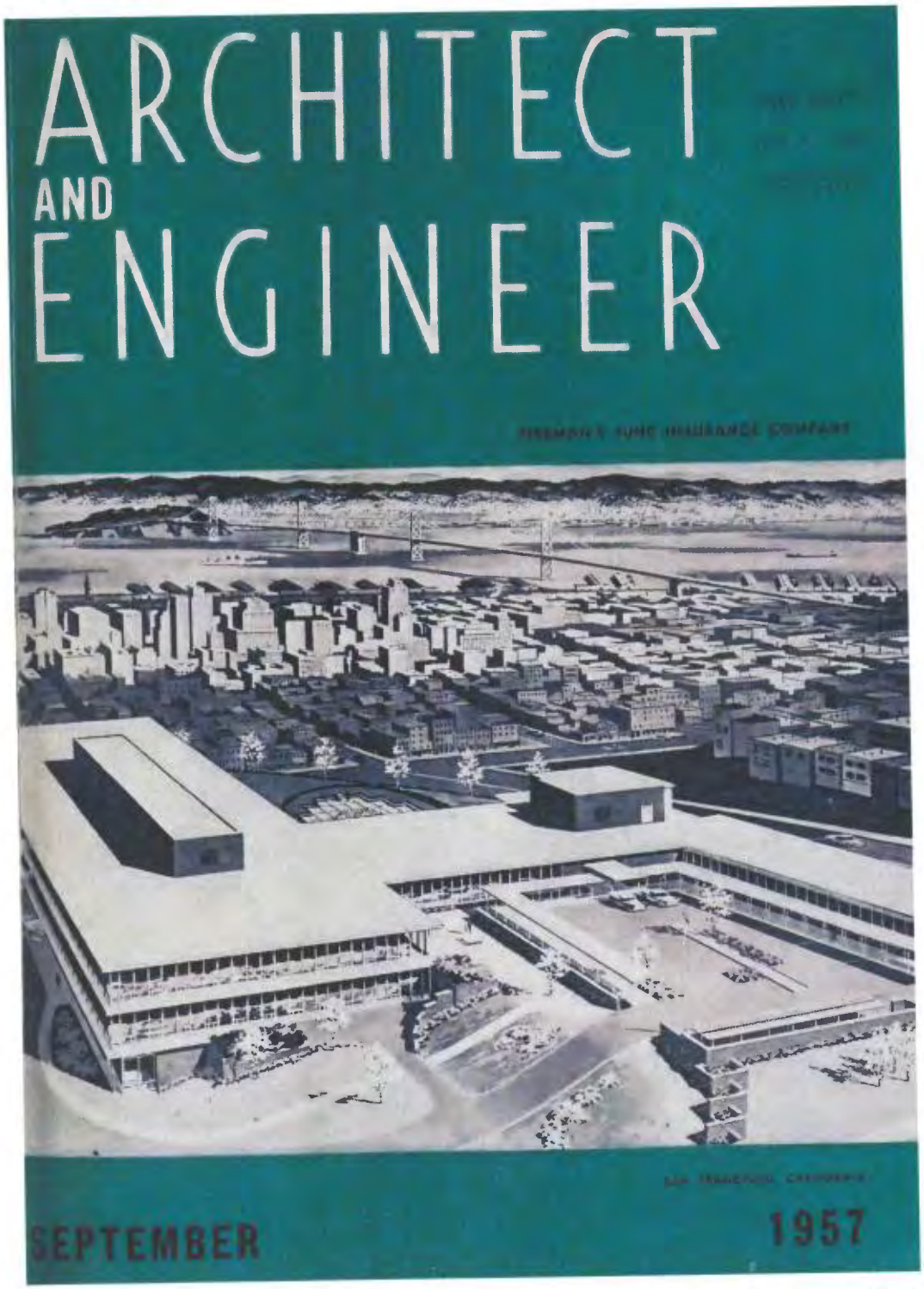



Figure 1. Perspective drawing of Fireman's Fund Home Office, view east. Source: *Architect and Engineer*, cover, September 1957




Figure 2. Site Plan showing features ca. 1957–1963. Source: Garrett Eckbo, *Urban Landscape Design,* 1964



Figure 3. Photo of Terrace taken ca. 1957–1963; view east. Source: Garrett Eckbo, *Urban Landscape Design,* 1964




Figure 4. Photo of Terrace taken ca. 1957–1963; view southwest toward Cafeteria Wing of Office Building. Source: Garrett Eckbo, *Urban Landscape Design,* 1964; annotated by Denise Bradley and Michael Corbett

TERRACE LANDSCAPE FEATURES

T1-Biomorphic-Shaped Lawn

T2-Upper Level of Pavement

T3-Lower Level of Pavement

T4-Circular Planters for Specimen Tree

T5-Wall with Attached Benches frames the east side of Terrace

T6-Arch of Hedge adds to framing on east side of Terrace

T7-Ramp to lower level of site



Figure 5. Photo of Entrance Court taken ca. 1957–1963; view to west with parking lot (left) and paved outdoor sitting area (right). Source: Garrett Eckbo, *Urban Landscape Design,* 1964



Figure 6. Photo of Entrance Court taken ca. 1957–1963; view east of arbor covered sidewalk and foundation planting adjacent to Executive Wing. Source: Garrett Eckbo, *Urban Landscape Design,* 1964

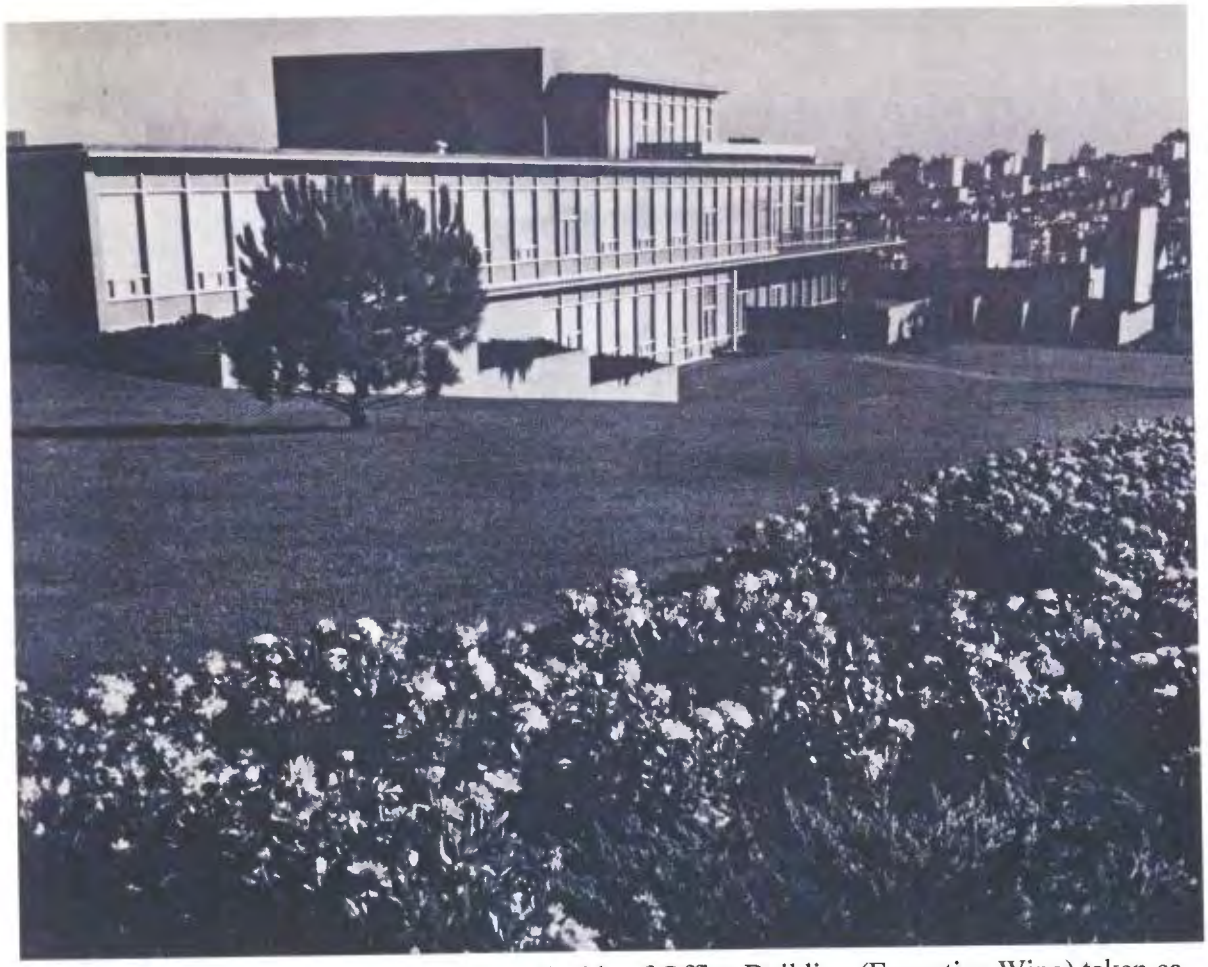


Figure 7. Photo of landscape along the south side of Office Building (Executive Wing) taken ca. 1957–1963. Source: Garrett Eckbo, *Urban Landscape Design,* 1964




Figure 8. Aerial view of Fireman's Fund property in 1961 after completion of Phase I. Source: Pacific Aerial Surveys, annotated by Denise Bradley and Michael Corbett




Figure 9. Aerial view of Fireman's Fund property in 1969 after completion of Phases II, III, and IV. Source: Pacific Aerial Surveys, annotated by Denise Bradley and Michael Corbett

RECEIVED
JAN 0 8 2019
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

3333 California Street, Mixed-use Project

Devincenzi Comments on Draft Environmental Impact Report

Planning Department Case No: 2015-014028ENV

# Exhibits to General Comments Part 2, Exhibits B-M

# EXHIBIT B

I-DEVINCENZI3

I-DEVINCENZI3

I-DEVINCENZI3

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# EXHIBIT C

I-DEVINCENZI3

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I-DEVINCENZI3

# EXHIBIT D

Margaret Fitzgerald

30 Wood Street, San Francisco, CA 94118

Date: February 28, 2016

Ms. Mary Woods
Planner – North West Quadrant
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2414

Submitted separately (See Exhibit F of O-LHIA1 [Kathryn Devincenzi, Laurel Heights Improvement Association])

23
(PD-5)

RE: 3333 California St. Development

Dear Ms. Woods:

I am writing regarding the development of the 3333 California Street development, currently the UCSF Laurel Heights Campus (the "Site"). It is my understanding that the San Francisco Planning Department is working with the developer of the Site regarding the initial project plans for the proposed development. The owner of the fee interest and the developer of the Site are limited in their joint ability to develop the Site because the owner of the Site does not have free and clear title; rather the general public holds a permanent recreational interest in all of the open space at the Site. Therefore, any development plans at the Site may not impinge upon this open space.

The general public holds a ***permanent*** right of recreational use on all of the open space at 3333 California and such rights were obtained by implied dedication. Dedication is a common law principle that enables a private landowner to donate his land for public use. Implied dedication is also a common law principle and is established when the public uses private land for a long period of time, which period of time is five (5) years in California. In 1972, the California legislature enacted Civil Code Section 1009 to modify the common law doctrine of implied dedication and to limit the ability of the public to secure ***permanent*** adverse rights in private property. Here, however, the existing open space at the Site was well established and well used as a park by the general public long before the completion of the construction of the full footprint of the improvements at the Site in 1966. Therefore, the general public has permanent recreational rights to the open space at the Site; the rights were obtained by implied dedication prior to the enactment of Cal. Civil Code Sec. 1009 in 1972.

Even if the general public had not secured permanent rights to recreational use through implied dedication prior to 1972, the public and countless individuals have acquired a prescriptive easement over the recreational open space. The recreational use has been continuous, uninterrupted for decades, open and notorious and hostile (in this context, hostile means without permission). Every day, individuals and their dogs use the green space along Laurel, Euclid and along the back of the Site at Presidio. Individuals ignore the brick wall along Laurel and regularly use the green space behind the wall as a park for people and for their dogs. The use of the Site has not been permissive. For example, the owner of the Site has not posted permission to pass signs in accordance with Cal. Civil Code Sec. 1008. If such signs ever were posted, they have not been reposted at least once per year. Although it is counterintuitive, an owner typically posts such signs to protect against the public securing adverse rights. One might assume the owner of the Site has not posted such signs, as the owner is aware of the pre-existing and permanent recreational rights the general public has secured to the open space. Because the

23

(PD-5) cont'd

public's rights to the open space were secured decades ago through implied dedication, it is not necessary for the general public to rely upon its prescriptive easement rights outlined in this paragraph; rather it is another means to the same end.

It is important that the Planning Department understand these legal issues as any project plan (or any future project description in an Environmental Impact Report ("EIR") for the Site) cannot include development of the open land over which the public has a secured permanent rights of recreational use. It would not be a concession by the owner/developer to leave the open space undeveloped and allow public recreational use as the general public holds permanent recreational rights to this space. It is important to note that even the open space behind the walls that has been used as park space is also included in this dedication to the public. According to well-established case law, a wall or fence is not effective in preventing the development of adverse property rights if individuals go around the wall, as is the case here.

In sum, the open space at the Site cannot be developed as the public secured such rights through implied dedication prior to 1972 (or, alternatively, by prescriptive easement). In reviewing the development plans for the Site, the City cannot decide to allow development of any of the open space as the recreational rights to the space are held by the public at large. Any project description in the future EIR for the Site that contemplates development of any of the open space would be an inadequate project description and would eviscerate any lower impact alternative presented in the EIR. One only need to look to the seminal land use case decided by the California Supreme Court regarding this very Site[1] to see that an EIR will not be upheld if the project alternatives are legally inadequate. It would be misleading to the public to suggest that a lesser impact alternative is one that allows the public to use the space to which it already has permanent recreational use rights.

In sum, please be advised of the public's permanent recreational rights to all of the existing open space at the Site and please ensure that a copy of this letter is placed in the project file.

Sincerely,

*Meg Fitzgerald*

Margaret N. Fitzgerald

With copies to:
Mark Farrell, Supervisor
Dan Safir, Prado Group
Kathy DiVicenzi, Laurel Heights Improvement Association
Robert Charles Friese, Esq.

[1] Laurel Heights Improvement Association of San Francisco, Inc. v. The Regents of the University of California, 47 Cal. 3rd 376 (1988).

# EXHIBIT E




I-DEVINCENZI3

I-DEVINCENZI3



## EUCLID GREEN

*The Green*

## WALNUT WALK

*The River Grove*





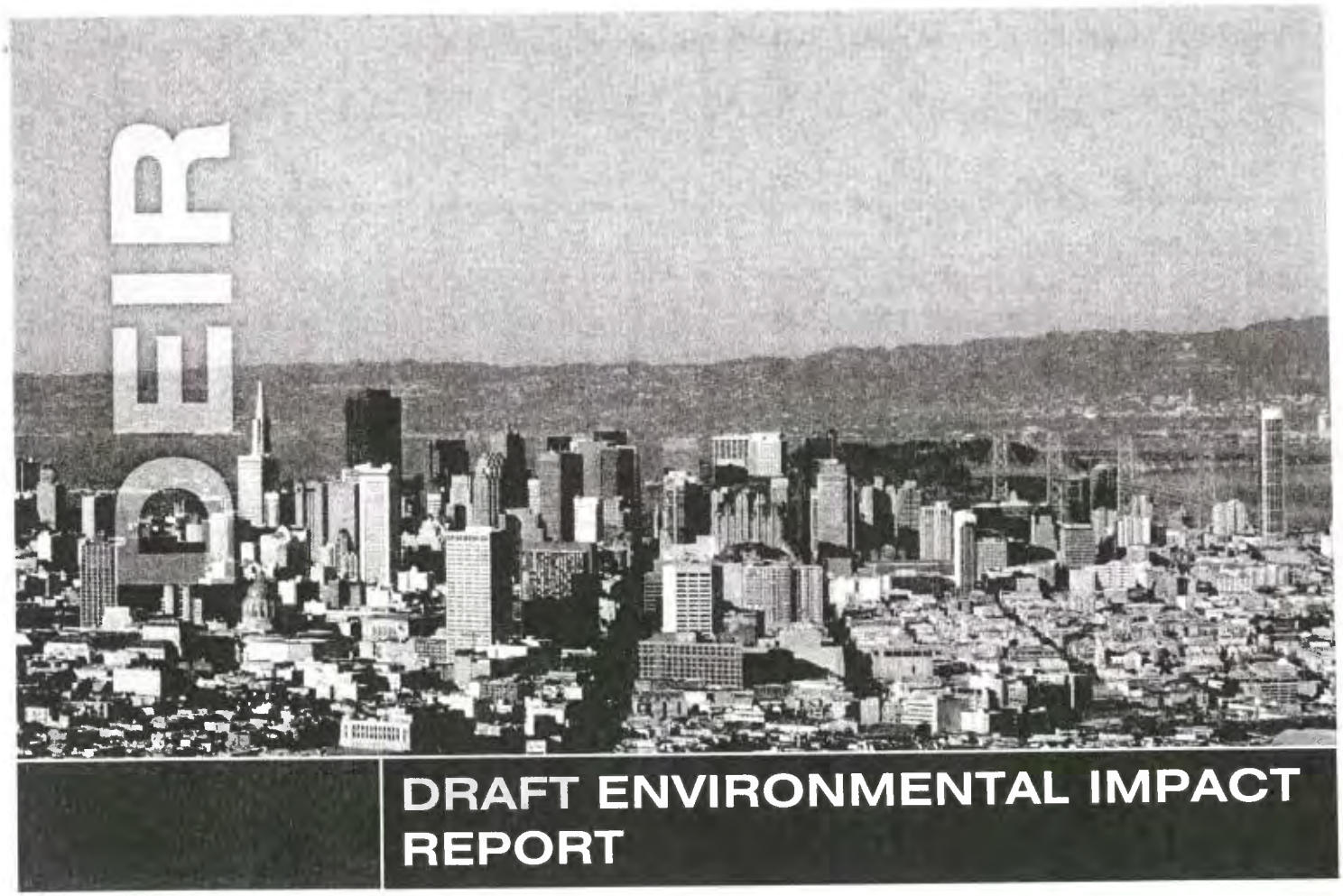



**LEGEND**

1 Level Lawn
2 Sloping Lawn
3 Pine Tree
4 Traffic-Calming Bulbout
5 Bike Parking
6 Small Retail Node
7 Casual Seating in the Grove
8 Planted Grove
9 Lobby Entries
10 Private Lawn
11 Mature Oak Trees
12 Terraced Sidewalk Garden

I-DEVINCENZI3

# EXHIBIT F




# DRAFT ENVIRONMENTAL IMPACT REPORT

# San Francisco 2004 and 2009 Housing Element

## Volume I: Draft EIR (Section I to Section V.G)

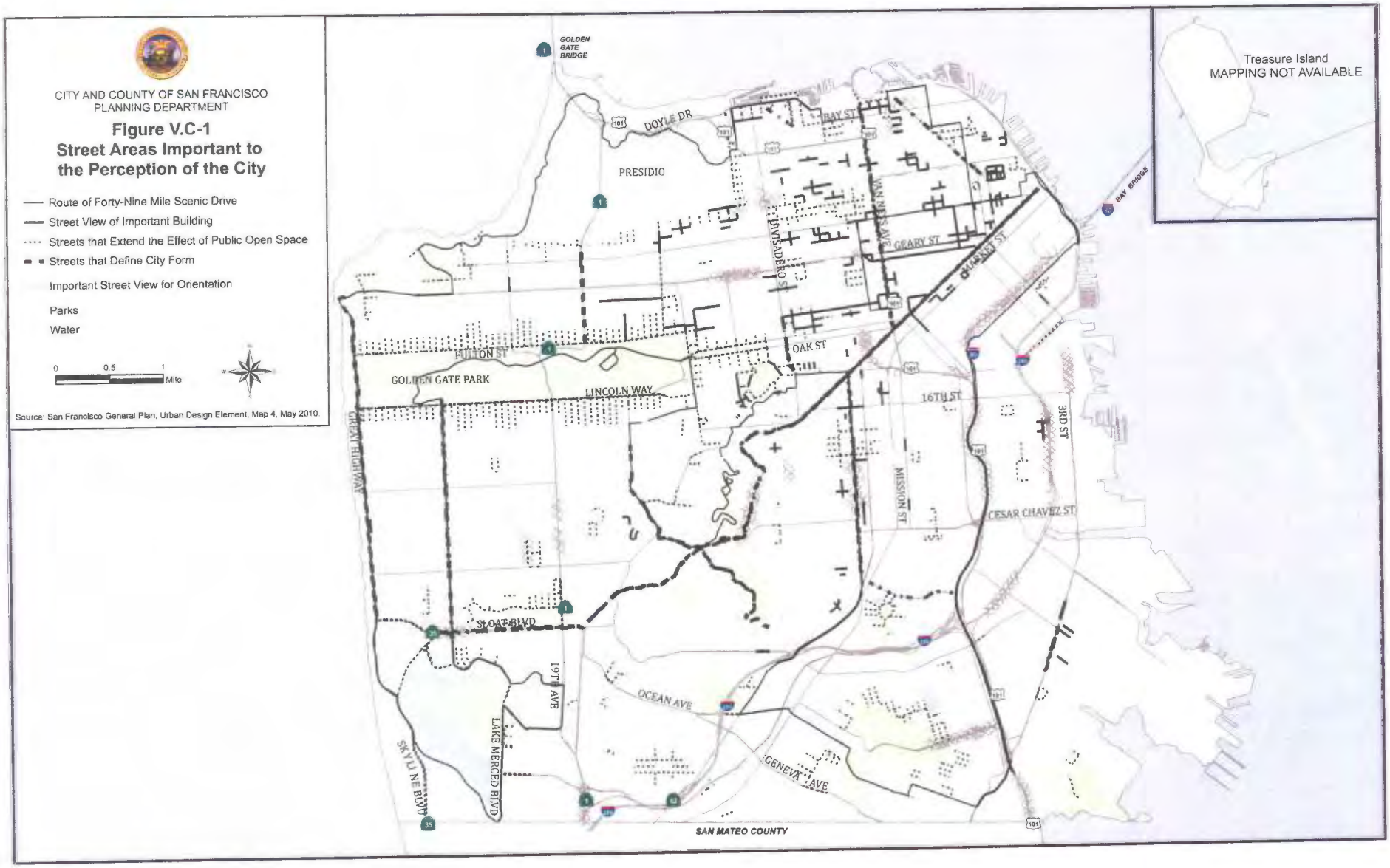
PLANNING DEPARTMENT
CASE NO. **2007.1275E**

STATE CLEARINGHOUSE NO. 2008102033

| | |
|---|---|
| Draft EIR Publication Date: | June 30, 2010 |
| Draft EIR Public Hearing Date: | August 5, 2010 |
| Draft EIR Public Comment Period: | June 30, 2010 – August 16, 2010 |

SAN FRANCISCO
PLANNING
DEPARTMENT

*Written comments should be sent to:*
Environmental Review Officer | 1650 Mission Street, Suite 400 | San Francisco, CA 94103

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## IMPACTS

### Significance Thresholds

The proposed Housing Elements would normally have a significant effect on the environment if they would:

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting;
- Substantially degrade the existing visual character or quality of the site and its surroundings; or
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties.

### Impact Evaluation

As discussed previously, the 2004 Housing Element and 2009 Housing Elements would not change the land use objectives and policies in the City's area and redevelopment plans. According to Part I of the 2009 Housing Element (Data and Needs Analysis), the City has available capacity to meet the RHNA. Therefore, the rezoning of land uses is not required. To meet the City's share of the RHNA, the proposed Housing Elements aim to do the following: 1) preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound, and 2) provide direction for how new housing development in the City should occur. With respect to the latter, the 2004 Housing Element encourages new housing in Downtown and in underutilized commercial and industrial areas. The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed-use districts near Downtown. The 2009 Housing Element encourages housing in new commercial or institutional projects and accommodating housing through existing community planning processes.

***Impact AE-1: The proposed Housing Elements would not have a substantial adverse effect on a scenic vista. (Less than Significant)***

New residential housing could result in an impact related to scenic vistas if it would be developed in a manner that obstructs views from a scenic vista from a public area or introduces a visual element that would dominate or upset the quality of a view. The proposed Housing Elements do not change the allowable development in the City. However, the Housing Elements may promote increased density (as described below) which could result in greater bulk and mass of buildings thereby potentially affecting scenic vistas.

As shown in Figure V.C-2, important vistas are primarily viewed from public parks or open space, which would not be at risk for conversion to housing uses. New housing could also encroach into a scenic vista and alter the appearance of the vista. As discussed previously, Telegraph Hill, Russian Hill, Pacific Heights, Buena Vista, and Dolores Heights are areas with outstanding visual features that are unique to

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Generally, allowable height and bulks, as established in the San Francisco Planning Code are intended to reflect the City's topography and take advantage of the City's scenic vistas. However, individual development projects could have the potential to affect scenic vistas; this issue is appropriately considered in the project-specific environmental review of proposed new development. Additionally, in some circumstances, modified controls such as increased height limits could result in reductions to building bulk and preservation of views that might otherwise be blocked by a more massive structure. For example, the EIRs for Transbay Terminal[8] and Rincon Hill[9] areas identified this relative difference in the effect of building heights and massing and the respective EIRs for these projects appropriately evaluated increases in building heights. However, it is possible that changes in density standards and encouraging development to maximum allowable heights could indirectly result in taller and bulkier buildings that may potentially affect a scenic vista.

The following 2004 Housing Element policies could counteract the 2004 Housing Element's potential to result in an adverse effect on a scenic vista by preserving existing housing, which would reduce the need for new construction, and the potential for the construction of taller or bulkier buildings. Additionally, policies that promote the preservation of housing within the existing neighborhood scale could be expected to reduce the potential for new development that could affect a scenic vista.

| Impact | 2004 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| Retain existing housing, which could reduce demand for construction of new housing, potentially avoiding adverse impacts on scenic vistas. | Policy 2.1: Discourage the demolition of sound existing housing. | 3.1: Discourage the demolition of sound existing housing. |
| | Policy 2.4: Retain sound existing housing in commercial and industrial areas. | 3.6: Restrict the conversion of housing in commercial and industrial areas. |
| Retain existing neighborhood scale | Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households. Set allowable densities in established | Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character. |

[8] As discussed in Section 5.15 (Visual and Aesthetics) of the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Final EIS/EIR, March 2004.

[9] As discussed in Section III.B (Visual Quality) of the Rincon Hill Plan Final EIR, Certified May 5, 2005.

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***Impact AE-2: The proposed Housing Elements would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting. (Less than Significant)***

New construction could result in impacts related to damaging scenic resources if new housing would directly affect environmental features, such as topographic features, landscaping, or a built landmark that contributes to a scenic public setting. Figure V.K-1 in section V.K (Recreation) depicts San Francisco's open spaces. These open spaces contain the majority of the City's natural scenic resources. As shown in this map, much of San Francisco's larger tracts of open spaces are located on the west side of the City, with some larger open spaces also located along the southern edges of the City. San Francisco's landmark buildings are shown on Figure V.E-1 in section V.E (Cultural and Paleontological Resources). The majority of San Francisco's landmarks are confined to the northeastern portion of the City. The following addresses the potential for the 2004 and 2009 Housing Element policies to substantially damage scenic resources.

*2004 Housing Element Analysis*

The 2004 Housing Element includes policies that promote development of vacant and/or underutilized lands (2004 Housing Element Implementation Measure 4.1.4) to a similar degree as the 1990 Residence Element (Policy 1.1). Additionally, as discussed under Impact V.AE-1, the 2004 Housing Element promotes increased residential density more so when compared to the 1990 Residence Element policies. Promoting increased residential densities in tandem with the development or redevelopment of vacant and underutilized lands could result in potential impacts related to scenic resources. For example, new development that could occur on vacant or undeveloped parcels or redevelopment of underutilized parcels could affect existing natural features that would have otherwise remained without the emphasis to develop/redevelop a particular site. Although some 2004 Housing Element policies could increase the potential for development of underutilized and/or vacant lands that may potentially contain scenic resources, 2004 Housing Element Policies 2.1 and 2.4 could reduce the potential for this impact by promoting housing retention and discouraging demolition. Discouraging demolition of existing structures and retaining existing housing units would help ensure that redevelopment of sites would not result in substantial changes to the overall building footprint, thereby reducing the potential to affect any existing scenic resources. Regardless, development of sites with scenic resources could occur, however any impacts to scenic resources under such circumstances would be development specific and appropriately addressed during the environmental analysis prepared for the specific project.

New development would be required to comply with the previously discussed regulations, including the Residential Design Guidelines, Section 311 of the San Francisco Planning Code and the Urban Design Element of the San Francisco General Plan. Additionally, street trees (and other trees including Landmark trees) that may be considered a scenic resource are protected under the City's tree ordinance (as described above), and therefore the 2004 Housing Element policies would not be anticipated to substantially affect the City's street trees. Furthermore, the majority of the City's scenic resources are confined to open spaces designated as public land and under the jurisdiction of the Recreation and Parks Department and other state and federal agencies and therefore are not expected to be converted to residential uses. Therefore, the 2004 Housing Element would not directly or indirectly damage scenic resources, and the

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2004 Housing Element would have a ***less than significant*** impact with respect to substantially damaging scenic resources.

*2009 Housing Element Analysis*

As discussed under Impact AE-1, the 1990 Residence Element promotes increased density on a broader, citywide, scale to a greater extent than the 2009 Housing Element. Some policies in the 2009 Housing Element could promote density for affordable housing projects and as a strategy to be pursued during community planning processes. The 2009 Housing Element also promotes development of underused and surplus public lands (Implementation Measure 4). As discussed in the analysis for the 2004 Housing Element policies that promote increased residential densities in tandem with the redevelopment of underutilized lands could result in potential impacts related to scenic resources by increasing the development potential of the site, thereby incentivizing the redevelopment of underused sites. Nonetheless, the 2009 Housing Element, when compared to the 1990 Residence Element, does not aggressively promote density more so than the 1990 Residence Element. When taken as a whole, the 2009 Housing Element would promote density to a lesser extent than the 1990 Residence Element, which could potentially result less development incentive for underused sites. Regardless, development of sites with scenic resources could occur, however any impacts to scenic resources under such circumstances would be development specific and appropriately addressed during the environmental analysis prepared for the specific project. New development would be required to comply with the previously discussed regulations, including the Residential Design Guidelines, Section 311 of the San Francisco Planning Code, the Urban Design Element of the San Francisco General Plan, and the City's tree protection ordinance.

Furthermore, 2009 Housing Element Policies 2.2 through 2.5 and Implementation Measure 37 could reduce this impact for similar reasons as discussed above under the 2004 Housing Element analysis. In addition, 2009 Housing Element Policy 11.6 preserves landmark buildings, some of which could be considered a scenic resource of the built environment. Additionally, the majority of the City's scenic resources are confined to open spaces designated as public land and under the jurisdiction of the Recreation and Parks Department and other state and federal agencies and therefore are not expected to be converted to residential uses. Also, as discussed above, the policies noted would not directly result in new residential development and would, thus, not directly or indirectly damage scenic resources. Therefore, the 2009 Housing Element would not directly or indirectly damage scenic resources, and the 2009 Housing Element would have a ***less than significant*** impact with respect to substantially damaging scenic resources.

***Impact AE-3: The proposed Housing Elements would not substantially degrade the existing visual character or quality of the site and its surroundings. (Less than Significant)***

New construction could result in impacts related to visual character if new housing would be developed with greater densities or heights than surrounding land uses or introduce incompatible uses in such a way as to substantially degrade the character or quality of the site. The existing visual characteristics throughout the City, similar to the land uses, are varied and reflect the change in the development patterns, land uses, and architectural styles in the City. Telegraph Hill, Russian Hill, Pacific Heights,

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character because the 2009 Housing Element would not change allowable land uses or increase allowable building height and bulk. Similarly, as the 2009 Housing Element would not result in changes to the physical land use controls or to allowable uses, the 2009 Housing Element would not be expected to result in substantial changes to the City's existing visual character. Additionally, the following 2009 Housing Element policy would further consider neighborhood character when developing new housing, thereby reducing the potential for new development to degrade the existing visual character.

| Impact | 2009 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| Respect existing neighborhood character. | Policy 11.1: Promote the construction and rehabilitation of well-designed housing that emphasizes beauty, flexibility, and innovative design, and respects existing neighborhood character. | Policy 12.4: Promote construction of well designed housing that conserves existing neighborhood character. |

As shown above, the differences between 2009 Housing Element Policy 11.1 and 1990 Residence Element Policy 12.4 are not significant and would not represent a shift in policy. 1990 Residence Element Policy 12.4 provides guidelines for development that are intended to preserve neighborhood character. The 2009 Housing Element recognizes the diversity in architectural styles throughout the City. 2009 Housing Element Policy 11.1 would ensure that future development would be consistent with existing neighborhood character. Moreover, as with the 2004 Housing Element, there would be no direct or indirect substantial adverse change to visual character attributable to the 2009 Housing Element policies.

Overall, the 2009 Housing Element would promote measures that would increase the housing supply in a manner that does not present conflicts with existing visual character. Development associated with new residential units would be required to comply with the previously discussed regulations and requirements. Therefore, the 2009 Housing Element would have a ***less than significant*** impact with respect to degradation of existing visual character.

***Impact AE-4: The proposed Housing Elements would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties. (Less than Significant)***

Implementation of the 2004 Housing Element and 2009 Housing Element could result in impacts related to light and glare if new housing would introduce new sources of light or glare that are unusual for an urban area. New housing could introduce new sources of light and glare if reflective glass or if bright, decorative or security lighting is used. However, for infill development that would replace open parking lots or yards, softer lighting that generates less glare than the present security lighting would typically be used. Additionally, residential exterior lighting tends to be focused on specific areas, rather than lighting a wide area such as a surface parking lot or undeveloped parcels. City Resolution 9212 prohibits the use of highly reflective or mirrored glass in new construction. New development would be required to comply

# EXHIBIT G

I-DEVINCENZI3

# EXHIBIT H

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| For Health Department Use Only | | | | | |
|---|---|---|---|---|---|
| Date Application Filed: November 21, 2014 | Health District: | 2 3 4 5 OTHER: | | | |
| Date to Zoning: | Inspector: | Amelia C. | Phone: | 252-3838 | |
| Date from Zoning: | Supervisor Initials: | KW | Date: | 11/24/14 | |

RECEIVED

CITY AND COUNTY OF SAN FRANCISCO
**DEPARTMENT OF PUBLIC HEALTH, ENVIRONMENTAL HEALTH**
1390 Market Street, Suite 210, San Francisco, CA 94102

# Zoning Referral for Health Permit

## 1. Business Information

BUSINESS STREET ADDRESS:
3333 CALIFORNIA ST. STE 232 SAN FRANCISCO, CA 94118
NAME OF BUSINESS:
THE VIEW CAFE (located within UCSF campus)

TOTAL GROSS SQUARE FEET (GSF) OF AREA (includes storage and bathroom areas):
1183 assignable Square feet

OUTDOOR SEATING AREA? ☐ Yes ☒ No

WHAT FLOOR OF THE BUILDING WILL THE BUSINESS OCCUPY?
☐ Ground (First) Level ☒ Second Level ☐ Third Level ☐ Other Level:

2014-002281 MIS

1a. Change of Use (depending of the zoning of the property, neighborhood notification may be required): ☐ Yes ☒ No
If yes, what is the existing use?

1b. Change of Ownership? ☒ Yes ☐ No
If not a change of ownership, then is it a new establishment? ☐ Yes ☐ No

DCP FEE

1c. Is the establishment vacant? ☐ Yes ☒ No
If yes, how long was the establishment vacant?

1e. Do you proposed to alter the interior or exterior of the establishment? ☐ Yes ☒ No
If yes, what is the Building Permit Application Number?

1f. Is the business a Formula Retail Chain with 12 or more locations within the U.S.? ☐ Yes ☒ No
If yes, a Formula Retail Affidavit is **required**. (Formula Retail - P.C. Sec. 703.3 & 703.4)

NW

## 2. Type of Operation

Please indicate the type of operation (summary descriptions on reverse):

☐ **Restaurant** 790.91
☐ **Limited Restaurant** 790.90
☐ **Bar** 790.22
☐ **General / Specialty Grocery** 790.102(a) and (b)
☒ **Other:** COFFEE SHOP (Considered Limited Restaurant use under the Planning Code)

If Other, please describe more about this type of operation:

2a. Accessory Use (Business within another business)? ☐ Yes ☒ No
**If yes, plans are required.**

2b. Days / Hours of Operation: Monday - Friday, From 7am - 4:30 pm

## 3. Applicant's Affidavit

NAME: SAKPRANETH KIM
☐ Property Owner ☒ Authorized Agent

MAILING ADDRESS: (STREET ADDRESS, CITY, STATE, ZIP)
1090 GOETTINGEN ST. SAN FRANCISCO, CA 94134

PHONE: (415) 602-7765
EMAIL: SAKPRANETH_KIM@YAHOO.COM

1. I am the owner or authorized agent of the owner of this property.
2. The information presented on this application is true and correct to the best of my knowledge.
3. Additional information or applications may be required in order to render this application complete.

Applicant's Signature:
Date: Nov. 21st, 2014

PLEASE SUBMIT THIS FORM TO: **Department of Public Health, Environmental Health**
1390 Market Street, Suite 210
San Francisco CA 94102
(415) 252-3800

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## PLANNING DEPARTMENT USE ONLY

| BLOCK / LOT: | ZONING: | RUD / SUD: | LCU / NCU: |
|---|---|---|---|
| 1032/003 | RM-1 | | |

ZONING REFERRAL NUMBER: 2014-002281 PRJ

OFFICIAL SITE ADDRESS (if different):

BPA NUMBER:

312 NOTICE COMPLETE: ☐ Yes ☐ No

PRELIMINARY SCREENING? ☐ Yes ☐ No

CASE NO.:

MOTION NO.:

EFFECTIVE DATE:

CONDITIONS: ☐ Yes ☐ No

OTHER:

ADDITIONAL DOCUMENTS REQUIRED:

☐ SITE PLAN ☐ MASSAGE DOCS ☐ OTHER:

**RECOMMENDATION:** **Per Planning Code Section:**

☒ APPROVAL ☐ DISAPPROVAL

CONDITIONS OF APPROVAL:

COMMENTS:
Limited Restaurant is permitted as a continuation of an existing use.

AUTHORIZATION:

Signature: Sharon Young Date: 12/5/14

Printed Name: SHARON YOUNG Phone: (415) 558-6346

**Restaurant** [790.91]: A retail eating and/or drinking use which serves prepared, ready-to-eat cooked foods to customers for consumption on or off the premises and which has seating. It may have a Take-Out Food[790.122] as a minor and incidental use. It may provide on-site alcohol sales for drinking on the premises (ABC Types 41, 47, 49, 59, or 75); however, if it does it is required to operate as a Bona Fide Eating Place[790.142]. It is not required to operate within an enclosed building per Section 703.2(b)(1) so long as it is also a Mobile Food Facility[102.34]. Any outdoor seating and/or dining area is subject to regulation as an Outdoor Activity Area.

**Limited Restaurant** [790.90]: A retail eating and/or drinking use which serves ready-to-eat foods and/or drinks to customers for consumption on or off the premises, that may or may not have seating. It may provide off-site beer and/or wine sales for consumption off the premises with an ABC Type 20 license within the accessory use limits of Section 703.2(b)(1)(C)(vi).

**Bar** [790.22]: A retail use which provides on-site alcoholic beverage sales for drinking on the premises. ABC License Types include: 42, 48, or 61 (no minors permitted on premises) and 42 or 60 (minors permitted on premises).

**General Grocery** [790.102(a)]: A retail food establishment that offers a diverse variety of unrelated, non-complementary food and non-food commodities. May provide beer, wine, and/or liquor sales for consumption off the premises with ABC Type 20 or 21 within the accessory use limits of Section 703.2(b)(1)(C)(vi). May prepare minor amounts or no food on-site for immediate consumption

**Specialty Grocery** [790.102(b)]: A retail food establishment that offers specialty food products, such as baked goods, pasta, cheese, confections, coffee, meat, seafood, produce, artisanal goods and other specialty food products, and may also offer additional complementory food and non-food commodities. May provide beer, wine, and/or liquor sales for consumption off the premises with ABC Type 20 or 21 within the accessory use limits of Section 703.2(b)(1)(C)(vi). May prepare minor amounts or no food on-site for immediate consumption.

**Other may include: Massage Establishment** [790.60], **Tobacco Paraphernalia Establishment** [790.123], **Medical Cannabis Dispensary** [790.141], **Service, Personal** [790.116], **Take-out Food** [790.122]

For more information regarding types of establishments, zoning, and Planning Code questions, you may go on-line to www.sfplanning.org or contact the Planning Information Center (PIC) for more information:

**Planning Information Center (PIC)**
1660 Mission Street, First Floor
San Francisco CA 94103-2479
TEL: **415.558.6377**
*Planning staff are available by phone and at the PIC counter. No appointment is necessary.*

# EXHIBIT I

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# EXHIBIT J

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City and County of San Francisco
Department of City Planning

450 McAllister Street
San Francisco, CA 94102

ADMINISTRATION
(415) 558-5111 / 558-4656
CITY PLANNING COMMISSION
(415) 558-4656
PLANS AND PROGRAMS
(415) 558-4641
IMPLEMENTATION / ZONING
(415) 558-3066

June 25, 1986

MEMO

UCSF-Laurel Heights
3333 California St.

TO: Supervisor John Molinari

FROM: Dean L. Macris

RE: UCSF-Laurel Heights
3333 California Street (at Presidio)
(formerly Fireman's Fund office building)

As a result of recent inquiries about the proposed UCSF-Laurel Heights campus, we have compiled the following background information about the property. Because the University of California is not subject to local zoning regulations, no permits have been filed with the City for the proposed use. Nevertheless, the University has prepared a draft EIR, which we have reviewed. A copy of our comments on the EIR is attached for your information.

## Project Description

Two buildings were constructed in three phases (1955-1966) on the 10-acre site as corporate headquarters of Fireman's Fund Insurance Company, which occupied the building through 1982. The building was purchased in 1982 by Presidio Corporate Center and renovation was begun for use as an office building. It was subsequently purchased by the Regents of University of California in February 1985. Current development on the site is as follows:

354,000 square feet of gross building area in main building
13,000 square feet of gross building area in annex building
97,500 square feet of parking area (549 spaces)

## Building Use

| | | | |
|---|---|---|---|
| Exsiting use in 1982 | Fireman's Fund | | 1260 employees |
| Proposed use in 1988 | UCSF School of Pharmacy | 400 persons | |
| | CalTrans, approximately | 840 persons | |
| | Private lessees | 20 persons | |
| | | | 1260 persons |
| Proposed use in 1995 | UCSF School of Pharmacy (CalTrans will vacate when lease expires) | | 860 persons |

3333 California St.

## Zoning History

1921 Original zoning was "First Residential". Site was formerly a portion of the Laurel Hill Cemetary.

1952 Zoning changed to "Commercial" in order to permit development of Fireman's Fund Corporate Headquarters. CPC Resolution 4109 approves zoning change and establishes conditions for use of property (copy attached). Conditions include:

1. Use limited to professional, institutional, or office buildings.
2. Aggregate gross floor area limited to total area of property (approximately 435,600 square feet).
3. Parking to be 1 space for each 500 square feet of gross floor area.
4. No buildings within 100 feet of Euclid Avenue or Laurel Street and Mayfair Drive.
5. Conditions for residential development if such should occur in future.
6. Landscaping requirements.

1960 Zoning changed to "R-4" (as part of citywide rezoning program), which permits office/insitutional use as "transitional". Prior stipulations of Resolution 4109 continue to apply.

1978 Zoning changed to "RM-1" (as part of citywide rezoning program), which does not permit office/instituional uses.

However, because use was established in conformity with zoning at time of development, status becomes Non-Conforming Use (NCU) with a 50 year termination date (Section 185(b). Use also qualifies as a Limited Commercial Use (LCU) (Section 186(a)2) which allows continuation without termination date. Prior stipulations of Resolution 4109 continue to apply.

Compliance provisions permit continuation as office use or conversion to institutional or hospital use without termination date.

## Extent of Local Control

The University of California is not subject to local zoning review.

If local zoning did apply, building permit applications for remodeling or conversions to institutional use would not require conditonal use or other special use review by Department of City Planning. However, City Planning Commission could elect to review building permit applications and establish conditions for approval under powers of Discretionary Review.

Attachments

0019m

# EXHIBIT K

I-DEVINCENZI3

City and County of San Francisco

Department of City Planning

February 22, 1981

Mr. John Cloudsley, Jr.
Page, Cloudsley & Baleix
400 Montgomery Street
San Francisco, CA

RE: Fireman's Fund Office Site,
3333 California Street
Lot 3 in Assessor's Block 1032;
Use of Existing Property by
more than one firm.

Dear Mr. Cloudsley:

This is to confirm the above-described property is considered a nonconforming use under the City Planning Code. Provisions of the Code applicable to nonconforming uses and this RM-1 zoned site will permit the property to be converted from its present use by a single firm to use by more than one firm. The total floor area in commercial use may not be expanded, however.

Sincerely,

Robert W. Passmore
Assistant Director of
Planning-Implementation
(Zoning Administrator)

RWP/jf

3333 Calif

(415) 558-4656

100 Larkin Street

San Francisco, CA 94102

# EXHIBIT L

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

# Letter of Determination

March 5, 2015

J. Gregg Miller, Jr.
Coblentz Patch Duffy & Bass LLP
One Ferry Building, Suite 200
San Francisco CA 94111-4213

| | |
|---|---|
| **Site Address:** | 3333 California Street |
| **File No:** | 2015-001580ZAD |
| **Assessor's Block/Lot:** | 1032/003 |
| **Zoning District:** | RM-1 (Residential, Mixed, Low-Density) District |
| **Staff Contact:** | Mary Woods, (415) 558-6315 or mary.woods@sfgov.org |

Dear Mr. Miller:

This letter is in response to your request for a Letter of Determination regarding the property at 3333 California Street. This parcel is located in the RM-1 (Residential, Mixed, Low-Density) District and a 40-X Height and Bulk District. The request includes two main components: (1) confirmation of the current office use and its continuation as a legal, non-conforming use, not subject to Planning Code Section 321 with respect to the Office Development Annual Limit Program; and (2) confirmation that certain deferred maintenance work, property upgrades, and tenant improvements would not be considered an intensification or expansion of the legal, nonconforming office use, pursuant to Planning Code Section 186.

In your letter, dated February 10, 2015, you stated that there are two existing buildings at the site: a "main building" and an "annex building." The main building contains approximately 348,800 gross square feet of office use, and the annex building contains approximately 14,000 gross square feet of office use. The site also contains 541 off-street parking spaces, of which 212 are located in the main building's three levels of below-grade parking. The remaining 329 parking spaces are located in surface lots.

The site was part of the Laurel Hill Cemetery from the mid-1850s until the early 1940s. The San Francisco Unified School District (SFUSD) owned the property until the early 1950s. The Fireman's Fund Insurance Company (Fireman's) purchased the property from SFUSD in April, 1953. It then developed the site in phases between 1955 and 1966 as its corporate headquarters. Fireman's occupied the site from 1957 to 1982 (when it relocated to Novato, California). The property was then sold to a private party in 1982, during which time it underwent office renovations and was occupied with office tenants. In January, 1985, the Regents of the University of California (UC Regents) purchased the property subject to then – existing office leases. UC Regents has occupied and used the site for office uses and ancillary uses since 1985.

March 5, 2015
Letter of Determination
3333 California Street

J. Gregg Miller, Jr.
One Ferry Building, Suite 200
San Francisco, CA 94111-4213

In your February 10, 2015 letter, you indicated that, currently, the Prado Group, Inc./SKS Partner LLC and the UC Regents have entered into an exclusive negotiating agreement with respect to the future of the property. With that in mind, you are seeking a determination with respect to the current uses, the continuation of those uses, change in tenancy, and associated maintenance work and upgrades. The upgrades may include: replacing the HVAC systems, upgrading the mechanical, electrical and plumbing systems, replacing the glazing system, and improving the landscaping and hardscape.

The site is currently zoned RM-1. Under the RM-1 zoning, office uses are generally not permitted. However, Section 186 of the Planning Code allows for the continuation of legal, non-conforming uses, despite limitations on the duration of such non-conforming uses set forth in Section 185 of the Planning Code. Because the two existing buildings were lawfully constructed and occupied as offices prior to the enactment of the RM-1 zoning in 1978, they have legal, non-conforming use status under Section 186 and, therefore, are not subject to the limitations set forth in Section 185.

Your letter also referenced past letters of determination by the Zoning Administrator in 1981 and 1983, which discussed issues related to multi-tenancy and continuation of the nonconforming office use. In the February 22, 1981 letter, the Zoning Administrator stated that the "...property is considered a nonconforming use...and this RM-1 zoned site will permit the property to be converted from its present use by a single firm to use by more than one firm." In the August 4, 1983 letter, the Zoning Administrator confirmed the continuation of the nonconforming business office use allowing "...business office use of the property at all levels, without expansion, and with activities, signs and hours limited by Section 186(b) of the Code. There is no termination date for continued business office use within these controls."

With regard to Section 321 of the Planning Code, the Office Development Annual Limit Program and associated development impact fees would not apply to the property since they were enacted after the existing office uses were lawfully established in 1957.

With respect to maintenance work, upgrades, and tenant improvements, Section 181 of the Planning Code allows certain maintenance and repair work, and minor alterations to be made to nonconforming uses, as long as such work continues to be consistent with the applicable restrictions of Section 181.

**Determination**
Based on City records of the property's continued occupancy as office spaces, and current zoning provisions, it is my determination that the existing office use may continue indefinitely as a legal, nonconforming use, and that the maintenance work, property upgrades and tenant improvements constitute permissible alterations under Section 181 of the Planning Code. In the event that the nonconforming use is abandoned or discontinued for three years or more, Section 183 of the Planning Code shall apply.

**APPEAL:** If you believe this determination represents an error in interpretation of the Planning Code or abuse in discretion by the Zoning Administrator, an appeal may be filed with the Board of Appeals within 15 days of the date of this letter. For information regarding the appeals process, please contact the Board of Appeals located at 1650 Mission Street, Room 304, San Francisco, or call (415) 575-6880.

March 5, 2015
Letter of Determination
3333 California Street

J. Gregg Miller, Jr.
One Ferry Building, Suite 200
San Francisco, CA 94111-4213

Sincerely,

Corey A. Teague
Acting Zoning Administrator

cc: Property Owner at: Regents of the University of California, 3333 California Street, Suite 102, San Francisco, CA 94118
Neighborhood Groups
Mary Woods, Planner

# EXHIBIT M

**UDAT NOTES**

**Project: 3333 California**

**Planner: Brittany Bendix**

**Date: November 16, 2017**

**Attendees: David Winslow, Glenn Cabreros, Maia Small, Brittany Bendix, Jeff Joslin**

The sloped site occupies a transition zone between several neighborhoods and proposes partial retention and adaptive re-use of an existing non-complying building with respect to height, and non-conforming office use. The site is in an RM -1 / 40-X district. The project is organized around a plaza, a hill top green space, and several public accessible ways. The site is bounded by five street frontages: California, Presidio, Masonic, Euclid, and Laurel.

## Site Design and Open Space

*Walnut extension*

UDAT recommend continued effort to reinforce the sense of Walnut as a street rather than a garage access lane. The width of the parking entrances should be no greater than a single lane (12'). Garage doors should be brought close to the face of buildings rather than deeply recessed. Sidewalks should span driveways on Walnut Street. Driveways on Walnut should have curb aprons as opposed to the curb returns shown, allowing for a contiguous public sidewalk into the site.

UDAT recommends the pick-up and drop-off area at the southeastern end of Walnut extension be designed to act and feel primarily as a pedestrian plaza. Consider amenities and design treatments that enhance that use.

Euclid Park seems to show retaining walls and other interruptions. It seems strongest as a single zone of lawn.

## Parking

The current proposal shows 558 dwelling units with 885 parking spaces, which translates to 1.6 parking spaces per dwelling unit. The quantity of parking proposed will likely trigger several measures to offset automobile usage through the Transportation Demand Management program (TDM) which is designed to incentivize transit and active transportation modes like walking and biking and depress demand for single occupancy vehicle use by residents of and visitors to the site. Since the project site is within quarter mile (5 minute walk) of numerous transit lines several of which fall on the Muni Rapid network, SDAT strongly encourages the project sponsor to reduce the off-street parking ratio within the project.

*Masonic Parking Entrance:* Design so as to minimize the cavernous gap in the street wall: explore angling entrance perpendicular to Masonic and reducing the width of the throat. Explore maximizing the slope of the ramp to allow a door and roof covering to come closer to the street.

*Laurel parking Entrance:*

To diminish the scale of the garage entrance, please consider dividing into two doors 10' wide and setback slightly (2'-3') from face of building wall.

**Architecture**

*California Building east (office Bldg):*

Though proposed as an office building, this should be compatible with the overall context, which is dependent on detailing and materiality that provides a neighborhood sense of scale and character.

*California and Laurel (Plaza 'A' Building):*

While the use of balconies is encouraged to support an active interface between buildings and public realm, the open, continuous wrap-around balconies appear to remove too much building frontage from the street wall, do not reinforce a sense of individual use, and tend to overemphasize the horizontality of the buildings. Balance the transparency of the balconies to vertically modulate the building façade, and balance the open ness with more solid guardrail.

*Laurel Townhomes:*

The ground floor frontage reads as mostly garage doors. Explore alternative means for aggregating or minimizing the single car parking function to better express the townhouses with landscaped front yards and entries with porches.

*Mayfair Building Elevation:*

Please explore materials and detailing compatible with the block face. Minimize the use of metal panels and open balconies.

*Bridge:* Consider how the bridge across the north-south walnut lane should be invitational and frame and the space at an appropriate scale for pedestrians. There is an opportunity to design this as a visible public serving amenity / celebratory focal element.

As the design of individual buildings continues to develop, please provide larger scale drawings and details.

**KATHRYN R. DEVINCENZI**
22 IRIS AVENUE
**SAN FRANCISCO, CALIFORNIA 94118-2727**
Telephone: (415) 221-4700
Email: KRDevincenzi@gmail.com

BY HAND DELIVERY June 8, 2018

City and County of San Francisco
San Francisco Planning Department
c/o Julie Moore, Senior Environmental Planner
1650 Mission Street, Suite 400
San Francisco, CA 94103

RECEIVED
JUN 0 8 2018
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
RECEPTION

Re: 3333 California Street, Mixed-Use Project
Initial Study: Case No. 2015-014028ENV

These preliminary comments are submitted as to the Initial Study but are not required by June 8, 2018, because the Planning Department has confirmed that the City will not issue a negative declaration after the public comment period on the Initial Study and the City will prepare an Environmental Impact Report (EIR) under the California Environmental Quality Act, Public Resources Code sections 21000 *et seq.* (CEQA) as to this proposed project. The EIR on the project has not yet been released, and under applicable law, comments on the potentially significant environmental impacts and other analyses required by CEQA are not due until the end of the public review period on the draft EIR or hearing held by the decisionmaker on the proposed project. Ex. A, e-mails dated March 22 and 28, 2018 with Planning Department. 1 (CEQA-5)

Also, the Initial Study ("IS") does not provide the complete CEQA analyses of significant impacts on traffic, air quality, noise and historical resources, and those analyses may contain information pertinent to the IS's evaluations of impacts the City proposes to treat as not significant under CEQA. Based on the additional information provided in the Draft EIR, comments as to significant impacts and nonsignificant impacts may be provided after the Draft EIR is released.

In addition, pertinent information is missing from the Initial Study, and complete copies of all the reference materials cited in the Initial Study were not provided as of June 4, 2018. Further, the Initial Study is incomplete, inaccurate and/or inadequate to support determinations that certain impacts of the proposed project would not be significant. Under CEQA Guidelines section 15063(d)(3), an Initial Study must include sufficient information to support its conclusions, but the IS does not include such sufficient information.

**Governing Principles**

It is important to recognize that a significant effect on the environment is defined in CEQA as a substantial or potentially substantial adverse change in the environment. Public Resources Code

sections 21068, 21100(d). 14 California Code of Regulations ("CCR") section 15382 defines a "significant effect on the environment" as " a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." Under 14 CCR section 15064(a)(1), if there is substantial evidence in light of the whole record before an agency that a project may have a significant effect on the environment, the agency must prepare a draft EIR. 1 (CEQA-5) cont'd

In preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project irrespective of whether an established threshold of significance has been met with respect to any given effect. *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1106-07.

As used in this submission, "project" will mean the proposed project as well as the proposed project variant, unless otherwise indicated.

**1. The Proposed Project Would Have a Significant Adverse Impact on Geology and Soils.**

Under Appendix G of the CEQA Guidelines and the Initial Study (p. 205) a project would have a significant impact on the environment if it would:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
   i. Seismic-related ground failure, including liquefaction
   ii. Landslides
b. Result in substantial soil erosion or loss of topsoil, or
c. Be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. Ex. B, 14 California Code of Regulations ("CFR") section 15000 *et seq.* ("CEQA Guidelines"), Appendix G.

Also, under the Initial Study (p. 205) a project would have a potentially significant impact on geology and soils if it would:

d. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Under the standards identified in the San Francisco 2004 and 2009 Housing Element EIR ("Housing Element EIR"), a project would normally have a significant effect if it would:

> "Change substantially the topography or any unique geologic or physical features of the site." Ex. C, San Francisco 2004 and 2009 Housing Element EIR ("Housing Element EIR"), p. V.O-25.

In addition, according to the EIR for the Pier 70 Mixed-Use District Project, a project would have a significant impact if it would "substantially change the topography or any unique geologic or physical features of the site." Ex. D, excerpt of EIR for Pier 70 Mixed-Use District Project, p. 4.N.32. "Unique geologic or physical features" include those which "embody distinctive characteristics of any regional or local geologic principles." *Ibid.*

**A. The Proposed Project Would Result in Substantial Soil Erosion or Loss of Topsoil.**

Construction of the proposed project or project variant would require earthwork activities across the entire project site. According to the Initial Study, the depths of excavation would range from 7 to 40 feet below the existing grade, with a total of approximately 241,300 net cubic yards of excavated soils generated during the approximately 7 to 15-year construction period. Only approximately 3,700 cubic yards of excavated soils would be reused on the project site as fill. IS p. 207. Evidence of the method used to calculate the amounts of excavated soils was not included in the IS and must be provided in the Draft EIR to afford an opportunity for public comment on the accuracy of the calculation and severity of resulting impacts. 2 (GEO-2)

Many areas to be excavated are now covered by topsoil and extensively planted with grasses, shrubs, and various vegetation. The project's geotechnical consultant Langan Treadwell Rollo recommended that "all areas to receive improvements should be stripped of vegetation and organic topsoil." (LTR p. 14)

As explained in the EIR for the 2009 Housing Element:

> "New construction could result in impacts related to soil erosion and the loss of topsoil if new housing.... would result in grading activities, or if new development would require much more extensive grading. This exposure could result in erosion or loss of topsoil. The 2004 and 2009 Housing Element policies that promote increased density could result in heavier buildings on soil types or in proximity to slopes that are susceptible to erosion. Heavier buildings would require stronger and deeper foundations, involving more excavation than lighter buildings. Ex. C, San Francisco 2004 and 2009 Housing Element EIR. p. V.O-46.

As evidenced by the Langan Treadwell Rollo report and the Initial Study, substantial amounts of existing topsoil would be removed to construct underground parking garages in the Masonic Building, Mayfair Building, Plaza A and B Buildings and Walnut Building and new multi-unit

buildings. Paved pathways and stairways would be constructed on areas which are now planted with vegetation and grasses. 37 percent of the site is now landscaping or landscaped open space. IS p. 210.

2 (GEO-2) cont'd

The Initial Study fails to analyze the impact of project excavation and construction on the substantial loss of topsoil and erroneously bases its determination that the impact would not be significant on operational conditions existing after the topsoil has been excavated. The Initial Study states that at buildout, the project site would be more intensely developed and landscaped with limited to no open areas susceptible to erosion or loss of topsoil. IS. p. 211. Since substantial existing topsoil will have been lost as a result of construction of the project, it is irrelevant to the loss of existing topsoil from construction and excavation that later operation on the paved and built areas would not expose the minimal topsoil that may be reused or replaced to erosion or loss. *Ibid.* An EIR must analyze the changes which the project would have to the existing environment.

The EIR must analyze the substantial loss of existing topsoil as a significant impact of the proposed project and analyze alternatives and mitigation measures that would avoid or reduce the impact.

**B. The Proposed Project Would Substantially Alter the Existing Topography and Unique Geologic or Physical Features of the Site.**

3 (GEO-3)

The proposed project would have a significant impact because it would directly or indirectly destroy substantial portions of Laurel Hill, which is a unique geological or physical feature and embodies distinctive characteristics of local geologic principles. As explained in the Laurel Heights Improvement Association's nomination of the site for listing on the National Register of Historic Places, which was granted by the State of California Historic Resource Commission on May 17, 2018:

> "the site is part of a cluster of low hills associated with Lone Mountain whose several high points were developed as cemeteries in the nineteenth century. The Fireman's Fund site was previously a portion of the Laurel Hill Cemetery, and was long recognized for its views. Today there are distant views from the property to the southeast and downtown, to the northwest and a partial view of the Golden Gate Bridge, and to the west into the Richmond District." (Ex. E, excerpts from Nomination of Laurel Heights Improvement Association for listing of Fireman's Fund Insurance Company Home Office in the National Register of Historic Places, p. 6) [Note that the copy of the nomination included in the City's reference materials was a draft version; although the final version of the nomination was provided to the San Francisco Planning Department, that Department has not included the final version of the nomination in the reference materials provided with

the Initial Study.]

The plaque previously placed on the site to commemorate the former site of Laurel Hill Cemetery 1854-1946, California Historical Landmark #760, recognized the site as "the most revered of San Francisco's hills." (Ex. F, excerpts from State Office of Historic Preservation file on California Historical Landmark #760) The remarks of Gardiner Johnson of the California Historical Society recognized that when the new cemetery grounds were located on Laurel Hill: 3 (GEO-3) cont'd

> "From the summit of this beautifully-shaped hill it was then possible to obtain one of the finest and most extensive views of both land and water." (*Id.* p. 1-2)

The existing Terrace on the 3333 California Street site, "as the 'centerpiece' of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco)" currently exists on the site and overlooks views of San Francisco. (Ex. E, Nomination p. 28)

The proposed project would have a significant impact on the environment because it would result in excavation of substantial portions of Laurel Hill and alter existing slopes, including the areas known for its views of the City. (See Ex. G, photographs of areas of Laurel Hill proposed for excavation)

The Initial Study recognizes that the topography exhibits a generally southwest-to-northeast downslope, with a grade change of approximately 65 feet. (IS p. 206) On the south and east portions of the site, bedrock is relatively shallow, at 7 to 17 feet below ground surface. IS p. 206.

The Masonic Building would be a four- to six-story, 40 foot-tall building. Due to the site's slope, the Masonic Building's first level would be a partially below-grade parking garage with a residential lobby at the northeast corner of the floor adjacent to the proposed garage entry. IS pp. 41-43. The Euclid Building would be a four- to six-story, 40-foot-tall building. Due to the site's slope, the Euclid Building would have a partially below-grade floor. IS pp. 44-45.

Construction of the Masonic and Euclid Buildings would excavate the existing slope of Laurel Hill along Masonic and Euclid. As a result of the proposed excavation and construction, the existing slopes of Laurel Hill along Masonic and Euclid would be substantially altered and their distinctive characteristics of providing views of San Francisco substantially degraded by the structures erected in these slopes. On the south and east portions of the site, bedrock is relatively shallow, at 7 to 17 feet below ground surface. IS p. 206. The excavations on the south and central portions of the project site would encounter bedrock. IS p. 207. The Mayfair building on Laurel Street would also have a below-grade garage with access from Laurel Street. IS p. 47.

The EIR must analyze the substantial alteration of the south, east and western slopes of Laurel

Hill as a result of construction of the Euclid, Masonic and Mayfair buildings and underground garages as a significant impact and analyze alternatives and mitigation measures that would avoid or reduce the impact.

3 (GEO-3) cont'd

**C. The Proposed Project Would Expose People or Structures to Potential Substantial Adverse Effects Including the Risk of Loss, and/or Would Be Located on a Geologic Unit or Soil That is Unstable or Would Become Unstable as a Result of the Project and Potentially Result in On-Site or Off-Site Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse.**

4 (GEO-1)

The Langan Treadwell Rollo Preliminary Geotechnical Investigation dated 3 December 2014 (Ex. H "LTR") constitutes expert evidence supported by fact that all of the aforementioned potentially significant impacts could occur as a result of the proposed project. The Initial Study violates the requirements of CEQA because it fails to analyze these impacts a significant impacts and fails to require binding and enforceable mitigation measures to reduce or avoid these significant effects as a condition of approval of the project.

The Revised Environmental Evaluation explains that massive excavation would occur on the project site for below-grade parking garages, the basement levels of buildings and site terracing, as the project would excavate approximately 61 percent of the surface of the site (274,000/446,479 square feet) at depths of 7 to 40 feet. Revised Environmental Evaluation p. 28. The Initial Study estimates that 241,300 net cubic yards of soils would be excavated (which is 2,171,700 square feet of soils). IS p. 207. Approximately 288,300 cubic yards of demolition debris and excavated soils would be removed from the project site, and approximately 3700 cubic yards of soil would be reused on the project site as fill. IS p. 78.

LTR advises that adverse effects could occur onsite that could result in damage from the following conditions that could result from project activities:

- the presence of fill and loose sand will affect foundation support and excavation support (p. 9).
- the new building to be constructed adjacent to the parking garage may impose surcharge on the basement wall of the parking garage; to avoid surcharging the wall, the western perimeter wall of the new building may need to be supported on drilled piers that gain support in the bedrock below the elevation of the bottom of the parking garage. (LTR, p. 10).

- the proposed single basement will require an excavation of approximately 12 feet below the ground surface; the primary considerations related to the selection of the shoring system are the presence of fill and loose to medium-dense sand and the potential settlement of adjacent structures and improvements caused by movement of temporary shoring (LTR, p. 10).

- to retain the excavation sides for the multi-level basements, a retaining system with tiebacks may have been used; therefore, tiebacks may be encountered during basement excavation for new structure located east of the parking garage (LTR, p. 10). 4 (GEO-1) cont'd

- drilling of shafts for the soldier piles will likely require casing and/or use of drilling mud (slurry) to prevent caving; to prevent settlement of adjacent improvements, soldier piles should not be installed by driving or vibratory methods; a monitoring program should be established to evaluate the effects of the construction on the adjacent buildings and surrounding ground (LTR, p. 10-11).

- sand with low fines content was encountered within the zone of excavation.; to reduce caving, lagging boards should be placed with every foot of excavation to limit caving; voids that result from caving soil behind wood lagging should be grouted before proceeding to the next row of lagging (LTR, p. 11).

- the bottom of the excavation should be above the groundwater level; during drilling of the soldier-pile holes, groundwater or perched water may be encountered; to keep the holes from caving, casing and/or drilling slurry may be needed; alternatively, the soldier piles may be installed using auger-case method (LTR, p. 11).

- generally, soldier piles can be installed under the City's sidewalk provided that the top 3 feet of the soldier piles are removed after the permanent basement wall is cast; if tiebacks are needed, it has been our experience that using hollow-stem augers to install tiebacks in sand will result in loss of ground; therefore, tiebacks, if required, should be installed using smooth-cased method (such as a Klemm rig) to reduce loss of ground (LTR, p. 11).

- the soil at subgrade should consist of stiff to very stiff clay, medium dense sand, and bedrock; therefore, the slabs may be supported on grade; if weak soil is present at subgrade level, the weak soil should be removed and replaced as engineered fill (LTR, p. 11).

- the near surface soil was determined to be moderately corrosive; the corrosive soil will adversely affect below grade improvements, such as foundations and utilities; recommendations for protection of buried structures presented in Appendix D are that all steel, iron, etc, should be properly protected against corrosion depending upon the critical nature of the structure; all buried metallic pressure piping should be protected against corrosion (LTR, p. 11).

- if the site grading is scheduled for the rainy season, the near-surface soil may be too wet to achieve adequate compaction during site preparation and fill placement and may deflect significantly under the weight of construction equipment; for these conditions, moisture conditioning of the material and the use of lightweight equipment may be required to lower the soil to a moisture level that will promote proper compaction; methods of moisture conditioning

include mixing and turning (aerating) the soil to naturally dry the soil and lower the moisture content to an acceptable level; aeration typically requires at least a few days of warm, dry weather to effectively dry the material (LTR, p. 12). 4 (GEO-1) cont'd

- if localized soft or wet areas are encountered, it may be necessary to over-excavate to a depth of 18 to 24 inches, place a layer of stabilizing geo-synthetic, and backfill with granular material to stabilize the subgrade and bridge the soft material (LTR, p. 12)

- bedrock encountered in the borings consists of serpentinite and sandstone; serpentinite contains naturally occurring asbestos; therefore a Site Mitigation Plan may be needed to be prepared prior to construction; bedrock handling and disposal should be performed in accordance with the Site Mitigation Plan. (LTR, p. 12)

- inclinations of temporary slopes should not exceed those specified in local, state or federal safety regulations; at a minimum the requirements of the current OSHA Health and Safety Standards for Excavations (29 CFR Part 1926) should be followed; temporary slopes less than 10 feet high should be inclined no steeper than 1.5: 1 (horizontal to vertical); in addition, all vehicles and other surcharge loads should be kept at lease 10 feet away from the tops of temporary slopes (LTR, p. 13).

- all areas to receive improvements should be stripped of vegetation and organic topsoil; voids resulting from the demolition activities should be properly backfilled with lean concrete or engineered fill as described in the LTR recommendations (LTR, p. 14).

- prior to placement of any engineered fill, the onsite soil exposed by stripping should be scarified to a depth of at least 12 inches, moisture-conditioned to at least three percent above optimum moisture content, and compacted to at least 95 and 90 percent relative compaction for sand and clay, respectively; the soil subgrade should be kept moist until it it covered by select fill (LTR, p. 14).

- if soft areas are encountered during site preparation and grading, the soft material should be removed and replaced with engineered fill; if the soft material is deeper than 24 inches, LTR recommends over-excavating to a depth of 18 to 24 inches, placing a geotextile fabric at the bottom of the excavation, and backfilling with granular material (LTR, p. 14).

- fill should consist of onsite or imported soil that is non-corrosive, free of organic matter or other deleterious material, contains no rocks or lumps larger than four inches in greatest dimension, has a liquid limit of less than 25 and a plasticity index lower than 8, and is approved by the geotechnical engineer (LTR, p. 14).

- fill should be placed in horizontal lifts not exceeding eight inches before compacted,

moisture-conditioned to above optimum moisture content, and compacted to at leaset 90 percent relative compaction; fill thicker than five feet and-or consisting of clean sand or gravel should be compacted to at least 95 percent relative compaction (LTR, p. 14).

4
(GEO-1)
cont'd

- LTR should be provided with samples of proposed fill at least three days before use at the site; the grading contractor should provide analytical test results or other suitable environmental documentation indicating the imported fill is free of hazardous materials at least three days before use at the site; a bulk sample of approved fill should be provided to LTR at least three working days before use at the site so a compaction curve can be prepared (LTR, p. 14-15)

- where necessary, trench excavations should be shored and braced to prevent cave-ins and/or in accordance with safety regulations; if trenches extend below the groundwater level, it will be necessary to temporarily dewater them to allow for placement of the pipe and/or conduits and backfill (LTR, p. 15).

- if fill with less than 10 percent fines is used, the entire depth of the fill should be compacted to at least 95 percent relative compaction; jetting of trench backfill should not be permitted; special care should be taken when backfilling utility trenches in pavement areas; poor compaction may cause excessive settlements resulting in damage to the pavement section (LTR, p. 15).

- to reduce the potential for water to become trapped in trenches beneath the building or pavements, which trapped water can cause heaving of soils beneath slabs and softening of subgrade soil beneath pavements, an impermeable plug consisting of either native clay or lean concrete, at least five feet in length, should be installed where the trenches enter the building or cross planter areas and pass below asphalt or concrete pavements (LTR, p. 15).

- to reduce the potential for differential movement and cracking, exterior concrete slabs should be underlain by at least 4 inches of Class 2 aggregate base, and the upper 12 inches of the soil subgrade should be compacted to at least 95 and 90 percent relative compaction for sand and clay, respectively (LTR, p. 15).

- the foundation subgrade should be free of standing water, debris, and disturbed materials prior to placing concrete; if fill, soft, or loose soil is present at the foundation subgrade, it should be removed to expose competent material and be replaced by lean concrete (LTR, p. 17).

- to avoid surcharging the basement wall of the parking garage, the western perimeter wall of the new building may need to be supported on drilled piers that gain support in the bedrock below the elevation of the parking garage (LTR, p. 17).

- drilled piers should be installed by a qualified contractor with demonstrated experience in this type of foundation; loose material may potentially cave during drilling, thus casing and/or drilling fluid may be required (LTR, p.18).

4 (GEO-1) cont'd

- where space does not permit a sloped excavation, shoring will be required, and a cantilever soldier pile and lagging shoring system is the most appropriate for the depth of the excavation planned and types of soil present; penetration of soldier piles should be sufficient to provide lateral stability (LTR, p. 18).

- a soldier pile and lagging system is relatively flexible, and movement should be anticipated; if the shoring system is properly designed and installed, movements at the top of the shoring should not exceed one inch (LTR, p. 19).

- because the site is in a seismically active region, the wall design should be checked for seismic condition; seismic design parameters recommended for areas in the northwwest portion of the site where bedrock is relatively deep or in the eastern and southern portions of the site where bedrock is relatively shallow, should be followed (LTR, p. 21-22).

Significantly, LTR concludes by recommending in-person observation of various operations to check that the contractor's work conforms to the geotechnical aspects of the plans and specifications:

> "Prior to construction, we should review the project plans and specifications to check their conformance to the intent of our recommendations. During construction, we should observe excavation, temporary shoring and foundation installation, subgrade preparation and compaction of backfill. These observations will allow us to compare the actual with the anticipated subsurface conditions and check that the contractor's work conforms to the geotechnical aspects of the plans and specifications...Actual subsurface conditions may vary. If any variations or undesirable conditions are encountered during construction, or it the proposed construction will differ from that described in this report, Langan Treadwell Rollo should be notified to make supplemental recommendations, as necessary." (LTR, p. 22)

This recommendation is evidence that the existence of various Building Code provisions, the preparation of plans by a qualified geotechnical engineer, and the review of construction plans by the Department of Building Inspection cannot be relied upon as providing adequate or effective mitigation for the hazards described above, given the reality that the project proponent and/or contractor will focus on minimizing costs of construction and the fact that regulatory standards are subject to interpretation. LTR did not rely upon an expectation of regulatory compliance as mitigation for these potentially significant adverse effects of the project. Rather, LTR

recommended that on-site monitoring of various excavation and construction activities by a licensed geotechnical professional would be required to mitigate the potential adverse impacts of this project. While LTR recommended that such on-site monitoring be performed, the project does not incorporate it as an enforceable, binding mitigation measure imposed as a condition of approval of the project.

4
(GEO-1)
cont'd

In addition, the Initial Study recognizes that in the event of an earthquake that exhibits strong to very strong seismic ground shaking, "considerable damage could occur to buildings on the project site, potentially injuring building occupants and neighbors." IS p. 209.

In order to reduce the severity of the aforementioned significant impacts, the following mitigation measures should be imposed in the EIR as conditions of approval of the project:

> "**MITIGATION MEASURE**. Prior to construction, Langton Treadwell Rollo (or an equivalently qualified geotechnical professional licensed in the State of California, herein "LTR")) should review the project plans and specifications to check their conformance to the intent of LTR's recommendations in its Preliminary Geotechnical Investigation, 3333 California Street dated December 3, 2014. At all times during construction, LTR should observe excavation, temporary shoring and foundation installation, subgrade preparation and compaction of backfill. These observations will allow LTR to compare the actual with the anticipated subsurface conditions and check that the contractor's work conforms to the geotechnical aspects of the plans and specifications...Actual subsurface conditions may vary. If any variations or undesirable conditions are encountered during construction, or if the proposed construction will differ from that described in this report, LTR should be notified to make supplemental recommendations, as necessary."
>
> **MITIGATION MEASURE**. Since bedrock encountered in the borings consists of serpentinite and sandstone and serpentinite contains naturally occurring asbestos, a Site Mitigation Plan to reduce or eliminate any exposures of workers or nearby residents to asbestos will be prepared prior to excavation by a qualified, licensed professional and reviewed by LTR prior to excavation; such Site Mitigation Plan will be included in the Draft EIR and will be released for public comment; bedrock handling and disposal must be performed in accordance with the Site Mitigation Plan.
>
> **MITIGATION MEASURE**. Since up to 15 feet of loose to medium dense sand was encountered above the water table, and loose and medium dense sand may densify during an earthquake (IS p. 210), most of the soil susceptible to seismic densification must be removed during excavation; at the conclusion of excavation, LTR will perform any necessary or advisable investigation of the site and verify in writing that most of the soil subject to seismic densification has been removed from the site.

**MITIGATION MEASURE.** Project sponsor will be required to maintain a water truck on site during all excavation, demolition, filling and other activities that could cause dust and will wet down dust sufficiently to prevent its blowing onto residences across the street from the site on Laurel, Euclid, Presidio and California streets.

4 (GEO-1) cont'd

Residents are very concerned that the 7-10 year proposed duration of construction would be too impactful for this residential area, especially since there would be substantial excavation from 7 to 40 feet below grade to accommodate underground garages and foundations. Residents recently learned of this proposed duration, and the developers stated that they would seek a development agreement that would permit them to construct the project over a 15 year period so that "if conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability." (See Ex. I, October 12, 2017 email from Dan Safier) Since the Initial Study indicates that the developers would seek the right to apply for additional zoning changes after a certain period, the developers could seek approval for increases in the project from the Board of Supervisors, so the project could become more impactful. *Ibid.* The EIR must address all phases of the project, including foreseeable future expansion that could increase impacts of the project.

**2. The Proposed Project Would Have a Potentially Significant Impact on Biological Resources and Would Conflict With Local Policies or Ordinances Protecting Biological Resources.**

5 (BR-1)

The proposed project would have a significant adverse impact on the environment because it would remove 185 onsite trees to allow for demolition, excavation and site preparation, including 19 onsite Significant Trees (i.e. trees within 10 feet of the public right-of-way that meet specific height, trunk, diameter, and canopy width requirements) and 15 protected street trees along California Street, and adequate mitigation is not included as a condition of approval of the proposed project. (IS p. 69)

The Initial Study failed to evaluate impacts of the proposed project against the applicable significance standards. Both CEQA Appendix G and the Housing Element EIR acknowledge that a proposed project would normally have a significant effect on the environment if it would:

> "Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
>
> Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;

> Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
>
> Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
>
> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
>
> Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan." (Ex. B, excerpts from CEQA Appendix G; and Ex. C, excerpts from Housing Element EIR, p. V.N-29.

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(BR-1)
cont'd

The Initial Study fails to analyze whether the proposed project would conflict with any local policies and only analyzes select provisions of one local ordinance, the San Francisco Urban Forestry Ordinance (SFUFO), which it misinterprets.

The Initial Study fails to analyze the proposed project's conflict with the stated purposes of the San Francisco Urban Forestry Ordinance, article 16, sections 801 *et seq.*, of the San Francisco Public Works Code ("SF UFO") to "realize the optimum public benefits of trees on the City's streets and public places, abatement of air and noise pollution, enhancement of the visual environment and others;" to integrate street planting and maintenance with other urban elements and amenities, including but not limited to utilities, and enhancement of views and solar access; to recognize that "the removal of important trees should be addressed through appropriate public participation and dialogue, including the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.)", to "recognize that green spaces are vital to San Francisco's quality of life as they provide a range of environmental benefits, protect public safety, and limit conflicts with infrastructure." SF UFO section 801.

Under SF UFO section 807, removal of significant trees "shall be subject to the the applicable rules and procedures for removal set forth in Sections 806, 810, or 810A" of the SF UFO. Also, protection of such trees during construction shall be required in accordance with Section 808( c) of the SF UFO.

Under SF UFO section 810A (b), removal of a significant tree(s) on privately-owned property shall be subject to the rules and procedures governing permits for removal of street trees as set forth in Section 806(b). Under those rules, the Department must give all Interested San

Francisco organizations and, to the extent practical, all owners and occupants of properties that are on or across the from the block face where the affected Tree is located, 30 days notice of the proposed removal and also post a notice on the affected Tree 30 days before the proposed removal. SF UFO section 806 (a) (2). If during that notice period, any person files with the Department written objections to the Removal, the Director shall hold a hearing to consider public testimony concerning the proposed Tree Removal. Under SF UFO section 806(a)(3)(A), seven days notice must be given of the hearing date in the manner provided in SF UFO section 806(a)(3(A). Under SFO section 806(a)(3)( C), the Director's decision is appealable to the Board of Appeals. 5 (BR-1) cont'd

Also under SF UFO section 810A, as "part of the Director's determination to authorize removal of a significant tree, the Director shall consider the following factors related to the tree:

(1) Size, age, and species;
(2) Visual and aesthetic characteristics, including the tree's form and whether it is a prominent landscape feature or part of a streetscape;
(3) Cultural or historic characteristics, including whether the tree has significant ethnic appreciation or historical association or whether the tree was part of a historic planting program that defines neighborhood character;
(4) Ecological characteristics, including whether the tree provides important wildlife habitat, is part of a group of interdependent trees, provides erosion control, or acts as a wind or sound barrier;
(5) Locational characteristics, including whether the tree is in a high traffic area or low tree density area, or provides shade or other public benefits;
(6) Whether the tree constitutes a hazard tree as set forth in Section 802(o); and
(7) Whether the tree has been maintained as set forth in Section 802(1)."

The standards for new street trees require, among other things, that the new street trees "be of a species suitable for the site conditions," and the Director may "waive or modify the number of and/or standards for Street Trees" if other pre-existing surface, sub-surface, or above-grade features render installation of the required Street Tree(s) in the required fashion impossible, impractical, and/or unsafe." SF UFO section 806 (d). For each required street tree that the Director waives, the applicant shall pay an in-lieu fee or provide alternative landscaping, including sidewalk landscaping.

Thus, decision to remove a tree is a discretionary one which is to be made with consideration of the policies and factors stated in the SF UFO. The Initial Study and Arborist Report (p. 4) prepared by SBCA Tree Consulting, amended 10-19-15, erroneously portray the decision to remove significant trees as automatically granted whenever they would be in the way of construction as long as some kind of replacement trees would be provided.

However, some of the onsite significant trees are prominent landscape features and others have

significant historical association because they were present while the historically significant Laurel Hill cemetery was located on the site, so removal of the onsite significant trees would conflict with the policies stated above. The EIR should identify the trees which were present on the Laurel Hill cemetery. Due to this conflict, the proposed removal of Significant Trees is a significant impact that must be evaluated in the EIR. 5 (BR-1) cont'd

In addition, the San Francisco Urban Forest Plan (SF UFP) recognizes that "trees and other vegetation clean our air and water, create greener neighborhoods, calm traffic, improve public health, provide wildlife habitat and absorb greenhouse gases." Ex. J, SF UFP p. 1. Among the strategies required to achieve the SF UFP, Strategy 2.2.2 to "Encourage developers to incorporate existing trees into building and site designs" provides that "[c]onsideration should be given during review of building plans to the existing trees on the site, especially 'significant' trees (20 feet or more in height, 15 feet or greater canopy width, and/or 12 inches or greater in trunk diameter." SF UFP pp. 39, 47. Also, Strategy 2.2.4 to ["r]equire contractors to carry Tree Protection Bonds during construction projects" recognizes that "[c]onstruction activities frequently result in accidental damage or loss of trees - including street trees. Development projects with the potential to disturb existing trees should be required to carry Tree Protection Bonds as insurance. Such bonds would allow recourse in the event that significant damage to trees occurs during the development process through fines, tree replacement or other measures." SF UFP pp. 47. Strategy 2.2.5 to "[i]mprove process for approving Tree Protection Plans for construction projects" states that "[c]urrently Tree Protection Plans are collected by the Planning Department. Review of these plans should take place with appropriate urban forestry staff. The inspection and enforcement of plans should be carried out. These plans include important provisions to protect trees such as protective barriers, construction exclusion zones, and the restriction of material and equipment storage within tree drip zones." *Ibid.*

The SF UFP also recognizes that Public Works Code section 810A "describes trees that are automatically protected under Significant Tree designation and "additional consideration that will be taken into account for tree removal applications." SF UFP p. 73.

The proposed project would have a significant impact on the environment because it would require the removal of Significant Trees and would conflict with the above-described policies of the SF Urban Forestry Plan, including policies that support preserving significant trees on construction sites and require specific mitigation measures such as Tree Protection Bonds and improved process for approving Tree Protection Plans for construction projects by including appropriate urban forestry staff in the approval, inspection and enforcement of plans. In addition, the proposed project would conflict with the policies stated in the SF Urban Forestry Ordinance for consideration of the historical association, size, age, species and visual and aesthetic characteristics, including the tree's form and whether it is a prominent landscape feature or part of the streetscape. The EIR should analyze whether the project as proposed could be built without the removal of each of the Significant Trees.

The IS's reliance on regulatory compliance to prevent significant adverse impacts to these resources was not sufficient because it was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance. Such project specific analysis of potential impacts and the specific effect of regulatory compliance was not included in the Initial Study. The effect of regulatory compliance on these resources cannot be determined because the decision to remove a Significant Tree is discretionary. Also, the environmental evaluation did not commit the project sponsor to implementation of specific performance criteria as mitigation measures agreed as a condition of approval of the project or objective performance criteria for measuring whether the goals related to these resources would be achieved. Such specific measures were not provided or agreed to as mitigation measures adopted as a condition of approval of the proposed project. 5 (BR-1) cont'd

Absent a binding agreement or approval decision which implements specific mitigation measures that contain objective performance criteria that would measure whether the policy goals for protection of these resources would be achieved, the substantial adverse impact from removal of 185 onsite trees, including 19 onsite Significant Trees and 15 protected street trees remains significant and must be analyzed as a significant impact in the EIR.

Mitigation measures imposed as a condition of approval of the proposed project should include the following:

> **MITIGATION MEASURE.** Project sponsor will be required to employ a contractor who maintains in effect during all excavation and/or construction performed while trees are present on the site Tree Protection Bonds which would allow recourse in the event that significant damage to trees occurs during the development process through fines, tree replacement or other measures." Ex. J, SF UFP pp. 47.
>
> **MITIGATION MEASURE.** Prior to their approval, all Tree Protection Plans will be reviewed by appropriate urban forestry staff, and urban forestry staff will be required to perform onsite inspection and enforcement of the Tree Protection plans.

**3. The Proposed Project Would Have a Potentially Significant Adverse Effect, Either Directly or Through Habitat Modifications, on Resident or Migratory Birds.** 6 (BR-2)

The proposed project would remove 185 onsite trees to allow for demolition, excavation and site preparation, including 19 onsite Significant Trees (i.e. trees within 10 feet of the public right-of-way that meet specific height, trunk, diameter, and canopy width requirements) and 15 protected street trees along California Street. (IS p. 69)

In addition to the significance standards stated in the preceding section, the Housing Element EIR acknowledges that "new construction could result in impacts related to biological resources

if new housing would result in disturbance from construction activities, tree removal...interference with migration, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor...". (Ex. C, p. V.N-30, 46)

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(BR-2)
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The Initial Study acknowledges that the proposed project "would result in the temporary loss of nesting and foraging habitat through the removal of onsite trees and vegetation during construction" and states that "after the approximately 7- to 15-year construction period and incorporation of site landscaping (including the planting of up to 250 new trees on the project site) birds would be expected to inhabit the project site." IS p. 199. The IS does not state how soon after the incorporation of site landscaping bird habitation would be expected to occur on site. The Initial Study also discloses that tree removal and construction-related activities associated with the proposed project could adversely affect bird breeding "at the project site and in the immediate vicinity." IS 199. "Construction activities that may cause visual disturbance or alter the ambient noise environment include vegetation removal, demolition of existing buildings, and construction of foundations and new buildings." IS p. 199-200. The Initial Study also acknowledges that "landscaped areas within the project site may provide suitable habitat for resident and migratory birds covered under the Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711) and the California Fish and Game Code (sections 3503 and 3503.5). IS p. 199.

The information set forth above supports a fair argument that the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. The information set forth above also provides a fair argument that the proposed project would interfere substantially with the movement of native resident or migratory wildlife species or impede the use of native wildlife nursery sites. This impact would be significant under the standards of Appendix G of the CEQA Guidelines and the Housing Element EIR set forth above. The impact on habitat interference would be substantial since it would last at least 7 years and possibly more than 15 years, given the need for the newly planted, unestablished trees to grow to sufficient size to support bird habitat. The Initial Study provides no mitigation for this potentially significant impact on biological resources, so the impact is significant and must be evaluated as a significant impact in the EIR, along with mitigation measures and alternatives that could reduce or avoid the impact. The Initial Study provides potential mitigation only for interference with onsite bird nests.

In addition, the Initial Study admits that the proposed project "would increase the number of new buildings at the project site and the heights of existing buildings, which could create potential obstacles for resident or migratory birds. This could result in an increase in bird injury or mortality in the event of a collision. The existing office building at the center of the site would be partially demolished and separated into two buildings connected by a bridge at the fourth floor. The separated buildings (i.e. Center Buildings A and B) would be adaptively reused as residential buildings and would include two- to three-story vertical additions, increasing the

height from approximately 55.5 feet tall to up to 92 feet tall, and a connecting bridge at the fourth floor. In addition, the proposed project includes the construction of 3 new structures at the site ranging from 37 to 45 feet in height (37 to 67 feet for the project variant), some of which would include balconies. San Francisco Planning Code section 139 addresses 'feature-related hazards', which are defined as 'free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet and larger in size.' The proposed project or project variant would comply with the feature-related standards of planning code section 139 by using bird-safe glazing treatment on 100 percent of any feature-related hazards (e.g. balconies, free-standing glass walls, or skywalks). With planning code section 139 compliance and implementation of Mitigation Measure M-B1-1, the proposed project or project variant would not interfere substantially with the movement of any native resident or migratory wildlife species or with established native resident or migratory wildlife corridors. This impact therefore, would be less than significant with mitigation." IS p. 201-202. 6 (BR-2) cont'd

However Mitigation Measure M-B1-1 pertains only to interference with onsite bird nests. The remainder of the discussion amounts only to an argument that regulatory compliance would be sufficient to mitigate significant impacts. However, Planning Code section 139 allows the Zoning Administrator to waive the requirements contained within Section 139( c)(2) or modify such requirements to allow equivalent Bird-Safe Glazing Treatments upon the recommendation of a qualified biologist. Also, Planning Code section 139( c)(2)(B) allows general exceptions for historic buildings and, pursuant to the Secretary of Interior Standards for Rehabilitation of Historic Properties, requires treatment methods such as netting, glass films, grates, and screens. Thus, compliance with Planning Code section 139 may not result in use of bird-safe glazing treatment on 100% of the feature-related hazards. Since regulators are allowed to use discretion in applying the subject regulations, the specific effect of the application of the regulations cannot be determined.

The IS's determination that regulatory compliance will be sufficient to prevent significant adverse impacts was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance. Such project specific analysis of potential impacts and the effect of regulatory compliance was not included in the Initial Study. Also, the environmental evaluation did not commit the project sponsor to implementation of specific performance criteria as objective criteria for measuring whether the goal would be achieved. Such specific measures were not provided and adopted as a condition of approval of the proposed project. Further, under Planning Code section 139(a), structures that create a feature-related hazard "are required to treat all of the feature-related hazard." Mitigation Measure M-B1-1 does not incorporate this measure. Absent an agreement to implement specific mitigation measures that contain specific performance criteria and objective criteria for measuring whether the goal would be achieved, the substantial adverse impact of interference with the movement of native resident or migratory birds remains significant and must be analyzed in the EIR as a significant impact.

In addition, the Initial Study's assertion that "the proposed project or project variant would comply with the feature-related standards of planning code section 139 by using bird-safe glazing treatment on 100 percent of any feature-related standards of planning code section 139 (e.g., balconies, free-standing glass walls, or skywalks" conflicts with the standards of Planning Commission Resolution 9212, which states that "clear, untinted glass should be used at and near the street level." Ex. C, excerpts from Housing Element EIR, p. V.A-35. The EIR should also analyze any and all conflicts between the bird-safe glazing treatment and the Planning Commission Resolution 9212 standards for clear, untinted glass at and near street level, because conflicts between applicable plans indicate that the impact may not be insignificant as a result of regulatory compliance. 6 (BR-2) cont'd

Renderings of the proposed project show clear glass walls and do not depict frosted glass, permanent stencils, or the like. The EIR should identify specific mitigation measures that would be used to provide bird-safe glazing treatment and incorporate them as a condition of approval of the proposed project.

**4. The Proposed Project Would Have a Significant Impact on the Environment Because the Project Would Conflict With Applicable Land Use Plans or Regulations and Would Have a Substantial Impact Upon the Existing Character of the Vicinity.** 7 (PP-1)

**A. Urban Design Element of San Francisco General Plan and Residential Design Guidelines**

The proposed project would conflict with the following policies of the Urban Design Element, among others:

Policy 1.1: Recognize and protect major views in the city, with particular attention to those of open space and water.

> Visibility of open spaces, especially those on hilltops, should be maintained and improved, in order to enhance the overall form of the city, contribute to the distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets.

Objective 3: Moderation of major new development to complement the City pattern, the resources to be conserved and the neighborhood environment.

Policy 3.3: Promote efforts to achieve high quality design for buildings to be constructed at prominent locations.

Policy 3.4: Promote building forms that will respect and improve the integrity of open spaces and other public areas.

Policy 3.5: Relate the height of buildings to important attributes of the city patterns and to the height and character of existing development.

Policy 3.6: Relate the bulk of the buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction....

> When buildings reach extreme bulk, by exceeding the prevailing height and prevailing horizontal dimensions of existing buildings in the area, especially at prominent and exposed locations, they can overwhelm other buildings, open spaces and the natural land forms, block views and disrupt the city's character. Such extremes in bulk should be avoided by establishment of maximum horizontal dimensions for new construction above the prevailing height of development in each area of the city...

Policy 3.7: Recognize the special urban design problems posed in development of large properties.

Policy 3.8: Discourage accumulation and development of large properties, unless such development is carefully designed with respect to its impact upon the surrounding area and upon the City.

Policy 3.9: Encourage a continuing awareness of the long-term effects of growth upon the physical form of the city.

Policy 4.1: Protect residential areas from the noise, pollution and physical danger of excessive traffic.

Policy 4.2: Provide buffering for residential properties when heavy traffic cannot be avoided. Ex. V, Urban Design Element of San Francisco General Plan.

The proposed project would also conflict with the following provisions of the Residential Design Guidelines:

DESIGN PRINCIPLE: Design buildings to be responsive to the overall neighborhood context, in order to preserve the existing visual character.

Many neighborhoods have defining characteristics such as street trees, buildings with common scales and architectural elements, and residential and commercial uses that make

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the neighborhood identifiable and an enriching place to be. The neighborhood is generally considered as that area around a home that can easily be traversed by foot....

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Though each building will have its own unique features, proposed projects must be responsive to the overall neighborhood context. A sudden change in the building pattern can be visually disruptive. Development must build on the common rhythms and elements of architectural expression found in a neighborhood. In evaluating a project's compatibility with neighborhood character, the buildings on the same block face are analyzed. However, depending on the issues relevant to a particular project, it may be appropriate to consider a larger context.

Broader Neighborhood Context: When considering the broader context of a project, the concern is how the proposed project relates to the visual character and scale created by other buildings in the general vicinity.

**Defined Visual Character**

GUIDELINE: In areas with a defined visual character, design buildings to be compatible with the patterns and architectural features of surrounding buildings.

On some block faces, there is a strong visual character defined by buildings with compatible siting, form, proportions, texture and architectural details. On other blocks, building forms and architectural character are more varied, yet the buildings still have a unified character. In these situations, buildings must be designed to be compatible with the scale, patterns and architectural features of surrounding buildings, drawing from elements that are common to the block.

**III. Site Design**

DESIGN PRINCIPLE: Place the building on its site so it responds to the topography of the site, its position on the block, and to the placement of surrounding buildings.

**TOPOGRAPHY**

Guideline: Respect the topography of the site and the surrounding area.

New buildings and additions to existing buildings cannot disregard or significantly alter the existing topography of the site. The surrounding context guides the manner in which new structures fit into the streetscape, particularly along slopes and hills. This can be achieved by designing the building so it follows the topography in a manner similar to surrounding buildings.

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Similarly, a proposed project may be located next to a historic or architecturally significant building that is set back from the street or is on a wider lot with front and side gardens. The front setback of the proposed project must respect the historic building's setbacks and open space. Additionally, the front setback must serve to protect historic features of the adjacent historic building.

**SIDE SPACING BETWEEN BUILDINGS**

GUIDELINE: Respect the existing pattern of side spacing.

Side spacing is the distance between adjacent buildings...Projects must respect the existing pattern of side spacing.

**VIEWS**

GUIDELINE: Protect major public views from public spaces.

The Urban Design Element of the General Plan calls for protection of major public views in the City, with particular attention to those of open space and water. Protect major views of the City as seen from public spaces such as streets and parks by adjusting the massing of proposed development projects to reduce or eliminate adverse impact on public view sheds.

**IV. Building Scale and Form**

DESIGN PRINCIPLE: Design the building's scale and form to be compatible with that of surrounding buildings, in order to preserve neighborhood character.

**BUILDING SCALE**

GUIDELINE: Design the scale of the building to be compatible with the height and depth of surrounding buildings.

The building scale is established primarily by its height and depth. It is essential for a building's scale to be compatible with that of surrounding buildings, in order to preserve the neighborhood character.

**Building Scale at the Street**

GUIDELINE: Design the height and depth of the building to be compatible with the existing building scale at the street.

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If a proposed building is taller than surrounding buildings, or a new floor is being added to an existing building, it may be necessary to modify the building height or depth to maintain the existing scale at the street. By making these modifications, the visibility of the upper floor is limited from the street, and the upper floor appears subordinate to the primary facade.

In modifying the height and depth of the building, consider the following measures; other measures may also be appropriate depending on the circumstances of a particular project:

- Set back the upper story. The recommended setback for additions is 15 feet from the front building wall.
- Eliminate the building parapet by using a fire-rated roof with a 6-inch curb.
- Provide a sloping roofline whenever appropriate.
- Eliminate the upper story.

**Building Scale at the Mid-Block Open Space**

GUIDELINE: Design the height and depth of the building to be compatible with the existing building scale at the mid-block open space.

**BUILDING FORM**

GUIDELINE: Design the building's form to be compatible with that of surrounding buildings.

Though the Planning Code establishes the maximum building envelope by dictating setbacks and heights, the building must also be compatible with the form of surrounding buildings.

GUIDELINE: Design the building's facade width to be compatible with those found on surrounding buildings.

**Proportions**

GUIDELINE: Design the building's proportions to be compatible with those found on surrounding buildings.

Proportions are the dimensional relationships among the building's features, and typically involve the relationship between the height and width of building features....Building features must be proportional not only to other features on the building, but also to the features found on surrounding buildings.

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**Rooflines**

GUIDELINE: Design rooflines to be compatible with those found on surrounding buildings.

**V. Architectural Features**

DESIGN PRINCIPLE: Design the building's architectural features to enhance the visual and architectural character of the neighborhood.

In designing architectural features, it is important to consider the type, placement and size of architectural features on surrounding buildings, and to use features that enhance the visual and architectural character of the neighborhood. Architectural features that are not compatible with those commonly found in the neighborhood are discouraged.

**VI. Building Details**

DESIGN PRINCIPLE: Use architectural details to establish and define a building's character and to visually unify a neighborhood.

The use of compatible details visually unifies a neighborhood's buildings, providing continuity and establishing the architectural character of the area.

**WINDOWS**

GUIDELINE: Use windows that contribute to the architectural character of the building and the neighborhood.

Windows are one of the most important decorative features, establishing the architectural character of the building and the neighborhood.

**EXTERIOR MATERIALS**

GUIDELINE: The type, finish, and quality of a building's materials must be compatible with those used in the surrounding area.

When choosing building materials, look at the types of materials that are used in the neighborhood, and how those materials are applied and detailed. Ensure that the type and finish of these materials complement those used in the surrounding area, and that the quality is comparable to that of surrounding buildings. Ex. K, Residential Design Guidelines, excerpts.

Defining characteristics of the single-family residential buildings on Laurel Street across the street from the site include one-story in height at the front, with a second set-back story, sloped roofs, consistent entrance and front setback patterns and compatible stucco materials. Defining characteristics on Euclid Avenue across the street from the site are two-unit flats or multiple-unit apartment buildings with rear yards sloping toward the site. Defining characteristics of the residences on California Street and Presidio Avenue are approximately four-story buildings designed with traditional architectural forms. The proposed project conflicts with the prevailing character of the surrounding areas and neighborhood in these and other respects, including the existing pattern of mid-block open space, as can be seen in the plans showing the incongruent scale and building forms of the proposed project. Also, the new buildings and additions to existing buildings proposed in the project would disregard or significantly alter the existing topography of the site.

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**B. The Proposed Project Would Have a Significant Impact on the Environment Because the Project Would Conflict With Applicable Land Use Plans or Regulations and Would Have a Substantial Impact Upon the Existing Character of the Vicinity.**

The Housing Element EIR state that a proposed project would normally have a significant effect on the environment if it would:

> "Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
>
> Have a substantial impact upon the existing character of the vicinity." Ex. C, p. V.B-27-28.

On the Figure IV-3 of the Housing Element EIR, the Generalized Citywide Zoning Map, the project site is shown in a "Residential" area. Ex. C, 2014 Housing Element EIR, p. IV-14-15 and Figure IV-3.

"Figure IV-4 shows a generalized height map of the City." Ex. C, 2014 Housing Element EIR, p. IV-14 and Figure IV-4. This map shows that the project site is in a height district of "40 ft" or less.

Map 06 of the 2014 Housing Element shows average generalized permitted housing densities by Zoning Districts as 54 average units per acre in medium density areas. Ex. L, 2014 Housing Element p. I.70. Policy 11.4 of the 2014 Housing Element refers to this map and states the policy to:

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> "Continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan." Ex. L, p. 37

Policy 11.4 text provides that:

> "The parameters contained in the Planning Code under each zoning districts [sic] can help ensure that new housing does not overcrowd or adversely affect the prevailing character of existing neighborhoods. The City's current zoning districts conform to this map and provide clarity on land use and density throughout the city. When proposed zoning map amendments are considered as part of the Department's community planning efforts, they should conform generally to these [sic] this map, although minor variations consistent with the general land use and density policies may be appropriate. They should also conform to the other objectives and policies of the General Plan. Ex. L, p. 37.

Housing Element policies do not provide for zoning changes to allow retail or commercial office uses. 2014 Housing Element Policy 1.6 provides:

> "Consider greater flexibility in number and size of units within established building envelopes in community based planning processes, especially if it can increase the number of affordable units in multi-family structures.
>
> However, in some areas which consist mostly of taller apartments and which are well served by transit, the volume of the building rather than number of units might more appropriately control the density.
>
> Within a community based planning process, the City may consider using the building envelope, as established by height, bulk, set back, parking and other Code requirements, to regulate the maximum residential square footage, rather than density controls that are not consistent with existing patterns. In setting allowable residential densities in established neighborhoods, consideration should be given to the prevailing building type in the surrounding area so that new development does not detract from existing character." Ex. L, p. 10.

In addition, Housing Element Policy 7.5 supports process and zoning accommodation for affordable housing, as it provides that:

> "Encourage the production of affordable housing through process and zoning accommodations, and prioritize affordable housing in the review and approval process....
>
> Local planning, zoning, and building codes should be applied to all new development, however when quality of life and life safety standards can be maintained zoning

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accommodations should be made for permanently affordable housing. For example, exceptions to specific requirements, including open space requirements, exposure requirements or density limits, where they do not affect neighborhood quality and meet with applicable design standards, including neighborhood specific design guideline, can facilitate the development of affordable housing. Current City policy allows affordable housing developers to pursue these zoning accommodations through rezoning and application of a Special Use District (SUD)." Ex. L, p. 29.

Thus, the proposed project would conflict with the Housing Element of the General Plan because the proposed project would seek to use a Special Use District to change the permitted uses to allow retail uses, new commercial office uses and public parking uses and to increase height and/or bulk limits, which would not be zoning accommodations "for permanently affordable housing." Also, the proposed project would be inconsistent with the prevailing building type in the surrounding area and/or detract from existing character, detract from neighborhood quality and/or conflict with provisions of the Residential Design Guidelines and Urban Design Element, for the reasons stated herein.

For these reasons, the proposed project would also conflict with the following other policies of the 2014 Housing Element:

Policy 11.3 Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character.

Accommodation of growth should be achieved without damaging existing residential neighborhood character. ...In existing residential neighborhoods, this means development projects should defer to the prevailing height and bulk of the area.

Policy 11.5 Ensure densities in established residential areas promote compatibility with prevailing neighborhood character." Ex. L, p. 37.

The Housing Element EIR explains that:

"The San Francisco Planning Code, which incorporates by reference the City's Zoning maps, governs permitted uses, densities and the configuration of buildings in San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) cannot be issued unless either the proposed action conforms to the Planning Code, or an exception if granted pursuant to provisions of the Planning Code, or a reclassification of the site occurs....

Section 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed

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(PP-1)
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height may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section." Ex. C, p. V-A-32-33.

The City's Preliminary Project Assessment ("PPA") states that:

> "various aspects of the project conflict with both the current RM-1 Zoning of the site, as well as City Planning Commission Resolution No. 4109. The Preliminary Project Assessment application indicates the intent of the property owner to pursue a rezoning, potentially to an NC District. Additionally, as noted in the comments below, a special Use District overlay to the current RM-1 District may also be a potential path for rezoning, In either case, rezoning of the property requires approval by the Board of Supervisors....various components of the project exceed the current 40 foot height limit. Accordingly, a height district reclassification of the property must be sought. This also requires approval by the Board of Supervisors." Ex. M, PPA, p. 10.

As further explained in the City's Preliminary Project Assessment:

> "The project proposes a combination of residential, office, commercial parking, retail and entertainment uses. Of these proposed land use categories, only residential uses are currently permitted in the existing RM-1 District. Accordingly, pursuing the project as proposed would require a rezoning of the subject property. The project description provided in the Preliminary Project Assessment application indicates the owner's interest in pursuing a rezoning of the property to an NC (Neighborhood commercial) district, but does not specify which type of NC District...
>
> The project proposed retail uses throughout the property.
>
> The demolition of existing structures or conversion of floor area dedicated to the site's 363,218 square feet of existing nonconforming office use is an abandonment of that nonconforming use per Planning Code Section 183. Therefore, to re-establish office uses in the proposed new structures, the uses must comply with any applicable zoning controls.
>
> The project includes 60 off-street parking spaces as part of a 'Public Parking Garage' defined in Planning Code Section 102. The existing RM-1 district does not permit public parking garages and, at this time, it is unclear if the described 60 'paid public parking spaces for community use' are legally noncomplying with regard to the Planning Code. Additional information is needed regarding the existing and proposed location of these

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spaces and the date of their establishment to make that determination...

The site has subsequently undergone additional rezoning, as it is now within an RM-1 District. However, the stipulations of future development as outlined in Resolution 4109 continue to apply, absent modification by the Board of Supervisors per Planning Code Section 174....In the project comments that follow, when there is an inconsistency, the more restrictive is noted as the guiding control. As indicated in the Preliminary Project Assessment application, the project may result in the rezoning of the property which requires review and approval by the Board of Supervisors. Amending Resolution 4109 would also require review and approval by the Board of Supervisors....

In general, the RM-1 District controls are more restrictive than the Stipulations of Resolution 4109. However, the stipulations are more restrictive when defining the density and buildable area requirements as applicable to a portion of the subject property fronting on Laurel and Euclid Avenues. At present, the project does not comply with these restrictions and would require amending the Resolution...

The subject property is within an RM-1 District which permits a residential density of up to one unit per 800 square feet of lot area. However, as a Planned Unit Development the proposal may seek approval for a density equal to one less unit than what is permitted by the district with the next greater density (RM-2)...While additional information is necessary to calculate the exact maximum density for the area subject to Resolution 4109, initial calculations estimate approximately 508 units are allowed pursuant to the current RM-1 zoning and Resolution an upon seeking the additional density allowed as a Planned Unit Development, the estimated maximum is 660 dwelling units. If the Resolution did not apply, these respective amounts become 558 and 743...

The subject property is within a 40-X Height and Bulk District, restricting the maximum height of buildings to 40 feet above grade, as measured generally from curb at the center of each existing and proposed building. The upper measurement of the height limit changes depending on the grade at that location per Planning Code Section 260(a)(1). Additionally, the upper measurement of the height of a building varies based on the roof form per Planning Code Section 260(a)(2). While in general the proposal accurately applies these methodologies, curbs along the Walnut Street extension may not be used as the base of measurements because the Walnut Street extension is not a public right-of-way...The additional stories proposed for the altered structures will require that the project seek a Height District reclassification which is reviewed and approved by the Board of Supervisors...

The existing office building is 66.5 feet tall from the existing grade to the finished roof...

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> The project proposed a lot line adjustment that would extend the property's Masonic Avenue Boundary into the public right-of-way. This adjustment requires a General Plan Referral because it includes the vacation of a public way and transportation route owned by the City and County. This adjustment will also require review by the Department of Public Works as a partial street vacation request...
>
> Open Space. Additional information is needed to determine how the project complies with this requirement for each individual unit and to confirm that the spaces comply with the dimensional requirements for either private or common spaces... (Ex. M, PPA. pp. 12-17.

Planning Code section 209.2 provides that in an RM-1 district, the "Residential Density, Dwelling Units" is [u]p to one unit per 800 square feet of lot area." Retail uses and commercial uses are not permitted.

As acknowledged in the Housing Element EIR, a proposed project "could result in impacts related to conflicts with existing land use policy, plans, or regulations" if it "resulted in housing development that was not consistent with zoning and land use designations as outlined in the governing land use plans and/or the City's Planning Code to the extent those regulations help to avoid or mitigate potential environmental impacts." Ex. C, p. V.B-29. In addition, there could be "impacts related to land use character if new housing is substantially out of scale with development in an existing neighborhood, or if new development is so different than existing development that the new development would change the existing character of an area." Ex. 2, p. V.B-33. "Similarly, substantial increases in residential densities in traditionally low-density neighborhoods could result in changes to land use character." Ex. C, p. V.B-33.

The Initial Study admits that the "project as proposed is not consistent with the provisions set forth in the planning code for the RM-1 Zoning District and would not comply with development restrictions identified in Resolution 4109, described below. The existing office use within the project site, as well as the scale of the existing office building within the project site, does not conform to the low-density residential character described for the RM-1 Zoning District." IS p. 22. The Initial Study misinterprets Resolution 4109 and fails to mention that it contains a limitation on the aggregate gross floor area of all buildings on the property of a gross floor area that "shall not exceed the total area of the property allotted to such use," a limitation of 50% as to lot coverage of residential development, and a prohibition on any residential dwelling other than a one-family dwelling or a two-family dwelling occupying any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended, occupying a parcel of land having an area of less than 3300 square feet, and a requirement that such buildings be set back 12 feet from any other building and 10 feet from any street . The new buildings proposed on the site propose to violate these limitations, including the gross floor area

limitations, and the Mayfair and Euclid Buildings propose to violate the prohibition on any residential dwelling other than a one-family dwelling or a two-family dwelling being erected at the locations of the proposed buildings and/or would also violate the use limitations which prohibit retail uses. The Initial Study failed to analyze these provisions of Resolution 4109, and retail uses are not allowed under that Resolution. Ex. N, Resolution 4109 and Stipulation as to Character of Improvements. 7 (PP-1) cont'd

The Initial Study states that the "proposed project would include amendments to the planning code and zoning maps to rezone a portion of the site from the current RM-1 zoning and 40-X Height and Bulk Districts." IS p. 22. First, the proposed planning code and zoning map amendments were not provided in the Initial Study, so the IS is incomplete and its description of the proposed project is inadequate and incomplete. Also, the Initial Study states that these:

> "changes would be implemented through the creation of a Special Use District (SUD) that would establish land use zoning controls for the project site. An ordinance establishing the SUD would require a recommendation by the Planning Commission and approval by the Board of Supervisors. In addition, the project sponsor would seek approval of a Conditional Use authorization/Planned Unit Development to permit development of buildings in excess of 50 feet in height; to allow for more units than principally permitted in the RM-1 Zoning District, to allow certain planning code exceptions to open space requirements, dwelling unit exposure, and rear yard setback requirements mandated by the planning code in an RM-1 Zoning District; and to provide a waiver or modification of any applicable conditions of Resolution 4109." IS p. 23.

As discussed above, the City's Preliminary Project Assessment stated that amending Resolution 4109 would require review and approval of the Board of Supervisors.

Since the proposed project is within a 40-X Height and Bulk District, it does not meet the criteria required to allow the Planning Commission to increase the height limit pursuant to Planning Code section 253, which provides that "wherever a height limit of more than 40 feet in a RH District, or more than 50 feet in a RM or RC District, **is prescribed by the height and bulk district in which the property is located**, any building or structure exceeding 40 feet in height in a RH District, or 50 feet in height in a RM or RC District, shall be permitted only upon approval by the Planning Commission according to the procedures for conditional use approval in Section **303** of this Code." Further, under Planning Code section 253:

> "In reviewing any such proposal for a building or structure exceeding 40 feet in height in a RH District, 50 feet in height in a RM or RC District, or 40 feet in a RM or RC District where the street frontage of the building is more than 50 feet the Planning Commission shall consider the expressed purposes of this Code, of the RH, RM, or RC Districts, and of the height and bulk districts, set forth in Sections **101**, **209.1**, **209.2**, **209.3**,

> and **251** hereof, as well as the criteria stated in Section **303**(c) of this Code and the objectives, policies and principles of the General Plan, and **may permit a height of such building or structure up to but not exceeding the height limit prescribed by the height and bulk district in which the property is located**. (Emphasis added.)

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(PP-1)
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Since the property has a height limit of 40 feet in an RM-1 district, Planning Code section 253 does not authorize a height limit increase.

In addition, the proposed project would not meet the criteria applicable to conditional uses as stated in Section **303**(c) and elsewhere in the Planning Code and further would not meet the requirements of Planning Code section 304 for a Planned Unit Development, including that the requirements that the project shall:

(1) Affirmatively promote applicable objectives and policies of the General Plan;
(2) Provide off-street parking adequate for the occupancy proposed;
(3) Provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by this Code;
(4) Be limited in dwelling unit density to less than the density that would be allowed by **Article 2** of this Code for a district permitting a greater density, so that the Planned Unit Development will not be substantially equivalent to a reclassification of property;
(5) In R Districts, include Commercial Uses only to the extent that such uses are necessary to serve residents of the immediate vicinity, subject to the limitations for NC-1 Districts under this Code, and in RTO Districts include Commercial Uses only according to the provisions of 231 of this Code;
(6) Under no circumstances be excepted from any height limit established by **Article 2.5** of this Code, unless such exception is explicitly authorized by the terms of this Code. In the absence of such an explicit authorization, exceptions from the provisions of this Code with respect to height shall be confined to minor deviations from the provisions for measurement of height in Sections **260** and **261** of this Code, and no such deviation shall depart from the purposes or intent of those sections."

The IS has not explained the nature of the "minor deviations" from the provisions for measurement of height that would be sought, so the IS is incomplete, and the EIR must identify them so the nature of the project can be known, and comments can address inaccuracies and conflicts with land use policies.

The proposed project would fail to affirmatively promote applicable objectives and policies of the General Plan as to density and height.

Approval of a Planned Unit Development cannot be substantially equivalent to a reclassification of property, which it would if misused in this matter, because the 744 residential units in the

project variant would exceed the additional density of 660 units allowed as a Planned Unit Development above existing density limits (which include Resolution 4109) and the 558 project units would exceed the approximately 508 units allowed under the applicable stipulations as to future development contained in Resolution 4109, which can only be changed by the Board of Supervisors. (See Ex. O, developer's calculation of permitted densities under alleged PUD boost)

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Moreover, the proposed project ,which is located in an R District, would not "include Commercial Uses **only to the extent that such uses are necessary to serve residents of the immediate vicinity**, subject to the limitations for NC-1 Districts under this Code." The Initial Study does not state that a rezoning from the RM-1 District would be sought. The project site is directly adjacent to the Laurel Village neighborhood commercial area, and one block away from the Sacramento Street neighborhood commercial area and one block away from Trader Joe's. Residents of the immediate vicinity are adequately served by retail uses.

Thus, the project may under no circumstances be excepted from any height limit established by **Article 2.5** of this Code under the Planned Unit Development provisions, because no exception is explicitly authorized by the terms of the Planning Code in a 40-foot Height and Bulk District. The Initial Study fails to substantiate the nature of the proposed deviations from the provisions for the measurement of height as being minor and fails to establish that such deviation shall not depart from the purposes or intent of Planning Code sections 260 and 261. The Preliminary Project Assessment already warned the project proponent not to attempt to measure heights from the Walnut Street extension because it is a walkway and not a public right-of-way.

Further, the project would not provide open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by this Code.

Since plan sheet G3.03 shows that the project proponent counted the paved Lower Walnut walkway and the approximately 16 foot front set back in front of proposed retail uses on California Street (described as California Plaza) as open space, the project does not comply with the open space requirements of Planning Code section 135 that "[u]sable open space shall be composed of an outdoor area or areas designed for outdoor living, recreation or landscaping, including such areas on the ground and on decks, balconies, porches and roofs, which are safe and suitably surfaced and screened, and which conform to the other requirements of this Section." Moreover, the Initial Study admits that "the network of proposed new common open spaces, walkways, and plazas within the project site" "would be shaded mostly by proposed new buildings for much of the day and year." IS p. 161. For this reason, as well, such network of new common open spaces does not qualify as open space under Planning Code section 135 because it is not "designed for outdoor living, recreation or landscaping."

The Housing Element EIR further explains that:

"For construction of new residential buildings and alteration of existing residential buildings in R Districts, Section 311 of the Planning Code requires consistency with the design policies and guidelines of the General Plan and with the Residential Design Guidelines that are adopted for specific areas. ...The guidelines apply to development in all RH and RM districts, and are intended to maintain cohesive neighborhood identity, preserve historic resources, and enhance the unique setting and character of the City and its residential neighborhoods.

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The guidelines are based on the following design principles, which are also used to determine compliance with the guidelines:

- Ensure that the building's scale is compatible with surrounding buildings.
- Ensure that the building respects the mid-block open space.
- Maintain light to adjacent properties by providing adequate setbacks.
- Provide architectural features that enhance the neighborhood's character.
- Choose building materials that provide visual interest and texture to a building.
- Ensure that the character-defining features of an historic building are maintained." Ex. C, p. V.A-34.

The Housing Element EIR also explains that Proposition M, codified in Planning Code section 101.1, established eight Priority Policies including "protection of neighborhood character," "landmark and historic building preservation," "protection of open space," and "preservation and enhancement of neighborhood-serving retail uses." Ex. C, p. V.A-41-42.

The Housing Element EIR explains that "[s]ection 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed height limit may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section." Ex. C, p. V.B-2. None of these exceptions apply to the proposed project.

The Initial Study uses an erroneous legal standard in determining that the project's potential conflicts with land use plans (and other impacts analyzed in the IS) need not be studied as a significant impact in the EIR. As explained in the Initial Study for the 1629 Market Street Project :

"The Initial Study evaluates the proposed 1629 Market Street Mixed Use Project to determine whether it would result in significant environmental impacts. The designation of topics as 'Potentially Significant' in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant." Ex. P,

p. 4.

The Initial Study for the 3333 California Street project acknowledges that the proposed project "would not conform to the existing RM-1 zoning and 40-X Height and Bulk District, and amendments to the planning code would be required as part of the proposed project or project variant." The Initial Study then puts forth the erroneous conclusion that if "the Board of Supervisors finds that amendments to the planning code are warranted to allow for implementation of the proposed project or project variant, the Board of Supervisors would adopt amendments to establish the Special Use District, which would resolve any conflicts between the planning code and the proposed project or project variant. To approve the proposed project or project variant, the city would be required to make findings of project consistency with the planning code. The proposed project or project variant, as approved, would thus be consistent with relevant plans and policies once amended." IS. p. 110-111. The project's proposed misuse of Special Use District procedures and other procedures was explained above. 7 (PP-1) cont'd

The Initial Study errs in claiming that to approve the proposed project, the city would be required to make findings of project consistency with the planning code. In certain circumstances, the city is required to find that a proposed project is consistent with provisions of the General Plan. Planning Code section 101.1. The proposed project would be inconsistent with provisions of the Urban Design Element and Housing Element of the General Plan for the reasons set forth above, including that the bulk of the buildings does not relate to the prevailing scale of development and would have an overwhelming or dominating appearance, and that the height of buildings does not relate to important attributes of the city patterns and the height and character of existing development. Urban Design Element Policies 3.5 and 3.6. Policy 3.6 explains that it was intended to avoid disruption to the city's character from buildings that reach extreme bulk, by exceeding the prevailing height and prevailing horizontal dimensions of existing buildings in the area which " can overwhelm other buildings, open spaces and the natural land forms, block views." Thus, these provisions of the general plan were adopted for the purpose of mitigating or avoiding an environmental effect. At the project site, the proposed new buildings would block public views from the open green spaces and significantly shadow open spaces and overwhelm other buildings.

Also, application of a Special Use District is authorized by the Housing Element to encourage production of affordable housing, not to authorize deviations from residential use district classifications for retail or commercial uses. The Housing Element EIR identified "Policy 7.5: Encourage the production of affordable housing through process and zoning accommodations and prioritize affordable housing in the review and approval processes" as one of the "Policies With Potential for Physical Environmental Impacts." Ex. C, p. IV-35. The Housing Element EIR acknowledged that "[i]mplementation of the 2009 Housing Element could result in impacts related to existing character if new housing is out of scale with development in an existing neighborhood or if new development is so different it would change the existing character of an

area." Such impacts would occur if a Special Use District or other deviations were used for the purposes proposed by the project proponent, especially for the improper purposes set forth above. The new buildings would still be out of scale with surrounding development and disrupt the area's character through their dominating appearance, so the significant adverse physical impacts would remain despite approval of an Special Use District under the circumstances requested by the project proponent. The project approval would not result in consistency with the policies of the Urban Design Element or Housing Element, because the IS does not identify those elements of the General Plan as proposed to be amended in connection with approval of the proposed project. IS p. 86.

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The Initial Study also improperly asserted that the impact on land use plans and policies would be less than significant because that the proposed project "would adhere to applicable environmental regulations, and therefore, would not conflict with policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect such that a substantial adverse physical change in the environment related would result." IS p. 111. This is an unsupported conclusion which is inadequate under CEQA and is contradicted by the evidence discussed herein. No explanation is provided as to the nature of the environmental regulations that would be complied with, the performance standards that would result in compliance or the specific expected management actions that would be taken. The IS's determination that regulatory compliance will be sufficient to prevent significant adverse impacts was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance.

Thus, the EIR must analyze the potentially significant impacts which the proposed project would have on conflicts with numerous applicable land use plans, policies and regulations, including those discussed herein, and the substantial impact that the proposed project would have upon the existing character of the vicinity. In the cumulative impact discussion, the Initial Study acknowledges that to some extent conflicts with land use plans and policies under the proposed project "could be embodied in a considerable contribution to a cumulative physical environmental impact" and "such cumulative physical impacts are addressed and analyzed under the specific environmental topics section in the initial study and will also be addressed in Chapter 4, Environmental Setting and Impacts, of the EIR." This statement constituted recognition that plans and policies with which the project would conflict were adopted for the purpose of avoiding or mitigating an environmental effect.

In addition, the Housing Element EIR recognized that :

> "Implementation of the 2004 Housing Element and 2009 Housing Element could result in impacts related to conflicts with existing land use policy, plans, or regulations if the Housing Elements resulted in housing development that was not consistent with zoning and land use designations as outlined in governing land use plans and/or the City's Planning Code to the extent those regulations help to avoid or mitigate potential

environmental impacts. For example, if a height limit in a particular area was designed to avoid impacting a view from a public vantage point, there could be an impact from a policy that increased the height limits." Ex. C, p. V.B-29. 7 (PP-1) cont'd

The proposed project's increased heights and bulk would conflict with existing public views from the publicly accessible open space that currently exists on the project site, including on Euclid, Laurel and Presidio avenues and the Terrace.

**5. The Project Could Have Significant Shadow Impacts on Existing Open Spaces that Have Been Used by the Public for Recreational Purposes, on Sidewalks on the East Side of Laurel Street, and on Publicly Accessible Open Space Proposed by the Project.** 8 (WS-2)

The City's Shadow Analysis Procedures and Scope Requirements state that the proposed project is subject to review under CEQA if it "would potentially cast new shadow on a park or open space such that the use and enjoyment of that park or open space could be adversely affected," and such procedures describe potentially affected properties as including "parks, publicly-accessible open spaces, and community gardens." (Ex. Q) Also, the 2017 Notice of Preparation of an EIR for a mixed use project states that "the topic of shadow will include an evaluation of the potential for the proposed project to result in shadow impacts on nearby sidewalks." (Ex. P, Initial Study for 1629 Market Street Project, p. 19)

The Initial Study states that the "threshold for determining the significance of shadow impacts under CEQA is whether the proposed project or project variant would create new shadow in a manner that substantially affects the use and enjoyment of outdoor recreational facilities or other public areas." IS p. 156.

The San Francisco Planning Department Shadow Analysis Procedures and Scope Requirements provide that a a shadow analysis would be required:

"If the proposed project is subject to review under the California Environmental quality Act (CEQA) and would potentially cast new shadow on a park or open space such that the use of enjoyment of that park or open space could be adversely affected." Ex. Q, p. 1.

Those procedures further provide that:

"Potentially Affected Properties. Potentially affected properties including: parks, publicly-accessible open spaces, and community gardens identified in the graphical depictions should be listed and described. The description of these properties should include the physical features and uses of the affected property, including but not limited to: topography, vegetation,

structures, activities, and programming. Each identified use should be characterized as 'active' or passive.' Aerial photographs should be included, along with other supporting photos or graphics. The programming for each property should be verified with the overseeing entity, such as the Port of San Francisco, the Recreation and Parks Department, etc. Any planned improvements should also be noted." Ex. Q, p. 2. 8 (WS-2) cont'd

The Initial Study failed to analyze the significance of the shadow impact upon the entire open green spaces used by the public for recreational purposes on the project site.

The Initial Study inaccurately stated that "UCSF currently grants public access" to two existing open green spaces at the perimeter of the project site. In fact, these areas have been used by the public without the permission of the property owner for many years. At the time of issuance of the Initial Study, there were no signs posted indicating that use of the open space was under the permission of the property owner. As explained in the attached letter from attorney Fitzgerald, the public has acquired permanent recreational rights to the open space at the site; the rights were obtained by implied dedication prior to the enactment of Cal. Civil Code section 1009 in 1972. Ex. R) The public has also "acquired a prescriptive easement over the recreational open space. The recreational use has been continuous, uninterrupted for decades, open and notorious and hostile (in this context, hostile means without permission.) Every day, individuals and their dogs use the green space along Laurel, Euclid and along the back of the Site at Presidio. Individuals ignore the brick wall along Laurel and regularly use the green space behind the wall as a park for people and for their dogs. The use of the Site has not been permissive." *Ibid.*

The Initial Study failed to analyze the impact of shadows on the entire open green space along Laurel, and excluded the open green space along Presidio, because the project proponent seeks permission to build upon, or alter, some of those areas. This is not an of-right project. As explained by the City's Preliminary Project Assessment, the proposed project fails to comply with numerous requirements of the Planning Code, and rezonings and discretionary approvals would be required to be granted by the Planning Commission and Board of Supervisors. Under applicable discretionary review procedures, the Planning Commission could scale the project back to avoid construction on, or alteration of, the currently publicly-accessible open spaces, and/or make other modifications.

Under Public Resources Code section 21068, a "Significant effect on the environment" means a substantial, or potentially substantial, adverse change in the environment.

Under the CEQA Guidelines, 14 Cal. Code of Regulations section 15382, "Significant effect on the environment" means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the

environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." To assess the changes to the environment that will result from the project, the agency treats existing conditions as the environmental baseline against which the project's changes to the environment are measured. 14 Cal. Code of Regulations section 15152.

8 (WS-2) cont'd

As established by the nomination of the property to the National Register of Historic Places, the "landscape design connects the outdoors with the indoors both functionally and conceptually." Ex. E, Nomination, p. 5. Among the character defining features of this historically significant resource, the nomination listed "Vegetation features that helps to integrate the character of the Fireman's Fund site with that of the surrounding residential neighborhoods including (1) the large trees in and around the East and West parking Lots, (2) the lawns on the west, south and east sides of the property, and (3) the planted banks along laurel and masonic streets." The subject lawn areas and the Terrace are currently used as publicly-accessible open spaces, and it is possible that the approving agencies will retain them as open spaces. These areas would be significantly shaded by the proposed project, with the 2-3 floors proposed to be added to the top of the building. Thus, significantly shading these areas should be treated as a potentially significant impact on the environment in the EIR.

However, the Initial Study failed to analyze the significance of the shadow impact on the entire open green areas and merely analyzed the potential impact upon the portions of these areas that the project proponent proposes not to build upon. However, Figure 37, Extent of Net New Project Shadow Throughout the Day and Year, shows the entire open green spaces along Laurel Street and Presidio Avenue as in the "frequent shadow" zone. IS p. 158. The area in which the Terrace is located would also be frequently shadowed, and the project as proposed would remove the Terrace. The Initial Study shows that there would be a significant adverse shadow impact upon the areas along Laurel Street, Presidio Avenue and the Terrace which the project proponent proposes to build upon or alter, and the Initial Study failed to analyze the potentially significant impact of shadows on these publicly-accessible areas and failed to make a determination that impacts on these areas would not be significant. Thus, the EIR should analyze the potential shadow impacts on these areas as potentially significant impacts under CEQA. Approving authorities may retain some or all of these open spaces. The Initial Study failed to use the correct significance standard, which required it to analyze whether impacts on these areas could be "potentially significant." The Initial Study's exclusion of these areas because they would possibly be within part of the built project was erroneous. The Initial Study acknowledges that the decision-makers could modify the project to continue the usability of these spaces. IS p. 160.

Since the evidence shows that new shadows would be frequent on the publicly-accessible open spaces, the EIR should evaluate these shadows as a potentially significant impact on the environment. As acknowledged in the Initial Study for 1629 Market Street Project, the "designation of topics as 'Potentially Significant' in the Initial Study means that the EIR will

consider the topic in greater depth and determine whether the impact would be significant." Ex. P, p. 4. 8 (WS-2) cont'd

Similarly, the Initial Study shows that the proposed project would cause frequent shadows on the sidewalks on the east side of Laurel Street. The Initial Study failed to specifically determine that the proposed project would not create new shadow on the sidewalks on the east side of Laurel Street in a manner that substantially affects public areas. Instead, it determined that impact would not be significant by using a lesser standard, stating that "[o]verall, the proposed project or project variant would not increase the amount of shadow on the sidewalks above levels that are common and generally expected in developed urban environments." IS p. 160. Since the evidence shows that the new shadow would be frequent on sidewalks on the east side of Laurel Street, the EIR must evaluate this shadow as a potentially significant impact on the environment and make a determination of whether the impact would be significant under the correct significance standard.

As acknowledged in the Initial Study for 1629 Market Street Project, to determine the impact insignificant, a determination must be made under CEQA that the proposed project's net new shadows would not be anticipated to substantially affect the use of "any publicly-accessible areas, including nearby streets and sidewalks." Ex. P, p. 66.

In addition, the Initial Study shows that the proposed project would cause new shadows on the open space proposed to be used in the project, which would be open to the public. " The Initial Study admits that "the network of proposed new common open spaces, walkways, and plazas within the project site" "would be shaded mostly by proposed new buildings for much of the day and year." IS p. 161. Thus, the EIR must analyze shadow impacts on these publicly-accessible areas as significant impacts, but the IS improperly excluded them from analysis as significant impacts. Many of these areas are not now significantly shaded as part of the existing environment, but would be a a result of the proposed project.

The EIR should follow the City's shadow analysis procedures and identify and describe all the potentially newly shadowed areas discussed above in graphic depictions together with aerial photographs and provide a quantitative analysis of the impacts that would result from the project. Ex. Q, p. 4.

In addition, it is inaccurate to state that under the proposed project, the Euclid Green "would be developed as common open space that would be open to the public." IS p. 160. That green open space is currently used as recreational open space by the public, as I have observed.

It should be noted that shadows are physical impacts, not aesthetic impacts exempt from CEQA in certain transit-served areas. The EIR on the Housing Element of the San Francisco General Plan clearly treats shadows as a physical effect along with wind impacts and analyzes aesthetic

impacts in a separate section. Ex. C - Final EIR 2004 and 2009 Housing Element p. V.J-3, V.C-1. As further explained in that EIR: 8 (WS-2) cont'd

> "Shadow is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed 'shadow sensitive.' (Ex. C - Final EIR 2004 and 2009 Housing Element p. V.J-3)

Thus, shadows are a physical impact and are not an aesthetic impact.

**6. The Proposed Project Could Have a Significant Hazard and Hazardous Materials Impact.** 9 (HZ-1)

The Initial Study states that hazards or hazardous material would be significant if the project would:

> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials,
>
> 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.
>
> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
>
> Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. IS p. 227-228.

The Initial Study acknowledges that during construction, particularly excavation and grading, construction workers would be exposed to chemicals in the soil and groundwater through skin contact, ingestion or inhalation of airborne dust or vapors, and the "public, including nearby offsite residents and future site occupants, could be exposed to these chemicals through inhalation of airborne dust or vapors or contact with accumulated dust if proper precautions were not implemented." IS p. 232.

Langan Treadwell Rollo evaluated the additional samples collected in August 2014 from the location of the former onsite USTs following removal of the waste oil UST against the environmental screening levels for commercial uses, but the San Francisco Health Department

requested that the soil gas results for the site be compared to current environmental screening levels for residential uses. IS p. 229-230. Volatile organic compounds were detected in soil gas at concentrations exceeding residential environmental screening levels, at two of seven sampling locations. IS p. 230. "The health department also requested that a site mitigation plan and a demolition and construction dust control plan be prepared for the site. The site mitigation plan would include soil and groundwater handling procedures, designs for minimization measures that control human exposure to remaining hazardous substances, an environmental contingency plan, and a health and safety plan....All compliance documentation would be reviewed and approved by the health department." IS p. 230. 9 (HZ-1) cont'd

However, the Housing Element EIR states that "redevelopment of former commercial and industrial sites to residential uses would be required to undergo remediation and cleanup under DTSC and the SFBRWQCB before construction activities could begin. If contamination at any specific project were to exceed regulatory action levels, the project proponent would be required to undertake remediation procedures prior to grading and development under the supervision of the City's SFDPH, HMUPA, or the SFBRWQCB (depending on the nature of any identified contamination). Ex. C, p. V.Q-42.

The Initial Study does not disclose the mitigation measures that the site mitigation plan would provide, including soil and groundwater handling procedures, designs for minimization measures that control human exposure to remaining hazardous substances, an environmental contingency plan, and a health and safety plan. An agency may not rely upon a corrective action plan to mitigate potential impacts of site contamination when the plan's mitigation measures are not disclosed in the record. *Citizens for Responsible Equitable Environmental Development v. City of Chula Vista* (2011) 197 Cal.App.4th 327, 332. Since the Initial Study has not disclosed the mitigation measures that would be used, the EIR must analyze the project's impact from hazardous materials as a significant impact, and analyze mitigation measures. The Initial Study has not disclosed the soil and groundwater handling procedures, designs for minimization measures that control human exposure to remaining hazardous substances, an environmental contingency plan, or a health and safety plan, which the public health department would require.

Since specific mitigation measures have not been developed, disclosed and adopted as a condition of approval of the project, the potentially significant impacts from hazards and hazardous materials has not been mitigated to a level of insignificance. The IS's determination that regulatory compliance will prevent significant adverse impacts was not based on a project specific analysis of potential impacts, potential mitigation measures and the specific effect of regulatory compliance. The Initial Study has not explained the effect of regulatory compliance, identified methods the agencies will consider for mitigating the impact or indicated the expected outcome. By relying on a hope of compliance with regulations that apply to transitory conditions, such as excavation or construction activities that could release hazardous substances, and do not require onsite monitoring to determine compliance, the IS failed to perform a careful

analysis that would be sufficient to find the impact not significant. Thus, the impact remains significant and must be fully analyzed in the EIR, with review and mitigation approved by all agencies with jurisdiction over the nature of any identified contaminants. 9 (HZ-1) cont'd

Since LTR compares soil gas results to the Environmental Screening levels published by the San Francisco Regional Water Quality Control Board, review and approval of mitigation plans by DTSC and the SFBRWQCB may be required in addition to review and approval by the San Francisco Department of Public Health. The EIR should analyze the whether the soil gas detections are under the jurisdiction of DTSC and the SFBRWQCB or other agencies besides the San Francisco Department of Public Health and whether the mitigation plan conforms with the supplemental vapor intrusion guidance document for conducting uniform vapor intrusion evaluations in California expected to be released in mid-2018 by the State Water Resources Control Board, the San Francisco Bay Regional Water Quality Control Board, and the Department of Toxic Substances Control. IS, FN302.

Moreover, the Initial Study evaluates only whether the low levels of volatile organic compounds which were detected in soil gas would pose a vapor intrusion concern for commercial or residential residents at the Plaza A building. However, the impact could be significant if a member of the public, such as a resident across the street from the project site, could be exposed to such soil gas released during construction. The EIR should analyze potential impacts on the public and nearby residents of release into the air of such soil gas and also analyze whether such emissions could be emitted within one-quarter mile of a school.

In addition to contamination from the USTs, the Initial Study discloses that "the site may contain onsite hazardous waste associated with medical uses, such as radioactive materials or other contaminants that may be contained within the existing onsite fume hoods, centrifuges, refrigerators, and waste storage containers. There is also the potential for contaminants, including minor radioactive contamination, in the facility plumbing system from disposal of secondary washes. Currently this hazardous waste is properly disposed of offsite under manifest." IS p. 233.

While UCSF would remove much of the chemicals and radioactive materials as part of their relocation, the date of their relocation is uncertain, as is the manner of disposal of the remaining materials. What is the date on which UCSF employees would be relocated from the site? The Initial Study states that any remaining medical hazardous waste would be disposed of in an approved facility during building demolition or reuse and would not pose a significant hazard to the public or the environment if applicable federal, state and local regulations are followed. IS 233. The Initial Study does not indicate the identified methods the agencies will consider for mitigating the impact, adopt specific mitigation measures, explain the effect of regulatory compliance or indicate the expected outcome. Thus, the potentially significant impact from medical hazardous waste, including radioactive contamination in the plumbing system from

disposal of secondary washes, must be analyzed as a potentially significant effect in the EIR, together with all appropriate mitigation measures. The EIR should include as a mitigation measure the preclusion of connection of the piping system used for disposal of secondary washes containing minor radioactive contamination with the proposed graywater reeycling system proposed to be installed and used on the property. Without such mitigation, water containing radioactive waste contamination could be used for irrigation onsite and the radioactive materials could be spread onsite. 9 (HZ-1) cont'd

> **MITIGATION MEASURE.** No piping onsite which was used for medical uses, including disposal of secondary washes containing radioactive material, may be connected with any piping used in the graywater recycling system proposed to be installed on the property and used for onsite irrigation and other uses. The project proponent will be required to execute a binding agreement to implement such mitigation measure as a condition of approval of the project.

In addition, the Initial Study states that the building may contain hazardous building materials such as asbestos, lead-based paint, electrical transformers containing PCBs, flourescent light ballasts containing PCBs or other contaminants, and flourescent light tubes containing mercury vapors, which could escape in the environment and pose concerns for construction workers and the public if not properly handled or disposed of in accordance with applicable regulations. Again, the impact must be evaluated as a significant impact in the EIR because the Initial Study does not indicate the identified methods the agencies will consider for mitigating the impact, adopt specific mitigation measures, explain the effect of regulatory compliance or indicate the expected outcome. The project proponent proposes to expose substantial amounts of such materials, as it proposes to demolish substantial portions of the existing building and cut a large hole in the building for a passageway.

Also, the Initial Study states that bedrock which would be encountered during site excavation includes serpentinite, which contains naturally occurring asbestos, and during project excavation, naturally occurring asbestos minerals may present a human health hazard if they become airborne and are inhaled. IS p. 235. The Initial Study states that the construction contractor would be required to prepare an asbestos dust mitigation plan specifying measures that would be taken to ensure that no "visible" dust crosses the property boundary during construction. However, the Initial Study indicates that the 17 California Code of Regulations section 93105 requires the use of best available dust mitigation measures to prevent the offsite migration of asbestos-containing dust. Again, the impact must be evaluated as a significant impact in the EIR because the Initial Study does not indicate the identified methods the agencies will consider for mitigating the impact, adopt specific mitigation measures, explain the effect of regulatory compliance or indicate the expected outcome.

Also, under Appendix G of the CEQA Guidelines project hazards and hazardous materials would

be significant impact if the project would:

> "Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school." Ex. B.

9
(HZ-1)
cont'd

The Housing Element EIR uses the same significance standard Ex. C, p. V.Q-40.

The Initial Study identifies several schools/daycare centers are located within a quarter mile of the project site, that states that demolition and construction activities would require handling and transport of hazardous wastes. However, the IS improperly relies upon unspecified future regulatory compliance as the basis for a conclusion that "there would be limited potential for such materials to affect the nearest school." IS p. 237. The significance standard is triggered by a release within one-quarter mile of an existing school. For the reasons stated above, reliance upon unspecified future regulatory compliance is not sufficient to mitigate the adverse impact, and the potential that such materials could be emitted within one-quarter mile of a school requires the potentially significant impact to be analyzed in the EIR as a significant impact, together with specified mitigation measures that will be incorporated as conditions of approval of the proposed project.

The Initial Study admits that the project site is currently on the Leaking Underground Storage Tank Sites list maintained by the State Water Resources Control Board and "is included on other lists of hazardous materials sites compiled pursuant to Government Code section 65962.5. The listings are related to public notice requirements for permitted activities such as air emissions reporting for onsite activities, small quantity generation of hazardous waste in the medical laboratories, and the former USTs discussed in Impact HZ-2." IS p. 238. However, the Initial Study is incomplete and inadequate because it does not identify the other lists of hazardous materials sites compiled pursuant to Government Code section 65962.5 on which the project site is included. The EIR must disclose each such site which lists the project site and the nature of the listing so that potential impacts from hazards and hazardous materials can be evaluated.

Thus, the City has failed to comply with the procedures required by CEQA, because Public Resources Code section 21092.6 requires the agency to include in the draft EIR any information derived from consultation of Government Code section 65962.5 (the Cortese list), but the Initial Study states that it will not further address the issue of hazardous materials or waste. Ex. S, CEB, *Practice Under CEQA*, section 13.65 p. 13-74. The City has failed to include in the IS the information "on other lists of hazardous materials sites compiled pursuant to Government Code section 65962.5. The listings are related to public notice requirements for permitted activities such as air emissions reporting for onsite activities, small quantity generation of hazardous waste in the medical laboratories, and the former USTs discussed in Impact HZ-2." IS p. 238. The City must state all information contained in the listings on such other sites in the Draft EIR.

**7. The Proposed Project Could Have a Significant Adverse Impact on Greenhouse Gas Emissions.** 10 (GHG-1)

The Initial Study states that the project's impact on greenhouse gas emissions ("GHG") would be significant if it would:

> "Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment" or
>
> "Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases." IS p. 146.

New CEQA Guideline section 15064.4, on the determination of significance of GHG emissions, reflects the existing CEQA principle that there is no iron-clad definition of "significance." CEQA Guidelines section 15064(b). Accordingly, lead agencies must use their best efforts to investigate and disclose all that they reasonably can regarding a project's potential adverse impacts. *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm.* (2001) 91 Cal.App.4th 1344, 1380-81; Ex. T, California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009. Section 15064.4 is designed to assist lead agencies in performing that required investigation. *Id.*, p. 20; In particular, it provides that lead agencies should quantify GHG emissions where quantification is possible and will assist in the determination of significance, or perform a qualitative analysis, or both as appropriate in the context of the particular project, in order to determine the amount, types and sources of GHG emissions resulting from the project. *Ibid.* Regardless of the type of analysis performed, the analysis must be based "to the extent possible on scientific and factual data." *Ibid.* In addition, lead agencies should also consider several factors. *Ibid.*

As further explained in *Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, December 2009, pp. 21-22:

> "With the foregoing principles in mind, the quantification called for in proposed section 15064.4(a)(1) is reasonably necessary to ensure an adequate analysis of GHG emissions using available data and tools, in accordance with Public Resources Code Section 21083.05. Even where a lead agency finds that no numeric threshold of significance applies to a proposed project, the holdings in the *Berkeley Jets and Protect the Historic Amador Waterways cases,* described above, require quantification of emissions if such quantification will assist in determining the significance of those emissions. OPR and the Resources Agency find that quantification will, in many cases, assist in the determination of significance, as explained below. (State CEQA Guidelines, § 15142 ("An EIR shall be prepared using an interdisciplinary approach which will ensure the integrated use of the

natural and social sciences and the consideration of qualitative as well as quantitative factors.").)

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(GHG-1)
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First, quantification of GHG emissions is possible for a wide range of projects using currently available tools. Modeling capabilities have improved to allow quantification of emissions from various sources and at various geographic scales. (Office of Planning and Research, *CEQA and Climate Change: Addressing Climate Change Through the California Environmental Quality Act Review*, Attachment 2: Technical Resources/Modeling Tools to Estimate GHG Emissions (June 2008); CAPCOA White Paper, at pp. 59-78. Moreover, one of the models that can be used in a GHG analysis, URBEMIS, is widely used in CEQA air quality analyses. (CAPCOA White Paper, at p. 59) Second, quantification informs the qualitative factors listed in proposed section 15064.4(b). Third, quantification indicates to the lead agency, and the public, whether emissions reductions are possible, and if so, from which sources. Thus, if quantification reveals that a substantial portion of a project's emissions result from energy use, a lead agency may consider whether design changes could reduce the project's energy demand.

Proposed section 15064.4(a)(1) also reflects existing case law that reserves for lead agencies the precise methodology to be used in a CEQA analysis. (See, e.g. *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357, 371-373.) As indicated above, a wide variety of models exist that could be used in a GHG analysis. (CAPCOA White Paper, at pp. 59-78.) Further, not every model will be appropriate for every project. For example, URBEMIS may be an appropriate tool to analyze a typical residential subdivision or commercial use project, but some public utilities projects, such as waste-water treatment plants, may require more specialized models to accurately estimate emissions. (*Id.* at pp. 60-65.) The requirement to disclose any limitations in the model or methodology chosen also reflects the standard for adequacy of EIRs in existing State CEQA Guidelines section 15151...

If the lead agency determines that quantification is not possible, would not yield information that would assist in analyzing the project's impacts and determining the significance of the GHG emissions, or is not appropriate in the context of the particular project, section 15064.4(a) would allow the lead agency to consider qualitative factors or performance criteria...

The existing CEQA Guidelines state that the determination of significance requires a lead agency to use its judgment based on *all* relevant information. (State CEQA Guidelines, § 15064(b); see also *Id.* at §§ 15064.7 (thresholds may be qualitative), 15142 (analysis should be interdisciplinary and both qualitative and quantitative.).)

Subdivision (a) would also allow a lead agency to rely on performance-based standards to

assist in the determination of significance. Just as with quantification, the purpose of engaging in a qualitative or performance standard based analysis is to develop information relevant to a significance determination. Several examples exist of the types of performance standards that might appropriately be used in determining the significance of greenhouse gas emission. Proposed section 15183.5(b)(1)(D), for example, contemplates that a plan for the reduction of greenhouse gas emissions may contain performance based standards. Where such standards are developed as part of such a plan, a lead agency would have evidence indicating that compliance with such standards would indicate that the impact of greenhouse gas emissions would be less than significant. Further, in adopting SB375, the Legislature acknowledged that regional transportation plans, and the environmental impact reports prepared to analyze those plans, may contain performance standards that would apply to transit priority projects. (See, e.g., Public Resources Code, § 21155.2.) Other potential examples include the Bay Area Air Quality Management District's proposed Best Management Practices for Construction Greenhouse Gas Emissions (calling for use of alternative fuels, local building materials and recycling), and the California Public Utilities Commission's Performance Standard for Power Plans [sic] (requiring emissions no greater than a combined cycle gas turbine plant). Compliance with such standards may be relevant to the significance determination, when considered in conjunction with the project's total projected emissions... 10 (GHG-1) cont'd

Similar to use of a significance threshold, a lead agency must exercise care to ensure that performance standards do not replace a full analysis of all potential emissions. *(Protect the Historic Amador Waterways, supra*, 116 Cal.App.4th at 1109 ("in preparing and EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect.).) For example, while a Platinum LEED ® rating could assist a lead agency in determining whether emissions related to a building's energy use may be significant, that performance standard may not reveal sufficient information to evaluate transportation-related emissions associated with that proposed project.

As indicated above, even a qualitative analysis must be based to the extent possible on scientific and factual data. Further, the type of analysis that is required will depend on the context of a particular project....The following hypothetical examples may illustrate, however, how section 15064.4(a) could operate:

> **Project 2**: a large commercial development is proposed in an suburban context. Heavy-duty machinery would be required in various construction phases spanning many months. Following construction, the development would rely on electricity, water and wastewater services from the local utilities. Natural gas burners would be used on site. The development would employ several hundred workers and

> attract thousands of customers daily. A traffic study has been prepared for the project. The local air quality management district's guidance document recommends that projects of similar size and character should use URBEMIS, or another similar model, to estimate the air quality impacts of the development.

10 (GHG-1) cont'd

In the context of Project 2 a quantitative analysis would likely be appropriate. The URBEMIS model, which would likely be used to analyze other emissions, could also be used to estimate emissions from both project-related transportation and on-site indirect emissions (landscaping, hot-water heaters, etc.) Modeling is typically done for projects of like size and character. Other models are readily available to estimate emissions associated with utility use. In the context of Project 2, a lead agency may find it difficult to demonstrate a good faith effort through a purely qualitative analysis. (See, e.g., *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm.* (2001) 91 Cal.App.4th 1344, 1370...

Factors Potentially Indicating Significance

The qualitative factors listed in the proposed secton 15064.4(b) are intended to assist lead agencies in collecting and considering information relevant to a project's incremental contribution of GHG emissions and the overall context of such emissions. Notably, while subdivision (b) provides a list of factors what should be considered by public agencies in determining the significance of a project's GHG emission, other factors can and should be considered as appropriate.

Determine Whether Emissions Will Increase or Decrease

The first factor in subdivision (b), for example, asks lead agencies to consider whether the project will result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting. All project components, including construction and operation, equipment and energy use, and development phases must be considered in this analysis. (State CEQA Guidelines, § 15378 (Project includes "the whole of the action").)...

This section's reference to the 'existing environmental setting' reflects existing law requiring that impacts be compared to the environment as it currently exists. (State CEQA Guidelines, § 15125.) This clarification is necessary to avoid a comparison of the project against a 'business as usual' scenario as defined by ARB in the Scoping Plan. Such an approach would confuse 'business as usual' projections used in ARB's Scoping Plan with CEQA's separate requirement of analyzing project effects in comparison to the environmental baseline. (*Compare* Scoping Plan, at p. 9 ('The foundation of the Proposed Scoping Plan's strategy is a set of measures that will cut greenhouse gas

emissions by nearly 30 percent by the year 2020 as compared to business as usual.' *with Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (existing environmental conditions normally constitute the baseline for *environmental* analysis); see also *Center for Bio. Diversity v. City of Desert Hot Springs*, Riverside Sup. Ct. Case No. RIC464585 (August 6, 2008) (rejecting argument that a large subdivision project would have a 'beneficial impact on CO2emissions' because the homes would be more energy efficient and located near relatively uncongested freeways). Business as usual may be relevant, however, in the discussion of the 'no project alternative' in an EIR. (State CEQA Guidelines, § 15126(e)(2) (no project alternative should describe what would reasonably be expected to occur in the future in the absence of the project).)...

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(GHG-1)
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Thresholds of Significance

The second factor in subdivision (b) asks whether a project exceeds a threshold of significance for GHG emissions...

Several agencies have developed, or are in the process of developing, thresholds of significance for GHG emissions. For example, thresholds are currently being developed, or have already been adopted by the Bay Area Air Quality Management District for operations and construction, the City of Davis for residential developments, and the South Coast Air Quality Management District for industrial projects. Regardless of the threshold chose, however, this section does not alter the pre-existing rule under CEQA that if substantial evidence supports a fair argument that a project may result in significant impacts, despite *compliance* with a threshold, an EIR must be prepared. (*Meija v. City of Los Angeles* (2005) 130 Cal. App.4th 322, 342.) Further, 'in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established thrshold of significance has been met with respect to any given effect." (*Protect the Historic Amado Waterways, supra,* 116 Cal.App.4th at 1109.)

Consistent with the above, if relying on a threshold developed by another agency, lead agencies must exercise caution in selecting a threshold to ensure that the threshold is appropriately applied...Some agencies have adopted 'thresholds' pursuant to other laws that may not be applicable in the CEQA context. ARB has adopted several thresholds pursuant to AB32, for example, to address specific purposes that are unrelated to CEQA. For example, the *de minimus* threshold governs the level at which emissions will be regulated by ARB's AB 32 regulations. (Health & Safety Code, § 38561(e); Scoping Plan, at pp. 96-97.) CEQA does not permit use of a *de minimus* threshold, however...Additionally, the Reporting Threshold is the level at which emissions from large industrial sources are required to be reported.

Consistency with a Plan or Regulation

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(GHG-1)
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Finally, the third factor in subdivision (b) directs consideration of the extent to which a project complies with a plan or regulation to reduce GHG emissions. That section further states, however, that to be used for the purpose of determining significance, a plan must contain specific requirements that result in reductions of GHG emissions to a less than significant level. This clarification is necessary because of the wide variety of climate action plans and GHG reduction plans that are currently being adopted by public agencies. ARB, for example, recently adopted its statewide Scoping Plan. That plan may not be appropriate for use in determining the significance of individual projects, however, because it is conceptual at this state and relies on the future development of regulations to implement the strategies identified in the Scoping Plan. (Scoping Plan, at p. 9.) Regulations that will require actual reductions of GHG emissions may not be adopted until 2012. (*Ibid.*) Once those regulations are adopted and being implemented, they may, if appropriate, be used to assist in the determination of significance, similar to the current use of air quality, water quality and other similar environmental regulations. (*CBE, supra* 103 Cal.App.4th at 111...

In addition to the regulations that will be developed to implement the Scoping Plan, this factor would also allow lead agencies to consider plans that are developed to reduce GHG emissions on a regional or local level. (Scoping Plan, at p. 26.) The proposed section 15064.4(b)(3) is intended to be read in conjunction with the section 15064(h)(3), as proposed to be amended, and proposed section 15183.5. Those sections each indicate that local and regional plans may be developed to reduce GHG emissions. If such plans reduce community-wide emissions to a level that is less than significant, a later project that complies with the requirements in such a plan may be found to have a less that significant impact.

Notably, CEQA does not provide a specific definition of 'comply' in the context of determining a project's consistency with a particular plan. Some guidance may be gleaned, however, from case law interpreting the requirements that a local government's activities be consistent with its General Plan. In that context, a 'zoning ordinance [for example] is consistent with the city's general plan where, considering all of its aspects, the ordinance furthers the objectives and policies of the general plan and does not obstruct their attainment.' (*City of Irvine v. Irvine Citizens Against Overdevelopment* (1994) 25 Cal.App.4th 868, 879.) **Reading section 15064.4 together with 15064(h)(3), however, to demonstrate consistency with an existing GHG reduction plan, a lead agency would have to show that the plan actually addresses the emissions that would result from the project.** Thus, for example, a subdivision project could not demonstrate 'consistency' with the ARB's Early Action Measures because those measures do not address emissions resulting from a typical housing subdivision. (ARB,

Expanded List of Early Action Measures for Reduce Greenhouse Gas Emissions in California Recommended for Board consideration, October 2007; see also State CEQA Guidelines, §§ 15063(d)(3) (initial study must be supported with information to support conclusions), 15128 (determination in an EIR that an impact is less than significant must be briefly explained).) (Emphasis added)

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(GHG-1)
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**SECTION 15064.7. THRESHOLDS OF SIGNIFICANCE**

**Specific Purposes of the Amendment**

Proposed subdivision ( c) of section 15064.7 would allow a lead agency to adopt a threshold developed by another agency, or recommended by experts, provided that such threshold is supported with substantial evidence...In adopting any threshold of significance, including one developed by an expert or agency with specialized expertise, the lead agency must support the threshold with substantial evidence in the administrative record. (State CEQA Guidelines, § 15064.7(b).)...Because any threshold must be supported with substantial evidence, and must be adopted through a public process, any threshold recommended by an expert that is ultimately adopted will undergo sufficient scrutiny to ensure its legitimacy. (State CEQA Guidelines, § 15064.7(b).)

**SECTION 15126.4 CONSIDERATION AND DISCUSSION OF MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS.**

**Specific Purposes of the Amendment.**

Section 21083.05 of the Public Resources Code expressly requires OPR and the Resources Agency to develop regulations on the 'mitigation of greenhouse gas emissions.' The goals of this legislative mandate are to (1) reduce GHG emissions and (2) to provide consistency in the development of GHG emissions reduction measures...

Existing section 15126.4 provides guidance on CEQA's general mitigation requirements. To emphasize that mitigation of GHG emissions is subject to those existing CEQA requirements, OPR and the Natural Resources Agency added a new subdivision ( c) to the existing section 15126.4. The Amendments identify five general methods of mitigation that may be tailored to the specific circumstances surrounding a specific project...

Mitigation of Greenhouse Gas Emissions

Comments submitted on the Amendments indicated general concerns that mitigation for GHG emissions may not be effective or reliable. To further clarify the existing mitigation requirements that would apply to measures to reduce greenhouse gas emissions, the

Natural Resources Agency revised the lead-in sentences in subdivision ( c). Specifically, the Natural Resources Agency added that all mitigation must be supported with substantial evidence and be capable of monitoring or reporting. This addition reflects the requirement in Public Resources Code that a lead agency's findings on mitigation be supported with substantial evidence and that it must adopt a mitigation monitoring and reporting program along with the project if mitigation measures are required. (Public Resources Code, §§ 21081(a)(1), 21081.6.)... 10 (GHG-1) cont'd

Consistent with section 15126.4)a), a lead agency must support its choice of, and its determination of the effectiveness of, any reduction measures with substantial evidence. Substantial evidence in the record must demonstrate that any mitigation program or measure is [sic] will result in actual emissions reductions...

**Measures to be Implemented on a Project-by-Project Basis**

Finally, the fifth type of measure that could reduce GHG emissions at a planning level is the development of binding measures to be implemented on a project-specific basis. Proposed subdivision ( c)(5) recognizes that, for a planning level decision, appropriate mitigation of GHG emissions may include the development of a program to be implemented on a project-by-project basis...

This type of mitigation is subject to the limits of existing law, however, Thus, proposed subdivision ( c) (5) should not be interpreted to allow deferral of mitigation. Rather, it is subject to the rule in existing section 15126.4 (a) (1)(B) that such measures 'may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.'

**SECTION 15130. DISCUSSION OF CUMULATIVE IMPACTS**

**Specific Purposes of the Amendment**

Section 15130(b)(1)(B)

Section 21083(b) of the Public Resources Code requires that an EIR be prepared if the 'possible effects of a project are individually limited but cumulatively considerable.' that section further defines 'cumulatively considerable' to mean that 'the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.'

In determining whether a project may have significant cumulative impacts, a lead agency

> must engage in a two-step process. First, it must determine the extent of the cumulative problem. To do so, a lead agency must examine the 'effects of past projects, the effects of other current projects, and the effects of probably future projects.' Once it does so, the lead agency then determines whether the project's incremental contribution to that problem is cumulatively considerable...
>
> The existing Guideline section 15130(b) addresses the first step of the process. It offers two options for estimating the effects resulting from past, present and reasonably foreseeable projects. A lead agency may either rely on a list of such projects, or a summary of projections to estimate cumulative impacts. Existing section15130(b)(1)(B) allows a lead agency to rely on projections in a land use document or certified environmental document that addresses the cumulative impact under consideration...
>
> The proposed amendments would also allow a lead agency to rely on information provided in regional modeling programs. The best projections of the cumulative effect of GHG emissions may be available in up-to-date models such as the International Council for Local Environmental Initiative's Local Government GHG Protocol and the California Climate Action Reserve's Registry general, industry and project type protocols. (Ex. T, California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 97,* pp. 20-28, 30, 46, 49, 50, 53, 54)

10 (GHG-1) cont'd

The Initial Study failed to quantify GHG emissions that could result from the proposed project, and such quantification is reasonably necessary to ensure adequate analysis of GHG emissions using available data and tools, and such quantification would assist in determining the significance of those emissions. URBEMIS is one model that is widely used in CEQA air quality analyses and can also be used to analyze a project's GHG emissions. In fact, the local air quality management district's guidance document recommends that projects of a similar size and character to a large commercial development proposed in a suburban context "should use URBEMIS, or another similar model, to estimate the air quality impacts of the development..." Ex. T, p. 23.

In addition, in June 2010, the BAAQMD adopted recommended thresholds with two alternatives for determining significance for most nonindustrial development projects. One is a bright-line threshold of 1100 MT/year of carbon dioxide equivalent emissions. The other recommended threshold is a per capita threshold of 4.6 MT/yr of CO2-equivalent emissions, based on the service population of the project. Ex. S, CEB, *Practice Under the California Environmental Quality Act,* § 20.81A, p. 20-100.

The Housing Element EIR states that BAAQMD has updated their CEQA air quality guidelines and "adopted significance standards for GHGs on June 2, 2010." The updated CEQA Air

Quality Guidelines includes significance thresholds, assessment methodologies, and mitigation strategies for GHG emissions. Ex. C, p. V.I-12. The recently adopted GHG thresholds of significance, as discussed in BAAQMD's May 2010 CEQA Air Quality Guidelines, includes two sets of GHG thresholds: one that would apply to specific development projects, and another threshold that would apply to plan-level CEQA analysis. *Ibid.* 10 (GHG-1) cont'd

The California Resources Agency has identified "the Bay Area Air Quality Management District's proposed Best Management Practices for Construction Greenhouse Gas Emissions (calling for use of alternative fuels, local building materials and recycling" as performance-based standards that are appropriate to use in determining significance of GHG emissions. Ex. T, p. 22.

The Initial Study has not provided substantial evidence that the project's GHG emissions, and/or the project's percentage reduction from business as usual ("BAU") correlates with statewide, regional or local goals. The IS's claim that GHG impacts would not be significant was not supported by substantial evidence that the project's energy-efficiency goals, construction- related GHG emission goals, and transportation-related GHG emission goals would be reached.

Moreover, the IS failed to consider "whether the project will result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting. All project components, including construction and operation, equipment and energy use, and development phases must be considered in this analysis." Ex. T, p. 24. Instead, the IS evaluated the project's consistency with applicable local and regional plans for GHG reduction rather than considering whether the project will "result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting." Thus, the IS erroneously used existing plans as the baseline against which potential project effects were analyzed, instead of increases or decreases in different types of GHG emissions relative to the existing environment.

The IS's consistency evaluation was supported by the bald claim that the project would comply with various regulations and programs relating to energy efficiency, waste reduction, tree planting and landscaping, etc. This analysis was inadequate because it was not based on a project specific analysis of potential impacts and the specific effect of regulatory compliance. Also, the environmental evaluation did not commit the project sponsor to implementation of specific performance criteria as mitigation measures agreed as a condition of approval of the project or objective performance criteria for measuring whether the project would achieve the goals of such programs or regulations.

The Initial Study states that "construction-related emissions would still have the potential to conflict with or obstruct implementation of the applicable air quality plan...Both construction and long-term operational emissions have the potential to result in emissions that could conflict with or obstruct implementation of the applicable air quality plan. IS p. 144. "As described above, construction and operation of the proposed project or project variant would generate criteria air

pollutant and ozone precursor emissions that would contribute to regional air emissions and affect regional air quality. It is possible that the levels of emissions generated during construciton or operation could violate or contribute substantially to an existing or projected air quality violation." IS pp. 144-145. 10 (GHG-1) cont'd

The Initial Study's claim that the project would comply with various plans or regulations to reduce GHG emissions is also deficient because the IS has failed to show that the plans or regulations contain specific requirements that would result the proposed project's reducing GHG emissions to a less than significant level. Ex. T, p. 26. The IS has failed to show that the referenced plans or regulations actually address that emissions that would result from this proposed project or project variant. Ex. T, p. 27.

Thus, the IS has failed to comply with CEQA because it has failed to determine the extent to which the proposed project either increases or decreases GHG emissions, by comparing the project's emissions to the current environment and whether the anticipated GHG emissions associated with the project exceed a threshold of significance set by the lead agency or another agency with jurisdiction over resources affected by the project.

Moreover, the IS's GHG analysis is deficient under CEQA because it failed to provide substantial evidence that the proposed project's percentage reduction in GHGs from business as usual would correlate with achieving AB 32's statewide goal of reducing emissions by approximately 30 percent below BAU by 202, or other applicable goals of the City or other agencies. The IS lacks substantial evidence to show that the proposed project would reduce its GHG emissions to levels that would be consistent with achieving applicable state, regional, local or other agency GHG reduction goals.

The IS does not present substantial evidence demonstrating that project GHG emissions would be consistent with SB 32's goal of reducing GHG emissions by 40% below 1990 levels by 2030 (IS p. 147, fn. 124), of the goals of Executive Order S-3-05 to reduce emissions to 1990 levels by 2020, and to reduce emissions to 80% below 1990 levels by 2050 (IS p. 147 fn. 121), or the targets of Executive Order B-30-15 of reducing GHG emissions to 40 percent below 1990 levels by 2030. (IS p. 147, fn. 122) Also, the IS inadequately relied on the claim that San Francisco has met the State and regional 2020 GHG reduction targets citywide, but this proposed project would have significant adverse air emissions from 7-15 years of construction and operations which would result for years after 2020, so the GHG analysis analysis should have been performed for a a longer time-range.

In addition, the IS failed to implement mitigation measures requiring as a condition of approval that during operations and construction the project proponent implement enforceable measures that would ensure that targeted reductions in GHG emissions would be met, and that compliance with applicable programs and regulations would actually occur.

For the reasons stated above, the IS failed to follow CEQA procedures in determining the significance of the project's effect on GHG emissions, failed to support with substantial evidence in the record its determination that the project's and project variant's effect on GHG emissions would not be significant, and failed to provide substantial evidence in the record showing that the project and project variant's percentage reduction in GHGs in comparison with business as usual would correlate with achieving state, regional or local goals. 10 (GHG-1) cont'd

**8. The Determination that the Project Could Not Have Significant Growth-Inducing Impacts is Not Supported by Substantial Evidence.** 11 (PH-2)

As required by section 15126.2(d) of the CEQA Guidelines, an EIR must consider the ways in which the proposed project could directly or indirectly foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.

Implementation of the proposed project would require numerous zoning changes to establish new land use controls for the project site. As previously discussed herein, retail and new office uses are not allowed by the existing zoning set forth in Resolution 4109, and the project would propose to construct housing units in excess of the approximately 508 housing units allowed under Resolution 4109. The zoning changes sought and resulting land uses would change the mix and types of land uses that could be developed on the project site, and would allow for increased building heights and density.

The EIR should analyze whether the proposed project and project variant would result in residential development at a greater average housing density per acre than currently exists on the project site or in the immediate project vicinity.

Also, implementation of the proposed project would include the expansion of infrastructure for the provision of new or expanded distribution lines for water, gas and electrical service and sewer system lines.

The proposed project could be growth inducing if it would extend water supply infrastructure and/or gas and electric distribution infrastructure or sewer service infrastructure beyond what is necessary to serve uses proposed under the project.

The IS states that the project would include construction of new natural gas and sewer lines to serve the project site. IS p. 119. However, the IS provides no support for its conclusion that this infrastructure would not indirectly induce substantial population growth in the project area because the project site is an infill site surrounded by existing development and "the proposed infrastructure improvements would be sized to meet only project needs and would not enable additional development." IS p. 119. The project description did not include specifications as to

the sizing of new or expanded infrastructure or impose limitations on its size as an enforceable condition of approval of the project.

11
(PH-2)
cont'd

The following mitigation measure should be adopted as a condition of approval of the proposed project:

> **MITIGATION MEASURE.** The EIR will set forth technical specifications that show without question that proposed infrastructure improvements installed in connection with the project would be sized to meet only the needs of the project or project variant as proposed in the project description in the EIR and would not enable additional development; a qualified professional engineer will review the proposed specifications and sign a report verifying that such specifications will allow such infrastructure to only meet the needs of the project or project variant as proposed in the project description in the EIR and would not enable additional development; such report will be included in the Draft EIR and submitted for public comment; and the project approval will incorporate as enforceable mitigation measures such technical specifications that specifically provide that infrastructure installed on and/or nearby the project site would be sized to meet only the needs of the project or project variant as proposed in the project description in the EIR and would not enable additional development.

Absent substantial evidence to support the conclusion that no indirect impacts related to population growth as a result of expansion of infrastructure would occur, the evidence contained in the IS supports a fair argument that the expansion of infrastructure could indirectly foster population growth. The EIR must analyze this impact as a potentially significant impact.

Also, CEQA Guidelines section 15126.2(d) recognizes that increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The EIR should analyze in detail whether the project's demand for water, gas, electricity and sewer service could adversely affect the current supply of water, gas, electricity and sewer service to residences surrounding the site or in the immediate vicinity, so that new or expanded connections could be required.

**9. The Project Description is Not Stable.**

12
(PD-7)

For purposes of CEQA, a "project" is defined as comprising "the whole of an action " that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. 14 CCR section 15378(a).

The Initial Study lists approval of a subdivision map by San Francisco Public Works as an approval that would be required to implement the proposed project or project variant. IS p. 86.

However the Initial Study fails to provide any information on the nature of the subdivision that would be sought, including whether spaces proposed to be used for retail or office uses would be subdivided. The EIR should disclose all information in the possession of the City as to the nature of the subdivision that would likely be sought. 12 (PD-7) cont'd

In addition, the Initial Study indicates that the Walnut Street extension would be a pathway, and the EIR should clarify that approval would not be sought to make the Walnut Street extension a public street or public right of way. The EIR should also clarify that approval would not be sought to divide the project site into blocks, because the whole site is now one lot and block.

The project description and objectives are artificially narrow and preclude consideration of reasonable alternatives for achieving the project's underlying purpose. By describing the project as "mixed-use," the Initial Study seeks to prejudice the consideration of other adaptive reuse alternatives, such as all-residential development, which would conform with the existing zoning. The proposed project, however, would conflict with the existing land use controls, including controls prohibiting retail uses and new office uses at the site, heights in excess of 40-feet, violation of open space and rear yard requirements, and would seek other deviations. The project description and objectives would require numerous zoning changes, so is not an of-right project. The community has supported new residential construction, and the project objectives should be corrected to seek to achieve adaptive reuse of this historically significant resource in a manner which complies with applicable land use controls and avoids or substantially reduces significant impacts on the environment under CEQA standards. An all-residential alternative should be included in the EIR so as not to artificially limit alternatives considered by omitting information from the EIR that is highly relevant to the Board of Supervisors, which would have to approve zoning changes to permit the project as proposed to proceed. 13 (AL-1)

Further, the report of the project sponsor's consultant as to preservation alternatives states that all new construction proposed in the preservation alternative has been designed to the greatest extent that is technically feasible "to be comparable in square footage to the proposed Project or Project Variant." Ex. U, Page & Turnbull, 3333 California Street, Preservation Alternatives Report, excerpts, p. 8. According to the IS, the proposed project would have a total of 1,372,270 gross square feet, whereas the existing uses on the site occupy a total of 469,000 gross square feet. IS pp. 9, 21. The project variant would occupy a total of 1,476,987 gsf. Ex. U, p. 82. The EIR must clarify the actual objectives of the proposed project so as not to preclude consideration of reasonable alternatives for achieving the project's underlying purpose. Considering this information, together with the other information in the IS, it is unclear whether the project objectives are to build mixed-use development, to rezone the site to allow retail and new office uses and increased height limits, to achieve an amount of square footage of development that is now sought by the proposed project or project variant, or to achieve feasible adaptive reuse of a historically significant resource.

In addition, the project description is unstable in that the Initial Study indicates that the project proponent would seek a development agreement that would permit a 15-year period for construction and "limit the City's ability to rezone the site for a set period of time." IS p. 23. Thus, the development described in the Initial Study may not be the full extent of the contemplated development, especially in view of the proposed removal of the 4th floor of the existing office building and the strengthening of the building to accommodate additional floors. 14 (PD-7)

The EIR must disclose all information as to the number of additional floors that the strengthening of the structure is being designed to accommodate and all other designs that are being prepared to accommodate expansion. Is the strengthening of the building being designed to accommodate more floors than three, and if so, how many such additional floors? The Initial Study discloses only that two to three stories are proposed to be added to the existing building. Also, are any of the new buildings being designed to accommodate expansion, and how many additional floors are they being designed to accommodate? An Initial Study must consider all phases of project planning, including phases planned for future implementation. 14 CCR section 15063(a)(1). The EIR must also disclose all available information as to the terms of the proposed development agreement that the project proponent and/or the City is considering.

Additional floors added to buildings would allow space for more residential units or other uses sought by the developer, and could increase the number of occupants or users of the site, and the consequent volumes of traffic, air emissions, noise and shadows. The impact of shadow would be greater if more than two to three additional stories were added to the existing building. Thus, the information sought is relevant to analysis of environmental impacts.

Very truly yours,

Kathryn Devincenzi

Kathryn Devincenzi

ATTACHMENTS

Ex. A - E-mails dated March 22 and 28, 2018 with Planning Department

Ex. B - 14 California Code of Regulations section 15000 *et seq.* ("CEQA Guidelines"), Appridix G, excerpts

Ex. C - San Francisco 2004 and 2009 Housing Element EIR, excerpts

Ex. D - EIR for Pier 70 Mixed-Use District Project, excerpts

Ex. E - Nomination of Fireman's Fund Insurance Company Home Office for Listing in the National Register of Historic Places, excerpts

Ex. F - State Office of Historic Preservation File on California Historical Landmark #760, excerpts

Ex. G - Photographs

Ex. H - Langan Treadwell Rollo Preliminary Geotechnical Investigation dated 3 December 2014, excerpts

Ex. I - October 12, 2017 e-mail from Dan Safier

Ex. J - San Francisco Urban Forest Plan, excerpts

Ex. K - Residential Design Guidelines, excerpts

Ex. L - 2014 San Francisco Housing Element, excerpts

Ex. M - Preliminary Project Assessment, excerpts

Ex. N - Resolution 4109 and Stipulation as to Character of Improvements

Ex. O - Developer's calculation of permitted densities

Ex. P - Initial Study for 1629 Market Street, excerpts

Ex. Q - San Francisco Planning Department Shadow Analysis Procedures and Scope Requirements

Ex. R - February 28, 2016 Letter from Fitzgerald to San Francisco Planning Department

Ex. S - CEB, *Practice Under CEQA*, excerpts

Ex. T - California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action, Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97*, excerpts

Ex. U - Page & Turnbull, *3333 California Street, Preservation Alternatives Report*, excerpts

Ex. V - Urban Design Element of San Francisco General Plan, excerpts

RECEIVED
JUN 0 8 2018
CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
RECEPTION

3333 California Street, Mixed-Use Project
Initial Study: Case No. 2015-014028ENV

# PART 1, Exhibits A-G

# EXHIBIT A

[Quoted text hidden]

**Moore, Julie (CPC)** <julie.moore@sfgov.org> Wed, Mar 21, 2018 at 4:16 PM
To: Kathy Devincenzi <krdevincenzi@gmail.com>

Ms. Devincenzi,

I can confirm that the petition is part of the administrative record. We expect to release the initial study next month.

**Julie Moore, Senior Planner**
**Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.8733 | www.sfplanning.org

San Francisco Property Information Map

**From:** Kathy Devincenzi [mailto:krdevincenzi@gmail.com]
**Sent:** Wednesday, March 21, 2018 12:06 PM
**To:** Moore, Julie (CPC)

[Quoted text hidden]

[Quoted text hidden]

**Kathy Devincenzi** <krdevincenzi@gmail.com> Thu, Mar 22, 2018 at 10:55 AM
To: "Moore, Julie (CPC)" <julie.moore@sfgov.org>

Ms. Moore,

Thank you. Please confirm that the City will not issue a negative declaration after the 30-day public comment period on the initial study, and the City will prepare an EIR for 3333 California.

Kathy Devincenzi
[Quoted text hidden]

**Moore, Julie (CPC)** <julie.moore@sfgov.org> Wed, Mar 28, 2018 at 3:35 PM
To: Kathy Devincenzi <krdevincenzi@gmail.com>

Your understanding is correct. Regardless of whether a negative declaration is issued after the 30-day comment period, providing your specific comments about the adequacy of the CEQA environmental review for the project in a timely manner will enable the Department to fulfill our responsibility under CEQA to engage in a good faith effort to disclose significant effects of the proposed project on the physical environment. The sooner you are able to provide such comments, the more thorough this evaluation is likely to be.

Regards,

**Julie Moore, Senior Planner**
**Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.8733 | www.sfplanning.org

San Francisco Property Information Map

**From:** Kathy Devincenzi [mailto:krdevincenzi@gmail.com]
**Sent:** Thursday, March 22, 2018 10:56 AM

[Quoted text hidden]

[Quoted text hidden]

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**Kathy Devincenzi** <krdevincenzi@gmail.com> Wed, Mar 28, 2018 at 3:46 PM
To: "Moore, Julie (CPC)" <julie.moore@sfgov.org>

I understand the reason for comments. I wrote to confirm that a negative declaration will not be issued in order to avoid surprise and prejudice.
[Quoted text hidden]

Gmail

Kathy Devincenzi <krdevincenzi@gmail.com>

# 3333 California Street

4 messages

**Kathy Devincenzi** <krdevincenzi@gmail.com> Fri, May 11, 2018 at 10:57 AM
To: "Moore, Julie (CPC)" <julie.moore@sfgov.org>
Bcc: Richard Frisbie <frfbeagle@gmail.com>

Julie,

Thank you for sending me the Initial Study.

We need the reference materials cited in the Initial Study. You said you were having them compiled electronically. Can we pick up a CD(s) containing all the reference materials?

Thank you,

Kathy Devincenzi
(415) 221-4700

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**Moore, Julie (CPC)** <julie.moore@sfgov.org> Mon, May 14, 2018 at 12:04 PM
To: Kathy Devincenzi <krdevincenzi@gmail.com>

Ms. Devincenzi,

I had a miscommunication with the environmental consultant about this. I should receive copies in the next day and will email you when it is available.

My apologies for the delay. In the meantime, I have requested a link to transmit the HRE electronically.

**Julie Moore, Senior Planner**
**Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.8733 | www.sfplanning.org

San Francisco Property Information Map

**From:** Kathy Devincenzi [mailto:krdevincenzi@gmail.com]
**Sent:** Friday, May 11, 2018 10:57 AM
**To:** Moore, Julie (CPC)
**Subject:** 3333 California Street

[Quoted text hidden]

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**Kathy Devincenzi** <krdevincenzi@gmail.com> Mon, May 14, 2018 at 12:14 PM
To: "Moore, Julie (CPC)" <julie.moore@sfgov.org>

Dear Ms. Moore,

Thank you for your reply. Can we have a 3-week extension on the 30-day review period due to unavailability of the reference materials for the Initial Study?

Kathy Devincenzi
[Quoted text hidden]

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**Moore, Julie (CPC)** <julie.moore@sfgov.org> Tue, May 15, 2018 at 1:21 PM
To: Kathy Devincenzi <krdevincenzi@gmail.com>

The CD is ready for pickup – or if you prefer, I can mail it.

We will extend the comment period to Friday, June 8th at 5 p.m.

**Julie Moore, Senior Planner**
**Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.8733 | www.sfplanning.org

San Francisco Property Information Map

**From:** Kathy Devincenzi [mailto:krdevincenzi@gmail.com]
**Sent:** Monday, May 14, 2018 12:15 PM
**To:** Moore, Julie (CPC)
**Subject:** Re: 3333 California Street

[Quoted text hidden]

# EXHIBIT B

## CEQA APPENDIX G:
## ENVIRONMENTAL CHECKLIST FORM

NOTE: The following is a sample form and may be tailored to satisfy individual agencies' needs and project circumstances. It may be used to meet the requirements for an initial study when the criteria set forth in CEQA Guidelines have been met. Substantial evidence of potential impacts that are not listed on this form must also be considered. The sample questions in this form are intended to encourage thoughtful assessment of impacts, and do not necessarily represent thresholds of significance.

1. Project title: _____
2. Lead agency name and address:
   _____
   _____
   _____
3. Contact person and phone number:_____
4. Project location: _____
5. Project sponsor's name and address:
   _____
   _____
   _____
6. General plan designation: _____ 7. Zoning: _____
8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)
   _____
   _____
   _____
9. Surrounding land uses and setting: Briefly describe the project's surroundings:
   _____
   _____
   _____
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)
    _____
    _____
    _____
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun? _____

    Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| d) Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☐ | ☐ |
| e) Create objectionable odors affecting a substantial number of people? | ☐ | ☐ | ☐ | ☐ |
| IV. BIOLOGICAL RESOURCES: Would the project: | | | | |
| a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☐ |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? | ☐ | ☐ | ☐ | ☐ |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☐ | ☐ |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? | ☐ | ☐ | ☐ | ☐ |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | ☐ | ☐ | ☐ | ☐ |
| f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ☐ |

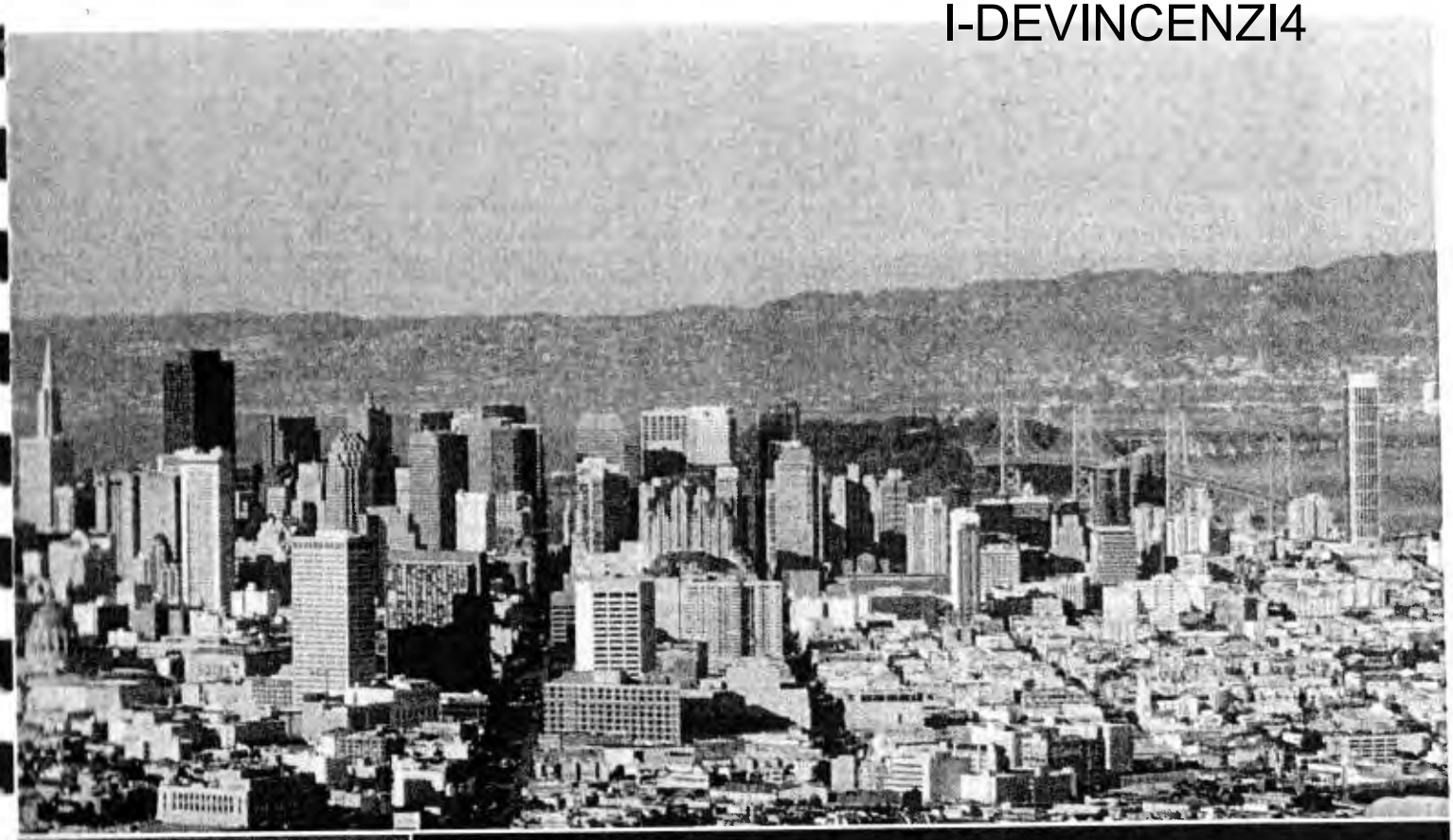
| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | ☐ | ☐ | ☐ | ☐ |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? | ☐ | ☐ | ☐ | ☐ |
| VII. GREENHOUSE GAS EMISSIONS. Would the project: | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☐ | ☐ |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☐ | ☐ |
| VIII. HAZARDS AND HAZARDOUS MATERIALS. Would the project: | | | | |
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☐ | ☐ |
| b) 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? | ☐ | ☐ | ☐ | ☐ |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☐ | ☐ |
| d) 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, would it create a significant hazard to the public or the environment? | ☐ | ☐ | ☐ | ☐ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☐ |
| f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☐ |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☐ | ☐ |
| h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ☐ | ☐ | ☐ | ☐ |
| IX. HYDROLOGY AND WATER QUALITY. Would the project: | | | | |
| a) Violate any water quality standards or waste discharge requirements? | ☐ | ☐ | ☐ | ☐ |
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | ☐ | ☐ | ☐ | ☐ |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? | ☐ | ☐ | ☐ | ☐ |

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|---|---|---|---|
| XIII. POPULATION AND HOUSING. Would the project: | | | | |
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | ☐ | ☐ | ☐ | ☐ |
| b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☐ |
| c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☐ |
| XIV. PUBLIC SERVICES. | | | | |
| a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | ☐ | ☐ | ☐ | ☐ |
| Fire protection? | ☐ | ☐ | ☐ | ☐ |
| Police protection? | ☐ | ☐ | ☐ | ☐ |
| Schools? | ☐ | ☐ | ☐ | ☐ |
| Parks? | ☐ | ☐ | ☐ | ☐ |
| Other public facilities? | ☐ | ☐ | ☐ | ☐ |
| XV. RECREATION. | | | | |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | ☐ | ☐ | ☐ | ☐ |

# EXHIBIT C

I-DEVINCENZI4



# ENVIRONMENTAL IMPACT REPORT

# San Francisco 2004 and 2009 Housing Element

## Volume II: Final EIR (Section V.H to IX)

PLANNING DEPARTMENT
CASE NO. **2007.1275E**

STATE CLEARINGHOUSE NO. 2008102033

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SAN FRANCISCO
PLANNING
DEPARTMENT

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT

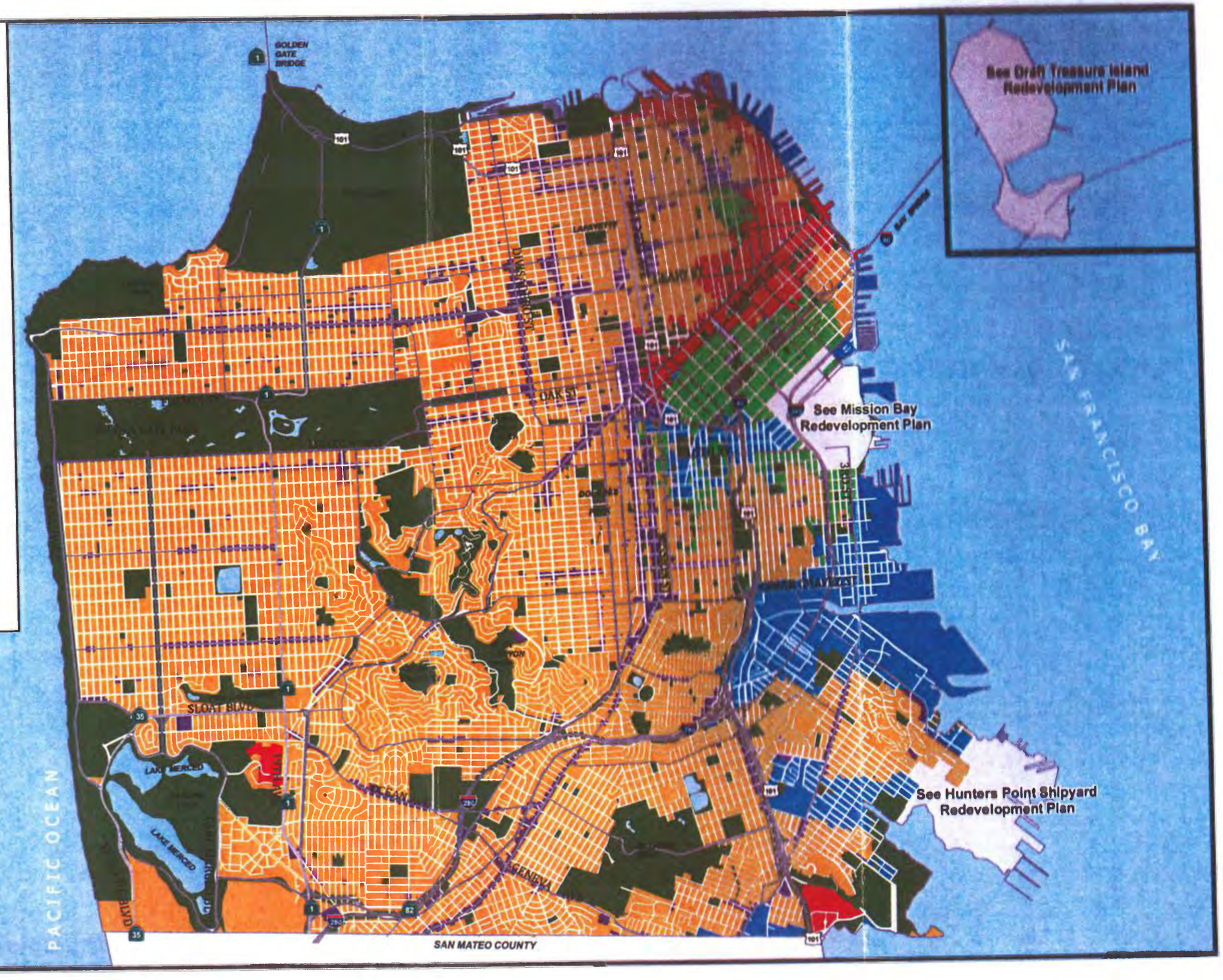
## Figure IV-3
## Generalized Citywide Zoning Map

- Public (including parks, openspace and publicly owned buildings)
- Residential
- Neighborhood Commercial
- Mixed Use (Residential/Commercial, Residential/Industrial)
- Commercial
- Industrial & Production, Distribution and Repair
- Water

See Redevelopment Plan

0 0.5 1 Mile

Source: CCSF Planning Code, May 2010



CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT

## Figure IV-4
## Generalized Citywide Height Map

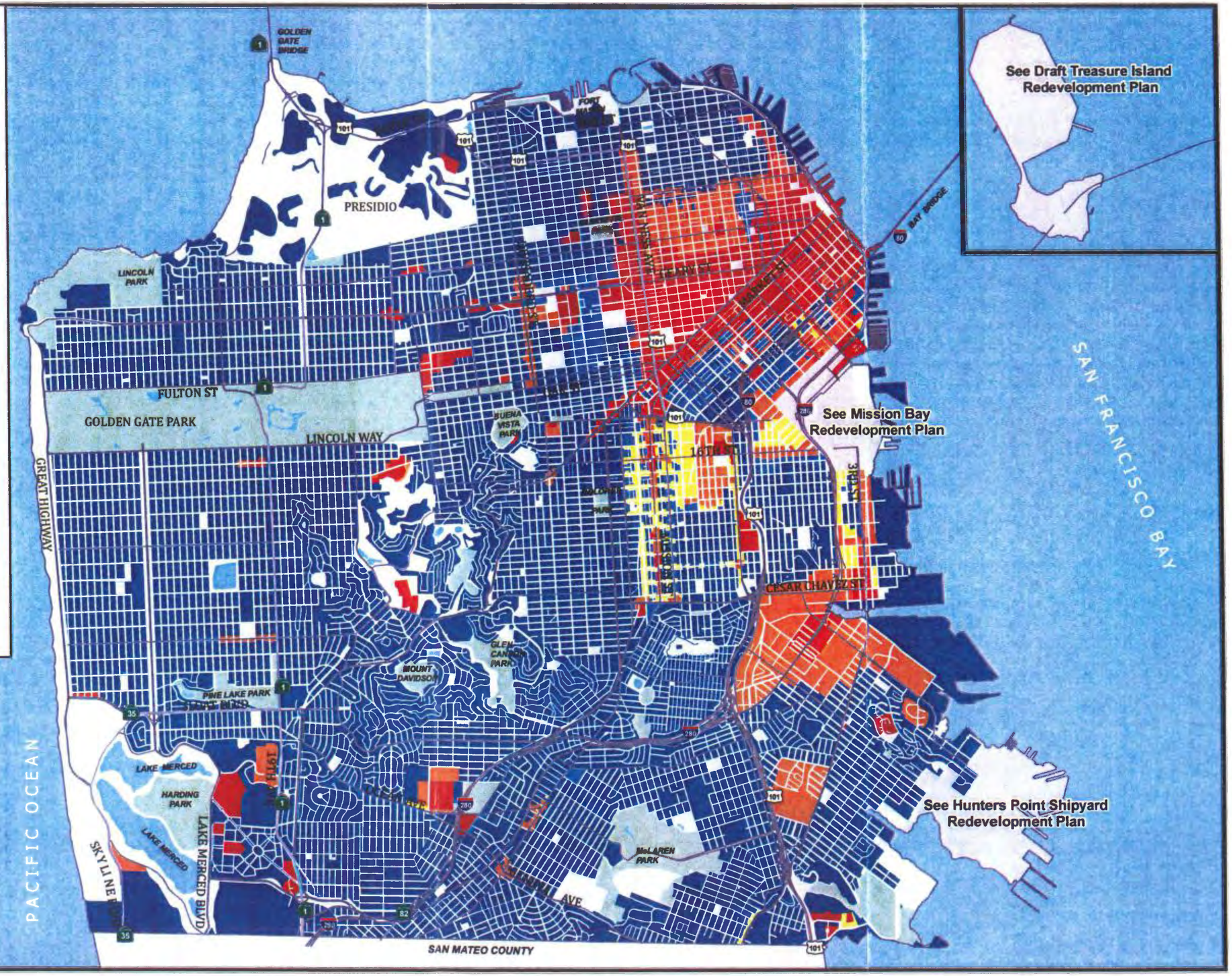
Height Districts

- ≤ 40 ft
- 41 - 50 ft
- 51 - 60 ft
- 61 - 68 ft
- 69 - 120 ft
- 121 - 550 ft
- Parks
- Water

See Redevelopment Plan

0 0.5 1 Mile

Source: CCSF Planning Code, May 2010



I-DEVINCENZI4

**Table IV-8**
**Policies With Potential for Physical Environmental Impacts[1]**

| Corresponding 1990 Residence Element Policy | 2004 Housing Element | 2009 Housing Element |
|---|---|---|
| Policy 2.2: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are permanently affordable to lower income households. | Policy 1.6: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects. | Policy 1.10: Support new housing projects where households can easily rely on public transportation, walking and bicycling for the majority of daily trips. |
| Policy 1.3: Create incentives for the inclusion of housing, particularly permanently affordable housing, in new commercial development projects. | Policy 1.7: Encourage and support the construction of quality, new family housing. | Policy 1.6: Consider greater flexibility in number and size of units within established building envelopes in community based planning processes, especially if it can increase the number of affordable units in multi-family structures. |
| Policy 1.5: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households. | Policy 1.8: Allow new secondary units in areas where their effects can be dealt with and there is neighborhood support, especially if that housing is made permanently affordable to lower income households. | Policy 7.5: Encourage the production of affordable housing through process and zoning accommodations, and prioritize affordable housing in the review and approval processes. |
| Policy 7.3: Grant density bonuses for construction of affordable or senior housing. | Policy 4.4: Consider granting density bonuses and parking requirement exemptions for the construction of affordable housing or senior housing. | Policy 11.5: Ensure densities in established residential areas promote compatibility with prevailing neighborhood character. |
| Policy 2.3: Allow flexibility in the number and size of units within permitted volumes of larger multi unit structures, especially if the flexibility results in creation of a significant number of dwelling units that are permanently affordable to lower income households. | Policy 4.5: Allow greater flexibility in the number and size of units within established building envelopes, potentially increasing the number of affordable units in multi-family structures. | |
| Policy 12.5: Relate land use controls to the appropriate scale for new and existing residential areas. | Policy 11.6: Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new neighborhoods, in downtown areas, and in other areas through a Better Neighborhoods type planning process while maximizing the opportunity for housing near transit. | |

increase the likelihood that those individuals would utilize available public transit, or other alternatives modes of transportation (bicycle and walking) to work, decreasing the overall number of vehicle trips or vehicle miles traveled (VMTs) citywide. It also follows that housing in proximity to neighborhood services (such as along neighborhood commercial districts, mixed-use districts, or commercial areas) could reduce vehicle trips by shifting a portion of those trips to transit, bicycle or pedestrian trips. Proximity to neighborhood services could also result in lower VMT. For example, 2004 Housing Element Policies 1.2 and 1.9 and their corresponding implementation measures direct housing to commercial and educational areas more strongly than the 1990 Residence Element, which would reduce vehicle trips by locating housing in proximity to job cores and services. 2009 Housing Element Policies 12.1, 13.1, and 13.3 encourage housing near transit lines and existing transit infrastructure to a greater extent than their corresponding 1990 Residence Element policies. Therefore, no inconsistencies between the proposed Housing Elements and the Transportation Element have been identified.

***Urban Design Element***

The Urban Design Element is concerned with the physical character and environment of the City with respect to development and preservation. The following Urban Design Element policies may be potentially inconsistent with the proposed Housing Elements.

Objective 3: Moderation of major new development to complement the City patter, the resources to be conserved and the neighborhood environment.

Policy 3.3: Promote efforts to achieve high quality of design for buildings to be constructed at prominent locations.

Policy 3.4: Promote building forms that will respect and improve the integrity of open spaces and other public areas.

Policy 3.5: Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.

Policy 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.

Policy 3.7: Recognize the special urban design problems posed in development of large properties.

Policy 3.8: Discourage accumulation and development of large properties, unless such development is carefully designed with respect to its impact upon the surrounding area and upon the City.

Policy 3.9: Encourage a continuing awareness of the long-term effects of growth upon the physical form of the city.

Policy 4.1: Protect residential areas from the noise, pollution and physical danger of excessive traffic.

Policy 4.2: Provide buffering for residential properties when heavy traffic cannot be avoided.

The proposed Housing Elements would not adversely affect implementation of the above policies. Specifically, 2004 Housing Element Policies 11.1, 11.8, and 11.9 would use new housing to enhance neighborhood vitality and diversity and would ensure increased housing density would not conflict with existing neighborhood character. 2009 Housing Element Policies 11.1 and 11.7 encourage the preservation of neighborhood character. All of these policies would relate directly to the Urban Design Element policies. No inconsistencies between the proposed Housing Elements and the Urban Design Element have been identified.

**Area Plans**

The General Plan also includes several area (neighborhood) plans that serve to guide the nature of future development within specific districts of the City. The 2004 Housing Element and 2009 Housing Element do not include any changes to the land use objectives and policies in the City's Area Plans or Redevelopment Plans for certain areas in the City. However, the proposed Housing Elements promote specific neighborhood and area plans as part of the planning process. 2004 Housing Element Policy 11.6 calls for the completion of the Better Neighborhoods area plans and 2009 Housing Element Policy 1.1 calls for a community planning process to guide new housing growth. Applicable Area Plans or Redevelopment Plans would continue to guide future development in specific neighborhoods or districts. A number of other planning efforts are currently underway including, but not limited to the Transit Center District Plan, Treasure Island, and Western SoMa, which could result in increased residential development potential in those areas. The estimated new housing construction potential for each of these areas is provided in Table IV-6 in Section IV (Project Description).

The more general policies in the 2004 and 2009 Housing Elements are made more precise in the applicable area plans as they relate to certain parts of the City. 2004 Housing Element Policies 1.7, 4.4, 11.6, 11.7, and 11.8 and 2009 Housing Element Policies 2.1 and 7.5 would promote increased housing density by encouraging the construction of new housing and discouraging demolition of existing housing. 2004 Housing Element Policies 3.1, 3.3, 3.4, and 3.5 and 2009 Housing Element Policies 2.5 and 7.6 encourage the preservation of existing residential units through maintenance and upgrade activities. 2004 Housing Element Policy 11.3 and 2009 Housing Element Policies 8.1, 9.1, 9.2, 9.3 support the production, management, and preservation of affordable housing units in accordance with San Francisco's needs. 2004 Housing Element Policies 11.1, 11.8, and 11.9 and 2009 Housing Element Policies 11.1 and 11.7 would ensure new housing does not conflict with existing neighborhood character. 2004 Housing Element Policies 1.7 and 4.5 and 2009 Housing Element Policy 2.2 encourage family housing. Implementation of the policies in the proposed Housing Elements could also serve to increase energy efficiency of San Francisco's housing stock by directing housing to locations where residents could have reduced reliance on automobiles, such as mixed use neighborhoods and areas surrounding existing transportation infrastructure. The proposed Housing Element policies discussed above further the intent related to housing of the Area Plans discussed below. No inconsistencies between the proposed Housing Elements and specific area plans have been identified.

## Other Development Agreements

### *Executive Park*

Executive Park is a 71-acrea area located in southeastern San Francisco. It is bounded on the west by U.S. 101, on the east by the Candlestick Point Special Use District, on the north by Bayview Hill, and on the south by Candlestick State Park and the San Francisco Bay. Adjacent neighborhoods include the Bayview Hunters Point neighborhood to the north, and the Little Hollywood and Visitacion Valley neighborhoods to the northwest. Primary access to Executive Park is from Harney Way, Alana Way, Thomas Mellon Drive and Executive Park East Boulevard. Secondary access is provided via Blanken Avenue to the west, which connects Bayshore Boulevard with Executive Park West Boulevard, and Jamestown Avenue/Hunters Point Expressway to the east. Executive Park is now an office park with some housing on the far eastern end. The office buildings are surrounded by surface parking and the housing is internally focused and gated. The plan envisions a new San Francisco neighborhood: a mixed-used residential neighborhood with attractive public streets and open space connectivity.[17] The Executive Park Area Plan is an ongoing effort that could provide approximately 1,600 additional housing units.

### *Park Merced*

Park Merced is residential neighborhood on approximately 152 acres of land in the southwest portion of San Francisco adjacent to Lake Merced and generally bounded by Vidal Drive, Font Boulevard, Pinto Avenue, and Serrano Drive to the north, 19th Avenue and Junipero Serra Boulevard to the east, Brotherhood Way to the south, and Lake Merced Boulevard to the west The Plan would increase residential density, provide a neighborhood core with new commercial and retail services, modify transit facilities, and improve utilities within the development site. The principal land use goals are to reduce automobile use by concentrating housing close to employment, increasing the supply of housing, and providing better integrated residential and neighborhood serving retail and office uses; to maximize opportunities to use pedestrian and bicycle pathways; to establish pedestrian-oriented nodes for the location of neighborhood services and amenities, open space, and community services; and to incorporate environmental factors such as sun, shade, and wind into the design and housing materials.[18] The Parkmerced Area Plan is an ongoing effort that could provide approximately 5,600 additional housing units.

## San Francisco Planning Code

The San Francisco Planning Code, which incorporates by reference the City's Zoning Maps, governs permitted uses, densities and the configuration of buildings in San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) cannot be issued unless either the proposed action conforms to the Planning Code, or an exception is granted pursuant to provisions of the Planning Code, or

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[17] Executive Park Area Plan, revised draft, March 19, 2009, website: http://www.sf planning.org/Modules/ShowDocument.aspx?documentid=1545, accessed June 22, 2010.

[18] Park Merced EIR, Part 1 website: http://www.sf-planning.org/ftp/files/MEA/2008.0021E_Parkmerced_DEIR_VI-01.pdf accessed June 22, 2010.

a reclassification of the site occurs. The following is a summary of Planning Code provisions related to controls on housing.

***Existing Zoning (San Francisco Planning Code)***

San Francisco utilizes a zoning system with two separate sets of districts: one that regulates land uses, and another that regulates the height and bulk of buildings. The existing use districts and height limits in the City are described below.

There are a total of 13 residential zoning districts in the City, reflecting a mix of land use. A summary of the planning code provisions for residential uses is provided in the San Francisco Planning Code Zoning Districts, Residential Districts Controls Summary, on the Planning Department's website.[19] Residential zoning designations in the City range in density from RH-1 (D) (House-One Family, Detached Dwellings) to RTO (Residential Transit Oriented Development).

The City contains 25 separate height and bulk districts that range in height from 40 feet to 550 feet. The City is divided into classes of height and bulk districts as indicated on the zoning maps. Additional height limits are imposed for certain use districts, such as areas located within narrow streets or alleys. Section 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed height may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section. Some of the areas eligible for exceptions to the height limits include north and south of the Ferry Building, east and west of Chinese Playground, Chinatown corners and parapets, and north of Market residential special use districts, among others.

**Planning Code Section 295**

Section 295 of the Planning Code, the Sunlight Ordinance, was adopted through voter approval of Proposition K in November 1994 to protect certain public open spaces from shadowing by new structures. Section 295 prohibits the issuance of building permits for new construction or additions that would result in structures greater than 40 feet in height that would shade property under the jurisdiction of, or designated to be acquired by, the Recreation and Park Commission, during the period from one hour after sunrise to one hour before sunset on any day of the year. An exception is permitted if the Planning Commission, upon advice from the Recreation and Park Department general manager and the Recreation and Park Commission, determines that the shadow would have an insignificant impact on the use of such property. In practice, therefore, Section 295 acts as a kind of overlay that further limits heights and/or shapes of certain buildings around protected parks; the Section 295 limit is in addition to the height limits in the Height and Bulk districts.

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[19] San Francisco Planning Department, Zoning Districts, Residential Districts Controls Summary, website: http://www.sfgov.org/site/uploadedfiles/planning/projects_reports/Residential%20Standards%20Summary%20Table.pdf, accessed April 9, 2009.

All of the open spaces within the City that are under Recreation and Park Department control are protected by Section 295. Privately-owned open spaces, including any open spaces that are required under the Planning Code as part of an individual development proposal, are not subject to Section 295. Section 295 is applicable to the analysis of shadow impacts in Section V.I (Wind and Shade) of this EIR.

**Planning Code Section 147**

Planning Code Section 147, applicable to the C-3, RSD, SLR, SLI, or SSO zoning districts, states that new buildings and additions to existing buildings where height limits are greater than 50 feet must be shaped to minimize shadow on public plazas or other publicly accessible open spaces other than those protected by Section 295, "in accordance with the guidelines of good design and without unduly restricting the development potential of the property." The following factors must be taken into account in determining compliance with this criterion: the amount of area shadowed, the duration of the shadow, and the importance of sunlight to the type of open space being shadowed. Various areas within the City are zoned RSD, SLR, SLI, or SSO and hence subject to Section 147. Section 147 is applicable to the analysis of shadow impacts in Section IV.I (Wind and Shade) of this EIR.

**Planning Code Section 311 and Residential Design Guidelines**

For construction of new residential buildings and alteration of existing residential buildings in R Districts, Section 311 of the Planning Code requires consistency with the design policies and guidelines of the General Plan and with the Residential Design Guidelines that are adopted for specific areas. Section 311 also states that the Director of Planning may require modifications to the exterior of a proposed residential building—including, but not limited to changes in siting, building envelope, scale, texture, detailing, openings, and landscaping—in order to bring it into conformity with the Residential Design Guidelines and the General Plan. The most recent set of Residential Design Guidelines was adopted in 2003. The guidelines apply to development in all RH and RM districts, and are intended to maintain cohesive neighborhood identity, preserve historic resources, and enhance the unique setting and character of the City and its residential neighborhoods.

The guidelines are based on the following design principles, which are also used to determine compliance with the guidelines:

- Ensure that the building's scale is compatible with surrounding buildings.
- Ensure that the building respects the mid-block open space.
- Maintain light to adjacent properties by providing adequate setbacks.
- Provide architectural features that enhance the neighborhood's character.
- Choose building materials that provide visual interest and texture to a building.
- Ensure that the character-defining features of an historic building are maintained.

Various areas within the City are zoned R and hence subject to Section 311 and the Residential Design Guidelines. Section 311 is applicable to the analysis of visual quality in Section V.C (Aesthetics) of this EIR.

***Other Controls***

**Reflective Glass (Planning Commission Resolution 9212)**

Planning Commission Resolution No. 9212 (1981) established a pair of guidelines for reviewing and acting on proposed building projects. The first guideline states that clear, untinted glass should be used at and near the street level. The second guideline states that mirrored, highly reflective, or densely tinted glass should not be used except as an architectural or decorative element. By prohibiting mirrored or reflective glass, this resolution serves to limit glare. Resolution 9212 is applicable to the analysis of visual quality in Section V.C (Aesthetics) of this EIR.

**San Francisco Green Building Ordinance (SFGBO)**

In 2008, the City adopted Chapter 13C (Green Building Requirements) into San Francisco Building Code. The purpose of the requirements is to promote the health, safety, and welfare of San Francisco residents, workers, and visitors by minimizing the use and waste of energy, water and other resources in the construction and operation of the buildings within the City and by providing a healthy indoor environment. The requirements are based on LEED®[20] or GreenPoints[21] rating systems. Upon full implementation of the SFGBO in 2012, residential development will be required to achieve the following minimum standards:

1. Small residential (four or fewer units) – 75 GreenPoints;
2. Mid-sized residential (five or more units less than 75 feet in height) – 75 GreenPoints; or
3. High-rise large residential – 75 GreenPoints or LEED® Silver.

The ordinance requires compliance with the applicable LEED® performance standards or GreenPoint Rated checklists (which applies mostly to residential buildings) for New Construction, Version 2.2, LEED® criteria sustainable Sites (SS) 6.1 and SS6.2 for stormwater management, as well as the best management practices (BMPs) and Stormwater Design Guidelines of the SFPUC (1304C.0.3). Additionally, for high-rise residential buildings (1304C.1.3), new group B (Business) and M (Mercantile) occupancy buildings (1304C.2), and new large commercial buildings (1304C.2.2), water efficient landscaping (LEED® credit WE1.1) and water conservation are required (LEED® credit WE3.2).

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[20] U.S. Green Building Council - LEED Rating Systems information website: http://www.usgbc.org/DisplayPage.aspx?CMSPageID=222 accessed June 17, 2010.

[21] Build It Green - GreenPoint ratings information website: http://www.builditgreen.org/greenpoint-rated/ accessed June 17, 2010.

- consider the impacts of ozone control measures on particulate matter (PM), air toxics, and greenhouse gases in a single, integrated plan;
- review progress in improving air quality in recent years; and
- establish emission control measures to be adopted or implemented in the 2009-2012 timeframe

Overall, the intent of the CAP, as described above, would not conflict with the proposed Housing Elements. No inconsistencies between the proposed Housing Elements and the CAP have been identified

***The San Francisco Bay Plan***

The San Francisco Bay Plan was completed and adopted by the San Francisco Bay Conservation and Development Commission in 1968 and submitted to the California Legislature and Governor in January 1969. The Bay Plan was prepared by the Commission over a three-year period pursuant to the McAteer-Petris Act of 1965 which established the Commission as a temporary agency to prepare an enforceable plan to guide the future protection and use of San Francisco Bay and its shoreline. In 1969, the Legislature acted upon the Commission's recommendations in the Bay Plan and revised the McAteer-Petris Act by designating the Commission as the agency responsible for maintaining and carrying out the provisions of the Act and the Bay Plan for the protection of the Bay and its great natural resources and the development of the Bay and shoreline to their highest potential with a minimum of Bay fill. The Bay Plan is in the process of being updated. No inconsistencies between the proposed Housing Elements and this Plan have been identified.

***Urban Forest Plan***

Pursuant to Chapter 12 of the San Francisco Environment Code, the Urban Forestry Council advises City departments, including the Board of Supervisors and the mayor. Its tasks are to develop a comprehensive urban forest plan; educate the public; develop tree-care standards; identify funding needs, staffing needs, and opportunities for urban forest programs; secure adequate resources for urban forest programs; facilitate coordination of tree-management responsibilities among agencies; and report on the state of the urban forest. The Council's scope of authority is completely advisory and educational in nature. The Council has prepared an Urban Forest Plan, which reviews the creation of San Francisco's urban forest, analyzes the structure and functional benefits of the forests, and identifies the challenges that threaten its future, which could include impacts resulting from housing development. Designed to provide a road map for policy-makers and implementers, the Plan identifies goals that are critical to maximizing the value of the forest. Underlying these goals is the understanding that the urban forest is a living and evolving resource that is adapted to the unique and often challenging conditions of the urban environment. These goals are directed at the owners and managers of the trees that comprise the urban forest. No inconsistencies between the proposed Housing Elements and this Plan have been identified.

***Proposition M***

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City Planning Code to establish eight Priority Policies. These

policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies are (1) preservation and enhancement of neighborhood-serving retail uses (Section V.B); (2) protection of neighborhood character (Section V.B); (3) preservation and enhancement of affordable housing (Section V.D with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Section V.F); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Section V.B); (6) maximization of earthquake preparedness (Section V.O [Geology and Soils]); (7) landmark and historic building preservation (Section III.E [Cultural Resources and Paleontological Resources]); and (8) protection of open space (Section V.J [Shadows] and Section V.N).

Prior to issuing a permit for any project that requires an Initial Study under CEQA, and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, Section 101.1 requires that the City find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the Project with the environmental topics associated with the Priority Policies is discussed in Chapter V (Environmental Setting, Impacts, and Mitigation Measures) of this EIR. The case report and approval motions for the Project would contain the Planning Department's comprehensive Project analysis and findings regarding consistency of the Project with the Priority Policies.

## CONCLUSION

Overall, the proposed Housing Elements would not conflict with any of the goals of the plans and policies listed in this section. The potential of the proposed Housing Elements to conflict with applicable plans, polices, or regulations is discussed in detail under Impact LU-1 in Section V.B (Land Use and Land Use Planning).

- Mixed Uses (Non-residential);
- Residential;
- Visitor-Serving Retail; and
- Parks and Open Space.

**Existing Zoning**

There are a total of 13 residential zoning districts in the City, reflecting a mix of land use. A summary of the planning code provisions for residential uses is provided in the San Francisco Planning Code Zoning Districts, Residential Districts Controls Summary, on the Planning Department's website.[1] The Summary of the Planning Code Standards for Residential Districts provides the name of the zoning district and maximum dwelling unit density, as well as other land use controls. Residential zoning designations in the City include, but are not limited to RH-1 (D) (House-One Family, Detached Dwellings), RH-2 (House-Two Family), RM-1 (Mixed [Apartments and Houses], Low Density) to RM-4 (Mixed [Apartments and Houses], High Density), RC-3 (Residential-Commercial Combined, Medium Density), RED (Residential Enclave District) and RTO (Residential Transit Oriented Development). Generally, RH-1 zoning districts allow for one dwelling unit per lot. RH-1(S) zoning districts allow for an additional minor second unit. RH-2 zoning districts generally allow for two units per lot, with RH-3 zoning districts allowing three units per lot. Residential Mixed zoning districts can allow up to three dwelling units per lot (RM-1), or up to one unit per 200 square feet (sf) of lot area (RM-4). RC-3 districts allow up to three units per lot or one unit per 400 sf of lot area and RC-4 districts allow up to one unit per 200 sf of lot area. RED districts have similar density standards as RC-3 and RM-3 zoning districts, in that, RED districts allow for one dwelling unit per 400 sf of lot area. RTO zoning districts generally allow one dwelling unit per 600 sf of lot area, although these density limits may be exceeded for providing additional affordable housing units and other special uses.

**Existing Height and Bulk Districts**

The City contains 25 separate height and bulk districts that range in height from 40 feet to 400 feet. The different classes of height and bulk districts are indicated on the zoning maps. Additional height limits are imposed for certain use districts, such as areas located within narrow streets or alleys. Section 263 of the Planning Code contains special exceptions to the height limits for certain uses within certain areas. Buildings and structures exceeding the prescribed height may be approved by the Planning Commission according to the procedures for conditional use approval in Section 303 of the Planning Code; provided, however, that such exceptions may be permitted only in the areas specified and only to the extent stated in each section. Some of the areas eligible for exceptions to the height limits include north and south of the Ferry Building, east and west of Chinese Playground, Chinatown corners and parapets, and north of

[1] San Francisco Planning Department, Zoning Districts, Residential Districts Controls Summary, website: http://www.sf-planning.org/Modules/ShowDocument.aspx?documentid=5358, accessed April 9, 2009.

Market residential special use districts, among others. Figure IV-4, Generalized Citywide Height Map, shows that generally the western half of the City is dominated by 40-foot height limits. Moving east, towards the Downtown, heights increase along Van Ness Avenue and continue into the Downtown. Additional information on existing height limits is included in the following discussion of individual planning districts.

**San Francisco Planning Districts**

For purposes of this section of the EIR, the City is discusses with respect to each Planning District, as depicted in Figure V.A-1. The City is comprised of 18 Planning Districts. The following discussion provides a general overview of the existing land use character within each of the 18 Planning Districts. The existing land use character is described in terms of general land uses, height limits, preservation districts, and other characteristics that may pertain to a given planning district, including details of various planning efforts. Over the years, the San Francisco Planning Department has undergone a number of focused planning efforts, initiated by either the Planning Department or the Redevelopment Agency, to guide the development of various areas or neighborhoods within the City. These efforts have resulted in the preparation of Area Plans or Redevelopment Plans. Within each Planning District, applicable Area and Redevelopment plans are also discussed with respect to land use character. These Area and Redevelopment Plans are also discussed in Section V.A (Plans and Policies).

***South Bayshore***

The South Bayshore area of the City is bordered to the north by the South of Market and Mission Planning Districts, to the west by the Bernal Heights and South Central Planning Districts, and to the south by San Mateo County and the San Francisco Bay. The entire eastern border of this district fronts along the San Francisco Bay. Existing height limits north of Islas Creek are 40 feet, increasing to 80 and 85 foot height limits along Third Street. West of Third Street heights decrease to 65 feet. Heights south of Islas Creek are 40 feet along Pier 90 and 90, increasing to 85 feet along Third Street and 80 feet for parcels near Pier 88. Land uses north and south of Islas Creek are designated M-2 (Heavy Industrial), and further east, land uses are primarily PDR (Production, Distribution and Repair) zoning districts. PDR zoning districts allow for a variety on non-residential activities and are an important reservoir of space for San Francisco's new and evolving industry and unforeseen activity types. Business and activities allowed in PDR Districts generally share a need for flexible operating space that features large open interior spaces, high ceilings, freight loading docks and elevators, floors capable of bearing heavy loads, and large (often uncovered exterior) storage areas. These uses are often not ideally compatible with housing for operational reasons, including the need for significant trucking and delivery activities, 24-hour operation, and emission of noise, odors and vibrations. North and south of Islas Creek, a variety of PDR-related special use districts exists.

Industrial zoning districts (M-1 and M2 [Light Industrial]) extend south of Islas Creek, along the San Francisco shoreline, with 40 foot height limits. To the east of Hunter's Point Boulevard lies the India Basin shoreline park, which is designated as Open Space. RM-1 zoning districts are located southeast of Innes Avenue and abut the Hunter's Point Naval Shipyard. The Hunter's Point Naval Shipyard generally

### *Chapter 35 of the San Francisco Administrative Code*

Chapter 35 of the San Francisco Administrative Code "Residential and Industrial Compatibility and Protection" is designed to protect existing and future industrial businesses from potentially incompatible adjacent and nearby development. The City encourages the use of best available control technologies and best management practices whenever possible to further reduce the potential for incompatibility with other uses, including residential. Another goal of this ordinance is to protect the future residents of industrial and mixed-use neighborhoods by providing a notification process so that residents are made aware of some of the possible consequences of moving to an industrial or mixed-use neighborhood and by encouraging and, if possible, requiring, features in any new residential construction designed to promote the compatibility of residential and adjacent or nearby industrial uses.

### *San Francisco Redevelopment Agency Plans*

The San Francisco Redevelopment Agency, formed in 1948, was established for the purpose of improving the environment of San Francisco and creating better urban living conditions through the removal of blight. Authorized and organized under the provisions of the California Community Redevelopment Law, the Agency is an entity legally separate from the City and County of San Francisco, but existing solely to perform certain functions exclusively for and by authorization of the City and County of San Francisco. The Agency operates primarily in redevelopment project areas designated by the Board of Supervisors. Redevelopment Plans within the City are discussed above.

### *San Francisco County Countywide Transportation Plan*

Pursuant to state law, in 1990, the San Francisco County Transportation Authority was designated the Congestion Management Agency for San Francisco. The Transportation Authority is responsible for setting transportation investment priorities for the city, developing and maintaining a computerized travel demand forecasting model and related databases, and programming state and federal funds for local transportation projects. The Authority is also responsible for preparing a long-range Countywide Transportation Plan. The Countywide Transportation Plan is the City's blueprint to guide transportation system development and investment over the next thirty years. The Plan is consistent with the broader policy framework of San Francisco's General Plan and particularly its Transportation Element. The Countywide Transportation Plan further develops and implements General Plan principles by identifying needed transportation system improvements.

## IMPACTS

### Significance Thresholds

The proposed Housing Elements would normally have a significant effect on the environment if they would:

- Physically divide an established community;

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or

- Have a substantial impact upon the existing character of the vicinity.

**Impact Evaluation**

Section V.A (Plans and Policies) of this EIR describes the Area Plans of the General Plan and Redevelopment Plan Areas adopted by the San Francisco Redevelopment Agency that serve to guide the nature of future development in specific neighborhoods or districts in the City. The City's General Plan includes adopted Area Plans for the following areas: Bayview Hunters Point, Central Waterfront, Chinatown, Civic Center, Downtown, East SoMa, Market & Octavia, Mission, Northeastern Waterfront, Showplace Square/Potrero, Rincon Hill, South of Market, Van Ness Avenue, and Western Shoreline. The San Francisco Redevelopment Agency maintains redevelopment plans for the following areas: Bayview Hunters Point, Federal Office Building, Golden Gateway, Hunters Point Shipyard, Mission Bay, Rincon Point - South Beach, South of Market, Transbay, Visitacion Valley, Western Addition A-1, and Yerba Buena Center. Redevelopment Areas also serve to guide the nature of future development in specific areas, and either contain special zoning and land use controls or specify that the controls of the San Francisco Planning Code apply.

Implementation of the proposed Housing Elements would not directly result in changes to applicable height and bulk zoning districts or to allowable uses under the Planning Code. Additionally, the 2004 Housing Element and 2009 Housing Element do not include any changes to any of the land use objectives and policies in the City's Area Plans or Redevelopment Plans. While implementation of the proposed Housing Elements would not directly affect existing Area Plans or Redevelopment Plans, it would encourage new Area Plans with similar planning-related strategies that may be designed to accommodate growth. Applicable Area Plans or Redevelopment Plans would continue to guide future development in specific neighborhoods or districts.

As noted before, ABAG, in coordination with the State Department of Housing and Community Development (HCD), uses population and job growth projections from the State Department of Finance to determine the regional housing needs for the Bay Area and allocates housing to cities and counties within the Bay Area through the Regional Housing Needs Allocation (RHNA). In providing direction for meeting regional housing needs, ABAG's RHNA number focuses on both the amount of housing and the affordability of housing. Currently, the City is generally meeting ABAG's most recent household projections and is slightly exceeding ABAG's latest population estimates. A variety of local factors support growth projections for San Francisco. The desirability of San Francisco, with its wealth of natural and urban amenities, has always appealed strongly to consumers. This desirability has resulted in continued high demand for housing, as evidenced by high property values and a growing population. Therefore, it is expected that residential development in the City would occur regardless of the proposed Housing Elements, and housing element law ensures that local agencies, including San Francisco, plan for

the development of, and make land available for, new housing. To meet the City's share of the RHNA, including its income requirements, the proposed Housing Elements aim to do the following: 1) preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound, and 2) provide direction for how and where new housing development in the City should occur. With respect to the latter, the 2004 Housing Element encourages new housing in Downtown and in underutilized commercial and industrial areas. The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed use districts near Downtown. The 2009 Housing Element encourages housing in new commercial or institutional projects, housing projects near major transit lines, and accommodating housing in appropriate locations and densities through community planning efforts.

Impacts related to land use could occur if the proposed Housing Elements resulted in new development, including infrastructure, which would divide an established community. The 2004 and 2009 Housing Elements encourage future housing development in infill areas or on individual parcels, and future housing development would be expected to take place in established neighborhoods as shown in Figure IV-5 in Section IV (Project Description). The proposed 2004 and 2009 Housing Elements would not change allowable land uses already permitted by the City's Planning Code, therefore the proposed Housing Elements would not physically divide an established community. Furthermore, none of the policies in the 2004 or 2009 Housing Elements would encourage the division of a community. In fact, most policies would encourage residential growth in established areas within an established land use plan. For example, Policies 1.1, 1.2, 1.3, 1.4, and 1.5 of the 2004 Housing Element encourage housing in appropriate geographic locations as well as encouraging higher density and in-fill development. Therefore, implementation of these policies would not result in the division of an established community. Similarly, Policies 1.1, 4.6, 12.1, 12.3, 13.1, and 13.3 of the 2009 Housing Element encourage the development of strategically located housing near existing infrastructure or transit. Therefore, implementation of these policies would not result in the division of an established community. In addition, the 2004 and 2009 Housing Elements do not include any extensions of roadways or other development features through a currently developed area that could physically divide an established community. Therefore, implementation of either of the 2004 or 2009 Housing Elements would have ***no impact*** resulting from the division of an established community.

***Impact LU-1: The proposed Housing Elements would not conflict with applicable land use plans, policy, or regulations. (Less than Significant)***

Implementation of the 2004 Housing Element and 2009 Housing Element could result in impacts related to conflicts with existing land use policy, plans, or regulations if the Housing Elements resulted in housing development that was not consistent with zoning and land use designations as outlined in governing land use plans and/or the City's Planning Code to the extent those regulations help to avoid or mitigate potential environmental impacts. For example, if a height limit in a particular area was designed to avoid impacting a view from a public vantage point, there could be an impact from a policy that increased the height limits. However, as discussed throughout this document, the proposed Housing Elements would not result in changes to allowable land uses or height and bulk designations.

The following includes a general consistency discussion between City land use and planning policy documents and both the 2004 Housing Element and 2009 Housing Element. As stated in the analysis

***Impact LU-2: The proposed Housing Elements would not have a substantial impact upon the existing character of the vicinity. (Less than Significant)***

The City includes a mix of land uses, including residential, neighborhood retail, institutional and cultural, commercial, industrial, and open space areas. This mix of land uses varies throughout the City: some areas are predominately residential in nature, some predominately commercial, and other areas contain a variety of mixed uses (commercial strips surrounded by residential uses or commercial and industrial areas with small amounts of residential). These various types and mixtures of land uses contribute to the existing land use character throughout the City. The proximity of housing to these various land uses has shaped the development of San Francisco. As discussed throughout this EIR, varied land uses exist within relatively close proximity to residential uses, providing needed services as well as housing in proximity to job cores.

Figures V.B-1 and V.B-2 show the available housing unit capacity and pipeline units that are anticipated to be developed, or have the potential for residential development, outside existing Commercial Districts and within Downtown and Mixed-Use Districts, respectively. As shown in Figure V.B-1, approximately 17,587 units in the City's pipeline occur outside the service area of one of the City's Commercial Districts (calculated as more than 1/4 mile from a commercial district), with capacity for additional 498 units. The areas of the City with the most pipeline or capacity units not served by a Commercial District include Park Merced, Hunters Point Shipyard, and Candlestick neighborhoods. Planning efforts are underway in these areas, and the intent of these efforts is to develop commercial uses to support the new residential development. As shown in Figure V.B-2, approximately 3,134 units in the City's pipeline occur within Downtown and Mixed Use Districts, with capacity for another 8,692 units in these areas. According to the land use inventory prepared by the City, the areas with the greatest potential for development near Downtown and Mixed Use Districts include Rincon Hill, East SoMa, and Mission. These figures reflect the trends that much of San Francisco's residential neighborhoods are located in relatively close proximity to a variety of land uses. The following discusses the potential for the 2004 and 2009 Housing Element policies to affect land use character.

*2004 Housing Element Analysis*

Implementation of the 2004 Housing Element Housing Element could result in impacts related to land use character if new housing is substantially out of scale with development in an existing neighborhood, or if new development is so different than existing development that the new development would change the existing character of an area. The following 2004 Housing Element policies promote residential development in certain areas of the City and promote increased residential densities. A substantial increase of residential uses in an area that has been traditionally dominated by non-residential uses could result in changes to land use character. Similarly, substantial increases in residential densities in traditionally low-density neighborhoods could result in changes to land use character. The potential for the 2004 Housing Element policies to affect land use character is addressed below.

Overall, the 2004 Housing Element includes policies that would maintain consistency with existing neighborhood and land use character though the encouragement of in-fill development in a manner that does not present conflicts with the existing character of the vicinity. Furthermore, the 2004 Housing Element would not directly result in changes to zoning or height and bulk designations. New housing would be required to comply with the previously discussed regulations, the governing land use plan, the City's Residential Design Guidelines, and the Urban Design Element of the General Plan, which is concerned with the physical character and environment of the City with respect to development and preservation. Finally, Chapter 35 of the City's Administrative Code further reduces incompatibilities between residential and industrial uses. Therefore, the 2004 Housing Element would have a ***less than significant*** impact with respect to conflicts with existing land use character.

*2009 Housing Element Analysis*

Implementation of the 2009 Housing Element could result in impacts related to existing character if new housing is out of scale with development in an existing neighborhood or if new development is so different it would change the existing character of an area. The following 2009 Housing Element policies promote residential development in certain areas of the City and promote increased residential densities. The potential for these policies to affect land use character is addressed below.

| Impact | 2009 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| Direct growth to certain areas of the City. | Policy 1.1: Focus housing growth- and the infrastructure necessary to support that growth- according to community plans. Complete planning underway in key opportunity areas such as Treasure Island, Candlestick Park and Hunters Point Shipyard. | Implementation Measure 1.1.2: Pursuit of housing development opportunities in neighborhood and area plans. |
| | Policy 1.3: Work proactively to identify and secure opportunity sites for permanently affordable housing. | Policy 1.1: Promote development of permanently affordable housing on surplus, underused and vacant public lands. |
| | Policy 1.6: Consider greater flexibility in the number and size of units within established building envelopes in community based planning processes, especially if it can increase the number of affordable units in multi-family structures. | Policy 2.5: Allow flexibility in the number and size of units within permitted volumes of larger multi-unit structures, especially if the flexibility results in creation of a significant number of dwelling units that are permanently affordable to lower income households. |

| Impact | 2009 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| Promote housing that fits within existing neighborhood character. | Policy 11.1: Promote the construction and rehabilitation of well-designed housing that emphasizes beauty, flexibility, and innovative design, respects existing neighborhood character. | Policy 12.4: Promote construction of well designed housing that conserves existing neighborhood character. |
| | Policy 11.3: Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character. | Policy 12.4: Promote construction of well designed housing that conserves neighborhood character. |
| | Policy 11.5: Ensure densities in established residential areas promote compatibility with prevailing neighborhood character. | Policy 12.5: Relate land use controls to the appropriate scale for new and existing residential areas. |
| | Policy 11.7: Consider a neighborhood's character with integrating new uses, and minimize disruption caused by expansion of institutions into residential areas. | Policy 12.3: Minimize disruption caused by expansion of institutions into residential areas. |
| Reduce land use conflicts through support of the long-range planning process. | Implementation Measure 8: Planning, Redevelopment and MOWED should complete long range planning processes already underway: Japantown, Glen Park, the Northeast Embarcadero Study, the Bayview Hunter's Point Plan, Candlestick/Hunters Point, India Basin Shoreline Community Planning Process, Treasure Island and Hunter's Point. | |

The 2009 Housing Element recognizes the diversity in architectural structures throughout the City. 2009 Housing Element Policy 11.1 would ensure that future development would be consistent with existing neighborhood character. The 2009 Housing Element advocates for housing to be incorporated into new commercial and institutional development, but notes that housing development in areas of commercial and institutional development should be determined based through a community planning process. Additionally, Implementation Measure 8 calls for the City to complete long range planning processes already underway for many areas of the City. These planning processes have identified locations where the City has determined that new residential development would be appropriate, and where the City has engaged the surrounding communities in a community planning process. The specific environmental

review conducted for those planning efforts will address the compatibility of those plans with the existing land use character.

As discussed previously, the 2009 Housing Element does not, overall citywide, promote increased residential densities more so than the 1990 Residence Element. The 2009 Housing Element promotes increased densities mostly as a strategy to be pursued during community planning processes. Any such community planning process would be required to undergo a separate environmental review pursuant to CEQA, and would be required to address the potential for the proposed land use controls of that community planning effort affect land use character. Furthermore, incremental increases in residential density in those areas that permit residential uses would not substantially change the existing land use character. Additionally, new residential uses would be required to be developed in accordance with the residential design guidelines or other applicable design guidelines, as well as Planning Code density requirements.

Although the 2009 Housing Element promotes housing in certain areas of the City, including within commercial developments and near transit, the proposed 2009 Housing Element would not change allowable land uses. As shown in Figures V.B-1 and V.B-2, much of the City is located in proximity to a variety of land uses including commercial districts and mixed use districts. Therefore, policies that promote additional residential development within mixed-use areas would not result in substantial changes to land use character.

Furthermore, new housing would need to comply with the previously discussed regulations, the governing land use plan, and the Urban Design Element of the General Plan. Finally, compliance with Chapter 35 of the City's Administrative Code further reduces any potential incompatibilities between residential and industrial uses. In addition, the following 2009 Housing Element policies could reduce any potential impacts to character by directly or indirectly encouraging the preservation of neighborhood character.

Similar to the 2004 Housing Element discussed above, overall, the 2009 Housing Element contains policies and measures that would increase the City's housing supply in a manner that does not present conflicts with existing land use character. The 2009 Housing Element would not result in changes to allowable land uses or height and bulk designations and future development would be required to comply with the previously discussed land use regulations. Therefore, the 2009 Housing Element would have a ***less than significant*** impact with respect to conflicts with existing land use character.

**Cumulative Impacts**

The geographic context for the cumulative impacts associated with land use issues is the City and County of San Francisco. Cumulative impacts occur when impacts from a proposed project that are significant or less than significant combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Changes to the existing land use environment in the area could occur through the conversion of vacant land and low density uses to higher density uses, or though conversion of existing land use (e.g., from commercial to residential). However, it is assumed that future development would be consistent with policies in the adopted General Plan as well as zoning

requirements. Any new development is also anticipated to require CEQA review and design review, as well as other state and local regulations such as San Francisco Administrative Code Chapter 35, which would reduce potential land use conflicts. For this reason, cumulative impacts to land uses as a result of incompatible uses and changes to land use character would be ***less than significant***. The contribution of the Housing Elements to such cumulative land use impacts is less than significant and is thus not cumulatively considerable because overall the Housing Elements promote compatibility with the surrounding land uses. This cumulative impact would be ***less than significant***.

It is also anticipated that any new development will be reviewed for consistency with adopted land use plans and policies by the City, such as CEQA, the Planning Code, and the California Subdivision Map Act, all of which require findings of plan and policy consistency prior to approval of entitlements for development. For this reason, cumulative impacts associated with inconsistencies of future development with adopted plans and policies would be ***less than significant***. In addition, the contribution of the Housing Elements to such cumulative impacts would be ***less than significant***. As a result, the proposed Housing Elements would not contribute to any impacts associated with plan or policy inconsistency. This is considered to be a ***less than significant*** cumulative impact.

## MITIGATION AND IMPROVEMENT MEASURES

### Mitigation Measures

No mitigation measures are warranted by the proposed Housing Elements.

### Improvement Measures

No improvement measures are warranted by the proposed Housing Elements.

# V. ENVIRONMENTAL SETTING AND IMPACTS
# C. AESTHETICS

## INTRODUCTION

This section addresses the potential impacts of the 2004 Housing Element and 2009 Housing Element policies related to scenic vistas, scenic resources, visual character or quality of surrounding area, and potential new sources of light and glare.

## ENVIRONMENTAL SETTING

### Visual Character

The visual setting of the City is varied, reflecting the unique visual characteristics of the City's topography, street grids, public open spaces, and distinct neighborhoods. San Francisco's skyline may be characterized by a general pattern of densely clustered high-rise commercial development in the downtown core that tapers off to low-rise development at its periphery. This compact urban form signifies the downtown as the center of commerce and activity and produces a downtown "mound," distinctive from the City's numerous hills. Although distinctive, this form is neither smooth nor uniform. A range of building heights in the downtown creates gaps, peaks, dips and inconsistencies within this pattern, allowing taller buildings and building tops to stand out in profile against the sky. The tension between conformity and variety in the skyline results in a readable and recognizable image for San Francisco, with notable landmarks such as the Transamerica Pyramid, sitting apart from the "mound."

Outside of the highly commercial and built-up downtown area, much of the City is characterized by unique residential neighborhoods, which each exhibit their own distinctive visual character. Neighborhoods within the City can vary greatly in terms of density, scale, architectural style, and general design pattern. Most neighborhoods have a traditional neighborhood commercial district with a main street which provides goods and services to residents in the vicinity. Commercial storefront buildings usually contain businesses on the first floor and residential units above. This type of development creates a village-like appearance, common throughout much of San Francisco's neighborhoods and districts.

Section V.B (Land Use and Land Use Planning) discusses the land use character of the 18 Planning Districts within the City, as depicted on Figure V.A-1, and describes existing height limits and land uses within each of the Planning Districts, including descriptions of neighborhood commercial areas.

### Open Space

Public open spaces often give a neighborhood its identity, a visual focus, a center for activity and provide a counterpoint to often dense mixed-use residential and commercial neighborhoods by providing visual relief from the built environment. Open spaces in the City include playgrounds, civic spaces, regional parks, and neighborhood parks. Refer to Section V.J (Recreation) for more information about parks and open spaces.

- Executive Order S-01-07 establishing the Low Carbon Fuel Standard (LCFS) requires a 10% or greater reduction in the average carbon intensity for transportation fuels in California regulated by ARB (also a discrete early action measure).

- AB 1493 (Pavley Standard) requires ARB to adopt regulations to reduce GHG emissions for noncommercial passenger vehicles and light-duty trucks of model year 2009 and thereafter.

- Under Senate Bill 107, California's Renewable Portfolio Standard (RPS) requires retail suppliers of electric services to increase procurement from eligible renewable energy resources to 20% by 2010.

- California Executive Order S-14-08 mandates retail suppliers of electric services to increase procurement from eligible renewable energy resources to 33% by 2020.

- Senate Bill (SB) 1368 requires the California Public Utilities Commission (PUC) and CEC to establish GHG emission performance standards for the generation of electricity.

**Regional**

The BAAQMD is the primary agency responsible for comprehensive air pollution control in the entire San Francisco Bay Area Air Basin. As such, the BAAQMD works directly with the Association of Bay Area Governments, the Metropolitan Transportation Commission, and local governments and cooperates actively with all federal and state government agencies. The BAAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

BAAQMD has published a document titled *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans* (BAAQMD CEQA Guidelines, December 1999). In that document BAAQMD provides guidance and recommendations on the methodologies of analysis and suggested thresholds of significance that Lead Agencies can use when analyzing air quality impacts during CEQA review of projects. This document does not address climate change or GHG emissions.

The BAAQMD recently updated their 1999 CEQA Air Quality Guidelines (referenced above) and adopted significance thresholds for GHGs on June 2, 2010. The updated CEQA Air Quality Guidelines includes significance thresholds, assessment methodologies, and mitigation strategies for GHG emissions. The recently adopted GHG thresholds of significance, as discussed in BAAQMD's May 2010 CEQA Air Quality Guidelines, includes two sets of GHG thresholds: one that would apply to specific development projects, and another threshold that would apply to plan-level CEQA analyses. The proposed 2004 and 2009 Housing Elements are an update to the City's General Plan and therefore, the plan-level threshold would be the applicable threshold for the proposed Housing Elements. However, as discussed in Section V.H (Air Quality), according to the BAAQMD, the recently adopted thresholds of significance for GHGs are intended to apply to environmental analyses that have begun on or after adoption of the revised CEQA thresholds (June 2, 2010). Therefore, the proposed project would not be subject to BAAQMD's recently

# V. ENVIRONMENTAL SETTING AND IMPACTS
# J. WIND AND SHADOW

## INTRODUCTION

This section addresses the potential impacts of the 2004 Housing Element and 2009 Housing Element policies related to wind and shadow. The San Francisco Planning Code contains provisions pertaining to wind and shadow minimization. Because wind and shadow contribute substantially to the San Francisco environment and can be highly susceptible to an impact from development, these issues are analyzed as part of CEQA review in San Francisco.

## ENVIRONMENTAL SETTING

### Wind

Wind impacts are generally caused by large building masses extending substantially above neighboring buildings, and by buildings oriented such that a new large wall catches a prevailing wind, particularly if such a wall includes little or no articulation.

Long-term wind data in San Francisco is available from historical wind records from the U.S. Weather Bureau weather station located above the old Federal Building at 50 United Nations Plaza. Table V.J-1 shows that average wind speeds are greatest in the summer and least in the fall. Winds also exhibit a diurnal variation with the strongest winds occurring in the afternoon, and lightest winds occurring in the early morning.

**Table V.J-1**
**Seasonal Wind Direction Frequency and Average Speed in Knots (%)**

| Prevailing Wind Direction | January | | April | | July | | October | | Annual | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Freq | Speed | Freq | Speed | Freq | Speed | Freq | Speed | Freq | Speed |
| North | 12.5 | 7.9 | 2.2 | 11.0 | 0.3 | 6.0 | 3.3 | 6.6 | 5.0 | 7.2 |
| North-northeast | 1.3 | 5.6 | 0.7 | 6.1 | 0.3 | 6.8 | 0.7 | 6.6 | 0.8 | 6.0 |
| Northeast | 4.5 | 5.3 | 1.3 | 4.7 | 1.1 | 7.4 | 2.2 | 5.8 | 1.9 | 5.6 |
| East-northeast | 1.4 | 6.3 | 0.6 | 4.8 | 0.2 | 5.1 | 0.8 | 5.1 | 0.8 | 5.6 |
| East | 11.9 | 4.8 | 2.6 | 4.5 | 0.1 | 3.9 | 4.8 | 4.5 | 4.8 | 5.0 |
| East-southeast | 2.1 | 6.4 | 0.3 | 5.2 | 0.1 | 2.5 | 0.6 | 5.8 | 0.8 | 5.8 |
| Southeast | 9.1 | 6.4 | 2.4 | 7.8 | 0.2 | 5.0 | 3.7 | 6.6 | 4.2 | 6.8 |
| South-southeast | 2.8 | 5.6 | 0.3 | 3.8 | 0.1 | 3.0 | 1.3 | 9.0 | 1.2 | 6.4 |
| South | 6.7 | 5.0 | 4.2 | 7.1 | 1.1 | 4.9 | 4.5 | 7.5 | 4.1 | 6.4 |
| South-southwest | 1.0 | 4.8 | 0.4 | 4.1 | 0.1 | 3.0 | 1.7 | 12.8 | 0.9 | 8.6 |
| Southwest | 4.5 | 8.0 | 7.7 | 9.2 | 15.6 | 10.1 | 7.8 | 9.1 | 9.3 | 9.3 |
| West-southwest | 1.0 | 5.9 | 1.7 | 7.7 | 1.2 | 8.1 | 2.8 | 8.8 | 2.4 | 8.6 |
| West | 13.2 | 7.2 | 43.0 | 10.9 | 53.0 | 13.1 | 34.6 | 9.1 | 35.7 | 10.9 |
| West-northwest | 7.5 | 11.1 | 20.7 | 14.1 | 14.9 | 14.5 | 15.2 | 10.9 | 13.8 | 12.7 |
| Northwest | 11.5 | 7.7 | 9.3 | 10.7 | 10.7 | 11.4 | 10.8 | 8.5 | 10.0 | 9.7 |
| North-northwest | 1.2 | 5.7 | 0.6 | 10.8 | 0.6 | 8.5 | 0.5 | 7.5 | 0.7 | 8.3 |
| Calm[1] | 7.7 | - | 2.1 | - | 0.3 | - | 4.6 | - | 3.7 | - |

**Shadow**

Shading is an important environmental issue because the users or occupants of certain land uses, such as residential, recreational/parks, churches, schools, outdoor restaurants, and pedestrian areas have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive". For a discussion of parks and open space in San Francisco, refer to Section V.K (Recreation).

Shadow lengths are dependent on the height and size of the building or object from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e., time of day) and elliptical orbit (i.e., change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

In the City, the presence of the sun's warming rays is essential to enjoying open space. This is because climatic factors, including ambient temperature, humidity, and wind, often combine to create a comfortable climate only when direct sunlight is present. Therefore, the shadows created by new development nearby can critically diminish the utility of the open space. This is particularly a problem in the Downtown area and in adjacent neighborhoods, where there is a limited amount of open space, pressure for new development, and zoning controls that allow tall buildings. Neighborhoods that experience shading issues include the Downtown area and many of the adjacent areas, including Civic Center, Nob Hill, Financial District, Mission Bay, and South of Market. Together these areas could accommodate approximately 12 percent of the City's pipeline housing units and approximately five percent of the overall capacity for new housing within the City.[4] Refer to Figure IV-4 in Section IV. Project Description, which shows the Citywide Height Map.

The City of San Francisco is densely developed with urban uses. As discussed in Section V.K (Recreation), the City is served by over 200 neighborhood park, recreation, and open space facilities. These facilities are considered "shadow-sensitive".

In general, all applications for new construction or additions to existing buildings above 40 feet in height must be reviewed to determine whether a project would cast additional shadows on properties under the jurisdiction of, or designated to be acquired by the Recreation and Park Department. The Planning Department staff develops a "shadow fan" diagram that shows the maximum extent of the shadows cast by a proposed building throughout the year, between one hour after sunrise and one hour before sunset. If the shadow fan indicates a project shadow does not reach any property protected by Planning Code Section 295 (the sunlight ordinance), no further review is required. If the shadow fan shows that a project has potential to shade such properties, further analysis is required.

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[4] This calculation used the entire Downtown District to represent the Civic Center, Nob Hill, and Financial District areas. The aforementioned areas do not encompass the entire Downtown District. Therefore, the percentage of pipeline housing units and overall capacity that are in areas with shading issues are likely overstated.

and are dominated by either coast live oak (*Quercus agrifolia*) or California wax myrtle (*Myrica californica*). Small stands of California wax myrtle forest occur in the eastern portion of Golden Gate Park, but these may be planted trees. However, stands of coast live oak forest within Golden Gate Park are thought to be remnants of the historic vegetation. Stands of coast live oak forest occur at several other natural areas, and those at Buena Vista Park and 15th Avenue Steps are also likely to be remnant stands of the historic San Francisco vegetation. Baker Beach and Fort Funston are also likely to include seabluff scrub habitat, another sensitive community.[5]

In addition, an EIR is currently being prepared for the Significant Natural Resource Areas Management Plan (SNRAMP)[6]Areas on Department of Recreation and Parks property in the City, which are different than the natural areas previous discussed. The SNRAMP will be used by the resource managers over the next 20 years. The 31 Natural Areas located within the City are scattered mostly throughout the central and southern portions of the City and constitute approximately four percent of the total City area. They range in size from less than one acre (i.e., 15th Avenue Steps) to almost 400 acres (i.e., Lake Merced).

The movement and migration of wildlife in urban and suburban areas has been substantially altered due to habitat fragmentation over the past century. This fragmentation is most commonly caused by development, which can result in large patches of land becoming inaccessible and forming a virtual barrier between undeveloped areas, or resulting in additional roads which, although narrow, may result in barriers to smaller or less mobile wildlife species. Fragmented habitat corridors are located throughout the City. Habitat fragmentation results in isolated "islands" of habitat, which prevents the exchange of genetic material within species populations in different geographic areas necessary to maintain the genetic variability to withstand major environmental disturbances such as fire or climate change.[7]

**Wetlands**

Wetlands are generally considered to be areas that are periodically or permanently inundated by surface or groundwater, and support vegetation adapted to life in saturated soil. Wetlands are recognized as important features on a regional and national level due to their high inherent value to fish and wildlife, use as storage areas for storm and flood waters, and water recharge, filtration, and purification functions. Technical standards for delineating wetlands have been developed by the U.S. Army Corps of Engineers (ACE) and the U.S. Fish and Wildlife Service (USFWS), which generally define wetlands through consideration of three criteria: hydrology, soils, and vegetation. The ACE and the California Department of Fish and Game (CDFG) have jurisdiction over modifications to stream channels, rivers banks, lakes and other wetland features. Due to the extent of development and past filling within the City, jurisdictional wetlands and other water features are not prevalent within the City. However, wetlands are

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[5] These areas include rocky cliffs along the shoreline that are likely to support seabluff scrub habitat.

[6] The Notice of Preparation of an Environmental Impact Report for the Natural Areas Management Plan was released on April 22, 2009.

[7] California Wilderness Coalition, et. al. Missing Linkages: Restoring Connectivity to the California Landscape. (http://www.calwild.org/resources/pubs/linkages/index.htm).

Sensitive vegetation communities are also identified by CDFG on its List of California Natural Communities Recognized by the CNDDB. Impacts to sensitive natural communities and habitats identified in local or regional plans, policies, regulations or by federal or state agencies must be considered and evaluated under the CEQA (CCR: Title 14, Div. 6, Chap. 3, Appendix G).

**Local**

***San Francisco General Plan***

The San Francisco General Plan provides general policies and objectives to guide land use decisions and development throughout the City. General Plan objectives and policies relevant to biological resources are discussed in Section V.A (Plans and Policies) of this EIR.

***Chapter 8 of the San Francisco Environmental Code***

Chapter 8 of the San Francisco Environment Code bans the use of tropical hardwood and virgin redwood for reasons including atmospheric imbalance and global warming and that the destruction of rainforests is contributing currently to extinction of 30 species of plant and animal life each day. The City prohibits the use, acquisition or purchase, directly or indirectly, by any City or County department or agency, of any tropical hardwoods or tropical hardwood wood products as well as virgin redwood or virgin redwood wood products.

***San Francisco Integrated Pest Management Ordinance***

Chapter 3 of the San Francisco Environmental Code states that the City, in carrying out its operations, shall assume pesticides are potentially hazardous to human and environmental health. City departments shall give preference to reasonably available nonpesticide alternatives when considering the use of pesticides on City property. The Integrated Pest Management Ordinance provides an outline of the City's integrated pest management (IPM) approach.

***Urban Forest Plan***

Pursuant to Chapter 12 of the San Francisco Environment Code, the Urban Forestry Council advises city departments, including the Board of Supervisors and the mayor. Its tasks are to develop a comprehensive urban forest plan; educate the public; develop tree-care standards; identify funding needs, staffing needs, and opportunities for urban forest programs; secure adequate resources for urban forest programs; facilitate coordination of tree-management responsibilities among agencies; and report on the state of the urban forest. The Council's scope of authority is completely advisory and educational in nature. The Council has prepared an Urban Forest Plan, which reviews the creation of San Francisco's urban forest, analyzes the structure and functional benefits of the forests, and identifies the challenges that threaten its future. Designed to provide a road map for policy-makers and implementers, the Plan identifies goals that are critical to maximizing the value of the forest. Underlying these goals is the understanding that the urban forest is a living and evolving resource that is adapted to the unique and often challenging

conditions of the urban environment. These goals are directed at the owners and managers of the trees that comprise the urban forest.

***Urban Forestry Ordinance***

Section 804 of Article 16, "Urban Forestry Ordinance," in the San Francisco Public Works Code outlines the jurisdiction of the San Francisco Department of Public Works (DPW) over trees and landscaping. DPW has jurisdiction over planning, planting, protection, maintenance, and removal of trees or landscaping in the public right-of-way, as well as over certain trees on private property if they are deemed hazard, landmark, or significant trees. Pursuant to Article 16, the San Francisco Urban Forestry Ordinance's purposes include: realize the optimum public benefits of trees on the City's streets and public places; integrate street planting and maintenance with other urban elements and amenities; promote efficient, cost effective management of the City's urban forest; reduce the public hazard, nuisance, and expense occasioned by improper tree selection, planting, and maintenance; provide for the creation of an equitable, sustained, and reliable means of funding urban-forest management throughout the City; create and maintain a unified urban-forest resource; recognize that trees are an essential part of the City's aesthetic environment; recognize that green spaces are vital to San Francisco's quality of life; and ensure that landscaping in sidewalk areas is properly constructed and maintained in order to maximize environmental benefits, protect public safety, and limit conflicts with infrastructure. Directions are provided for planting and removal of street trees by the DPW and persons outside the DPW. .

**Significant Trees**

Significant trees are defined by City ordinance as trees in, or within 10 feet of, a public right-of-way that are greater than 20 feet tall, have a canopy greater than 15 feet in diameter, or have a trunk greater than 12 inches in diameter at 4.5 feet above grade.[9] Removal of significant trees requires the authorization of the DPW director or the director's designee, and is subject to the rules and procedures governing permits and disclosures as above.

**Landmark Trees**

In 2007, the San Francisco Board of Supervisors adopted legislation for designation and protection of landmark trees. Landmark trees can be anywhere within San Francisco, including private property. They are designated as such by the Board of Supervisors, based on criteria such as age, location, species, or visual quality. Once the tree has been designated, a notice indicating this designation is recorded for the property on which the tree is located. The City Zoning Administrator is required to identify landmark trees on proposed development or construction sites, and to notify the Urban Forestry Council and DPW. Special permits are required if the property is later proposed for development.[10] The City Zoning

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9 San Francisco Public Works Code, Article 16, Urban Forestry Ordinance, Available at: http://www.municode.com/Resources/gateway.asp?pid=14142&sid=5, Section 810A.

10 San Francisco Public Works Code, Article 16, Urban Forestry Ordinance, Available at:

Administrator or other City agency must impose measures to protect landmark trees on a construction site.

## IMPACTS

### Significance Thresholds

The proposed Housing Elements would normally have a significant effect on the environment if they would:

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;
- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

### Impact Evaluation

As discussed previously, the 2004 Housing Element and 2009 Housing Elements would not change the land use objectives and policies in the City's area and redevelopment plans. According to Part I of the 2009 Housing Element (Data and Needs Analysis), the City has available capacity to meet the Regional Housing Needs Assessment (RHNA) as determined by the Association of Bay Area Governments (ABAG). Therefore, the rezoning of land uses is not required. To meet the City's share of the RHNA, the proposed Housing Elements aim to do the following: 1) preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound, and 2) provide direction for how new

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http://www.municode.com/Resources/gateway.asp?pid=14142&sid=5, Section 810.

housing development in the City should occur. With respect to the latter, the 2004 Housing Element encourages new housing in Downtown and in underutilized commercial and industrial areas. The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed-use districts near Downtown. The 2009 Housing Element encourages housing in new commercial or institutional projects and accommodating housing through existing community planning processes.

***Impact BI-1: The proposed Housing Elements would not have a substantial adverse effect on any candidate, sensitive, or special-status species; riparian habitat or other sensitive natural communities; federally protected wetlands; or interfere with the movement of species. (Less than Significant)***

New construction could result in impacts related to biological resources if new housing would result in disturbance from construction activities, tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status-species (e.g. development/redevelopment of abandoned buildings that provide habitat for bats could impact those species), application of pesticides and herbicides, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor, and conflict with provisions of an adopted habitat conservation plan. As shown in Figure IV-4 in Section IV (Project Description), the City's height districts allow the tallest buildings (121 to 550 feet) in the Downtown and SoMa areas, with a few exceptions in other areas of the City. Generally, lower heights in the western and southern portions of the City would not affect bird migration. Increases in density could be accomplished by promoting development to full height limits in the Downtown area, which could affect bird migration. On the other hand, increasing density could accommodate more of the City's fair share of the RHNA in fewer buildings, necessitating less new construction and less potential for disturbance or interference to biological resources.

*2004 Housing Element Analysis*

The 2004 Housing Element does not propose policies that would directly or indirectly encourage development of areas with sensitive habitat or species. However, the following 2004 Housing Element policies could affect bird migrations by encouraging increased density in Downtown areas.

| Impact | 2004 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| Direct growth to certain areas of the City. | Policy 1.1: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of units that are affordable to lower income households. Set allowable densities in established residential areas | Policy 2.1: Set allowable densities in established residential areas at levels which will promote compatibility with prevailing neighborhood character.<br>Policy 2.2: Encourage higher residential density in areas adjacent to downtown, in underutilized commercial and industrial areas proposed for conversion to housing and in neighborhood commercial districts where higher density will not have harmful effects, especially if the higher density provides a significant number of |

| Impact | 2004 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| | Policy 3.3: Maintain and improve the condition of the existing supply of public housing. | Policy 5.4: Maintain and improve the existing supply of public housing. |
| Promote preservation of residential buildings. | Policy 3.6: Preserve landmark historic residential buildings. | Policy 5.5: Preserve landmark historic residential buildings. |
| | Implementation Measure 3.6.6: The Planning Department will encourage property owners to use preservation incentives to repair, restore, or rehabilitate historic resources in lieu of demolition. These include federal tax credits for rehabilitation of qualified historical resources, Mills Act property tax abatement programs, the State Historic Building Code, and tax deductions for preservation easements. | |

As shown above, the 2004 Housing Element proposes policies that discourage demolition and promote the maintenance of existing public housing (including Policies 2.1, 3.3, and 3.6) to a degree similar to the 1990 Residence Element, which could reduce the amount of new housing required to meet the City's housing needs. Essentially, both the 1990 Residence Element and 2004 Housing Element recognize the need for the retention and maintenance of existing housing, and therefore do not represent a shift in policy. The preservation of existing housing reduces the potential for new development to build to maximum allowable height and bulk limits, thereby reducing the potential for subsequent biological resource impacts resulting from new development at maximum allowable height and bulk limits.

Although the 2004 Housing Element would not result in the construction of residential units, it would shape how new residential development should occur and ensures that there is adequate land available to meet future housing needs. Potential impacts related to biological resources would be offset by compliance with the Open Space Element of the San Francisco General Plan, Chapter 8 of the San Francisco Environment Code, San Francisco's Green Building Ordinance, San Francisco's IPM Ordinance, San Francisco's Urban Forest Plan, and San Francisco's Urban Forestry Ordinance to minimize impacts related to biological resources. Furthermore, any new development within the City would be subject, on a project-by-project basis, to independent CEQA review. Therefore, the 2004 Housing Element would have a ***less than significant*** impact with respect to biological resources.

| Impact | 2009 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| | Implementation Measure 64: Planning staff shall support affordable housing projects in the development review process, including allowing sponsors of permanently affordable housing to take advantage of allowable densities provided their projects are consistent with neighborhood character. | |
| | Implementation Measure 79: Planning staff shall continue to use community planning processes to develop policies, zoning and standards that are tailored to neighborhood character. | Implementation Measure 2.2.1: Densities compatible with neighborhood character |

As shown above, the 2009 Housing Element promotes housing through community planning processes (Policies 1.1, 1.6, and Implementation Measures 8, 80 and 97). The 2009 Housing Element also promotes housing on underused, vacant and surplus lands (Policy 1.3 and Implementation Measures 3 and 4), and housing within mixed-use areas (Policy 1.8 and Implementation Measure 80), thereby directing housing to commercial areas. As discussed previously, directing new housing to certain areas of the City could increase the amount of new housing occurring in those areas, thereby potentially resulting in new development potentially requiring tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status-species (e.g, development/redevelopment of abandoned buildings that provide habitat for bats could impact those species), application of pesticides and herbicides, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor, and conflict with provisions of an adopted habitat conservation plan.

The 2009 Housing Element generally promotes increased density through community planning processes (Policies 1.4, 1.6, and Implementation Measures 13 and 79) and for affordable housing (Policy 7.5 and Implementation Measures 36 and 64). The 2009 Housing Element also includes a strategy designed to reduce the amount of space required for non-housing functions (Implementation Measure 12). While the 2009 Housing Element contains a policy that advocates for family-sized housing units (Policy 4.1 and Implementation Measure 32), overall density increases from such policy would be speculative as less units would be accommodated within a given building envelope. However, as discussed in the analysis of the 2004 Housing Element, increased density standards could result in more units within a given building envelope, which could be partially achieved by the construction of multi-family housing built to maximum allowable height and bulk, thereby potentially resulting in new development potentially requiring tree removal, construction on or near wetlands or sensitive habitats or riparian areas, interference with migration, take of special status-species (e.g, development/redevelopment of abandoned buildings that provide habitat for bats could impact those species), application of pesticides and

herbicides, construction of tall buildings with glass walls that could increase bird strikes and possibly interrupt a migration corridor, and conflict with provisions of an adopted habitat conservation plan.

Similar to the 2004 Housing Element, major themes of the 2009 Housing Element include the preservation and maintenance of existing housing. The following 2009 Housing Element policies discourage demolition and encourage the maintenance of the City's existing housing stock, thereby reducing the amount of new housing required to meet the City's housing needs and subsequent biological resource related impacts resulting from development at maximum allowable height and bulk limits.

| Impact | 2009 Housing Element | Corresponding 1990 Residence Element Policy |
|---|---|---|
| Discourage demolition and improve existing housing supply. | Policy 2.3: Prevent the removal or reduction of housing for parking. | |
| | Policy 2.4: Promote improvements and continued maintenance to existing units to ensure long term habitation and safety. | Objective 5: To maintain and improve the physical condition of housing while maintaining existing affordability levels.<br>Policy 5.1: Assure that existing housing is maintained in decent, safe sanitary conditions at existing affordability levels.<br>Policy 5.2: Promote and support voluntary housing rehabilitation which does not result in the displacement of lower income occupants. |
| | Policy 3.1: Preserve rental units, especially rent controlled units, to meet the City's affordable housing needs | Policy 3.1: Discourage the demolition of sound existing housing. |
| | Policy 3.2: Promote voluntary housing acquisition and rehabilitation to protect affordability for existing occupants. | Policy 5.2: Promote and support voluntary housing rehabilitation which does not result in the displacement of lower income occupants. |
| | Policy 3.4: Preserve "naturally affordable" housing types, such as smaller and older ownership units. | |
| | Policy 3.5: Retain permanently affordable residential hotels and single room occupancy (SRO) units. | Policy 3.7: Preserve the existing stock of residential hotels. |
| | Policy 9.3: Maintain and improve the condition of the existing supply of public housing, through programs such as HOPE SF. | Policy 5.4: Maintain and improve the existing supply of public housing.<br>Policy 7.5: Encourage energy efficiency in new residential development and weatherization in existing housing to reduce overall housing costs. |

As shown above, the 2009 Housing Element proposes policies that discourage demolition and promote the maintenance of existing public housing (including Policies 2.4, 3.1, 3.2, 3.4, 3.5 and 9.3) to a degree similar to the 1990 Residence Element. The maintenance and preservation of existing housing would help to preserve the existing housing stock, requiring less new development to meet housing goals, thereby resulting in less development at maximum allowable height and bulk limits. 2009 Housing Element Policy 2.4, 3.1, 3.2, 3.4, 3.5 and 9.3 are essentially the same as their corresponding 1990 Residence Element policies. Essentially, both the 1990 Residence Element and 2009 Housing Element recognize the need for the retention and maintenance of existing housing, and therefore do not represent a shift in policy. The preservation of existing housing reduces the potential for new development to build to maximum allowable height and bulk limits, thereby reducing the potential for subsequent biological resource impacts resulting from new development at maximum allowable height and bulk limits.

The 2009 Housing Element does not propose policies that would directly or indirectly encourage development of areas with sensitive habitat or species. Overall, the 1990 Residence Element promotes increased density on a broader, citywide, scale to a greater extent than the 2009 Housing Element. However, there are three areas under which the 2009 Housing Element promotes greater density than the 1990 Residence Element. These include the following themes: increasing density near transit; construction of affordable housing; and development through the community planning process. Neither the 2009 Housing Element nor the 1990 Residence Element propose increased density specifically for the Downtown area and, therefore, do not represent a shift in policy. Although the 2009 Housing Element would not result in the construction of residential units, it would shape how new residential development should occur and ensures that there is adequate land available to meet future housing needs. Potential impacts related to biological resources would be offset by compliance with the previously discussed regulations. Therefore, the 2009 Housing Element would have a ***less than significant*** impact with respect to biological resources.

***Impact BI-2: The proposed Housing Elements would not conflict with any local policies or ordinances protecting biological resources nor would the proposed Housing Elements conflict with the provisions of an adopted habitat conservation plan. (No Impact)***

*2004 Housing Element and 2009 Housing Element Analysis*

As discussed under Impact BI-1, the 2004 Housing Element policies promote increased density more so than the 1990 Residence Element. The 2004 Housing Element directs growth to commercial and industrial areas, neighborhood commercial districts, the Downtown and on infill development sites, although to a greater degree than the 1990 Residence Element. The 2004 Housing Element also advocates for housing in community plan areas and along transit corridors, both of which are policies that were not included in the 1990 Residence Element.

Overall, the 1990 Residence Element promotes increased density on a broader, citywide, scale to a greater extent than the 2009 Housing Element. However, there are two areas under which the 2009 Housing Element promotes greater density than the 1990 Residence Element. These include the following themes: increasing density for affordable housing projects and increased density as a strategy to be pursued during the community planning process. As shown above, the 2009 Housing Element promotes housing through

community planning processes, near transit and other infrastructure, and in proximity to neighborhood services. The 2009 Housing Element also promotes housing on underused, vacant and surplus lands, and housing within mixed-use areas, thereby directing housing to commercial areas.

Directing growth to certain areas of the City and increased density could increase the amount of new housing occurring in those areas, thereby resulting in new development built to maximum allowable height and bulk, potentially increasing building height and mass. In seeking to achieve the objectives of the proposed Housing Elements, significant impacts could result if new construction conflicts with local policies or ordinances protecting biological resources or an adopted conservation plan. Although the proposed Housing Elements would not result in the construction of residential units, it would shape how and where new residential development should occur and ensures that there is adequate land available to meet future housing needs. A key strategy for meeting the City's housing goals is to maintain the City's existing housing stock. Both the 2004 Housing Element and 2009 Housing Element propose policies that discourage demolition and promote the maintenance of existing public housing to a degree similar to the 1990 Residence Element. The preservation of existing housing reduces the need for new development to maximum allowable height and bulk limits.

Neither the 2004 Housing Element nor the 2009 Housing Element contains policies that would directly or indirectly conflict with any policies protecting biological resources or any adopted habitat conservation plans. New residential development would be required to comply with the previously discussed regulations and plans, including the Open Space Element of the San Francisco General Plan, Chapter 8 of the San Francisco Environment Code, San Francisco's Green Building Ordinance, San Francisco's IPM Ordinance, San Francisco's Urban Forest Plan, and San Francisco's Urban Forestry Ordinance. Development of the opportunity sites within the City would not fundamentally conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP) because neither of these exists in the City. Furthermore, the proposed Housing Elements encourage higher density and infill development in already urbanized areas. Furthermore, the proposed Housing Elements would not result in conflicts with plans and policies related to the protection of biological resources because they would not directly or indirectly result in population growth or new development. Therefore, the 2004 and 2009 Housing Elements would have ***no impact*** with respect to conflicts with local plans or ordinances protecting biological resources or with the provisions of an adopted habitat conservation plan.

**Cumulative Impacts**

The geographic context for cumulative biological resources impacts are generally localized and affect the immediate vicinity surrounding development. Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. This would include the demolition of existing structures or new construction in the project area or immediately adjacent to its project boundaries resulting from past, present and reasonably foreseeable future projects combining with similar impacts from the 2004 Housing Element and 2009 Housing Element. The cumulative effect of development within the City could contribute to impacts related to biological resources. As discussed throughout this EIR, growth would occur regardless of implementation of the proposed Housing

Elements. The proposed Housing Elements provide direction for how residential development in the City should occur. Furthermore, any new development within the City would be subject, on a project-by-project basis, to independent CEQA review as well as policies in the San Francisco General Plan, governing area plans, design guidelines, zoning codes (including development standards), and other applicable land use plans that are intended to reduce impacts to biological resources. The 2004 Housing Element and 2009 Housing Element policies would not directly or indirectly affect biological resources. New development could affect such resources, but would be evaluated on a project-by-project basis. In addition, the 2004 Housing Element and 2009 Housing Element are public policy documents and would not result in direct significant impacts. The contribution of potential impacts from the proposed Housing Elements to the cumulative biological resource impacts would not be cumulatively considerable. Therefore, cumulative impacts related to biological resources would be ***less than significant***.

## MITIGATION AND IMPROVEMENT MEASURES

### Mitigation Measures

No mitigation measures are warranted by the proposed Housing Elements.

### Improvement Measures

No improvement measures are warranted by the proposed Housing Elements.

***Industrial Waste Ordinance (Ordinance No. 199-77)***

The San Francisco Industrial Waste Ordinance requires that groundwater meet specified water quality standards before it may be discharged into the sewer system. The Bureau of Systems Planning, Environmental and Compliance of the San Francisco Public Utilities Commission must be notified of projects necessitating dewatering. Should dewatering be necessary, the final soils report would address the potential settlement and subsistence impacts of this dewatering.

***Unreinforced Masonry Buildings Ordinance***

Adopted by the Board of Supervisors in 1992, UMB Ordinance No. 225-92 requires the City to notify all owners of UMBs and requires all property owners to retain a licensed civil structural engineer or architect to file a Building Inventory Form with the City to identify the "hazard class" of a particular UMB building. The ordinance also requires all owners of UMBs to seismically upgrade buildings by February 15, 2006. Building owners are responsible for financing the cost of the work.

The UMB ordinance spells out four different alternative standards for seismic strengthening of UMBs. Each standard requires a different level of construction and range of costs. The ordinance also specifies conditions that must be met if either of the two less extensive and costly approaches is used to seismically upgrade a UMB. The DBI, who is charged with oversight and enforcement of the program, also has the authority to initiate abatement proceedings in cases where an owner fails to seismically upgrade a building.

Exterior alterations, seismic retrofit and/or demolition of UMBs must be evaluated by the Planning Department in order to determine the type of review process required prior to the authorization of a building permit application. Some projects, however, may be approved administratively. Seismic retrofitting of UMBs is guided by the *Architectural Design Guidelines for the Exterior Treatment of Unreinforced Masonry Buildings During Seismic Retrofit*, developed by the American Institute of Architects.

## IMPACTS

### Significance Thresholds

The proposed Housing Elements would normally have a significant effect on the environment if they would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; (Refer to Division of Mines and Geology Special Publication 42.)

- Strong seismic ground shaking;
- Seismic-related ground failure, including liquefaction; or
- Landslides.

- Result in substantial soil erosion or the loss of topsoil;
- Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property;
- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
- Change substantially the topography or any unique geologic or physical features of the site.

**Impact Evaluation**

As discussed previously, the 2004 Housing Element and 2009 Housing Elements would not change the land use objectives and policies in the City's area and redevelopment plans. According to Part I of the 2009 Housing Element (Data and Needs Analysis), the City has available capacity to meet the Regional Housing Needs Allocation (RHNA) as determined by the Association of Bay Area Governments (ABAG). Therefore, the rezoning of land uses is not required. To meet the City's share of the RHNA, the proposed Housing Elements aim to do the following: 1) preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound, and 2) provide direction for how new housing development in the City should occur. With respect to the latter, the 2004 Housing Element encourages new housing in Downtown and in underutilized commercial and industrial areas. The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed-use districts near Downtown. The 2009 Housing Element encourages housing in new commercial or institutional projects and accommodating housing through existing community planning processes.

The San Francisco Bay Area and surrounding areas are characterized by numerous geologically young faults. However, there are no known fault zones or designated Alquist-Priolo Earthquake Fault Zones in the City. Therefore, the proposed Housing Elements would have ***no impact*** with respect to rupture of a known earthquake fault.

Although the proposed Housing Elements would not result in the construction of residential units, all new development would be connected to the City's existing wastewater treatment and disposal system. Development would not involve the use of septic tanks or alternative wastewater disposal systems.

***Impact GE-2: The proposed Housing Elements would not result in substantial soil erosion or the loss of topsoil. (Less than Significant)***

New construction could result in impacts related to soil erosion and the loss of topsoil if new housing, particularly on vacant or undeveloped sites, would result in grading activities, or if new development would require much more extensive grading. This exposure could result in erosion or loss of topsoil. The 2004 and 2009 Housing Element policies that promote increased density could result in heavier buildings on soil types or in proximity to slopes that are susceptible to erosion. Heavier buildings would require stronger and deeper foundations, involving more excavation than lighter buildings.

*2004 Housing Element Analysis*

As discussed under Impact GE-1, the 2004 Housing Element policies promote increased density more so than the 1990 Residence Element. (See 2004 Housing Element Policies 1.1, 1.6, 1.7, 1.8, 4.4, 4.5, 11.6, 11.7, 11.8, 11.9 and Implementation Measures 1.1.1, 1.3.1, 1.6.2, 1.8.1, 1.8.3, 4.4.1, 11.6.1 and 11.7.1.) Directing growth to certain areas of the City and increased density could increase the amount of new housing occurring in those areas, thereby resulting in new development built to maximum allowable height and bulk, potentially increasing building height and mass compared to exiting buildings. In addition, new construction could result in impacts related to erosion and the loss of topsoil by promoting housing construction on undeveloped sites. Both the potential for heavier buildings and the construction of housing on vacant or undeveloped sites could result in erosion or the loss of topsoil due to the need for extensive grading.

As discussed under Impact GE-1, the 2004 Housing Element proposes policies that promote development on undeveloped sites to the same extent as the 1990 Residence Element. 2004 Housing Element Policy 1.8 does not represent a policy shift from 1990 Residence Element Policy 1.1. The City's soft site analysis is essentially the identification of the underutilized and vacant sites, which is the subject of 2004 Implementation Measure 4.1.4. A portion of 2004 Implementation Measure 4.1.4 is similar to 2004 Housing Element Implementation Measure 1.3.3 with respect to development of Brownfield sites, which is not viewed as a policy shift. Therefore, the 2004 Housing Element would result in grading activities to an extent similar to the 1990 Residence Element and would result in a similar amount of erosion or loss of topsoil. In addition, as discussed under Impact GE-1, 2004 Housing Element Policies 3.1, 3.3, and 3.4 would retain existing housing by promoting seismic upgrades/retrofits, maintenance of existing housing, and correction of code violations to a degree similar to the 1990 Residence Element. The preservation of existing housing reduces the pressure for new housing development that could result in increased soil erosion or loss of topsoil. However, as discussed under Impact GE-1, 2004 Housing Element Policies 1.7, 4.4, 11.6, 11.7, and 11.8 would promote increased density compared to the 1990 Housing Element. Construction associated with housing could potentially result in substantial soil erosion or the loss of topsoil through the need for grading activities because increased density would result in heavier buildings that would require deeper foundations and more grading. Therefore, the 2004 Housing Element could promote increased density, which could potentially result in more soil erosion and a greater loss of topsoil compared to the 1990 Residence Element.Although the 2004 Housing Element would not result in the construction of residential units, it would shape how new residential development should occur and

on underused, vacant and surplus lands (Policy 1.3 and Implementation Measures 3 and 4), which have the potential to be contaminated. Although some 2009 Housing Element policies could increase the potential to encounter contaminated sites, 2009 Housing Element Policy 13.4 and Implementation Measure 36 could potentially reduce this impact by encouraging preservation of existing housing units, potentially reducing demolition and the corresponding exposure hazards, as described under Impact HZ-1. Furthermore, as discussed extensively in Section V.E (Cultural and Paleontological Resources) under Impact CP-1, and throughout this EIR, both the 2009 Housing Element contains numerous policies that promote the preservation of existing housing units. Retention of existing housing could reduce the potential for new construction that may occur on contaminated sites, but could also maintain units that may already be contaminated with LBP and ACM.

The 2009 Housing Element would not result in the construction of residential units, though all new development would be required to comply with all applicable federal, state, and local regulations. Therefore, the 2009 Housing Element would have a ***less than significant*** impact with respect to upset and accident conditions involving the release of hazardous materials into the environment.

***Impact HZ-3: The proposed Housing Elements would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (Less than Significant)***

Residential uses typically do not generate hazardous materials and household hazardous materials are typically labeled to ensure proper use. The exact location and quantity of hazardous materials associated with new housing is unknown. However, as discussed under Impact HZ-1, an increase in residential uses could result in additional transport, use and disposal of hazardous materials. The majority of the City's industrial and commercial land uses are clustered in the southeastern portion of the City near U.S. Highway 101. However, the Housing Elements would not directly result in new construction or locating new housing near existing or proposed schools and would have no effect on the emission of hazardous substances.

Although hazardous materials and waste generated from construction of housing may pose a health risk to nearby schools, all businesses associated with housing construction that handle or involve on-site transportation of hazardous materials would be required to comply with the provisions of the City's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for a Business Emergency Plan, which would apply to those businesses associated with construction activities. Both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to a regulating agency. In addition, implementation of federal and state regulations would minimize potential impacts by protecting schools from hazardous materials and emissions. For example, federal regulations such as RCRA would ensure that hazardous waste is regulated from the time that the waste is generated until its final disposal, and NESHAP would protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. The HMUPA is responsible for CUPA authority in the City and would require all businesses handling hazardous materials to create a Hazardous Materials Business Plan which would reduce the risk of an accidental hazardous materials release.

Brownfield or infill development sites. As discussed under Impact HZ-1, 2004 Housing Element Policies 1.7, 4.4, 11.6, 11.7, and 11.8 could promote increased density and housing construction, which could potentially increase development pressure on hazardous materials sites. 2004 Housing Element Implementation Measures 1.3.3 and 4.1.4 are both related to development of Brownfield sites, but are not considered to represent a shift in City policy. 2004 Housing Element Implementation Measure 4.1.7 more generally states that appropriate sites, which could include Brownfields, shall be identified for permanently affordable housing. Because of restrictions already imposed on such sites, there would be no significant impacts related to hazardous materials sites following remediation. Remediation efforts could, however, impact below ground resources including cultural resources, geology and soils, and hydrology and water quality. Impacts related to hazardous waste sites are typically project-specific and projects on Brownfield sites would be subject to the review and/or mitigation imposed by the City's SFDPH and/or the applicable regulator of hazardous waste. Specific mitigation measures would be developed in consultation with the SFDPH based on the real or perceived contaminants that may be onsite.

As discussed above, the 2004 Housing Element includes policies that would encourage higher residential density in underutilized commercial and industrial areas but also stresses that harmful effects should not occur as a result. For the most part, the areas mentioned in 2004 Housing Element Implementation Measure 1.3.2 comprise the Eastern Neighborhoods portion of the City. As outlined in the Eastern Neighborhoods EIR, the change in land use from an existing industrial use to new residential units would require adherence to strict cleanup levels. Compliance with facility closure requirements specified in Article 21 of the San Francisco Health Code, and site assessment and remediation requirements that may be triggered by Article 22A or the California Land Reuse and Revitalization Act, would ensure that the potential for hazardous materials to be present is addressed and that further remediation would be conducted under the oversight of the appropriate regulatory agency, if required. Because of the well established regulatory framework for site assessment and remediation, impacts related to exposure to hazardous materials due to land use changes are considered less than significant.

Development of Brownfield sites or redevelopment of former commercial and industrial sites to residential uses would be required to undergo remediation and cleanup under DTSC and the SFBRWQCB before construction activities could begin. If contamination at any specific project were to exceed regulatory action levels, the project proponent would be required to undertake remediation procedures prior to grading and development under the supervision of the City's SFDPH, HMUPA, or the SFBRWQCB (depending upon the nature of any identified contamination). The 2004 Housing Element would direct new construction to Brownfield sites and former commercial and industrial sites that would be required to comply with all applicable federal, state, and local regulations. Therefore, the 2004 Housing Element would have a ***less than significant*** impact with respect to development of hazardous materials sites.

*2009 Housing Element Analysis*

The following 2009 Housing Element implementation measures could result in impacts related to hazardous materials sites by siting residential uses in formerly commercial or industrial areas and on Brownfield or infill development sites. The 2009 Housing Element promotes residential development on

# EXHIBIT D

I-DEVINCENZI4

DRAFT ENVIRONMENTAL IMPACT REPORT

# PIER 70 MIXED-USE DISTRICT PROJECT

## VOLUME 2



**CITY AND COUNTY OF SAN FRANCISCO**
**PLANNING DEPARTMENT: CASE NO. 2014-001272ENV**

**STATE CLEARINGHOUSE NO. 2015052024**

**DRAFT EIR PUBLICATION DATE: DECEMBER 21, 2016**

**DRAFT EIR PUBLIC HEARING DATE: FEBRUARY 9, 2017**

**DRAFT EIR PUBLIC COMMENT PERIOD: DECEMBER 22, 2016 - FEBRUARY 21, 2017**

*Written comments should be sent to:*

Lisa Gibson
Acting Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
lisa.gibson@sfgov.org

SAN FRANCISCO
PLANNING
DEPARTMENT

point informing the public of potential risks associated with use of the structure and prohibiting public access.

**Impact GE-4: The Proposed Project would not create substantial risks to life or property as a result of locating buildings or other features on expansive or corrosive soils.** ***(Less than Significant)***

Much of the project site is underlain directly by bedrock, which is not expansive. The artificial fill beneath the project site is sandy and gravelly and would not be expansive. The Young Bay Mud is below the water table and is permanently saturated; therefore, it would not be subject to moisture changes that would cause expansion and contraction of the clay materials. Further, any backfill materials used for the Proposed Project would have a low expansion potential and would be adequately compacted in accordance with the recommendations of the geotechnical report prepared for the Proposed Project. Although corrosive soils have been identified at the project site, as discussed in "Corrosive Soils" on pp. 4.N.8-4.N.9, buried features of the Proposed Project would be constructed to resist corrosion in accordance with the San Francisco and Port of San Francisco Building Codes. Therefore, impacts related to problematic soils would be less than significant. No mitigation is necessary.

**Impact GE-5: The Proposed Project would not substantially change the topography or any unique geologic or physical features of the site.** ***(Less than Significant)***

The 35-foot-tall Irish Hill remnant is not considered a unique geologic or physical feature because it does not embody distinctive characteristics of any regional or local geologic principles; does not provide a key piece of information important to geologic history; does not contain minerals not known to occur elsewhere in the county; and is not used as a teaching tool. The remnant of Irish Hill is a prominent historic topographic feature in San Francisco. However, it was nearly leveled by extensive blasting and quarrying during the late 1800s and early 1900s, as described in "Project Site Topography and Geology," p. 4.N.2. Therefore, the existing hill is not representative of the original topography. In addition, construction of the new 21st Street would remove only the northern spur of the hill, and would not substantially alter the existing topography. Irish Hill is a contributing landscape feature of the Union Iron Works Historic District; the potential effects on this historic resource are addressed in Section 4.D, Cultural Resources.

As described in "Site Grading," in Chapter 2, Project Description, p. 2.67-2.69, site grades would be increased by up to 5 feet to prevent inundation due to sea level rise. However, this grading would not result in a substantial change in topography because no existing slopes would be eliminated and no new slopes would be created as a result of raising the site grade. Therefore, impacts related to alteration of topography and unique geologic or physical features of the site would be less than significant. No mitigation is necessary.

# EXHIBIT E

NPS Form 10-900
**United States Department of the Interior**
National Park Service

I-DEVINCENZI4

OMB No. 1024-0018

# National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form.* If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

## 1. Name of Property

Historic name: Fireman's Fund Insurance Company Home Office
Other names/site number: University of California at San Francisco Laurel Heights Campus
Name of related multiple property listing:
N/A
(Enter "N/A" if property is not part of a multiple property listing

## 2. Location

Street & number: 3333 California Street
City or town: San Francisco 94118 State: CA County: San Francisco 075
Not For Publication: ☐ Vicinity: ☐

## 3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this ___ nomination ___ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property ___ meets ___ does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

**___national ___statewide ___local**

Applicable National Register Criteria:

**___A ___B ___C ___D**

**Signature of certifying official/Title:** **Date**

**State or Federal agency/bureau or Tribal Government**

In my opinion, the property ___ meets ___ does not meet the National Register criteria.

**Signature of commenting official:** **Date**

**Title :** **State or Federal agency/bureau or Tribal Government**

located in the center of the property. There is also a much smaller, one-story Service Building in the northwest corner of the property. The two buildings were designed to complement each other in character and materials. The Office Building is a glass walled building with an open character. The Service Building is a brick building with a closed character. The Office Building is an International Style building which despite its size is built into its sloping hillside site in such a way as to minimize its presence. Its four wings, each built for different functions, range from three floors to seven floors. It is characterized by its horizontality, its bands of windows separated by the thin edges of projecting concrete floors, and brick trim. The wings of the building frame outdoor spaces whose landscape design connects the outdoors with the indoors both functionally and conceptually. The landscape design includes outdoor spaces for use by employees, parking lots, circulation paths, and vegetation. The principal outdoor spaces are the Entrance Court, the Terrace, and small areas around the Auditorium.

## Narrative Description

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## SETTING

The Fireman's Fund Home Office property is located in a central area of the north half of the City of San Francisco near the intersection of two principal streets, California and Presidio. The property occupies almost all of a large irregular block bound by California Street on the north, (continuing clockwise) Presidio Avenue on the east, Masonic Avenue on the southeast, Euclid Avenue on the south, and Laurel Street (in straight and curved sections) on the west. Fireman's Fund occupies about 10.2 acres—the entire block except for a small triangular parcel at the corner of California and Presidio. (See Map 1 and Map 4)

The site itself slopes down from about 300 feet in elevation in the southwest corner to about 225 feet in the northeast corner. It is part of a cluster of low hills associated with Lone Mountain whose several high points were developed as cemeteries in the nineteenth century. The Fireman's Fund site was previously a portion of the Laurel Hill Cemetery, and was long recognized for its views. Today there are distant views from the property to the southeast and downtown, to the northwest and a partial view of the Golden Gate Bridge, and to the west into the Richmond District.

The property is surrounded on all sides by thoroughly developed parts of the City of San Francisco. The site itself is at a junction of several different historical developments. To the east and north, the streets are laid out in a modified extension of the original grid of the city. Across Presidio Avenue on the east the neighborhood is called the Western Addition, characterized by a mix of middle-class homes built in the nineteenth century, and by flats and apartments built in

Horizontal bands of nearly identical window units

Uninterrupted glass walls

Window units of aluminum and glass

Circular garage ramps

Exposed concrete piers over the Garage

Wrought iron deck railings that match gates in the landscape

Brick accents and trim

**Service Building**

Massing of rectangular volumes

Brick walls with a minimum of openings

**Landscape**

Terrace, as the "centerpiece" of the landscape, designed to integrate the architecture of the building with the site and with the broader setting (through views of San Francisco); key character-defining features include its biomorphic-shaped lawn surrounded by a paved terrace and patio (paved with exposed aggregate concrete divided into panels by rows of brick); brick retaining wall and large planting bed around the east and north sides of the paved patio, custom-designed wood benches, and three circular tree beds constructed of modular sections of concrete.

Entrance Court, providing a connection between the Executive/Visitors Gate on Laurel Street and an entrance to the building on the west side of the Cafeteria Wing; key character-defining features include a central paved parking lot surrounded on its north, east, and west sides by narrow planting beds; exposed aggregate sidewalks along the north, east, and west sides of the parking lot; and a low free-standing brick wall along its north side.

Auditorium's two outdoor sitting areas—one on the east side of the Auditorium and one on its west side—that connect to entrances into the Auditorium; key character-defining features for the area on the west side of the Auditorium include the pavement (exposed aggregate divided into panels by rows of bricks), circular tree bed constructed of modular sections of concrete; and metal benches; key character-defining features for the area on the east side of the Auditorium include the pavement (concrete divided into panels by wood inserted into expansion joints).

# EXHIBIT F

I-DEVINCENZI4

# S U R V E Y
of
California Registered Historical Landmarks

Name SITE OF LAUREL HILL CEMETERY Number 760

County San Francisco

Location SE Corner Walnut and California, 3333 California St., San Francisco

Type of Plaque Plaque placed by the California State Park Commission in cooperation with the California Historical Society and the Fireman's Fund Insurance Company, May 31, 1961.

Condition of Plaque Excellent, but needs cleaning

Condition of Base Mounted to brick wall

Condition of Surroundings Good

Wording on Plaque FORMER SITE OF LAUREL HILL CEMETERY
1854-1946
The builders of the West, Civic and Military Leaders, Jurists, Inventors, Artists, and eleven United States Senators were buried here -- The most revered of San Francisco's hills.

Are there Highway Directional Signs? NO If so, where?

Remarks:

Plaque on private property.

Submitted by Jim Arbuckle Date 4-26-79

I-DEVINCENZI4

CHL#760
04/26/79






Remarks of
GARDINER JOHNSON
Member of California Historical Society
(Past President, The Bar Association of
San Francisco; now chairman of the
Association's Committee on the History
of the Bench and Bar.
Former Member, California Legislature
(1935-1947; 18th Assembly District)

San Francisco - May 31, 1961

"LAUREL HILL CEMETERY - BURIAL PLACE OF SAN FRANCISCO'S HISTORIC DEAD."

As a member of the California Historical Society I am pleased to join with my associates in that organization and the members of the State Park Commission in placing this plaque marking the site of historic "Laurel Hill Cemetery," which was originally known as "Lone Mountain Cemetery."

The inscriptions on the monuments in a city's early cemeteries usually record the dramatic history and the adventure of its founding. In Laurel Hill Cemetery, which existed from 1854 to 1946, were found the most famous and illustrious names of early San Francisco. For instance, here there were recorded the inscriptions on the graves of eleven United States Senators; six from California; four from Nevada; and one from Oregon.

Here were buried the last remains of Baker and Broderick:

Edward D. Baker, the former San Francisco lawyer who became a United States Senator from Oregon, and who, while still a member of the Senate, was killed leading his first charge at the Battle of Ball's Bluff on the banks of the Potomac on October 21, 1861; and

David C. Broderick, stone-cutter's son and volunteer fireman in New York City, who became a United States Senator from California only to be killed in a duel with Judge David S. Terry of the State Supreme Court. He died on September 16, 1859.

In addition to Broderick, the other United States Senators from California buried in Laurel Hill were James A. McDougall, William M. Gwin, Milton Latham, Aaron A. Sargent, and John F. Miller.

The four Senators from Nevada were William Sharon, James G. Fair, John Percival Jones, and William M. Stewart. The Senator from Oregon was Edward D. Baker.

For many years prior to 1853 San Francisco's principal cemetery was the Cemetery of Yerba Buena which was located in the area between Market, McAllister and Larkin Streets (near where the City Hall stands to-day). By November, 1853, many thoughtful people in San Francisco considered the Yerba Buena Cemetery site to be too near to the city for a permanent burial place. Accordingly, the Lone Mountain Cemetery project was undertaken by a private corporation composed of Nathaniel Gray, Frank B. Austin and William H. Ranlett.

The new cemetery grounds were to be located near "Lone Mountain" situated three or four miles west of the plaza. From the summit of this beautifully-shaped hill it was then possible to obtain one of the finest and most extensive views of both land and water. The title "Lone Mountain" Cemetery was selected by a council of advisers. The name was changed to Laurel Hill Cemetery in 1867.

Originally the planners intended to include in the grounds a tract of land about 320 acres in extent, the entire tract lying between the Presidio and the Mission. Subsequently, it was found that 160 acres would form a sufficiently large cemetery, and so the limits of the original plan were reduced. Because of the reduction in the size of the project, "Lone Mountain" was not situated within the cemetery boundaries, but adjoined them on the south.

The dedication of Lone Mountain Cemetery was held at 11:00 o'clock A.M. on May 30, 1854. It was reported that the weather was beautiful, and that ladies comprised at least one-half of those present. There were no street cars at that time; in fact, there were no streets within miles of the place. The only available

Former Site of Laurel Hill Cemetery 1854-1946

The Builders of the West, Civic and Military Leaders, Jurists, Inventors, Artists, and Eleven United States Senators Were Buried Here -- The Most Revered of San Francisco's Hills.

California Registered Historical Landmark No. 760

Plaque Placed by the California State Park Commission In Cooperation with the California Historical Society and the Fireman's Fund Insurance Company, May 31, 1961.

I-DEVINCENZI4

# EXHIBIT G

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JUN 0 8 2018

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
RECEPTION

3333 California Street, Mixed-Use Project
Initial Study: Case No. 2015-014028ENV

# PART 2, Exhibits H-M

# EXHIBIT H

# PRELIMINARY GEOTECHNICAL INVESTIGATION
# 3333 CALIFORNIA STREET
# San Francisco, California

*Prepared For:*
**The Prado Group**
**150 Post Street, Suite 320**
**San Francisco, California 94108**

*Prepared By:*
**Langan Treadwell Rollo**
**555 Montgomery Street, Suite 1300**
**San Francisco, California 94111**

**Peter Brady, P.E.**
**Senior Staff Engineer**




**Hadi J. Yap, Ph.D. G.E.**
**Vice President**

**3 December 2014**
**731639901**

Groundwater levels encountered in borings drilled at the site were generally between 18 and 38 feet bgs, which is below the soil susceptible to liquefaction. Therefore, we conclude the potential for liquefaction at the site is very low. Consequently, we conclude the potential for lateral spreading is also very low.

### 6.3 Seismic Densification

Seismic densification can occur during strong ground shaking in loose, clean granular deposits above the water table, resulting in ground surface settlement. Up to 15 feet of loose to medium dense sand was encountered in the borings above the water table. The loose and medium-dense sand may densify during an earthquake. We estimate settlement that may result from cyclic densification of the sand would be between ¼ and 1 inch, depending on thickness of the sand. The basement for the proposed buildings should remove most of the soil susceptible to seismic densification; therefore, we estimate less than ¼ inch of settlement should occur under the proposed buildings.

## 7.0 DISCUSSION AND CONCLUSIONS

On the basis of the results of our subsurface exploration, laboratory testing, and engineering studies, we conclude the proposed development is feasible from a geotechnical engineering standpoint. The primary geotechnical issue associated with the proposed development is the presence of fill and loose sand. These materials will affect foundation support and temporary excavation support. Our discussion and conclusions regarding these issues and their impact on the design and construction of the proposed structure are discussed in the following sections.

### 7.1 Foundations and Settlement

We understand the new buildings are planned with one below-grade level for parking. We anticipate stiff to very stiff clay, medium dense sand, and bedrock will be exposed at the foundation level. Where fill or loose sand is present below the planned depth of excavation additional excavation will be required to gain adequate support. Where this condition exist, the footing can be deepened or the over-excavation backfilled with lean concrete. On the basis of our engineering studies, we conclude the proposed buildings can be supported on shallow footings gaining support in the native soil or bedrock. We estimate total settlement of footings would be on the order of ½ to 1 inch, depending on the bearing material. Differential settlement between adjacent footings would be on order on one half of the total settlement. Where footing subgrade consists of medium dense sand, we estimate up to ¼ inch of seismic densification settlement could occur as discussed in Section 6.3.

The existing parking garage beneath the eastern wing of the main building extends three levels below grade. New building that will be constructed adjacent to the parking garage may impose surcharge on the basement wall of the parking garage. To avoid surcharging the wall, the western perimeter wall of the new building may need to be supported on drilled piers that gain support in the bedrock below the elevation of the bottom of the parking garage.

### 7.2 Excavation and Shoring

The proposed single basement will require an excavation of approximately 12 feet below the ground surface. The primary considerations related to the selection of the shoring system are:

- the presence of fill (which contains construction debris) and loose to medium-dense sand
- the potential settlement of adjacent structures and improvements caused by movement of the temporary shoring.

During excavation, the sides of the excavation and adjacent streets should be retained. The most common, and generally the most economical shoring system in the San Francisco Bay area is a soldier-pile-and-wood-lagging system. This shoring system consists of steel piles that are placed in predrilled holes; the annulus between the piles and the sides of the hole is backfilled with concrete. Wood lagging is placed between the soldier piles as excavation proceeds. For an excavation on the order of 12 feet deep, the shoring can be designed as a cantilever system. If the excavation is significantly deeper than 12 feet, tiebacks or internal bracings could be installed to provide lateral resistance and limit deflection. Considering the proposed depth of the excavation, we judge a cantilever soldier-pile-and-lagging shoring system could be used for this project.

A three-level, below-grade, parking garage is present beneath the eastern wing of the main building. To retain the excavation sides for the multi-level basements, a retaining system with tiebacks may have been used. Therefore, tiebacks may be encountered during basement excavation for new structure located east of the parking garage.

Drilling of the shafts for the soldier piles will likely require casing and/or use of drilling mud (slurry) to prevent caving. To prevent settlement of adjacent improvements, soldier

piles should not be installed by driving or vibratory methods. A monitoring program should be established to evaluate the effects of the construction on the adjacent buildings and surrounding ground.

Sand with low fines content was encountered within the zone of excavation. To reduce caving, lagging boards should be placed with every foot of excavation to limit caving. Voids that result from caving soil behind wood lagging should be grouted before proceeding to the next row of lagging.

The bottom of excavation should be above the groundwater level. During drilling of the soldier-pile holes, groundwater or perched water may be encountered. To keep the holes from caving, casing and/or drilling slurry may be needed. Alternatively, the soldier piles may be installed using auger-cast method.

Generally, soldier piles can be installed under the City's sidewalk provided that the top 3 feet of the soldier piles are removed after the permanent basement wall is cast. If tiebacks are needed, it has been our experience that using hollow-stem augers to install tiebacks in sand will result in loss of ground. Therefore, tiebacks, if required, should be installed using smooth-cased method (such as a Klemm rig) to reduce loss of ground.

The selection, design, construction, and performance of the shoring system should be the responsibility of the contractor and its shoring designer. A structural engineer knowledgeable in this type of construction should design the shoring.

### 7.3 Basement Floor Slabs

The soil at slab subgrade should consist of stiff to very stiff clay, medium dense sand, and bedrock. Therefore, the slabs may be supported on grade. If weak soil is present at subgrade level, the weak soil should be removed and replaced as engineered fill.

### 7.4 Corrosion Potential

The near surface soil was determined to be moderately corrosive. The corrosive soil will adversely affect below grade improvements, such as foundations and utilities. The results of the tests and more specific commentary and recommendations for protection of buried structures are presented in Appendix D.

### 7.5 Construction Considerations

If site grading is scheduled for the rainy season, usually between November and April, the near-surface soil may be too wet to achieve adequate compaction during site preparation and fill placement and may deflect significantly under the weight of construction equipment. For these conditions, moisture conditioning of the material and the use of lightweight equipment may be required to lower the soil to a moisture level that will promote proper compaction. Methods of moisture conditioning include mixing and turning (aerating) the soil to naturally dry the soil and lower the moisture content to an acceptable level. Aeration typically requires at least a few days of warm, dry weather to effectively dry the material. Other soil stabilization alternatives to provide a stable, workable subgrade for grading operations and other equipment include over-excavating the wet soil and replacing with drier material and/or mixing the soil with lime and/or cement.

If localized soft or wet areas are encountered, it may be necessary to over-excavate to a depth of 18 to 24 inches, place a layer of stabilizing geo-synthetic, and backfill with granular material to stabilize the subgrade and bridge the soft material.

At some locations, the excavation for the basement will encounter bedrock. Rock types will vary vertically and laterally. Also, the degree of weathering, fracturing and jointing will vary within each rock type. In San Francisco, excavation in rock has been performed with earth moving equipment, such as loaders and heavy-duty backhoes. However, because the quality of the rock varies, hard rock may be encountered that will require excavation using hoe-rams or dozers equipped with rippers. Jack hammering may be required in areas where the rock exhibits little weathering, fracturing, or jointing and in confined areas, such as footing and utility excavations.

Bedrock encountered in the borings consists of serpentinite and sandstone. Serpentinite contains naturally occurring asbestos. Therefore, a Site Mitigation Plan (SMP) may need to be prepared prior to construction. Bedrock handling and disposal should be performed in accordance with the SMP.

The contractor should be aware that there may be existing shoring elements, such as tiebacks behind basement walls, which could have been installed during the construction of the three-level parking garage. In addition, remnants of building footings within the site may be encountered during excavation.

## 8.0 RECOMMENDATIONS

Recommendations regarding site preparation, foundation design, floor slabs, and seismic design are presented in the following sections.

### 8.1 Site Preparation and Grading

This section presents earthwork recommendations for site preparation and grading.

#### 8.1.1 Site Clearing

Site demolition should include the removal of all slabs, foundations, retaining walls, pavements, utilities, and other below-grade improvements that will interfere with the proposed construction. Where utilities that are removed extend off site, they should be capped or plugged with grout. It may be feasible to abandon utilities in-place by filling them with grout, provided they will not impact future utilities or building foundations. The utility lines, if encountered, should be addressed on a case-by-case basis.

#### 8.1.2 Temporary Slopes

Excavations deeper than five feet that will be entered by workers should be shored or sloped for safety in accordance with the Occupational Safety and Health Administration (OSHA) standards (29 CFR Part 1926). Inclinations of temporary slopes should not exceed those specified in local, state or federal safety regulations. As a minimum, the requirements of the current OSHA Health and Safety Standards for Excavations (29 CFR Part 1926) should be followed. The Contractor should determine temporary slope inclinations based on the subsurface conditions exposed at the time of construction. However, temporary slopes less than 10 feet high should be inclined no steeper than 1.5:1 (horizontal to vertical). In addition, we recommend all vehicles and other surcharge loads be kept at least 10 feet away from the tops of temporary slopes.

8.1.3 Site and Subgrade Preparation

All areas to receive improvements should be stripped of vegetation and organic topsoil. Stripped materials should be removed from the site or stockpiles for later use in the landscaped areas, if approved by the landscape architect. Voids resulting from the demolition activities should be properly backfilled with lean concrete or engineered fill as described below.

Prior to placement of any engineered fill, the onsite soil exposed by stripping should be scarified to a depth of at least 12 inches, moisture-conditioned to at least three percent above optimum moisture content, and compacted to at least 95 and 90 percent relative compaction[9] for sand and clay, respectively. The soil subgrade should be kept moist until it is covered by select fill.

If soft areas are encountered during site preparation and grading, the soft material should be removed and replaced with engineered fill. If the soft material is deeper than 24 inches, we recommend over-excavating to a depth of 18 to 24 inches, placing a geotextile fabric, such as Mirafi 500X or approved equal at the bottom of the over-excavation, and backfilling with granular material. Alternatively, the over-excavation can be backfilled with lean concrete.

8.1.4 Fill Placement and Compaction

Fill should consist of onsite or imported soil that is non-corrosive, free of organic matter or other deleterious material, contains no rocks or lumps larger than four inches in greatest dimension, has a liquid limit of less than 25 and a plasticity index lower than 8, and is approved by the Geotechnical Engineer.

Fill should be placed in horizontal lifts not exceeding eight inches before compacted, moisture-conditioned to above optimum moisture content, and compacted to at least 90 percent relative compaction. Fill thicker than five feet and/or consisting of clean sand or gravel (soil with less than 10 percent fines by weight) should be compacted to at least 95 percent relative compaction.

We should be provided with samples of proposed fill at least three days before use at the site. The grading contractor should provide analytical test results or other suitable environmental documentation indicating the imported fill is free of hazardous materials at least three days before use at the site. If this data is not available, up to two weeks should be allowed to

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9 Relative compaction refers to the in-place dry density of soil expressed as a percentage of the maximum dry density of the same material, as determined by the ASTM D1557 laboratory compaction procedure.

perform analytical testing on the proposed import material. A bulk sample of approved fill should be provided to us at least three working days before use at the site so a compaction curve can be prepared.

8.1.5 Utility Trenches

We anticipate excavations for utility trenches can be made with a backhoe. All trenches should conform to the current CAL-OSHA requirements.

Utility trenches should be excavated a minimum of four inches below the bottom of pipes or conduits and have clearances of at least four inches on both sides. Where necessary, trench excavations should be shored and braced to prevent cave-ins and/or in accordance with safety regulations. If trenches extend below the groundwater level, it will be necessary to temporarily dewater them to allow for placement of the pipe and/or conduits and backfill.

To provide uniform support, pipes or conduits should be bedded on a minimum of four inches of sand or fine gravel. After pipes and conduits are tested, inspected (if required), and approved, they should be covered to a depth of six inches with sand or fine gravel, which should then be mechanically tamped to at least 90 percent relative compaction. If fill with less than 10 percent fines is used, the entire depth of the fill should be compacted to at least 95 percent relative compaction. Jetting of trench backfill should not be permitted. Special care should be taken when backfilling utility trenches in pavement areas. Poor compaction may cause excessive settlements resulting in damage to the pavement section.

Where utility trenches backfilled with sand or gravel enter the building pads, an impermeable plug consisting of either native clay or lean concrete, at least five feet in length, should be installed where the trenches enter the building. Furthermore, where sand- or gravel-backfilled trenches cross planter areas and pass below asphalt or concrete pavements, a similar plug should be placed at the edge of the pavement. The purpose of these recommendations is to reduce the potential for water to become trapped in trenches beneath the building or pavements. This trapped water can cause heaving of soils beneath slabs and softening of subgrade soil beneath pavements.

8.1.6 Exterior Slabs

To reduce the potential for differential movement and cracking, exterior concrete slabs should be underlain by at least 4 inches of Class 2 aggregate base. The upper 12 inches of the soil subgrade should be compacted to at least 95 and 90 percent relative compaction for sand and clay, respectively.

**TABLE 4**
**Depths to Bedrock**

| Boring | Approximate Ground Surface Elevation Feet | Approximate Depth to Bedrock Feet |
|---|---|---|
| B-1 | 269 | 31 |
| B-2 | 269 | 15 |
| B-3 | 245 | 7 |
| B-4 | 302 | 18 |
| B-5 | 301 | 10 |
| EB-5 | 246 | 11 |

Uplift loads may be resisted by the weight of the footings and any overlying soil. If the weight of these is no sufficient to provide the necessary uplift resistance, drilled piers or anchors may be used. If anchors are required, we should provide recommendations for their design. Drilled pier recommendations are presented in section 8.3.

The foundation subgrade should be free of standing water, debris, and disturbed materials prior to placing concrete. If fill, soft, or loose soil is present at the foundation subgrade, it should be removed to expose competent material and be replaced by lean concrete.

We should check foundation excavations prior to placement of reinforcing steel to check for proper bearing and moisture. Maintaining proper moisture will likely require wetting the excavations periodically until the concrete is placed.

### 8.3 Drilled Piers

As mentioned in Section 7.1, the existing parking garage beneath the eastern wing of the main building extends three levels below grade. New building that will be constructed adjacent to the parking garage may impose surcharge on the basement wall of the parking garage. To avoid surcharging the wall, the western perimeter wall of the new building may need to be supported on drilled piers that gain support in the bedrock below the elevation of the bottom of the parking garage. After the building layout is finalized, we should evaluate the need and refine our recommendations for drilled piers.

Drilled piers should be designed to derive their axial capacity from skin friction in the bedrock below adjacent building walls and foundations. For axial compression loads, drilled piers should

be designed using an allowable friction value of 2,000 psf; this value includes a factor of safety of approximately 2. Drilled piers should have a minimum diameter of 24 inches. Piers installed in a group should be spaced at least three diameters on center. For temporary uplift load, the skin friction value recommended for compressive capacity should be used. Total settlement of drilled piers should be small.

Resistance to lateral loads can be obtained from: 1) passive resistance acting on pier caps and grade beams oriented perpendicular to the direction of lateral load, and 2) lateral resistance of the piers. Passive resistance of pier caps and grade beams may be calculated using the recommendations we provided for shallow foundations. Lateral resistance of piers will depend on the stiffness of the pier, the strength of the surrounding soil, allowable deflection of the pier top, and the moment induced by the pier. If drilled piers are used, we can prepare moment and deflection profiles resulting from lateral loads.

Drilled piers should be installed by a qualified contractor with demonstrated experience in this type of foundation. Loose material may potentially cave during drilling, thus casing and/or drilling fluid may be required. Casing should extend to below any caving material. If casing is not extended through caving material, water or drilling slurry should be used, to stabilize holes. Concrete placement should start upon completion of the drilling and clean out. Concrete should be placed from the bottom up in a single operation using a tremie and/or a pumper pipe. The pipe should be maintained at least five feet below the upper surface of the concrete during casting of the piers. As the concrete is placed, casing used to stabilize the hole can be withdrawn. The bottom of the casing should be maintained at least three feet below the surface of the concrete.

### 8.4 Excavation and Temporary Shoring

Where space does not permit a sloped excavation, shoring will be required. We judge a cantilever soldier pile and lagging shoring system is the most appropriate for the depth of the excavation planned and types of soil present. For the design of the cantilever shoring system, we recommend using a lateral pressure corresponding to equivalent to an equivalent fluid unit weight of 40 pcf in soil and 25 pcf in rock; the depth to bedrock at boring location is presented in Table 4.

Penetration of soldier piles should be sufficient to provide lateral stability. For lateral resistance below the bottom of the excavation, we recommend using an allowable passive pressure of 2,000 psf. The passive value includes a factor of safety of about 1.5 and can be applied over

three pile diameters or the pier spacing, whichever is less. If traffic loads are expected within 10 feet of the shoring system, we recommend designing for an additional load of 100 psf applied to the upper 10 feet of the wall.

A soldier pile and lagging system is relatively flexible, and movement should be anticipated. If the shoring system is properly designed and installed, we expect movements at the top of the shoring should not exceed one inch.

### 8.5 Basement Floor Slabs

We anticipate that stiff to very stiff clay, medium dense sand, or bedrock will be exposed beneath the proposed building floor slabs; therefore, we conclude the slabs can be supported on grade.

If the subgrade is disturbed during excavation for footings and utilities, it should be prepared to provide firm support for casting of the slab. Loose, disturbed materials should be excavated, removed, and replaced with engineered fill or lean concrete during final subgrade preparation.

We recommend installing a capillary moisture break and a water vapor retarder if water vapor moving through the slab is unacceptable or if there are finished floor coverings susceptible to moisture. A capillary moisture break consists of at least four inches of clean, free-draining gravel or crushed rock. The vapor retarder should meet the requirements for Class C vapor retarders stated in ASTM E1745-97. The vapor retarder should be placed in accordance with the requirements of ASTM E1643-98. These requirements include overlapping seams by six inches, taping seams, and sealing penetrations in the vapor retarder. The vapor retarder should be covered with two inches of sand to aid in curing the concrete and to protect the vapor retarder during slab construction. The particle size of the gravel/crushed rock and sand should meet the gradation requirements presented in Table 5.

### 8.6 Permanent Below-Grade Walls

Permanent below-grade walls should be designed using an at-rest lateral pressure equivalent to a fluid unit weight of 60 pcf for soil and 45 pcf for rock. Because the site is in a seismically active region, the wall design should be checked for seismic condition. During earthquakes, the walls will be subjected to active pressure plus seismic pressure increment. We used the procedures outlined in (Sitar, et. al., 2012) to compute the seismic pressure increment. The results of our analyses indicate that the design wall pressure for seismic condition is similar to that for static at-rest condition.

If surcharge loads are present above an imaginary 1.5:1 (horizontal: vertical) projected up from the bottom of a retaining wall, a surcharge pressure should be included in the wall design. If this condition exists, we should be consulted to estimate the added pressure on a case-by-case basis.

Where traffic will pass within 10 feet of walls, traffic loads should be considered in the design of the walls. Traffic loads may be modeled by a uniform pressure of 100 psf applied in the upper 10 feet of the walls.

The lateral earth pressures given assume the walls are properly backdrained to prevent buildup of hydrostatic pressure. Backdrains can be provided by using a prefabricated drainage panels over the entire height of the walls. To protect against moisture migration, below-grade walls should be waterproofed and water stops placed at all construction joints. The waterproofing should be placed directly against the backside of the walls unless the manufacturer of the waterproofing directs otherwise.

### 8.7 Seismic Design

As discussed in Section 4.2, bedrock is relatively deep (31 feet bgs at boring B-1) in the northwest portion of the site, and less than 20 feet bgs (B-2 through B-5) the south and eastern portions of the site.

In accordance with the provision of the 2013 CBC, for the northwestern portion of the site, where bedrock is relatively deep, we recommend seismic design parameters listed below:

- Risk Targeted Maximum Considered Earthquake ($MCE_R$) $S_S$ and $S_1$ of 1.514g and 0.688g, respectively.
- Site Class D

- Site Coefficients $F_a$ and $F_v$ of 1.0 and 1.5, respectively
- Maximum Considered Earthquake (MCE) spectral response acceleration parameters at short periods, $S_{MS}$, and at one-second period, $S_{M1}$, of 1.514g and 1.032g, respectively.
- Design Earthquake (DE) spectral response acceleration parameters at short period, $S_{DS}$, and at one-second period, $S_{D1}$, of 1.009g and 0.688g, respectively.

For the eastern and southern portions of the site, where bedrock is relatively shallow, we recommend seismic design parameters listed below:

- Risk Targeted Maximum Considered Earthquake ($MCE_R$) $S_S$ and $S_1$ of 1.514g and 0.688g, respectively.
- Site Class C
- Site Coefficients $F_a$ and $F_v$ of 1.0 and 1.3, respectively
- Maximum Considered Earthquake (MCE) spectral response acceleration parameters at short periods, $S_{MS}$, and at one-second period, $S_{M1}$, of 1.514g and 0.895g, respectively.
- Design Earthquake (DE) spectral response acceleration parameters at short period, $S_{DS}$, and at one-second period, $S_{D1}$, of 1.009g and 0.596g, respectively.

## 9.0 FUTURE GEOTECHNICAL SERVICES

Prior to construction, we should review the project plans and specifications to check their conformance to the intent of our recommendations. During construction, we should observe excavation, temporary shoring and foundation installation, subgrade preparation and compaction of backfill. These observations will allow us to compare the actual with the anticipated subsurface conditions and check that the contractor's work conforms to the geotechnical aspects of the plans and specifications.

## 10.0 LIMITATIONS

The conclusions and recommendations presented in this report result from limited engineering studies and are based on our interpretation of the geotechnical conditions existing at the site at the time of investigation. Actual subsurface conditions may vary. If any variations or undesirable conditions are encountered during construction, or if the proposed construction will differ from that described in this report, Langan Treadwell Rollo should be notified to make supplemental recommendations, as necessary.

# EXHIBIT I

**Dan Safier** <dsafier@pradogroup.com> Thu, Oct 12, 2017 at 3:45 PM
To: John Rothmann <johnrothmann2@yahoo.com>, Dan Kingsley <dkingsley@sksre.com>
Cc: Kathy Devincenzi <krdevincenzi@gmail.com>, Catherine Carr <catherine.a.carr@gmail.com>, "M.J. Thomas" <mjinsf@comcast.net>, Richard Frisbie <frfbeagle@gmail.com>

Dear John, Kathy, Catherine, M.J., and Dick:

First of all John, thank you for the meeting last week at your home. As we agreed in the meeting, we are responding to your recent questions regarding the project. We have re-arranged your questions slightly to group them according to subject. If we haven't answered any of your questions, please let us know. We very much appreciate your willingness to promptly write back to us with your five outstanding issues on the project that are currently preventing us from obtaining LHIA support for the project. We appreciate your doing this so we can set a follow up meeting to find a mutually workable solution.

**LHIA Questions:**

**Q: You also stated that Prado wants to have a development agreement to lock in entitlements for longer periods of time than would normally be allowed?**

**A:** Yes, we are looking to enter into a development agreement (DA) with the City for a term of approximately 15 years. For large projects with multiple buildings like 3333 California Street, the City generally requires a DA. The DA vests the entitlements, protecting the entitlements from changes in the law in exchange for certain community benefits. This would include the community benefit of certainty of the entitlements during that period. If we did not build the project during the term of the DA, then the DA would expire and we would lose the protections of the DA.

**Q: What portion of the project would be built first?**

**A:** At this time, we have assumed that the Masonic and Euclid buildings would be built first. In general, we anticipate construction beginning with a staging and site preparation phase, which will include some demolition, then excavation for underground parking, followed by construction of the buildings. With the exception of work on the sidewalks, addition of landscaping, paving, and connecting to the City's various systems and utilities, our general contractor, Webcor Builders, is anticipating that construction will occur within the site. We will be preparing a detailed construction management plan, and the EIR will include mitigation measures around construction emissions, air quality, etc. with which we will have to comply.

**Q: What would you expect to be built in each successive phase of the project?**

**A:** At this time, we anticipate the following in each phase – Phase 1: Masonic and Euclid buildings; Phase 2: Center Buildings A and B; Phase 3: Plaza A, Plaza B and Walnut buildings; and Phase 4: Mayfair Building and Laurel Duplexes.

**Q: What do you anticipate the total period of time will be during each phase of construction?**

**A:** Our current planning assumes that each phase would overlap, e.g., Phase 2 begins approximately 20 months after Phase 1. Specifically, we think Phase 1 could take 30 months, Phase 2 could take 24 months, Phase 3 could take 36 months, and Phase 4 could take 20 months. Assuming an overlap of phases, from start to finish it could take approximately six to seven years to complete all phases of the construction. This construction phasing and related

durations are consistent with and defined in the phasing schedule under review in our environmental application. While the phasing could be accelerated, we have assumed a relatively conservative approach to the construction phasing.

**Q: What is the period of time that you anticipate that construction will occur?**

**A:** We anticipate that construction will occur in the spring of 2020.

**Q: What is the reason for constructing the project in phases?**

**A:** By allowing for potential phased construction, we would have the ability to complete and occupy portions of the project as each phase is completed. If conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability.

**Q: How many extensions do you anticipate requesting for the entitlements?**

**A:** None. Any extension of the DA's term would be a material amendment that would require Board of Supervisor's approval.

**Q: During those extended periods, would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased numbers of residential units, increased amounts of retail or office space? What about the possibility of design changes or other changes? Could Prado apply to change any part of the construction to provide the opportunity to have high rise construction?**

**A:** Once the EIR is certified and the project is approved, any material changes to the project would be subject to new environmental review, would require Planning Commission and Board of Supervisor approvals and also an amendment to the DA. Any increase in height over what is entitled in our project would require a revision to the Planning Code and Zoning Maps that would entail Planning Commission and Board of Supervisors approval.

**Q: There are genuine concerns about reducing open spaces and reduced on-site parking places.**

**A:** Open space will be part of the entitlements and will likely be considered by the City as one of the public benefits supporting the DA -- for that reason alone, reducing the amount of it would be very difficult if not impossible. The open space requirements will be carefully described in the project's approvals and will also be recorded against the property. So, as with any material changes to the approved project, any material change to the open space would be very difficult and would involve a public process and City approval. As to parking spaces, as you know, the City would like to see the number of spaces reduced. We plan to continue advocating for the proposed number of project parking spaces in our application.

**Q: During the phased construction could Prado transfer shares in the project to provide for new or additional investors?**

A: We have no plan to transfer any shares in the project and construction lenders generally prohibit any changes of ownership by the project developer during construction and stabilization of a project. PSKS, along with our equity partners and lenders, intend to provide all of the capital necessary to construct, own and operate the project. We plan to

retain day-to-day control of the project during development, construction, stabilization and ongoing operations. We design and build our projects to hold for the long-term owner.

We look forward to reconnecting and thank you again for making the time to meet with us.

Sincerely, Dan

PRADO GROUP

Dan Safier | President & CEO

Prado Group, Inc.

150 Post Street, Suite 320

San Francisco, CA 94108

dsafier@pradogroup.com

T: 415.395.0880 | D: 415.857.9306

# EXHIBIT J

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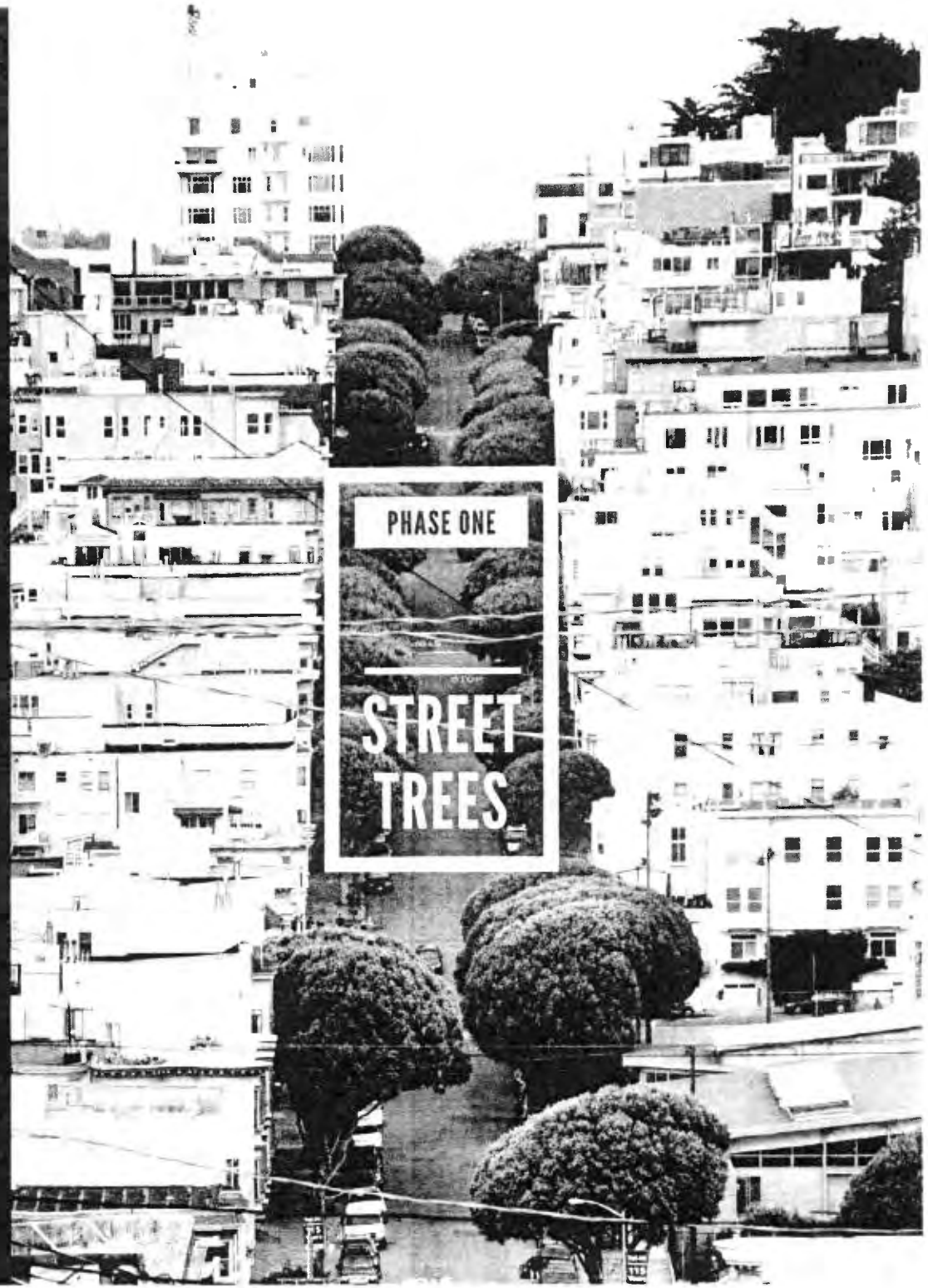
SAN FRANCISCO

# URBAN FOREST PLAN

FINAL FALL 2014



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SIDEWALK GARDEN PLANTING



FOLSOM STREET



GREEN ROOF ACADEMY OF SCIENCES

# Introduction

San Francisco was once a largely treeless landscape of expansive grasslands, sand dunes, coastal scrub and wetlands. Today, almost 700,000[1] trees grow along the city's streets, parks and private properties. From the Embarcadero's stately Palms to the tall Cypresses of Golden Gate Park, trees are a beloved feature of the city and critical piece of urban infrastructure.

Our urban forest creates a more walkable, livable and sustainable city. Trees and other vegetation clean our air and water, create greener neighborhoods, calm traffic, improve public health, provide wildlife habitat and absorb greenhouse gases. Annually, the benefits provided by trees in San Francisco are estimated at over $100 million[2].

Trees in San Francisco, however, face a number of challenges. Historically underfunded and inadequately maintained, the city's tree canopy is one of the smallest of any large U.S. city. Lack of funding has restricted the City's ability to plant and care for its street trees. Maintenance responsibility is increasingly being transferred to property owners. Widely unpopular with the public, this approach puts trees at further risk for neglect and potential hazards.

Our urban forest is a valuable capital asset worth $1.7 billion[2]. Like the public transit and sewer systems, it needs a long-term plan to ensure its health and longevity. The Urban Forest Plan offers a vision and strategy to ensure an expanded, healthy and thriving urban forest now and for the future.

1 United States Forest Service, Northern Research Station. 2007. Assessing Urban Forest Effects and Values: San Francisco's Urban Forest. Resource Bulletin NRS-8. Newton Square, PA: USDA Forest Service.

2 Simpson, J. R., McPherson, E.G. December 2007. San Francisco Bay Area State of the Urban Forest Final Report. Center for Urban Forest Research, USDA Forest Service, Pacific Southwest Research Station.

# Habitat & Biodiversity

San Francisco is home to diverse ecological communities of native habitats, plants and animals - some of which can be found nowhere else on earth. The term *biodiversity* is short for "biological diversity." It refers to the variety of interconnected species – flora, fauna, fungi and bacteria – that have co-evolved into the local ecological communities, ecosystems and processes of a particular place on Earth. In cities like San Francisco this also includes species imported from other places that contribute positively to the vibrant and thriving dynamics of the city's remaining indigenous ecology.

San Francisco's trees and vegetation support local wildlife by providing food, nectar, shelter and nesting areas for a variety of birds, insects and animals. The Western Tiger Swallowtail butterfly has found an unlikely habitat among Market Street's London Plane trees. The iconic Canary Island Date Palms used to mark prominent streets have contributed to the northward range extension of Hooded Orioles and are a favorite feeding place for the famous Wild Parrots. Several species of raptors nest in Eucalyptus trees which also have served as roosts for Monarch Butterflies. One of the best trees for promoting wildlife diversity is the native Coast Live Oak, which serves a variety of species of insects as well as resident and migratory birds.

The Plan strives to increase the carrying capacity of the city's urban forest to support more wildlife and enhance local biodiversity. Strategies include diversifying plantings on streets with wildlife-serving native as well as non-native trees, shrubs, grasses and perennials. San Francisco still harbors approximately 500 native plant species creating a vast palette of wildlife enhancement opportunities. For specific recommendations see the GROW chapter.

*THE CALIFORNIA FLORISTIC PROVINCE*

California including the San Francisco Bay Area is located in one of 34 globally recognized biodiversity hotspots. Combined, these areas contain about half of the plant and animal species on earth yet cover only 2.3% of the earth's surface. These areas are defined by their exceptional number of animal and plant species including high number of endemic (found nowhere else) species.
*Source: Conservation International*









Yellow-faced Bumble Bee
*Bombos vosnesenskii*



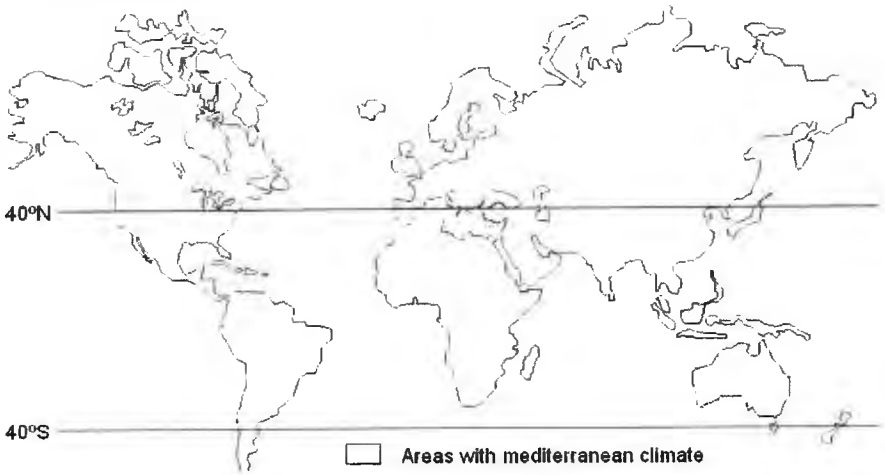
Clarkia Rubicunda



Anna's Hummingbird

*MEDITERRANEAN CLIMATE*

San Francisco's proximity to the ocean and moderate climate spare the city from extremes of hot and cold. Typical of the California coast, our Mediterranean climate is characterized by dry summers and wet winners. Similar climatic conditions are found in parts of Australia, South America, Africa, and the Mediterranean. This allows a wide variety of animals, trees and other plants from around the globe able to grow and thrive here.




*THE PACIFIC FLYWAY*

The Pacific Flyway is a major north-south route of travel for migratory birds throughout North and South America, extending from Alaska to Patagonia. Every year, migratory birds travel some or all of this distance both in spring and in fall, to follow food sources, find breeding grounds, or reach overwintering sites. The San Francisco Bay consists of many protected estuaries and mountain open space preserves that provide suitable winter quarters for birds as they fly south. San Francisco's trees, parks and water bodies provide important habitat for these migratory birds.




Wild Parrot


Green Hairstreak Butterfly


Mission Blue Butterfly

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# Related Plans & Documents

The Urban Forest Plan builds on several City focused on improving the city's ecological function, street design and mobility. These documents provide a foundation and starting point for the Urban Forest Plan. For a comprehensive list of Urban Forest related City policies, see **Appendix: Existing San Francisco Urban Forest & Greening Policies, Plans and Codes.**




### *URBAN FOREST PLAN*

The 2006 Urban Forest Plan provided a framework and goals of maintaining, conserving, and expanding upon the existing urban forest in San Francisco. *Adopted 2006.*



### *GREEN CONNECTIONS*

The Green Connections Project identified a network of streets and paths that improve pedestrian and bicycle access to parks and open spaces. These 'green connectors' are prioritized for tree and landscape planting that support habitat creation and recreational opportunities. *Completed 2013.*




### *BETTER STREETS PLAN*

A set of standards, guidelines, and implementation strategies to govern how the City designs, builds, and maintains its pedestrian environment. The plan outlines specific design guidelines for a variety of streets types. *Adopted 2010.*




### *STORMWATER DESIGN GUIDELINES*

The Stormwater Design Guidelines outline ways to incorporate on-site stormwater management using green infrastructure strategies that include trees and landscaping. *Adopted 2010.*




### *SAN FRANCISCO GENERAL PLAN*

The General Plan's Urban Design and Recreation & Open Space Elements provide policy frameworks that support urban forestry and landscaping on the City's streets and in open spaces.




### *CLIMATE ACTION PLAN*

The Plan includes an inventory of San Francisco's greenhouse gases (GHGs) and set goals for GHG reduction for the city to meet. *Adopted 2004. Update expected in 2014.*




### *PEDESTRIAN & BICYCLE PLANS*

The City's Bicycle Plan and WalkFirst strategy both identify priority bicycling and walking streets. Street trees have been proven to have traffic calming benefits and should be employed as part of strategies to create more bikable and walkable streets.

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## PLAN GOALS

The Plan is based on the following five goals for the urban forest. Each goal is accompanied by a series of strategies and actions required to achieve it.




GOAL 1

**GROW** THE URBAN FOREST THROUGH NEW PLANTING TO MAXIMIZE THE SOCIAL, ECONOMIC AND ENVIRONMENTAL BENEFITS OF TREES AND URBAN GREENING.

- PURSUE AN EXPANDED AND EQUITABLE DISTRIBUTION OF TREES AND GREENING THROUGHOUT THE CITY
- MAXIMIZE BENEFITS OF THE URBAN FOREST - SOCIAL, ENVIRONMENTAL, ECONOMIC.
- PROMOTE A RANGE OF GREENING TOOLS IN THE PUBLIC RIGHT-OF-WAY.




GOAL 2

**PROTECT** THE URBAN FOREST FROM THREATS AND LOSS BY PRESERVING THE CITY'S EXISTING STREET TREES.

- STABILIZE THE URBAN FOREST BY ACHIEVING A NET ZERO LOSS OF TREES
- REDUCE THE IMPACTS OF DEVELOPMENT ON THE URBAN FOREST.
- DEVELOP STRATEGIES TO COMBAT DISEASES AND PESTS.
- PROMOTE PROPER CARE AND MAINTENANCE OF STREET TREES.




GOAL 3

**MANAGE** THE URBAN FOREST THROUGH COORDINATED PLANNING, DESIGN AND MAINTENANCE TO ENSURE ITS LONG-TERM HEALTH AND SUSTAINABILITY.

- CREATE A COHESIVE MANAGEMENT PROGRAM FOR THE CITY'S STREET TREES.
- EMPLOY BEST MANAGEMENT PRACTICES IN STREET TREE MAINTENANCE TO CREATE A MORE COST-EFFICIENT AND EFFECTIVE PROGRAM.
- MANAGE AND CARE FOR STREET TREES THROUGHOUT THEIR ENTIRE LIFE-CYCLE.
- PLAN FOR THE LONG-TERM HEALTH AND BEAUTY OF THE URBAN FOREST.
- COLLECT AND USE DATA TO MANAGE AND MONITOR THE URBAN FOREST.
- IMPROVE COORDINATION AND COMMUNICATION BETWEEN AGENCIES, POLICY MAKERS AND THE COMMUNITY.




GOAL 4

**FUND** THE URBAN FOREST BY ESTABLISHING A LONG-TERM FUNDING STRATEGY FOR THE CITY'S TREES.

- SECURE FUNDING FOR TREE PLANTING, ESTABLISHMENT AND MAINTENANCE
- SEEK PRIVATE FUNDING AND OTHER SOURCES FOR THE URBAN FOREST.
- CONSIDER NEW AND INNOVATIVE FUNDING SOURCES.




GOAL 5

**ENGAGE** RESIDENTS, PUBLIC AGENCIES, COMMUNITY GROUPS AND THE PRIVATE SECTOR IN CARING FOR THE URBAN FOREST AND DEEPENING THEIR CONNECTION TO NATURE.

- PROMOTE URBAN FOREST EDUCATION AND EXPERIENTIAL OPPORTUNITIES.
- ENCOURAGE PARTICIPATION IN THE PLANTING, ESTABLISHMENT AND MAINTENANCE OF TREES.
- RECOGNIZE TREES WITH SPECIAL CONTRIBUTIONS (ECOLOGICAL, HISTORICAL, SOCIAL OR AESTHETIC) TO SAN FRANCISCO'S LANDSCAPE.

ical street tree can intercept range from 760 - 4,000 gallons/tree per year.[3] Large and medium broadleaf evergreen trees, large conifers and some deciduous trees with large leaf surface areas and a mature canopy typically demonstrate greater stormwater benefits. These trees should be considered for planting where space allows to maximize their benefits. Some large stature trees will not be appropriate as street trees due to their size and space requirements. but in those cases sidewalk gardens and medium stature trees can be utilized to maximize stormwater benefits. Recommendations for enhancing stormwater management through the urban forest are described below.

- Improve design of new tree wells to allow better infiltration of stormwater.
- Create sidewalk gardens and install sidewalk landscaping.
- Remove impermeable surfaces where possible.
- Conduct a study to determine which street tree species have the greatest runoff reduction capacity for San Francisco.

3 Stormwater, Trees, and the Urban Environment: A Comparative Analysis of Conventional Street Tree Pits and Stormwater Tree Pits for Stormwater Management in Ultra Urban Environments. Charles River Watershed Association (2009).

*PUBLIC HEALTH*

**1.2.4 Target trees to achieve public health benefits, especially for children and seniors.** Some strategies to improve public health through tree planting are described below.

Air quality and respiratory health can be improved by tree planting in:

High-volume traffic corridors and freeways
Areas with increased asthma rates

Trees have pedestrian safety and traffic calming effects by buffering of pedestrians from vehicles along:

Higher-speed arterial streets that are also priority transit or walking streets

Mental health and physical activity are supported by trees in:

Areas with limited access to parks and green space
Areas with lower than average tree canopy

Shading and temperature control can be provided by trees in:

Areas with higher risk of heat vulnerability

*CARBON SEQUESTRATION & CLIMATE CHANGE*

**1.2.5 Maximize carbon storage potential of urban forest to combat climate change.** Almost half of San Francisco's greenhouse gas emissions come from vehicles. Trees along city streets can provide a direct benefit to reducing San Francisco's climate impacts. As trees grow, they store carbon in woody tissues and soil. Healthy mature forests can sequester carbon for long periods acting as carbon "sinks." A variety of strategies should be considered to support the urban forest's ability to store greenhouse gases:

- Quantify carbon storage potential of City trees by species.
- Re-use urban wood from dead or removed trees to retain carbon storage capacity of woody biomass.
- Research Innovative tree farming/harvesting techniques that may increase carbon storage potential.
- Plant trees with high uptake of carbon including fast-growing species and those with significant biomass.

**1.2.6 Consider adaptation to climate change in identifying a local tree species palette.** As the climate changes, San Francisco may experience more extreme weather fluctuations that may result in increased fog and rain as well as intense periods of

### *Stabilize the urban forest by achieving a net zero loss of trees.*

Aside from growing the urban forest through new planting, one of the biggest steps the City can take is to protect and stabilize our existing urban forestry assets. The urban forest has an estimated 4% annual mortality rate. This means thousands of trees die or are removed each year. Many are lost to age, disease, vandalism and illegal removal without permits. New tree planting in San Francisco has not historically kept pace with these losses resulting in a shrinking urban forest canopy. Efforts should be made to replace lost trees and expand tree planting whenever possible.

**2.1.1 Replace all dead or removed trees on streets on a 1:1 basis.** To stabilize existing tree resources, the City should plant replacement trees whenever trees are removed. If trees cannot be replaced in the same location, plantings should take place in available planting sites elsewhere on other streets.

**2.1.2 Improve enforcement of existing codes for tree protection including: Public Works Code (Article 16: Urban Forestry Ordinance) and Planning Code (Sec. 138.1 & 428). See Appendix for list of additional tree codes and policies.** The City should continue to enforce and look for ways to improve existing regulations governing tree maintenance, care and planting. The City should regularly track the enforcement of these codes and the agencies responsible for implementing them.

### *Reduce impacts of development on the urban forest.*

**2.2.1 Improve care and maintenance of street trees through a comprehensive management program.** (See MANAGE chapter).
Regular ongoing maintenance of the City's trees is one of the most important ways to protect and ensure their long-term health.

**2.2.2 Encourage developers to incorporate existing trees into building and site designs.** While street trees and significant trees (within 10' of the public right-of-way) are afforded certain protections, many trees on vacant or redevelopment sites are removed to allow for new development. Consideration should be given during review of building plans to the existing trees on the site, especially "significant" trees (20 ft or more in height, 15 ft or greater canopy width, and/or 12 inches or greater in trunk diameter). If trees are removed efforts should be made to harvest or re-use the wood if possible.

**2.2.3 Explore regulatory devices to increase protection of trees during permitting process for garages, curb cuts and driveways.** Installation of parking facilities on public and private development often requires the removal of street trees. These include trees of significant size that provide valuable public benefits and a mature canopy. In such cases, where a tree would be impacted, design alternatives such as off-set driveways or denial of a permit may be appropriate where existing trees would be removed or new trees cannot be planted.

**2.2.4 Require contractors to carry Tree Protection Bonds during construction projects.** Construction activities frequently result in accidental damage or loss of trees - including street trees. Development projects with the potential to disturb existing trees should be required to carry Tree Protection Bonds as insurance. Such bonds would allow recourse in the event that significant damage to trees occurs during the development process through fines, tree replacement or other measures.

**2.2.5 Improve process for approving Tree Protection Plans for construction projects.** Currently Tree Protection Plans are collected by the Planning Department. Review of these plans should take place with appropriate urban forestry staff. The inspection and enforcement of plans should be carried out. These plans include important provisions to protect trees such as protective barriers, construction exclusion zones, and the restriction of material and equipment storage within tree drip zones.

**2.2.6 Fully integrate DPW into the Building Permit and Project Tracking System (PPTS).** DPW should be fully integrated into the development review and building permit process. The inclusion of DPW into the Permit and Project Tracking System (PPTS) used by the Planning Department and Department of Building Inspection (DBI) will facilitate the effective review of planting issues (e.g. appropriate siting, interference from pre-existing infrastructure, pedestrian and vehicular safety) by staff at an early stage in the development review process. The current process requires more staff time than is necessary, causes undue delay to development projects, and has com-

| | | |
|---|---|---|
| *MAINTAINING STREET TREES* | PWC, ARTICLE 16, SEC. 805 (A-B) | Describes general tree maintenance responsibilities of private property owners and DPW. |
| | PWC, ARTICLE 16, SEC. 805 (C) | Street tree establishment and replacement of dead trees. |
| | PWC, ARTICLE 16, SEC. 805 (E) | Departmental relinquishment of street tree maintenance. |
| | PWC, ARTICLE 16, SEC. 808 | Protection of trees and landscape materials |
| | PWC, ARTICLE 16, SEC. 811 | Describes criminal, civil, and administrative penalties for violating of the UF Ordinance. |
| | FINANCING SAN FRANCISCO'S URBAN FOREST: COSTS AND BENEFITS OF A COMPREHENSIVE MUNICIPAL STREET TREE PROGRAM (2012). | Identifies potential funding opportunities for a fully municipally maintained Street Tree program. Analyzed DPW current maintenance structure and program. |
| *REMOVING STREET TREES* | PWC, ARTICLE 16, SEC. 806(A)(2-5) | Procedures for departmental removal of street trees, including appeals process. |
| | PWC, ARTICLE 16, SEC. 806(B)(3) | Procedures for non-departmental removal of street trees, including application fees and appeals process. |
| *THE ADOPTED PRUNING STANDARDS* | ENV. CODE, CHAP. 12, SEC. 1206 | Describes the required development of these standards, identifying that the UFC was responsible for this work. These standards apply to all trees on public land (including street trees)and provide guidance for good maintenance of trees on private land |
| | PWC, ARTICLE 16, SEC 805 (A) | Notes that DPW will make pruning standards available to the public. |
| | URBAN FORESTRY COUNCIL RESOLUTION NO. 007-06-UFC | Urban Forestry Council Resolution No. 007-06-UFC – (passed in June 2006) Approves the Adopted Pruning Standards. SFE published an easy-to-use booklet on the Standards that we have provided to other City agencies for distribution. |
| *PINE PITCH CANKER* | URBAN FORESTRY COUNCIL RESOLUTION NO 004-10-UFC (ADOPTED MARCH 2010) | Recommended adoption of the Pitch Canker Task Force management recommendations for trees infected by pine pitch canker. (Details contained within position paper they revised in September 2001.) |
| *HAZARD TREE AND HAZARD TREE ABATEMENT* | PWC, ARTICLE 16, SEC. 809 | Notification, abatement, and enforcement procedures for hazard trees. |
| *LANDMARK TREE PROGRAM* | PWC, ARTICLE 16, SEC. 810 | Describes the nomination, review, and designation process, along with penalties for violation. |
| | ENV. CODE, CHAPTER 12, SEC. 1203 | Directs UFC to establish criteria, propose administrative procedures, and a tree removal appeal process for landmark trees. |
| *SIGNIFICANT TREE PROGRAM* | PWC, ARTICLE 16, SEC. 810A | Describes criteria for trees that are automatically protected under Significant Tree designation (trees within 10' of the public right-of-way that meet certain size thresholds) and additional consideration that will be taken into account for tree removal applications. |
| *SAN FRANCISCO TREE DISPUTE RESOLUTION ORDINANCE* | PWC, ARTICLE 16.1 | Describes procedures, standards to use to make determinations and possible restorative actions, and liabilities for disputes regarding trees on private property. |

# 3333 CALIFORNIA STREET MIXED-USE PROJECT




# RESPONSES TO COMMENTS ON DRAFT EIR VOLUME 2 (ATTACHMENTS A-E, PART 2)

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - JANUARY 8, 2019
FINAL EIR CERTIFICATION HEARING: SEPTEMBER 5, 2019

SAN FRANCISCO
PLANNING
DEPARTMENT

# 3333 CALIFORNIA STREET MIXED-USE PROJECT

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SAN FRANCISCO
PLANNING
DEPARTMENT

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# II. Neighborhood Character

DESIGN PRINCIPLE: Design buildings to be responsive to the overall neighborhood context, in order to preserve the existing visual character.

Most residents live in areas that are distinct neighborhoods. Many neighborhoods have defining characteristics such as street trees, buildings with common scales and architectural elements, and residential and commercial uses that make the neighborhood identifiable and an enriching place to be. The neighborhood is generally considered as that area around a home that can easily be traversed by foot. Neighborhoods may also be defined by natural or man-made elements such as parks, streets and hilltops.

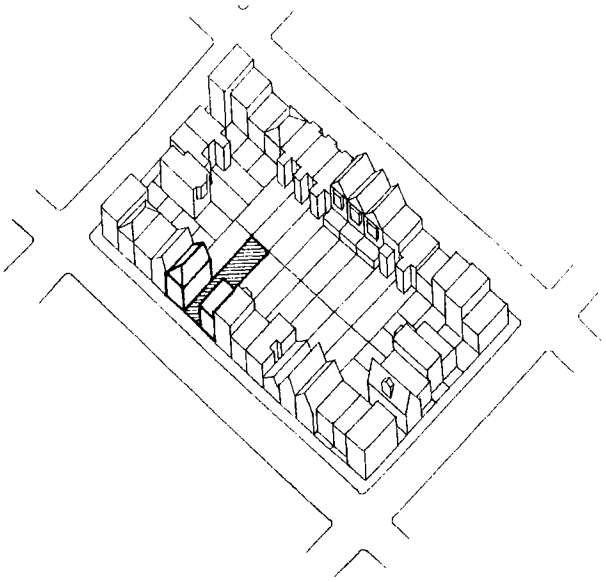
## NEIGHBORHOOD CONTEXT

Though each building will have its own unique features, proposed projects must be responsive to the overall neighborhood context. A sudden change in the building pattern can be visually disruptive. Development must build on the common rhythms and elements of architectural expression found in a neighborhood. In evaluating a project's compatibility with neighborhood character, the buildings on the same block face are analyzed. However, depending on the issues relevant to a particular project, it may be appropriate to consider a larger context.

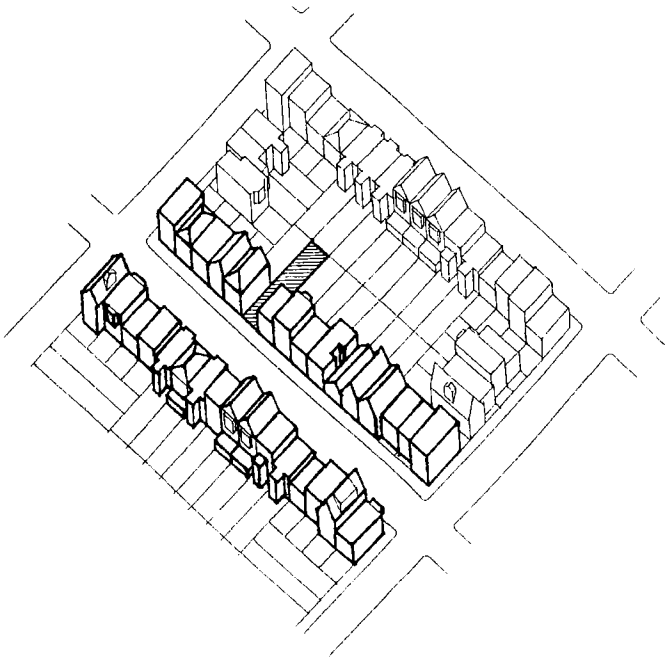
Neighborhood patterns that are important to the character of the neighborhood include:

- The **block pattern**: Most buildings are one piece of a larger block where buildings define the main streets, leaving the center of the block open for rear yards and open space. Some blocks are bisected by mid-block alleys where service functions that detract from the public pedestrian environment, such as garage entries, trash collection, and utilities, are located.

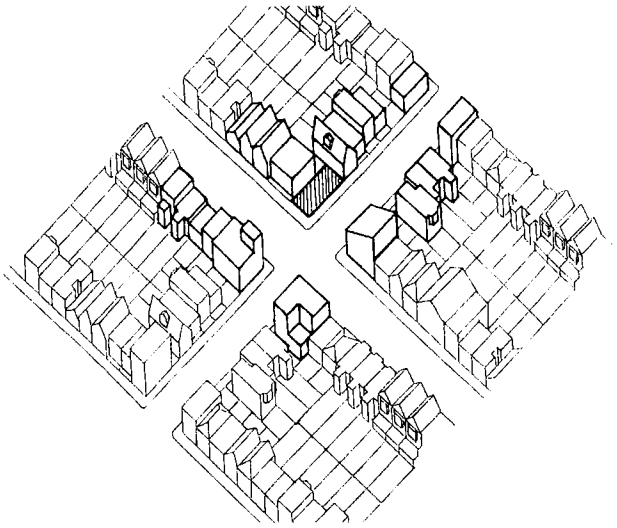
- The **lot pattern**: Residential blocks are typically made up of narrow and deep lots (25' x 100'), creating uniform building pattern, with a pedestrian scale.



*Immediate Context: When considering the immediate context of a project, the concern is how the proposed project relates to the adjacent buildings.*



*Broader Neighborhood Context: When considering the broader context of a project, the concern is how the proposed project relates to the visual character and scale created by other buildings in the general vicinity.*



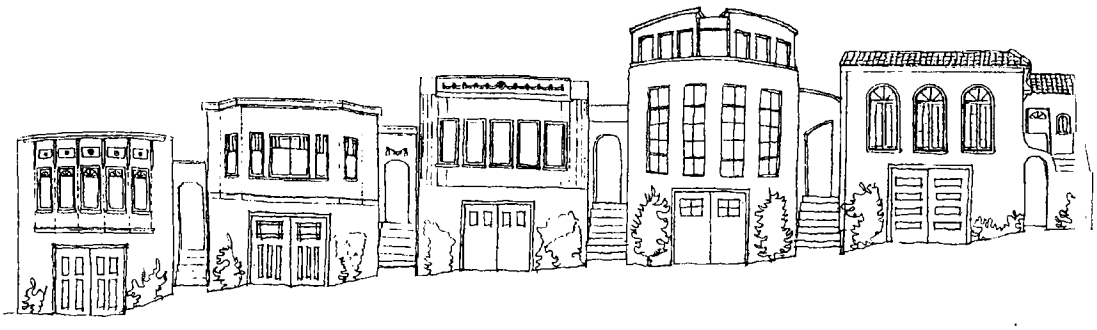
*Corner Lot Context: When considering the context of a corner lot, the concern is how the proposed project relates to buildings on both streets near the intersection.*

## WHAT IS THE CHARACTER OF THE NEIGHBORHOOD?

### Defined Visual Character

GUIDELINE: In areas with a defined visual character, design buildings to be compatible with the patterns and architectural features of surrounding buildings.

On some block faces, there is a strong visual character defined by buildings with compatible siting, form, proportions, texture and architectural details. On other blocks, building forms and architectural character are more varied, yet the buildings still have a unified character. In these situations, buildings must be designed to be compatible with the scale, patterns and architectural features of surrounding buildings, drawing from elements that are common to the block.



*This block face has a strong visual character because of the uniform width and height of the buildings on the block, compatible building details, and consistent placement of features such as entries and bays.*



*The buildings on this block have a variety of building forms and details, however the overall building scale is uniform, helping to define the block's visual character.*

**Mixed Visual Character**

GUIDELINE: In areas with a mixed visual character, design buildings to help define, unify and contribute positively to the existing visual context.

Some block faces do not have an apparent overriding visual character, or the character may be mixed or changing. When no clear pattern is evident on a block face, a designer has a greater opportunity and responsibility to help define, unify, and contribute positively to the existing visual context. Designs should draw on the best features of surrounding buildings. Existing incompatible or poorly designed buildings on the block face do not free the designer from the obligation to enhance the area through sensitive development.



*With a variety of building scales, forms and details, this block has a mixed visual character.*

# III. Site Design

DESIGN PRINCIPLE: Place the building on its site so it responds to the topography of the site, its position on the block, and to the placement of surrounding buildings.

Site design relates to how a building is placed on the site. It establishes how the building addresses the street and surrounding buildings. In designing the building on a site, the topography of the site and its location on the block must be considered. A property on a sloping site will have a different form than one on a flat site, as will a building on a corner rather than in the middle of the block. Other factors in site design include the site's relationship to adjacent properties and the location of front, side and rear yards.

### TOPOGRAPHY

Guideline: Respect the topography of the site and the surrounding area.

New buildings and additions to existing buildings cannot disregard or significantly alter the existing topography of a site. The surrounding context guides the manner in which new structures fit into the streetscape, particularly along slopes and hills. This can be achieved by designing the building so it follows the topography in a manner similar to surrounding buildings.

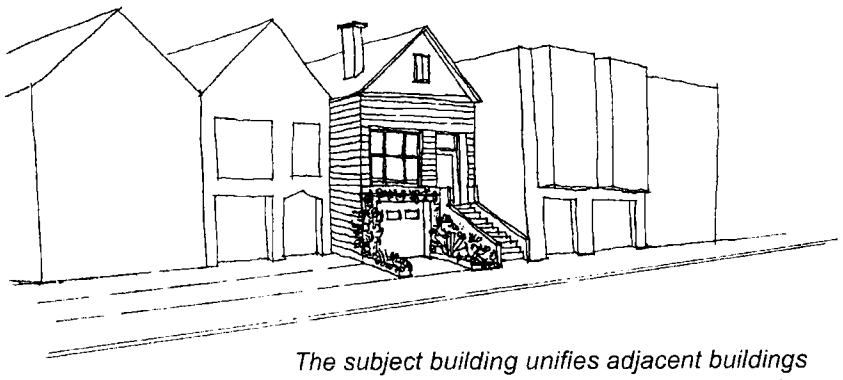


*These buildings respect the topography of the surrounding area by stepping down to the street. This is reinforced by garages at the street edge, elevated building entrances and setbacks to the mass of the buildings.*

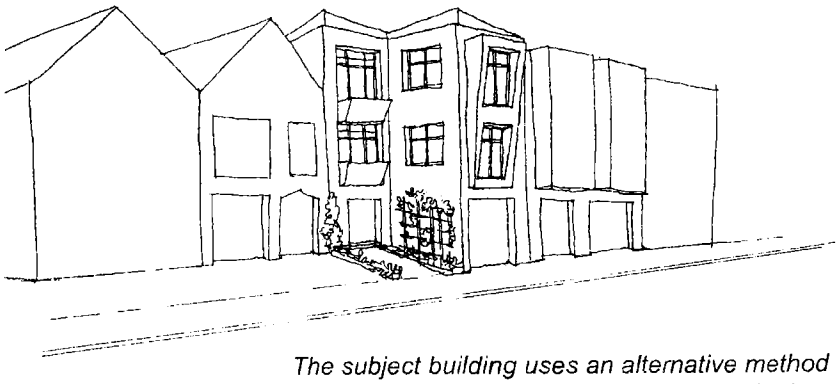
the overall rhythm of the streetscape. In designing the front setback, consider the following measures; other measures may also be appropriate depending on the circumstances of a particular project:

- Articulate the facade with well-defined building entrances and projecting and recessed facade features that will establish a rhythm and add visual interest to the block face.
- Articulate the front facade in "steps" to create a transition between adjacent buildings.
- Avoid creating blank walls at the front setback that detract from the street composition.

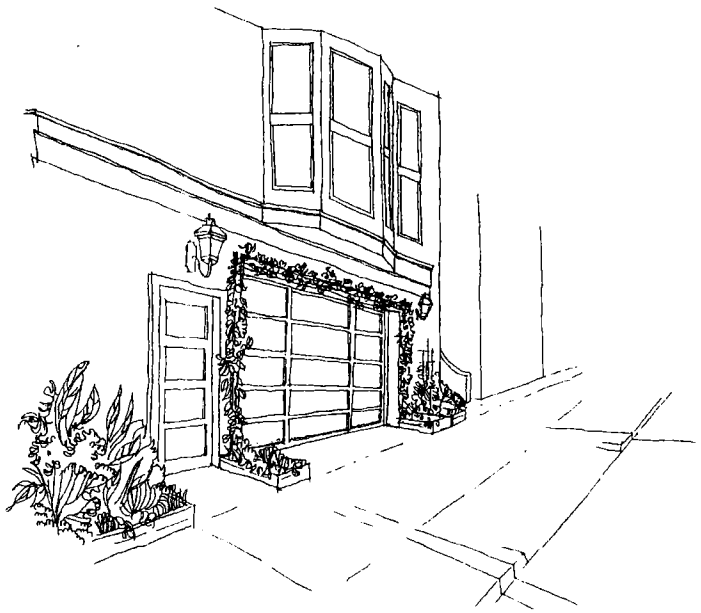
Similarly, a proposed project may be located next to a historic or architecturally significant building that is set back from the street or is on a wider lot with front and side gardens. The front setback of the proposed project must respect the historic building's setbacks and open space. Additionally, the front setback must serve to protect historic features of the adjacent historic building.



*The subject building unifies adjacent buildings with an appropriate front setback, landscaping and finished building materials.*



*The subject building uses an alternative method of averaging the front setback (Planning Code Section 132(b)) to unify the streetscape.*



*With an encroachment permit from the Department of Public Works, planting can be provided in front of a building without a setback*

Planning Code Section 132(g) requires that 20% of the required front setback area be unpaved and devoted to plant material.

On properties where there is no front setback, landscaping is still encouraged. Planting opportunities include the following:

- Provide street trees.
- At the ground level, incorporate planters into porches, stairways and recessed building entrances.
- At the upper levels, incorporate planters on decks and balconies.
- Install trellises on the front facade.

The use of native vegetation or climate appropriate plantings is encouraged. Consider irrigation and maintenance issues in selecting plant materials. When outdoor lighting is incorporated in the front setback, provide lighting that is energy efficient and is shielded to avoid excess glare.

## SIDE SPACING BETWEEN BUILDINGS

Planning Code Section 133 requires setbacks in RH-1(D) Districts only. Planning Code Section 136 limits projections into the side yard to three feet or 1/6 of the required side yard, whichever is less.

### GUIDELINE: Respect the existing pattern of side spacing.

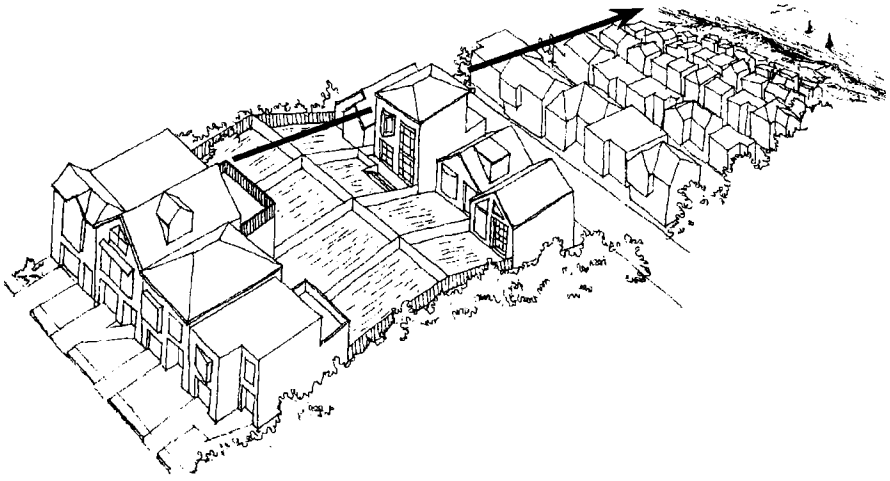
Side spacing is the distance between adjacent buildings. In many cases, only a portion of the building is set back from the side. Side spacing helps establish the individual character of each building while creating a rhythm to the composition of a proposed project. Projects must respect the existing pattern of side spacing.

## VIEWS

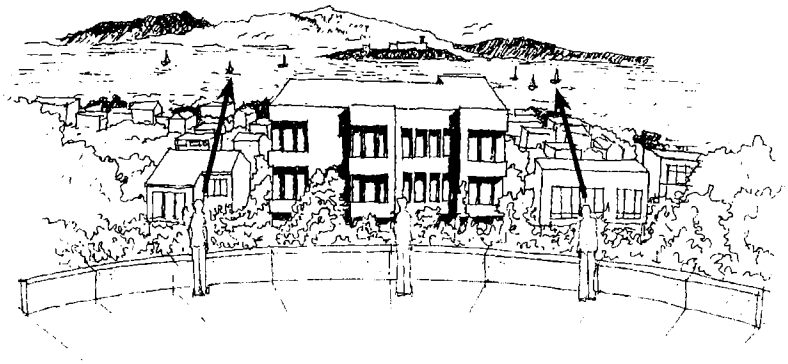
### GUIDELINE: Protect major public views from public spaces.

The Urban Design Element of the General Plan calls for the protection of major public views in the City, with particular attention to those of open space and water. Protect major views of the City as seen from public spaces such as streets and parks by adjusting the massing of proposed development projects to reduce or eliminate adverse impacts on public view sheds. The General Plan, Planning Code and these Guidelines do not provide for protecting views from private property.

The Urban Design Element identifies streets that are important for their quality of views (page I.5.16) and identifies outstanding and unique areas that contribute to San Francisco's visual form and character (page I.5.25).



*Views from this private building and deck are not protected.*



*Views from public areas, such as parks, are protected. The massing of this building impacts the view from the public park.*

# IV. Building Scale And Form

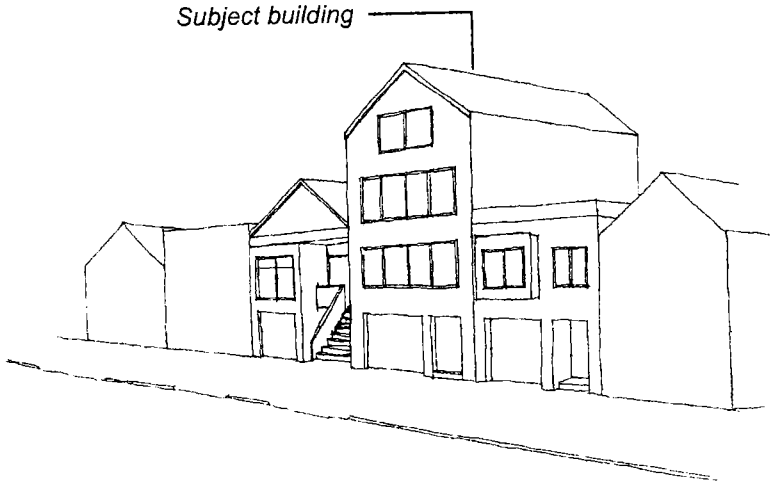
DESIGN PRINCIPLE: Design the building's scale and form to be compatible with that of surrounding buildings, in order to preserve neighborhood character.

## BUILDING SCALE

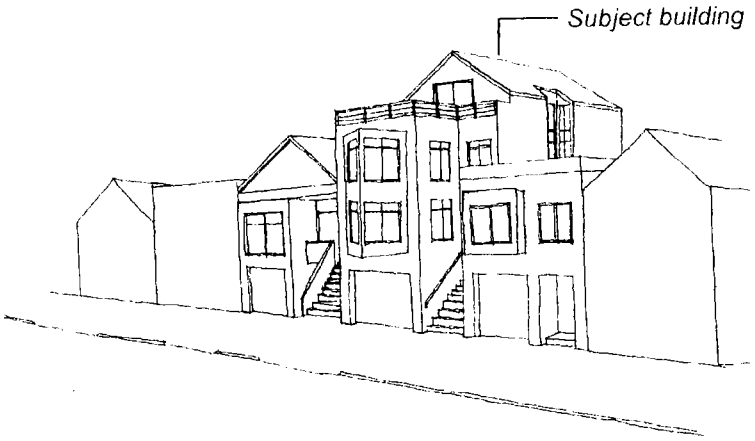
GUIDELINE: Design the scale of the building to be compatible with the height and depth of surrounding buildings.

The building scale is established primarily by its height and depth. It is essential for a building's scale to be compatible with that of surrounding buildings, in order to preserve the neighborhood character. Poorly scaled buildings will seem incompatible (too large or small) and inharmonious with their surroundings.

A building that is larger than its neighbors can still be in scale and be compatible with the smaller buildings in the area. It can often be made to look smaller by facade articulations and through setbacks to upper floors. In other cases, it may be necessary to reduce the height or depth of the building.




*This building is out of scale with surrounding buildings because it is not articulated to make it more compatible with the scale of surrounding two-story homes.*



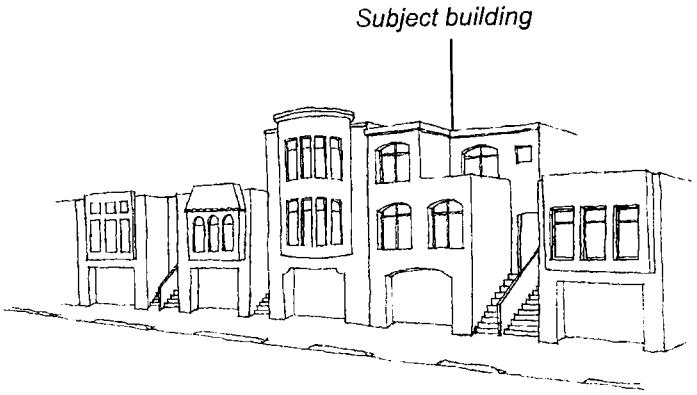

*A fourth story setback and facade articulations make the building more compatible with the scale of surrounding buildings.*

**Building Scale at the Street**

## GUIDELINE: Design the height and depth of the building to be compatible with the existing building scale at the street.

If a proposed building is taller than surrounding buildings, or a new floor is being added to an existing building, it may be necessary to modify the building height or depth to maintain the existing scale at the street. By making these modifications, the visibility of the upper floor is limited from the street, and the upper floor appears subordinate to the primary facade. The key is to design a building that complements other buildings on the block and does not stand out, even while displaying an individual design.

Refer to Planning Code Section 130, 136 and 250 for setbacks, permitted obstructions and height limits.



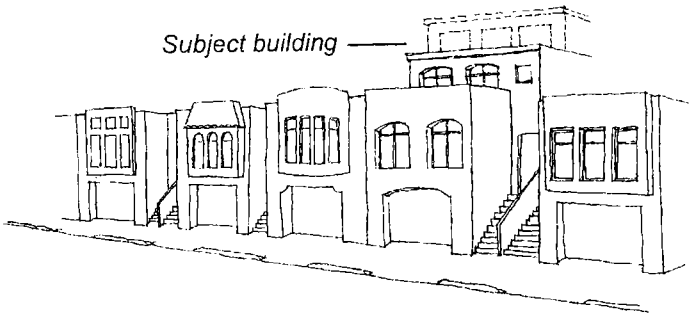

*A partial third-story setback provides a transitional height to the adjacent two-story building and maintains the scale of the buildings at the street level.*

I-DEVINCENZI4

In modifying the height and depth of the building, consider the following measures; other measures may also be appropriate depending on the circumstances of a particular project:

- Set back the upper story. The recommended setback for additions is 15 feet from the front building wall.
- Eliminate the building parapet by using a fire-rated roof with a 6-inch curb.
- Provide a sloping roofline whenever appropriate.
- Eliminate the upper story.

*On this block face of two-story buildings, it is possible to preserve the building scale at the street by setting back the third floor. However, an additional setback for a proposed fourth floor is not sufficient. The fourth floor must be eliminated to respect the neighborhood scale.*




*The three-story scale of the block face is maintained by setting the fourth floor back so it is subordinate the to the primary facade.*




### Building Scale at the Mid-Block Open Space

GUIDELINE: Design the height and depth of the building to be compatible with the existing building scale at the mid-block open space.

Rear yards provide open space for the residences to which they are attached, and they collectively contribute to the mid-block open space that is visible to most residents of the block. This visual open space can be a significant community amenity.

## BUILDING FORM

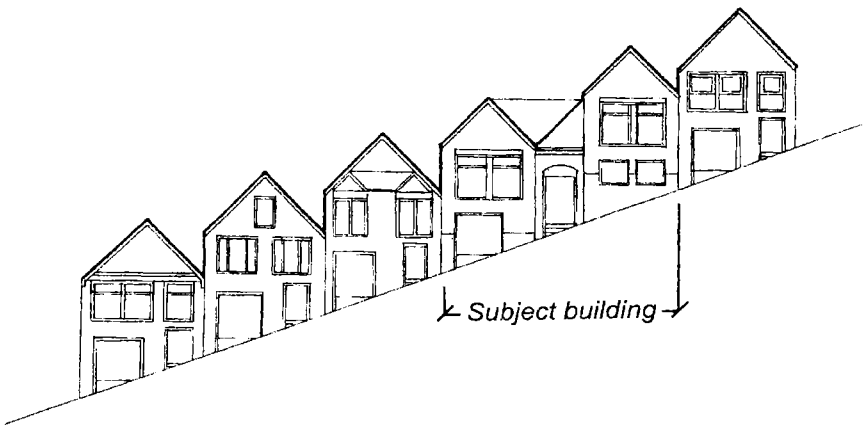
### GUIDELINE: Design the building's form to be compatible with that of surrounding buildings.

Building form is the three-dimensional shape of the building. The elements of building form include the width and proportions of the facade and the shape of the roofline. Though the Planning Code establishes the maximum building envelope by dictating setbacks and heights, the building must also be compatible with the form of surrounding buildings.

### Facade Width

### GUIDELINE: Design the building's facade width to be compatible with those found on surrounding buildings.

Most building widths are related to the lot width, typically 25 feet. This uniform building width contributes to the overall character of the neighborhood and the scale of buildings within the area. Therefore, it is very important to respect the facade widths typically found in the neighborhood. If a project is located on a site that is wider than usual, articulate the facade to respect traditional facade widths. For example, a facade may be broken into separate forms that match the widths of surrounding buildings. Design this articulation to be substantive, not merely be a surface treatment.

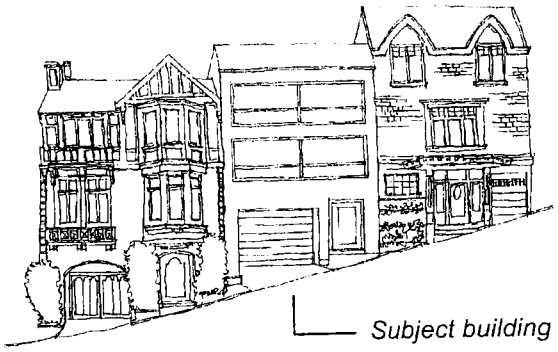



*Although this building is twice the width of surrounding buildings, it has been designed to have two gabled forms, similar in width to other buildings.*

**Proportions**

## GUIDELINE: Design the building's proportions to be compatible with those found on surrounding buildings.

Proportions are the dimensional relationships among the building's features, and typically involve the relationship between the height and width of building features. A building's proportions are evident in the floor-to-floor heights of a building, the size and placement of windows and doors, and the scale of features such as porches, cornices and bay windows. Building features must be proportional not only to other features on the building, but also to the features found on surrounding buildings.




*The horizontal emphasis of this building's windows and the lack of facade articulation results in a building that disrupts the character of the street and is inconsistent with the proportions of surrounding buildings.*




*Through the use of vertical oriented windows, the proposed building has proportions similar to surrounding buildings.*

# V. Architectural Features

DESIGN PRINCIPLE: Design the building's architectural features to enhance the visual and architectural character of the neighborhood.

Architectural features add visual interest to a building, and provide relief by breaking up a building's mass. Architectural features include building projections such as bay windows, porches, garage structures, rooftop forms, and building entrances. They are a significant component of the architectural character for both the building and the neighborhood.

In designing architectural features, it is important to consider the type, placement and size of architectural features on surrounding buildings, and to use features that enhance the visual and architectural character of the neighborhood. Architectural features that are not compatible with those commonly found in the neighborhood are discouraged. Many architectural features are permitted as obstructions in the front or rear yard under Planning Code Section 136; however many architectural features may also be located within the buildable area of the lot.

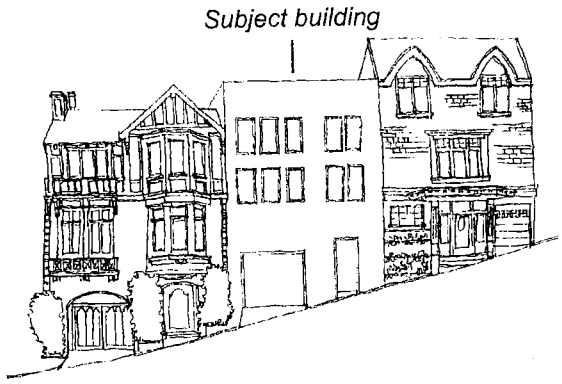
## BUILDING ENTRANCES

GUIDELINE: Design building entrances to enhance the connection between the public realm of the street and sidewalk and the private realm of the building.

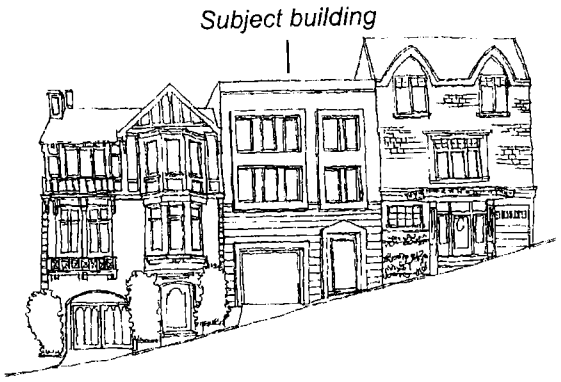
Building entrances are an important building feature, providing the connection between the public realm of the street and sidewalk, and the private realm of the building. A well-designed building entrance will appear welcoming and inviting to the pedestrian, making the neighborhood a pleasant place to live. In addition to the doorway itself, the entry may be comprised of stairways, landings, porches, and other elements.

character of the neighborhood. The use of decorative brackets, eaves, dentils, cornices, columns and capitals, for example, should come from an awareness of the evolution of such building elements and of their original structural function: columns hold up buildings, brackets support overhangs, etc. Do not use detail that makes the building stand out as excessively plain or overly decorated, or that results in building facades designed as replicas of historic buildings. Ornament that has been carelessly tacked on to the facade of a building can cause architectural disorder, and will appear superficial and cluttered.

A relatively flat facade with little articulation and detail will be inconsistent in an area that has a high degree of facade ornamentation. Likewise, if the detailing on buildings in the neighborhood is simple and restrained, adding a great deal of ornament is discouraged.




*A building with no detail looks out of place on a block face with rich detailing.*




*This building has added details around the windows and building entries, making it more compatible with other buildings on the block face.*

## WINDOWS

### GUIDELINE: Use windows that contribute to the architectural character of the building and the neighborhood.

Windows are one of the most important decorative features, establishing the architectural character of the building and the neighborhood. Windows provide human scale and emphasize the proportions of a building. They are also a link between the inside private space and the outdoor public space. The proportions, features and materials of a building's windows articulate the architectural rhythm along the block-face and contribute to the building's sense of mass.

Planning Code Section 136(c)(2) requires that the glass area on a projecting bay window be equal to at least 50 percent of the vertical surfaces on the bay.

## EXTERIOR MATERIALS

### GUIDELINE: The type, finish, and quality of a building's materials must be compatible with those used in the surrounding area.

When choosing building materials, look at the types of materials that are used in the neighborhood, and how those materials are applied and detailed. Ensure that the type and finish of these materials complement those used in the surrounding area, and that the quality is comparable to that of surrounding buildings. In neighborhoods with uniform materials, it is best to utilize the same materials. For example, a shingled house would not fit in with a row of stucco houses.

For more information about green building design and construction, see the "Green Building Guidelines" at www.sfenvironment.org.

Use material finishes that are compatible with those of surrounding buildings. If the materials are predominantly painted wood siding or shingles, a stained finish may not be compatible. Masonry (brick and stone) that is not painted should be left unpainted.

For information on sustainable materials and the reuse of building materials as part of new construction, contact the San Francisco Department of the Environment at 355-3700 or www.sfenvironment.org.

Also consider the visual qualities of a material, such as a smooth or rough texture. For example, in choosing masonry, the color and size of the bricks or stone may be a factor. Wood siding is available in a variety of widths and styles. Stucco may be smooth or rough, or scored to look like stone. Choosing among the varieties of a specific material is as important as choosing among the materials themselves.



*This unpainted shingled building is not compatible with the painted stucco of surrounding buildings.*

# EXHIBIT L

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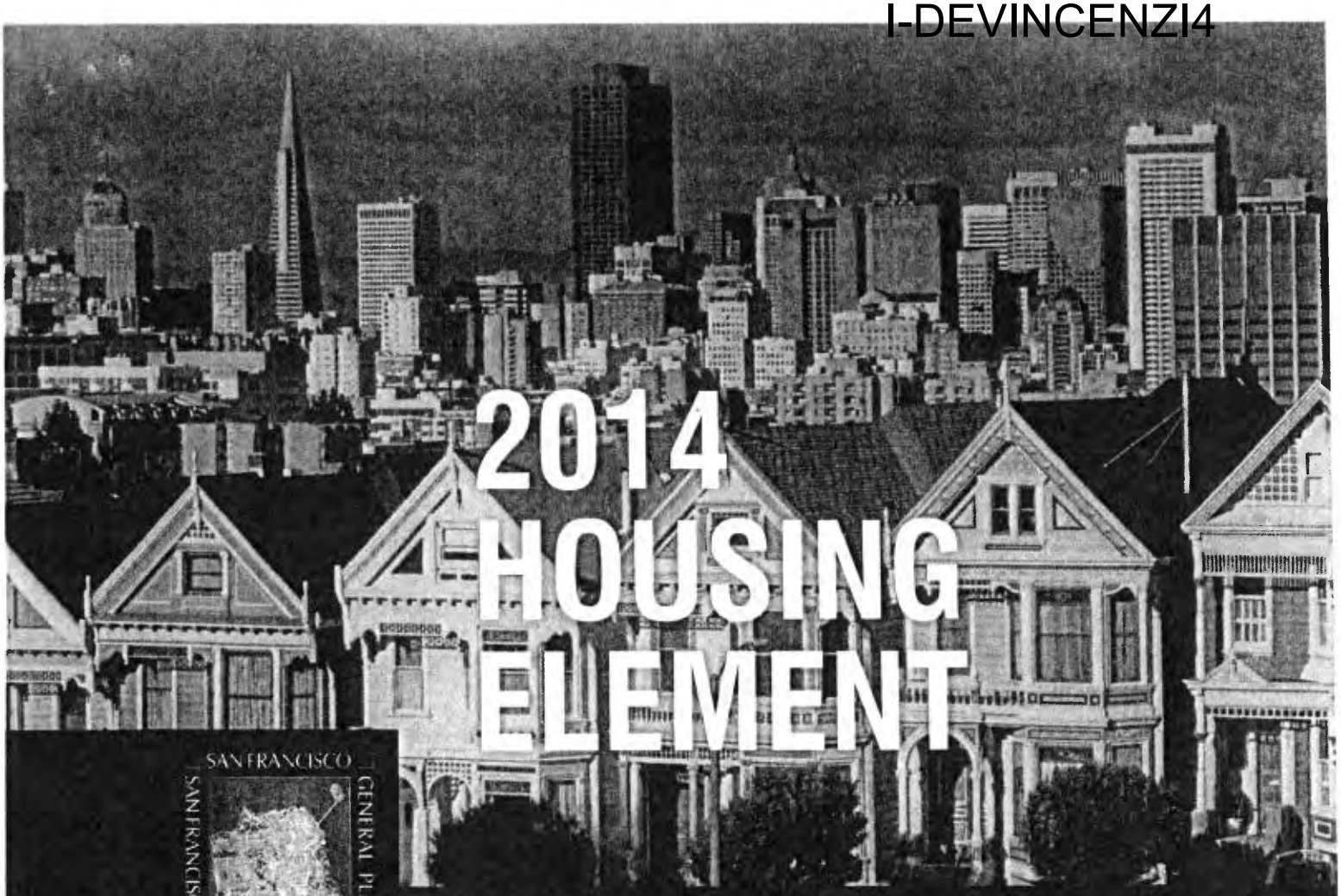
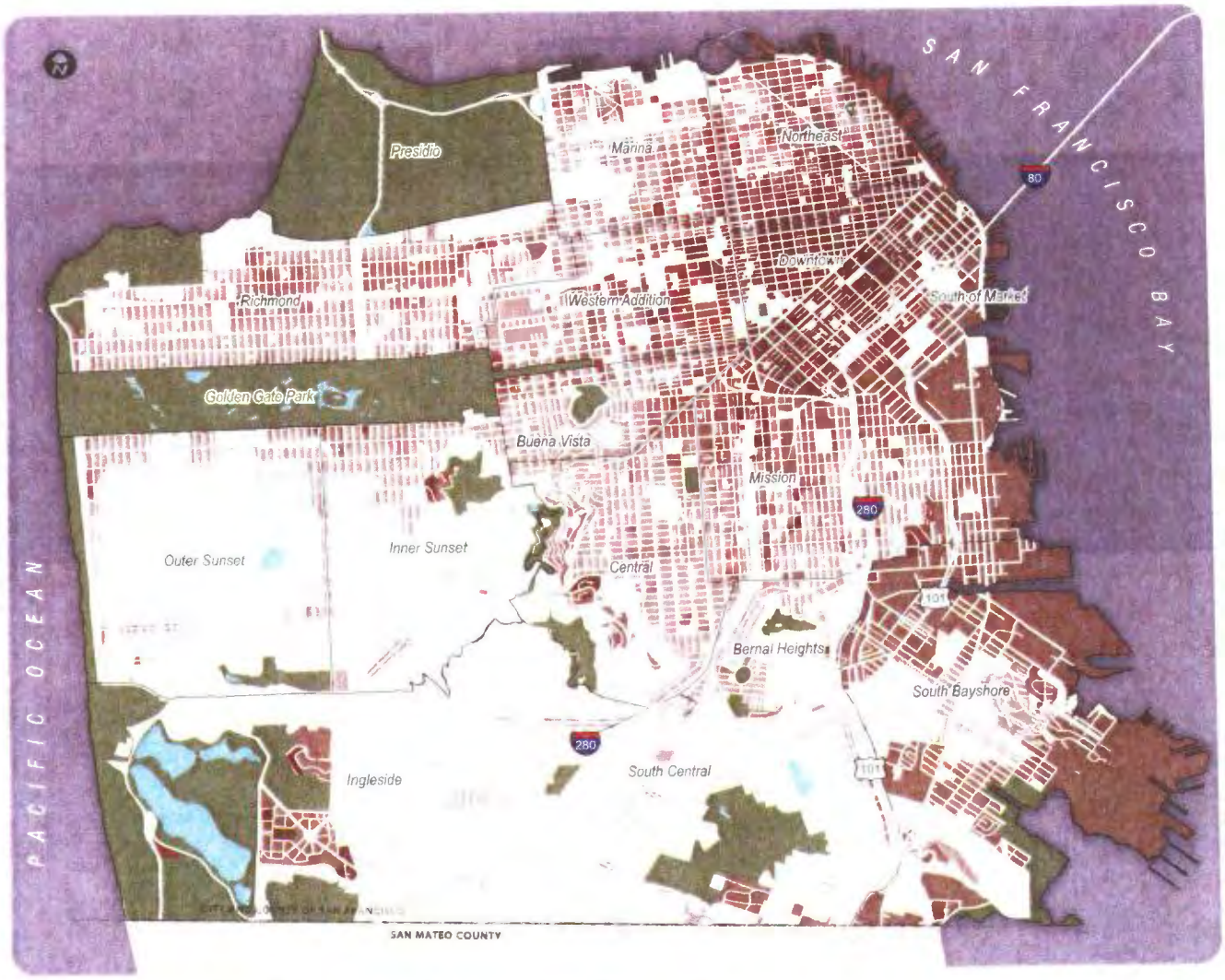


# 2014 HOUSING ELEMENT

SAN FRANCISCO GENERAL PLAN

## PART I: DATA AND NEEDS ANALYSIS

JANUARY 2015 | PENDING ADOPTION BY PLANNING COMMISSION




## Generalized Permitted Housing Densities by Zoning Districts, San Francisco, 2013

0 Miles 1

**MAP 06**

Density (Average Units per Acre)

- Low (14)
- Moderately Low (36)
- Medium (54)
- Moderately High (91)
- High (283)

that involve several blocks should always be made as part of a community based planning process.

Any new community based planning processes should be initiated in partnership with the neighborhood, and involve the full range of City stakeholders. The process should be initiated by the Board of Supervisors, with the support of the District Supervisor, through their adoption of the Planning Department's or other overseeing agency's work program; and the scope of the process should be approved by the Planning Commission. To assure that the Planning Department, and other agencies involved in land use approvals conduct adequate community outreach, any changes to land use policies and controls that result from the community planning process may be proposed only after an open and publicly noticed process, after review of a draft plan and environmental review, and with comprehensive opportunity for community input. Proposed changes must be approved by the Planning Commission and Board of Supervisors at a duly noticed public hearing. Additionally, the Department's Work Program allows citizens to know what areas are proposed for community planning. The Planning Department should use the Work Program as a vehicle to inform the public about all of its activities, and should publish and post the Work Program to its webpage, and make it available for review at the Department.

### POLICY 1.5

**Consider secondary units in community planning processes where there is neighborhood support and when other neighborhood goals can be achieved, especially if that housing is made permanently affordable to lower-income households.**

Secondary units (in-law" or "granny units") are smaller dwelling units within a structure containing another much larger unit(s), frequently in basements, using space that is surplus to the primary dwelling. Secondary units represent a simple and cost-effective method of expanding the housing supply. Such units could be developed to meet the needs of seniors, people with disabilities and others who, because of modest incomes or lifestyles, prefer or need small units at relatively low rents.

Within a community planning process, the City may explore where secondary units can occur without adversely affecting the exterior appearance of the building, or in the case of new construction, where they can be accommodated within the permitted building envelope. The process may also examine further enhancing the existing amnesty program where existing secondary units can be legalized. ~~for example through an amnesty program that requires~~ Such enhancements would allow building owners to increase ~~their~~ safety and habitability of their units. Secondary units should be limited in size to control their impact.

### POLICY 1.6

**Consider greater flexibility in number and size of units within established building envelopes in community based planning processes, especially if it can increase the number of affordable units in multi-family structures.**

In San Francisco, housing density standards have traditionally been set in terms of numbers of dwelling units in proportion to the size of the building lot. For example, in an RM-1 district, one dwelling unit is permitted for each 800 square feet of lot area. This limitation generally applies regardless of the size of the unit and the number of people likely to occupy it. Thus a small studio and a large four-bedroom apartment both count as a single unit. Setting density standards encourages larger units and is particularly tailored for lower density neighborhoods consisting primarily of one- or two-family dwellings. However, in some areas which consist mostly of taller apartments and which are well served by transit, the volume of the building rather than number of units might more appropriately control the density.

Within a community based planning process, the City may consider using the building envelope, as established by height, bulk, set back, parking and other Code requirements, to regulate the maximum residential square footage, rather than density controls that are not consistent with existing patterns. In setting allowable residential densities in established neighborhoods, consideration should be given to the prevailing building type in the surrounding area so that new development does not detract from existing character. In some areas, such as RH-1 and RH-2, existing height and bulk patterns should be maintained to protect neighborhood character.

open space purposes by providing major tax deductions; a similar program could be developed for charitable contribution of land for housing purposes.

**POLICY 7.5**

**Encourage the production of affordable housing through process and zoning accommodations, and prioritize affordable housing in the review and approval processes.**

Public processing time, staffing, and fees related to City approval make up a considerable portion of affordable housing development costs. The City should expedite the review process and procedures as appropriate; to reduce overall development costs and increase the performance of public investment in affordable housing.

Local planning, zoning, and building codes should be applied to all new development, however when quality of life and life safety standards can be maintained zoning accommodations should be made for permanently affordable housing. For example exceptions to specific requirements including open space requirements, exposure requirements, or density limits, where they do not affect neighborhood quality and meet with applicable design standards, including neighborhood specific design guideline, can facilitate the development of affordable housing. Current City policy allows affordable housing developers to pursue these zoning accommodations through rezoning and application of a Special Use District (SUD).

City review and approval of affordable housing projects should be improved to reduce costly delays. Affordable housing projects already receive Priority Application Processing through coordination with the Planning Department, Department of Building Inspection, and Department of Public Works. This process could be further enhanced by designating a planner(s) to coordinate governmental activities related to affordable housing.

**POLICY 7.6**

**Acquire and rehabilitate existing housing to maximize effective use of affordable housing resources.**

The city's existing housing stock provides a resource which can be used to fulfill a number of affordable housing needs. The City should pursue and facilitate programs that enable households to better access existing housing stock. By acquiring and rehabilitating such units, the City can use affordable housing funds in a cost-effective way that provides stability in existing low-income neighborhoods, where units may be at risk of poor safety or conversion. Such housing acquisition and rehabilitation should happen only on a voluntary basis, and must not displace occupants.

San Francisco should also explore opportunities to take advantage of projects that are delayed, abandoned or are on the market. Having a readily accessible pool of funding available for purchase of such projects would enable affordable housing developers to take over the land and entitlements of such projects. The City should explore a number of options to assist in securing these opportunities for permanently affordable housing, co-ops or land-trust housing, including subsidies, affordable housing programs, new tax incentives or government intervention.

**POLICY 7.7**

**Support housing for middle income households, especially through programs that do not require a direct public subsidy.**

Market rate housing in ~~the City of~~ San Francisco is generally ~~available~~ affordable to households making ~~at or above~~ 180% of median income or above. Affordable housing programs, including City subsidized affordable housing and inclusionary housing, are provided to households ~~at or below~~ making 120% of median income or below. This leaves a gap of housing options for households in between those two categories, referred to as "middle income" households and defined for the purposes of this Housing Element as ~~housing affordable to~~ households making between 120 and 150% of median income. Unfulfilled demand for middle income housing impacts the supply and pressure on housing stock for lower income households.

San Francisco prioritizes fedetal, state, and local subsidies for lower income households; therefore the City should support innovative market-based programs and practices that enable middle income housing opportunities. Creating smaller and less expensive unit types that are "affordable by design" can assist in providing units to households falling in this gap. Development strategies that reduce construction costs, such as pre-fabricated housing and other low cost construction types can decrease overall housing costs,

Planning Department review of projects and development of guidelines should build on adopted local controls, including recently adopted Area Plans, neighborhood specific design guidelines, and historic preservation district documents. Planning staff should be aware of, and be a resource for, on-going individual community efforts that support good planning principles, such as neighborhood-specific Covenants, Conditions, and Restrictions (CC&R's) and design guidelines. New development and alterations or additions to existing structures in these neighborhoods should refer to these controls in concert with the citywide Residential Design Guidelines, although only those guiding documents approved by the Planning Commission may be legally enforced by Planning staff. Also projects in historic preservation districts should refer to related design documents.

**POLICY 11.3**

**Ensure growth is accommodated without substantially and adversely impacting existing residential neighborhood character.**

Accommodation of growth should be achieved without damaging existing residential neighborhood character. In community plan areas, this means development projects should adhere to adopted policies, design guidelines and community review procedures. In existing residential neighborhoods, this means development projects should defer to the prevailing height and bulk of the area.

To ensure character is not impacted, the City should continue to use community planning processes to direct growth and change according to a community-based vision. The Planning Department should utilize residential design guidelines, neighborhood specific design guidelines, and other documents describing a specific neighborhoods character as guideposts to determine compatibility of proposed projects with existing neighborhood character.

The Department should support the adoption of neighborhood-specific design standards in order to enhance or conserve neighborhood character, provided those guidelines are consistent with overall good-planning principles and help foster a more predictable, more timely, and less costly pre-development process. To this end, the Department should develop official procedures for submittal of neighborhood-initiated design guidelines, for review by Department staff, and for adoption or endorsement.

**POLICY 11.4**

**Continue to utilize zoning districts which conform to a generalized residential land use and density plan and the General Plan.**

Current zoning districts result in land use and density patterns shown on the accompanying Generalized Permitted Housing Densities by Zoning District, Map 6; and the accompanying table illustrating those densities, Table I-64, in Part 1 of the Housing Element. The parameters contained in the Planning Code under each zoning districts can help ensure that new housing does not overcrowd or adversely affect the prevailing character of existing neighborhoods. The City's current zoning districts conform to this map and provide clarity on land use and density throughout the city. When proposed zoning map amendments are considered as part of the Department's community planning efforts, they should conform generally to these this map, although minor variations consistent with the general land use and density policies may be appropriate. They should also conform to the other objectives and policies of the General Plan.

**POLICY 11.5**

**Ensure densities in established residential areas promote compatibility with prevailing neighborhood character.**

Residential density controls should reflect prevailing building types in established residential neighborhoods. Particularly in RH-1 and RH-2 areas, prevailing height and bulk patterns should be maintained to protect neighborhood character. Other strategies to maintain and protect neighborhood character should also be explored, including "neighborhood livability initiatives" that could examine guidelines and principles to preserve what is beloved about the area. Such an initiative could result in strategies to improve the appearance and accessibility of neighborhood commercial districts, or neighborhood specific design guidelines for specific RH-1 and RH-2neighborhoods.

# EXHIBIT M

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

## Preliminary Project Assessment

| | |
|---|---|
| *Date:* | Thursday, July 14, 2016 |
| *Case No.:* | **2015-014028PPA** |
| *Project Address:* | 3333 California Street |
| *Block/Lot:* | 1032/003 |
| *Zoning:* | RM-1 (Residential, Low-Density)<br>40-X |
| *Project Sponsor:* | Don Bragg c/o Prado Group<br>150 Post Street, Suite 320<br>San Francisco, CA 94108<br>415-857-9324 |
| *Staff Contact:* | Brittany Bendix – 415-575-9114<br>Brittany.bendix@sfgov.org |

**DISCLAIMERS:**

This Preliminary Project Assessment (PPA) letter provides feedback to the project sponsor from the Planning Department regarding the proposed project described in the PPA application submitted on March 29, 2016, as summarized below. This PPA letter identifies Planning Department review requirements for the proposed project, including those related to environmental review, approvals, neighborhood notification and public outreach, the Planning Code, project design, and other general issues of concern for the project. Please be advised that the PPA application does not constitute an application for development with the Planning Department. The PPA letter also does not represent a complete review of the proposed project, does not grant a project approval of any kind, and does not in any way supersede any required Planning Department approvals listed below.

The Planning Department may provide additional comments regarding the proposed project once the required applications listed below are submitted. While some approvals are granted by the Planning Department, some are at the discretion of other bodies, such as the Planning Commission or Historic Preservation Commission. Additionally, it is likely that the project will require approvals from other City agencies such as the Department of Building Inspection, Public Works, the Municipal Transportation Agency, Department of Public Health, San Francisco Public Utilities Commission, and others. The information included herein is based on the PPA application and plans, the Planning Code, General Plan, Planning Department policies, and local/state/federal regulations as of the date of this document, all of which are subject to change.

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filed by the developer of any "major project." A major project is a real estate development project located in the City and County of San Francisco with estimated construction costs exceeding $1,000,000 where either: (1) The Planning Commission or any other local lead agency certifies an EIR for the project; or (2) The project relies on a program EIR and the Planning Department, Planning Commission, or any other local lead agency adopts any final environmental determination under CEQA. A final environmental determination includes: the issuance of a Community Plan Exemption (CPE); certification of a CPE/EIR; adoption of a CPE/Final Mitigated Negative Declaration; or a project approval by the Planning Commission that adopts CEQA Findings. (In instances where more than one of the preceding determinations occur, the filing requirement shall be triggered by the earliest such determination.) A major project does not include a residential development project with four or fewer dwelling units. The first (or initial) report must be filed within 30 days of the date the Planning Commission (or any other local lead agency) certifies the EIR for that project or, for a major project relying on a program EIR, within 30 days of the date that the Planning Department, Planning Commission, or any other local lead agency adopts a final environmental determination under CEQA. Please submit a Disclosure Report for Developers of Major City Projects to the San Francisco Ethics Commission. This form can be found at the Planning Department or online at http://www.sfethics.org.

## PLANNING DEPARTMENT APPROVALS:

The project requires the following Planning Department approvals. These approvals may be reviewed in conjunction with the required environmental review, but may not be granted until after the required environmental review is completed.

1. **Rezoning**. As indicated in the 'Preliminary Project Comments' below, various aspects of the project conflict with both the current RM-1 Zoning of the site, as well as City Planning Commission Resolution No. 4109. The Preliminary Project Assessment application indicates the intent of the property owner to pursue a rezoning, potentially to an NC District. Additionally, as noted in the comments below, a Special Use District overlay to the current RM-1 District may also be a potential path for rezoning. In either case, rezoning of the property requires approval by the Board of Supervisors.

2. **Height District Reclassification.** As indicated in the 'Preliminary Project Comments' below, various components of the project exceed the current 40 foot height limit. Accordingly, a height district reclassification of the property must be sought. This also requires approval by the Board of Supervisors.

3. **Conditional Use**. Because the project may seek a rezoning to an NC District, the Code analysis below takes into consideration requirements related to the current RM-1 District, in addition to NC-1, NC-2, NC-3 and NC-S Districts. Depending on the applicable zoning, the following elements of the project may require Conditional Use Authorization by the Planning Commission: development of a building

more than 50 feet tall in an RM-1 District, establishment of an 'Other Entertainment Use' in an NC-1 District; establishment of an 'Administrative Service Use in an NC-3 or NC-S District; establishment of an 'Automobile Parking' use in NC-1, NC-2, and NC-3 Districts; and, the Development of Large Lots in NC-1, NC-2, or NC-3 Districts. Additionally, through the Conditional Use Authorization process, the project may seek modifications to the front setback, rear yard, open space, and street frontage requirements of the Planning Code, as a Planned Unit Development pursuant to Section 304.

4. An **Office Allocation** from the Planning Commission is required per Planning Code Section 321 et seq. to establish more than 25,000 gross square feet of new office space.

5. A **Shadow Analysis** is required under Planning Code Section 295 as the project proposes building heights in excess of 40 feet, as measured by the Planning Code. A shadow analysis, attached, indicates that the project may cast new shadow on Laurel Hill Playground, which is under the jurisdiction of the Recreation and Parks Department. As a result the project requires that a shadow analysis must be performed per Planning Code Section 295. Please note that this preliminary analysis reflects the maximum building height (plus mechanical features) as applied to the entire lot.

6. A **General Plan Referral** application is required for the lot line adjustment of the Masonic Avenue property line.

7. A **Building Permit Application** is required for the proposed demolition of the existing structure(s) on the subject property.

8. A **Building Permit Application** is required for the proposed alteration of the existing structure(s) on the subject property.

9. A **Building Permit Application** is required for the proposed new construction on the subject property.

Conditional Use Authorization, Office Allocation, Shadow Analysis and General Plan Referral applications are available in the Planning Department lobby at 1650 Mission Street, Suite 400, at the Planning Information Center at 1660 Mission Street, and online at www.sfplanning.org. Building Permit applications are available at the Department of Building Inspection at 1660 Mission Street.

## NEIGHBORHOOD NOTIFICATIONS AND PUBLIC OUTREACH:

Project Sponsors are encouraged, and in some cases required, to conduct public outreach with the surrounding community and neighborhood groups early in the development process. Additionally, many approvals require a public hearing with an associated neighborhood notification. Differing levels of neighborhood notification are mandatory for some or all of the reviews and approvals listed above.

In addition to neighborhood notification as required per Planning Code Section 311 (or 312), this project is required to conduct a **Pre-Application** meeting with surrounding neighbors and registered neighborhood groups before a development application may be filed with the Planning Department. The Pre-Application packet, which includes instructions and template forms, is available at www.sfplanning.org under the "Permits & Zoning" tab. All registered neighborhood group mailing lists are available online at www.sfplanning.org under the "Resource Center" tab.

**Notification of a Project Receiving Environmental Review.** Notice may be required to be sent to occupants of the project site and properties adjacent to the project site, as well as to owners and, to the extent feasible, occupants of properties within 300 feet of the project site at the initiation of the environmental review process. Please be prepared to provide mailing addresses on a CD upon request during the environmental review process.

## PRELIMINARY PROJECT COMMENTS:

The following comments address specific Planning Code and other general issues that may substantially impact the proposed project.

1. **RM-1, NC and Special Use Districts.** The project proposes a combination of residential, office, commercial parking, retail and entertainment uses. Of these proposed land use categories, only residential uses are currently permitted in the existing RM-1 District. Accordingly, pursuing the project as proposed would require a rezoning of the subject property. The project description provided in the Preliminary Project Assessment application indicates the owner's interest in pursuing a rezoning of the property to an NC (Neighborhood Commercial) District, but does not specify which type of NC District. The four general NC Districts in Article 7 of the Planning Code are as follows: NC-1 (Neighborhood Commercial Cluster) District, NC-2 (Small-Scale Neighborhood Commercial) District, NC-3 (Moderate-Scale Neighborhood Commercial) District, and NC-S (Neighborhood Commercial Shopping Center District). The applicable land use controls for each proposed use are noted below and will be discussed, as relevant, in each forthcoming Planning Code requirement. The Project Sponsor is encouraged to match the proposal to the most appropriate district; however, a Special Use District overlay on RM or NC Zoning may be a preferred approach. For example, the California Street and Presidio Avenue – Community Center Special Use District, directly north of the subject property, is a hybrid of the RM-1 District and Sacramento Street Neighborhood Commercial District zoning controls. Ultimately, any such rezoning effort must be reviewed and approved by the Board of Supervisors. The Department strongly encourages the continued collaboration with the neighboring communities, as well as the District Supervisor, to determine the most appropriate zoning district.

    a. **Residential Uses.** The project proposes residential uses throughout the property. All four general NC Districts principally permit residential uses subject to other requirements noted

in Articles 1.2, 1.5 and 2 of the Planning Code such as density, open space, parking, unit exposure, and buildable area constraints.

b. **Retail Uses.** The project proposes retail uses throughout the property. 'Other Retail Sales and Service' uses, as defined in Planning Code Section 790.102 are generally principally permitted in every NC District at the 1st story. In NC-1 Districts, such uses are also subject to the more restrictive controls of any other (named) NC District or Restricted Use Subdistrict within a ¼-mile. In NC-2 and NC-S Districts such uses are principally permitted up to the second story, and at every story in NC-3 Districts. Please note that additional controls may apply to other types of retail uses such as Bars, Limited-Restaurants, and Restaurants.

c. **Other Entertainment.** The project proposes retaining an existing 12,455 square foot auditorium space, which is currently accessory to the existing office use. The existing auditorium is an accessory use to the UCSF offices, and retaining the auditorium as part of the project would convert it to a principle use, such as 'Other Entertainment,' defined in Planning Code Section 790.38. Establishing an 'Other Entertainment' use in an NC-1 District requires Conditional Use authorization by the Planning Commission. All other general NC Districts principally permit 'Other Entertainment' uses at the 1st story; and at the 2nd story in NC-3 and NC-S Districts.

d. **Office.** The demolition of existing structures or conversion of floor area dedicated to the site's 363,218 square feet of existing nonconforming office use is an abandonment of that nonconforming use per Planning Code Section 183. Therefore, to re-establish office uses in the proposed new structures, the uses must comply with any applicable zoning controls. NC Districts allow two types of commercial office uses: 'Business and Professional Service' as defined in Planning Code Section 790.108, and 'Administrative Service' as defined in Planning Code Section 790.106. Business and Professional Service uses are principally permitted only on the 1st story in an NC-1 District, only up to the 2nd story in NC-2 and NC-S Districts, and at all levels in NC-3 Districts. Administrative Service uses are only allowed through Conditional Use authorization by the Planning Commission at the 1st and 2nd stories of NC-S Districts and at all levels in the NC-3 Districts. Further, the current proposal of 49,999 gross square feet of office space requires an Office Allocation from the Planning Commission per Planning Code Section 321 et seq. if establishing more than 25,000 gross square feet.

e. **Commercial Parking.** The project includes 60 off-street parking spaces as part of a 'Public Parking Garage' defined in Planning Code Section 102. The existing RM-1 District does not permit public parking garages and, at this time, it is unclear if the described 60 "paid public parking spaces for community use" are legally noncomplying with regard to the Planning Code. Additional information is needed regarding the existing and proposed location of

these spaces and the date of their establishment to make that determination. Details relative to the existing and proposed depth of excavation for garages is also needed. Please note that if the spaces are determined to be legally noncomplying, but are otherwise removed or relocated through the elimination of existing surface parking lots or the reconstruction of an existing parking garage, the spaces will then be abandoned pursuant to Planning Code Section 183 and their re-establishment will need to conform to any applicable zoning controls. In NC Districts 'Automobile Parking' as a commercial use is defined in Planning Code Section 790.8 and is principally permitted in NC-S Districts, but requires Conditional Use authorization in NC-1, NC-2, and NC-3 Districts. Please note that any Conditional Use applications for parking exceeding accessory amounts must meet the additional criteria set forth in Planning Code Section 157. Given the Planning Department's concerns regarding the amount of proposed off-street parking referenced in both the 'Environmental Review' and 'Preliminary Design Comments' sections of this letter, you are strongly encouraged to substantially reduce or eliminate any proposed non-accessory commercial parking.

10. **City Planning Commission Resolution 4109.** In 1952, the City Planning Commission adopted Resolution 4109 which approved a rezoning of the subject property to a First Residential District and included additional stipulations subject to future development of the site. The site has subsequently undergone additional rezoning, as it is now within an RM-1 District. However, the stipulations of future development as outlined in Resolution 4109 continue to apply, absent modification by the Board of Supervisors per Planning Code Section 174. As expected, given that there have been more than 60 years of changes to the Planning Code there are some distinctions between the current RM-1 District controls and the stipulations outlined in Resolution 4109. In the project comments that follow, when there is an inconsistency, the more restrictive is noted as the guiding control. As indicated in the Preliminary Project Assessment application, the project may result in the rezoning of the property which requires review and approval by the Board of Supervisors. Amending Resolution 4109 would also require review and approval by the Board of Supervisors.

    a. **Residential Uses.** In general, the RM-1 District controls are more restrictive than the Stipulations of Resolution 4109. However, the stipulations are more restrictive when defining the density and buildable area requirements as applicable to a portion of the subject property fronting on Laurel and Euclid Avenues. At present, the project does not comply with these restrictions and would require amending the Resolution.

11. **Residential Density.** The subject property is within an RM-1 District which permits a residential density of up to one unit per 800 square feet of lot area. However, as a Planned Unit Development the proposal may seek approval for a density equal to one less unit than what is permitted by the district with the next greater density (RM-2). In consideration of rezoning the property, please note the following maximum residential densities for each zoning district: NC-1, NC-2 and NC-S Districts, generally, up to one unit per 800 square feet of lot area; and, in NC-3 Districts, generally up to one

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unit per 600 square feet of lot area. While additional information is necessary to calculate the exact maximum density for the area subject to Resolution 4109, initial calculations estimate approximately 508 units are allowed pursuant to the current RM-1 District zoning and Resolution and upon seeking the additional density allowed as a Planned Unit Development, the estimated maximum is 660 dwelling units. If the Resolution did not apply, these respective amounts become 558 and 743.

Ultimately, the proposal entails significantly fewer dwelling units than would be permitted under the site's current zoning. Given the City's need for housing and the tremendous opportunity presented by this unique 10-acre site, the Department strongly suggests that the project pursue residential densities approximating those which are currently allowed. As discussed in the comments that follow, any exceptions to the scale and massing provisions of the Planning Code that may ultimately be sought typically warrant a proportional increase in density. Should additional height and/or mass be necessary to achieve such density, it would seem most fitting along the California, Masonic and Presidio block faces, and generally in the northwest portion of the site.

12. **Height Requirement.** The subject property is within a 40-X Height and Bulk District, restricting the maximum height of buildings to 40 feet above grade, as measured generally from curb at the center of each existing and proposed building. The upper measurement of the height limit changes depending on the grade at that location per Planning Code Section 260(a)(1). Additionally, the upper measurement of the height of a building varies based on the roof form per Planning Code Section 260(a)(2). While in general the proposal accurately applies these methodologies, curbs along the Walnut Street extension may not be used as the base of measurements because the Walnut Street extension is not a public right-of-way. Additionally, to confirm the accuracy of measurements for the existing office building please provide a section through the center of the structure that includes the location of existing grade at that location. Because the building has frontage on two or more streets, the owner may choose the street or streets from which the measurement of height is to be taken. The additional stories proposed for the altered structures will require that the project seek a Height District reclassification, which is reviewed and approved by the Board of Supervisors.

13. **Proposed Buildings and Structures Exceeding 50 Feet in RM Districts.** Planning Code Section 253 requires Conditional Use authorization by the Planning Commission for any proposed building more than 50 feet in height. The existing office building is 66.5 feet tall from existing grade to the finished roof. The project proposes converting existing mechanical equipment above the roof to an additional two stories. This will require a Height District reclassification, as well as the required Conditional Use authorization from the Planning Commission if the property's zoning remains as an RM-1 District.

14. **Special Height Exceptions for Active Ground Floor Uses.** The Preliminary Project Assessment application indicates an interest in rezoning the subject property to an NC District so that the buildings fronting on California Street may receive an additional 5 foot height increase if they provide active uses on the ground floor. Please note that Planning Code Section 263.20 does not

currently apply this special height exception to general NC Districts. The districts that can apply this increase are specifically identified in Section 263.20. Accordingly, to achieve a five foot height increase on California Street the project would need to reclassify the applicable Height District, integrate this exception into a proposed Special Use District, or pursue a text amendment to Section 263.20. Each of these options requires review and approval by the Board of Supervisors.

15. **Lot Line Adjustment.** The project proposes a lot line adjustment that would extend the property's Masonic Avenue boundary into the public right-of-way. This adjustment requires a General Plan Referral because it includes the vacation of a public way and transportation route owned by the City and County. This adjustment will also require review by the Department of Public Works as a partial street vacation request.

16. **Development of Large Lots.** Planning Code Section 121.1 requires Conditional Use authorization to develop on lots that are equal to, or greater than, 5,000 square feet in an NC-1 District, or 10,000 square feet in NC-2 and NC-3 Districts. This requirement is not applicable to lots of any size in RM-1 or NC-S Districts.

17. **Floor Area Ratio.** Planning Code Sections 124 (NCs) and 209.2 (RM-1) limit the Floor Area Ratio of non-residential uses to the following maximums: 1.8 in RM-1, NC-1, and NC-S Districts; 2.5 in NC-2 Districts and 3.6 in NC-3 Districts. The Floor Area Ratio calculation includes all non-residential uses, accessory parking located above grade, and any non-accessory parking. Assuming the proposed non-accessory off-street parking occupies 93,023 square feet of gross floor area; the total non-residential uses result in a Floor Area Ratio less than 1.8 and would comply with the current RM-1 District requirement.

18. **Front Setback.** Planning Code Section 132 requires that new developments in RM-1 Districts provide front setbacks. If situated on a corner lot, the owner may elect which street or alley to designate as the front of the property. The Preliminary Project Assessment application does not indicate this designation. If the Project Sponsor elects either the property's California Street or Presidio Avenue/Masonic Avenue frontages, the required front setback is equal to half of the adjacent neighbor's front setback. Alternatively, the Project Sponsor could choose the Laurel Street or Euclid Avenue frontages and adhere to the setback noted in Resolution 4109 for the portion of the property to which it applies, and then apply Section 132 to any remaining frontage. The project can seek a modification to the requirements of Section 132 through a Planned Unit Development. Note that NC Districts do not have front setback requirements.

19. **Rear Yard.** The required rear yard for properties in RM-1 Districts is 45 percent of the lot depth. The project does not currently provide a code-complying rear yard. Therefore, the project must seek a modification to the requirements of Planning Code Section 134 as a Planned Unit Development. If the property is re-zoned to an NC District, Planning Code Section 134 requires a rear yard of 25 percent

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of the lot depth at the lowest level containing a dwelling unit. However, the required rear yard for corner lots in NC Districts may be further modified by the Zoning Administrator per Section 134(e)(2). In general, this alternative requires that the project provide compensating open areas on the lot equal to 25 percent of the lot area, with minimum horizontal dimensions of 15 feet. Alternatively, under NC District zoning, the project could also seek a modification as a Planned Unit Development.

20. **Open Space.** Planning Code Section 135 requires each dwelling unit in an RM-1 District to have access to a minimum of 133 square feet of open space, if private, or 100 square feet of open space if common. In NC Districts the range of open space required per unit, depending on the specific district, is 100 to 133 square feet, if private, or 80 to 100 square feet, if common. Additional information is needed to determine how the project complies with this requirement for each individual unit and to confirm that the spaces comply with the dimensional requirements for either private or common spaces. If necessary, the project can pursue a modification as a Planned Unit Development. However, when evaluating a Planned Unit Development, per Section 304(d)(3), the Planning Commission must consider whether the project provides open space usable by the occupants and, where appropriate, by the general public, at least equal to the open spaces required by the Code.

21. **Streetscape Plan.** The project proposes new construction on a property greater than half an acre, and as such, requires the submittal of a Streetscape Plan to the Planning Department to ensure that the new streetscape and pedestrian elements are in conformance with the Department's Better Street Plan. This Streetscape Plan shall be submitted to the Planning Department no later than 60 days prior to any Planning Commission action, and shall be considered for approval at the time of other project approval actions. The streetscape plan should show the location, design, and dimensions of all existing and proposed streetscape elements in the public right-of-way directly adjacent to the fronting property, including street trees, sidewalk landscaping, street lighting, site furnishings, utilities, driveways, and curb lines, and the relation of such elements to proposed new construction and site work on the property. Please see the Department's Better Streets Plan and Section 138.1(c)(2)(ii) for the additional elements that may be required as part of the project's streetscape plan. Additional comments from the Streetscape Design Advisory Team (SDAT) are provided in the 'Preliminary Design Comments' section below.

22. **Dwelling Unit Exposure.** Section 140 requires that each dwelling unit have at least one room that meets the 120 square foot minimum superficial floor area requirement of Section 503 of the Housing Code, and that it faces directly onto a street right-of-way, code-complying rear yard, or an appropriately sized courtyard. It's unclear if units in the inner northeast corner of Plaza B and the inner northwest corner of the Walnut Building comply with this section because of the proposed notching in the building. Please consider these units when revising the plans. While the project may pursue a modification as a Planned Unit Development, the Department generally encourages projects to minimize the number of units needing an exposure exception.

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RECEIVED

JUN 0 8 2018

CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
RECEPTION

3333 California Street, Mixed-Use Project
Initial Study: Case No. 2015-014028ENV

# PART 3, Exhibits N-V

# EXHIBIT N

I-DEVINCENZI4

RECORDED AT REQUEST OF
CITY & COUNTY OF SAN FRANCISCO
At 33 Min. Past 10 A. M
JAN 8 - 1953
OFFICIAL RECORDS
City and County of San Francisco, Calif.

B40426

Stipulation as to Character of Improvements on that portion of Lot 1A, Block 1032 Affected by Zoning Proposal Z-52.62.2

Official

The San Francisco Unified School District, being the owner of the above property described, and the applicant in Proposal No. Z-52.62.2 for reclassification thereof from a Second Residential District to a Commercial District, set for hearing before the City Planning Commission of the City and County of San Francisco on October 23, 1952, hereby agrees that the said property shall be developed only as set forth in the following stipulations, which if accepted by the said City Planning Commission shall be observed by the applicant and by its successors in interest for as long as the property remains in the zone classification presently sought. The owner further agrees that no improvements shall be constructed on said property in violation of the conditions hereinafter set forth, and recognizes that the reclassification of the property to a Commercial District is by the Commission's action made contingent, and will remain contingent unless further reclassified, upon adherence to these stipulations.

Stipulations

1. The character of the improvement for commercial purposes of the subject property, or any portion thereof, shall be limited to a building or buildings designed as professional, institutional or office buildings, including service buildings which are normally accessory thereto.

2. The aggregate gross floor area of all such buildings, calculated exclusive of cellars, of basement areas used only for storage or services incidental to the operation and maintenance of a building, and of indoor or other covered automobile parking space, shall not exceed the total area of the property allotted to such use.

3. For each five hundred square feet of gross floor area in such buildings, calculated as in stipulation 2, above, there shall be reserved and kept available on the property or the portion thereof allotted to such use, one off-street automobile parking space, or equivalent open space suitable for the ultimate provision of such parking space as needed for the accommodation of users of the premises.

4. No such building, other than a minor accessory building having a floor area of not more than 400 square feet, shall occupy any portion of the property which is within 100 feet of the line of the Euclid Avenue boundary thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

B40426 - N-553

5. If the subject property, or any portion thereof, is developed as a site for residential buildings, such buildings shall be limited as follows:

a. No residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

b. No dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than thirty three hundred (3300) square feet, nor shall any such dwelling cover more than fifty percent (50%) of the area of such parcel or be less than twelve (12) feet from any other such dwelling, or be set back less than ten (10) feet from any presently existing or future public street, or have a height in excess of forty (40) feet, measured and regulated as set forth in pertinent section of the Building Code of the City and County of San Francisco.

c. No residential building in other portions of the subject property shall have a ground coverage in excess of fifty percent (50%) of the area allotted to such building.

6. Development of the subject property, or of any separate portion thereof, for commercial use as stipulated herein, shall include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building or buildings there shall be submitted to the City Planning Commission, for approval as to conformity with these stipulations, a site plan showing the character and location of the proposed building or buildings, and related parking spaces and landscaped areas upon the property, or upon such separate portion thereof as is allotted to such building or buildings. It shall be understood that approval of any such plan shall not preclude subsequent approval by the Commission of a revised or alternative plan which conforms to these stipulations.

SAN FRANCISCO UNIFIED SCHOOL DISTRICT,
a public corporation

By [signature]
Eugene J. Riordan
Director of Property of the City and County of San Francisco

Subscribed and sworn to before me this 13th day of November, 1952

[signature]
County Clerk in and for the City and County of San Francisco, State of California.

CITY PLANNING COMMISSION

RESOLUTION NO. 4109

RESOLVED, That Proposal No. Z-52.62.2, an application to change the Use District Classification of the hereinafter described parcel of land from a First Residential District to a Commercial District, be, and the same is hereby APPROVED; subject to the stipulations submitted by the applicant and set forth herein:

Commencing at a point on the S/L of California Street distant thereon 187 feet west of the W/L of Presidio Avenue (produced), thence westerly on said line 707.375 feet to a curve to the left having a radius of 15 feet, thence 23.562 feet measured on the arc of the curve to the left to the E/L of Laurel Street, thence southerly on the E/L of Laurel Street 127.227 feet to the curve to the left having a radius of 60 feet, thence 77.113 feet measured on the arc of the curve to the left to a curve to the right having a radius of 120 feet, thence 149.153 feet measured on the arc of the curve to the right to a curve to the right having a radius of 4033 feet, thence 388.710 feet measured on the arc of the curve to the right to a curve to the left having a radius of 20 feet, thence 35.186 feet measured on the arc of the curve to the left to the northwest line of Euclid Avenue, thence N 73° 12' E on the northwest line of Euclid Avenue 312.934 feet to a curve to the left having a radius of 65 feet, thence 42.316 feet, measured on the arc of the curve to the left to the northwesterly line of Masonic Avenue (proposed extension), thence N 35° 54' E, 380.066 feet to the arc of a curve to the left having a radius of 425 feet, thence 254.176 feet measured on the arc of the curve to the left, thence N 52° 36' 29.74" W, 252.860 feet to the point of commencement. Being the major portion of Lot 1A, Block 1032, containing 10.2717 acres, more or less.

RESOLVED, FURTHER, That this change shall be and at all times remain contingent upon observance by the owner or owners and by his or their successors in interest of the conditions contained in the following stipulations as to the use of the land affected.

1. The character of the improvement for commercial purposes of the subject property, or any portion thereof, shall be limited to a building or buildings designed as professional, institutional or office buildings, including service buildings which are normally accessory thereto.

2. The aggregate gross floor area of all such buildings, calculated exclusive of cellars, of basement areas used only for storage or services incidental to the operation and maintenance of a building, and of indoor or other covered automobile parking space, shall not exceed the total area of the property allotted to such use.

3. For each five hundred square feet of gross floor area in such buildings, calculated as in stipulation 2, above, there shall be reserved and kept available on the property or the portion thereof allotted to such use, one off-street automobile parking space, or equivalent open space suitable for the ultimate provision of such parking space as needed for the accommodation of users of the premises.

4. No such building, other than a minor accessory building having a floor area of not more than 400 square feet, shall occupy any portion of the property which is within 100 feet of the line of the Euclid Avenue boundary thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

5. If the subject property, or any portion thereof, is developed as a site for residential buildings, such buildings shall be limited as follows:

a. No residential building other than a one-family dwelling or a two-family dwelling shall occupy any portion of the property which is within 100 feet of the Euclid Avenue boundary line thereof, or which is within 100 feet of the easterly line of Laurel Street and south of the northerly line of Mayfair Drive extended.

b. No dwelling within the said described portion of the subject area shall occupy a parcel of land having an area of less than thirty three hundred (3300) square feet, nor shall any such dwelling cover more than fifty percent (50%) of the area of such parcel or be less than twelve (12) feet from any other such dwelling, or be set back less than ten (10) feet from any presently existing or future public street, or have a height in excess of forty (40) feet, measured and regulated as set forth in pertinent section of the Building Code of the City and County of San Francisco.

c. No residential building in other portions of the subject property shall have a ground coverage in excess of fifty percent (50%) of the area allotted to such building.

6. Development of the subject property, or of any separate portion thereof, for commercial use as stipulated herein, shall include provisions for appropriate and reasonable landscaping of the required open spaces, and prior to the issuance of a permit for any building or buildings there shall be submitted to the City Planning Commission, for approval as to conformity with these stipulations, a site plan showing the character and location of the proposed

building or buildings, and related parking spaces and landscaped areas upon the property, or upon such separate portion thereof as is allotted to such building or buildings. It shall be understood that approval of any such plan shall not preclude subsequent approval by the Commission of a revised or alternative plan which conforms to these stipulations.

I hereby certify that the foregoing resolution was adopted by the City Planning Commission at its special meeting on November 13, 1952, and I further certify that the stipulations set forth in the said resolution were submitted in a written statement placed on file.

Joseph Mignola, Jr.
Secretary

Ayes : Commissioners Kilduff, Towle, Devine, Williams
Noes : None
Absent: Commissioners Brooks, Lopez, Prince
Passed: November 13, 1952

# EXHIBIT O

**Zoning Density Analysis for 3333 California**
***April 26, 2016***

Background:

| | |
|---|---|
| Site Zoning: | RM-1 (1 unit per 800 SF of lot area) |
| Site Zoning with PUD: | RM-2 minus one unit (1 unit per 600 SF of lot area) |

| | |
|---|---|
| Area (SF) of Property identified in Resolution 4109: | 83,085 SF |
| Remaining Area (SF) of Property: | 363,383 SF |
| Total Area (SF) of Property: | 446,468 SF |

Density Calculations:

| | | |
|---|---|---|
| RM-2, PUD, No Resolution 4109: | (446,468/600) -1 = | 743 |
| | | **743** |
| RM-2, PUD, with Resolution 4109*: | (363,383/600) -1 = | 605 |
| | (83,085/3,300) x 2 = | 50 |
| | 605 + 50 = | **655** |
| RM-1, no PUD, No Resolution 4109: | (446,468/800) -1 = | 558 |
| | | **558** |
| RM-1, no PUD, with Resolution 4109*: | 363,383/800 = | 454 |
| | (83,085/3,300) x 2 = | 50 |
| | 454 + 50 = | **504** |

* If Resolution 4109 is applicable

# EXHIBIT P

# Initial Study
## 1629 Market Street Project
## Planning Department Case No. 2015-005848ENV

## A. Project Description

[Note: A full project description is not provided with this Initial Study because a detailed project description is located in Chapter H, *Project Description*, of the EIR to which this Initial Study is attached.]

The project site occupies approximately 97,617 square feet, or 2.2 acres, on the block bounded by Market, 12th, Otis, and Brady Streets located within the boundaries of San Francisco's Market & Octavia Area Plan, an area plan of the *San Francisco General Plan* (*General Plan*). Most of the site is located within the NCT-3 (Moderate-Scale Neighborhood Commercial Transit) Zoning District, while the southwestern portion of the site, occupying approximately 20,119 square feet is in a P (Public) Zoning District. The portions of the project site north of Stevenson Street and east of Colusa Place are located within an 85-X height and bulk district, while the portion of the project site south of Colton Street is in a 40-X height and bulk district.[1] The project site is currently occupied by four surface parking lots containing 242 parking spaces, an approximately 15-foot-tall Bay Area Rapid Transit (BART) ventilation structure for the below-grade BART tunnel, as well as three buildings: the Civic Center Hotel, the United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry (UA) Local 38 building, and the Lesser Brothers Building.

The proposed project would demolish the existing UA Local 38 building, located at 1621 Market Street, demolish the majority of the Lesser Brothers Building, located at 1629–1637 Market Street, rehabilitate the Civic Center Hotel, located at 1601 Market Street, and demolish the 242-space surface parking lots on the project site. The proposed development would construct a total of five new buildings on the project site, including a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building adjacent to the Civic Center Hotel, as well as a 10-story, 85-foot-tall, 187,100-square-foot addition to the Lesser Brothers Building at the corner of Brady and Market Streets containing 198 residential units and 6,600 square feet of ground-floor retail/restaurant space ("Building A"). A 10-story, 85-foot-tall, 118,300-square-foot building containing 136 residential units and 2,500 square feet of ground-floor retail/restaurant space ("Building B") would be constructed on Market Street between the new UA Local 38 building and Building A. A nine-story, 85-foot-tall, 74,700-square-foot building containing 78 residential units would be constructed south of Stevenson Street and north of Colton Street ("Building D"). The five-story, 55-foot-tall Civic Center Hotel would be rehabilitated to contain 65 residential units and 4,000 square feet of ground-floor retail/restaurant space (also referred to as "Building C"), and a new six-story, 68-foot-tall, 50,900-square-foot Colton Street Affordable Housing building containing up to 107 affordable units would be constructed south of Colton Street as part of the proposed project. The proposed project would construct the new 18,300-square-foot Brady Open Space at the northeast corner of Brady and Colton Streets. In addition, the proposed project would include construction of a two-level, below-grade garage with up to 316 parking spaces (some of which may include the use of stackers) accessible from Brady and Stevenson Streets. Overall, the proposed project would include construction of 498,100 square feet of residential use that would contain up to 477 residential units and up to 107 affordable units in the Colton Street Affordable

[1] Following San Francisco convention, Market Street and streets parallel to it are considered to run east/west, while 12th Street and streets parallel to it are considered to run north/south.

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San Francisco Law School are located north of the project site near Market Street, and the City College of San Francisco has an auditorium and administrative offices along Gough Street, west of the project site. The project site is immediately surrounded by a mix of two- to nine-story commercial, residential, community facility, and light industrial buildings. Vegetation in the area is generally limited to street trees. Nearby public parks and open spaces within approximately 0.50 mile of the project site include Patricia's Green, Page & Laguna Mini Park, Koshland Park, Hayes Valley Playground, and Civic Center Plaza.

## C. Compatibility with Existing Zoning and Plans

| | Applicable | Not Applicable |
|---|---|---|
| Discuss any variances, special authorizations, or changes proposed to the *Planning Code* or Zoning Map, if applicable. | ☒ | ☐ |
| Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable. | ☒ | ☐ |
| Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies. | ☒ | ☐ |

See Chapter III, *Plans and Policies*, in this Draft Environmental Impact Report (DEIR) for a detailed discussion of land use plans applicable to the 1629 Market Street Mixed-Use Project and identification of the proposed project's potential to conflict with those plans or policies.

## D. Summary of Environmental Effects

The proposed project could potentially affect the environmental factor(s) checked below, for which mitigation measures would be required to reduce potentially significant impacts to less than significant. The following pages present a more detailed checklist and discussion of each environmental factor.

| | | |
|---|---|---|
| ☐ Land Use | ☐ Greenhouse Gas Emissions | ☒ Geology and Soils |
| ☐ Population and Housing | ☐ Wind and Shadow | ☐ Hydrology and Water Quality |
| ☒ Cultural Resources | ☐ Recreation | ☐ Hazards/Hazardous Materials |
| ☒ Transportation and Circulation | ☐ Utilities and Service Systems | ☐ Mineral/Energy Resources |
| ☒ Noise | ☐ Public Services | ☐ Agricultural/Forest Resources |
| ☒ Air Quality | ☐ Biological Resources | ☒ Mandatory Findings of Significance |

This Initial Study evaluates the proposed 1629 Market Street Mixed-Use Project to determine whether it would result in significant environmental impacts. The designation of topics as "Potentially Significant" in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant. On the basis of this Initial Study, topics for which there are project-specific effects that have been determined to be potentially significant are:

- Cultural Resources (historical architectural resources only); and
- Transportation and Circulation (all topics).

The Cultural Resources (historic architectural resources only) and the Transportation and Circulation topics are evaluated in the DEIR prepared for the proposed project. The project has the potential to result in a significant, cumulative transportation-related construction impact; therefore, for ease of reference all Transportation and Circulation topics will be included together in the DEIR.

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The proposed project would cast net new shadow on nearby sidewalks including those along Market Street, Brady Street, Stevenson Street, and around the confluence of Mission Street and South Van Ness Avenue at certain times of day throughout the year. Most of the sidewalks in this area are already shadowed by existing buildings and, given that sidewalks are typically used by pedestrians traveling between destinations and not as a recreational resource, the additional project-related shadow would not substantially affect the use of the sidewalks. Therefore, the shadow impact on the surrounding sidewalks as a result of the proposed project would be less than significant.

For the above reasons, the proposed project's net new shadow would not be anticipated to substantially affect the use of any publicly-accessible areas, including nearby streets and sidewalks. Given the foregoing, the proposed project would result in a ***less-than-significant*** impact with respect to shadow.

The proposed project would develop a new privately-owned, publicly-accessible open space (POPOS), referred to herein as the Brady Open Space. The Brady Open Space would be publicly-accessible, but would not be under the jurisdiction of the Recreation and Park Commission and would not be subject to Section 295. CEQA analysis covers impacts of a project on existing conditions, and not on elements of the project itself. Therefore, there is no shadow impact to this open space, which does not exist under current conditions. For informational purposes, the shadow diagrams prepared depict project shadow on the planned Brady Open Space, and those effects are discussed below for informational purposes only.

The shadow diagrams in **Figure 2 through Figure 4** reveal that the proposed project would add net new shadow to portions of the planned Brady Open Space primarily in the morning before 11:00 a.m. and afternoon after 3:00 p.m. throughout the year but allow relatively open sunshine during the middle of the day. The planned Brady Open Space would receive shadow from the proposed project on the north side of the park beginning at 6:46 a.m. on June 21, a time when much of the open space would already be in shadow from existing structures. By 8:00 a.m., existing shadow would be largely gone, and shadow from the proposed project would increase on the open space until 11:00 a.m. when it would be mostly gone. Shadow from the proposed project would begin to encroach again on the north side of the open space by 2:00 p.m. and would cover a majority of the open space by shortly after 4:00 p.m. Even by 6:00 p.m., the southwest corner of the open space would remain in sunshine. By 7:00 p.m., the entire open space would be in shade from a combination of the proposed project and existing structures.

On the morning of the fall equinox the Brady Open Space would be nearly entirely in shadow from the project and surrounding existing structures at 8:00 a.m. Sunlight would then begin to increase, and the open space would be nearly entirely in sunshine from 12:00 noon to 2:00 p.m. After 2:00 p.m., shade from the project would increase through the afternoon, covering the majority of the open space by 4:00 p.m. but leaving the southwestern corner in sun until after 6:00 p.m.

On the winter solstice, the Brady Open Space would be mostly in shade in the morning from the project and existing structures until 10:00 a.m., at which time the western half of the open space would be in sunlight. Between about 1:00 p.m. and 2:30 p.m., nearly all of the park would be in sunlight. Shadow from the project would encroach onto the northern portion of the open space by 3:00 p.m., and shadow from existing buildings to the west would begin to cover the western portion of the open space shortly thereafter, although, even by just before 4:00 p.m. there would still be a good portion of the open space on the southeast side in sunlight.

SAN FRANCISCO
**PLANNING DEPARTMENT**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

# Notice of Preparation of an Environmental Impact Report and Notice of Public Scoping Meeting

| | |
|---|---|
| *Date:* | February 8, 2017 |
| *Case No.:* | **2015-005848ENV** |
| *Project Title:* | **1629 Market Street Mixed-Use Project** |
| *Zoning:* | NCT-3 (Moderate Scale Neighborhood Commercial Transit District) and P (Public) Zoning Districts<br>40-X & 85-X Height and Bulk Districts |
| *Block/Lot:* | 3505/001, 007, 008, 027, 028, 029, 031, 031A, 032, 032A, 033, 033A, 034, 035 |
| *Lot Size:* | 97,617 square feet (2.2 acres) |
| *Project Sponsor:* | Strada Brady, LLC<br>William Goodman, 314.276.0707 |
| *Lead Agency:* | San Francisco Planning Department |
| *Staff Contact:* | Debra Dwyer – 415.575.9031<br>debra.dwyer@sfgov.org |

## INTRODUCTION

This notice provides a summary description of the proposed project; identifies environmental issues anticipated to be analyzed in the Initial Study (IS) and Environmental Impact Report (EIR); and provides the time, date, and location of the public scoping meeting (see page 21 for information on the public scoping meeting). The comments received during the public scoping process will be considered during the preparation of the IS and EIR for this project.

## PROJECT SUMMARY

The project sponsor, Strada Brady, LLC, proposes a mixed-use project fronting on Market Street between Brady and 12th Streets. The proposed project would demolish the existing United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry (UA) Local 38 building, located at 1621 Market Street, demolish the majority of the Lesser Brothers Building, located at 1629–1637 Market Street, rehabilitate the Civic Center Hotel, located at 1601 Market Street, for residential and retail/restaurant uses, and demolish the 242-space surface parking lots on the project site. The proposed project would construct a new four-story, 58-foot-tall, 27,300-square-foot UA Local 38 building, as well as a 10-story, 85-foot-tall, 187,100-square-foot addition to the Lesser Brothers Building at the corner of Brady and Market Streets containing 198 residential units and 6,600 square feet of ground-floor retail/restaurant space.[1,2] A 10-story, 85-foot-tall, 118,300-square-

[1] Square footages presented for the proposed project are approximate.
[2] Building heights for the existing buildings and the proposed project do not include rooftop mechanical penthouses. In accordance with *Planning Code* Section 260(b)(1)(B), elevator, stair, and mechanical penthouses would be a maximum of 16 feet in height above the roof line.

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### Air Quality

The topic of Air Quality will include analysis of consistency of the proposed project with applicable air quality plans and standards, the potential for the proposed project to result in emissions of criteria air pollutants and other toxic air contaminants (TACs) that may affect sensitive populations, as well as the potential for the proposed project to result in sources of odor. The air quality analysis will include quantification of both construction-related and operational air pollutant emissions. The analysis will also summarize the results of a health risk assessment prepared to evaluate potential long-term health effects of emissions from both project construction and operation.

### Greenhouse Gas Emissions

The topic of Greenhouse Gas Emissions will include an analysis of the proposed project's consistency with the City's Greenhouse Gas Reduction Strategy and the degree to which the proposed project's greenhouse gas emissions could result in a significant effect on the environment.

### Wind and Shadow

The topic of Wind will evaluate the potential to alter wind in a manner that substantially affects public areas. Based on a preliminary shadow fan analysis prepared by the Planning Department, no City parks or other publicly-accessible open space exists within the potential shadow area of the proposed project, and therefore no parks or open spaces would be affected by project shadow. The topic of Shadow will include an evaluation of the potential for the proposed project to result in shadow impacts on nearby sidewalks. In addition, for informational purposes the Shadow section will describe the potential for the proposed project to result in shadow on the project site itself, including the proposed Brady Open Space.

### Recreation

The topic of Recreation will include an analysis of whether the proposed project could adversely affect existing parks and open spaces.

### Utilities and Service Systems

The topic of Utilities and Service Systems will include analysis of potable water and wastewater treatment capacity, and will discuss disposal of solid waste that may be generated by the proposed project. This topic will also include an assessment of whether the proposed project would require the construction of new water supply, wastewater treatment, and/or stormwater drainage facilities, and if so, whether that construction could result in adverse environmental effects.

### Public Services

The topic of Public Services will include analysis of whether existing public services (e.g., schools, police and fire protection, etc.) would be adversely affected by the proposed project so as to require new or physically altered facilities, the construction of which could cause significant impacts.

# EXHIBIT Q

SAN FRANCISCO
**PLANNING DEPARTMENT**

**MEMO**

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

DATE: July 2014

TO: Planning Department Staff, Shadow Analysis Consultants

FROM: Rachel Schuett, Kevin Guy, SF Planning Department

RE: Shadow Analysis Procedures and Scope Requirements

In the City and County of San Francisco, there are two circumstances which could trigger the need for a shadow analysis:

(1) If the proposed project would be over 40 feet tall, and could potentially cast new shadow on a property under the jurisdiction of the Recreation and Park Department, per *San Francisco Planning Code Section 295*; and/or
(2) If the proposed project is subject to review under the California Environmental Quality Act (CEQA) and would potentially cast new shadow on a park or open space such that the use or enjoyment of that park or open space could be adversely affected.

This memorandum documents the Planning Department's standard procedures for conducting a shadow analysis both for the purposes of CEQA review and for the purposes of *Section 295* review. A complete Shadow Analysis has three main components: (1) Shadow Diagrams, (2) Shadow Calculations, and (3) a Technical Memorandum. In some cases, survey information may also be required.

A shadow analysis should be completed in five sequential steps:

Step 1. Preliminary Shadow Fan
Step 2. Project Initiation
Step 3. Shadow Diagrams
Step 4. Shadow Calculations
Step 5. Technical Memorandum

Each of these steps is described, in detail, below.

**Step 1. Preliminary Shadow Fan**

The Planning Department typically prepares a preliminary shadow fan as part of the Preliminary Project Assessment (PPA) process for projects which exceed 40 feet in height. If the preliminary shadow fan indicates that the proposed project has the potential to cast new shadow on a park or open space which is protected by Section 295 of the *Planning Code*, a shadow analysis will be required for the purposes of Section 295 review.

Typically, this information is included in the PPA Letter. For projects not subject to the PPA process, and/or if the project is over 40 feet in height and has potential to cast new shadow on a park or open space that is not protected by Section 295 of the *Planning Code*, or if the project is less than 40 feet in height and could cast new shadow on any park or open space a shadow analysis may also be required for the purposes of CEQA review. This would be determined on a case-by-case basis as part of the scoping process for the environmental review. A preliminary shadow fan would be prepared by Planning Department staff at that time.

**Step 5. Technical Memorandum**

The shadow diagrams, shadow calculations, and any other supporting materials should be accompanied by a technical memorandum which includes (at a minimum) the following information:

- Project Description. Include the location of the project site (neighborhood, address, Assessor's Block/Lot, nearby landmarks), general topography, and project boundaries. Describe existing building(s) and land use(s) on and around the project site, including building height(s). Include proximity to parks, open spaces, and community gardens. Describe the proposed project including demolition and new construction. Describe the physical characteristics of the proposed building(s) as well as the proposed use(s). Include and refer to building elevations.

- Modeling Assumptions. The shadow graphics and calculations should be accompanied by clear documentation of the assumptions for the modeling including:
  - The height assumed for each of the buildings (or building envelopes).
    **Please note:** Please contact the Planning Department for specific direction in how to model intervening shadow cast from buildings between the proposed project site and the affected park or open space.
  - The allowance for penthouses and parapets (which should be determined in consultation with Planning Department staff).
    **Please note:** the Planning Department typically requires that final building designs be modeled rather than building envelopes, or hypothetical building forms based on existing or proposed zoning. However, building envelopes may be substituted in some circumstances as directed by Planning Department staff.
  - Building sections and elevations (for the proposed project).
  - If the project site is steep and/or has varied topography the documentation should identify where the height of the envelope of the building was measured from.

- Potentially Affected Properties. Potentially affected properties including: parks, publicly-accessible open spaces, and community gardens identified in the graphical depictions should be listed and described. The description of these properties should include the physical features and uses of the affected property, including but not limited to: topography, vegetation, structures, activities, and programming. Each identified use should be characterized as 'active' or 'passive.' Aerial photographs should be included, along with other supporting photos or graphics. The programming for each property should be verified with the overseeing entity, such as the Port of San Francisco, the Recreation and Parks Department, etc. Any planned improvements should also be noted.

- Shadow Methodology and Results. Describe how the analysis was conducted, what assumptions were made? Describe the "solar year", the "solar day" and define any other terms, as needed. Refer to shadow diagrams and describe results.

- Quantitative Analysis (for properties subject to Section 295, and as required by the Planning Department). The Technical Memorandum should include a narrative summary of the quantitative shadow effects that would result from the project, and discuss how these effects relate to the quantitative criteria set forth in the "Proposition K – Implementation Memo" as jointly adopted by the Planning and Recreation and Park Commissions in 1989.

# EXHIBIT R

Same as Exhibit F in OLHIA1

Margaret Fitzgerald
30 Wood Street, San Francisco, CA 94118

Date: February 28, 2016

Ms. Mary Woods
Planner - North West Quadrant
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2414

RE: 3333 California St. Development

Dear Ms. Woods:

I am writing regarding the development of the 3333 California Street development, currently the UCSF Laurel Heights Campus (the "Site"). It is my understanding that the San Francisco Planning Department is working with the developer of the Site regarding the initial project plans for the proposed development. The owner of the fee interest and the developer of the Site are limited in their joint ability to develop the Site because the owner of the Site does not have free and clear title; rather the general public holds a permanent recreational interest in all of the open space at the Site. Therefore, any development plans at the Site may not impinge upon this open space.

The general public holds a ***permanent*** right of recreational use on all of the open space at 3333 California and such rights were obtained by implied dedication. Dedication is a common law principle that enables a private landowner to donate his land for public use. Implied dedication is also a common law principle and is established when the public uses private land for a long period of time, which period of time is five (5) years in California. In 1972, the California legislature enacted Civil Code Section 1009 to modify the common law doctrine of implied dedication and to limit the ability of the public to secure ***permanent*** adverse rights in private property. Here, however, the existing open space at the Site was well established and well used as a park by the general public long before the completion of the construction of the full footprint of the improvements at the Site in 1966. Therefore, the general public has permanent recreational rights to the open space at the Site; the rights were obtained by implied dedication prior to the enactment of Cal. Civil Code Sec. 1009 in 1972.

Even if the general public had not secured permanent rights to recreational use through implied dedication prior to 1972, the public and countless individuals have acquired a prescriptive easement over the recreational open space. The recreational use has been continuous, uninterrupted for decades, open and notorious and hostile (in this context, hostile means without permission). Every day, individuals and their dogs use the green space along Laurel, Euclid and along the back of the Site at Presidio. Individuals ignore the brick wall along Laurel and regularly use the green space behind the wall as a park for people and for their dogs. The use of the Site has not been permissive. For example, the owner of the Site has not posted permission to pass signs in accordance with Cal. Civil Code Sec. 1008. If such signs ever were posted, they have not been reposted at least once per year. Although it is counterintuitive, an owner typically posts such signs to protect against the public securing adverse rights. One might assume the owner of the Site has not posted such signs, as the owner is aware of the pre-existing and permanent recreational rights the general public has secured to the open space. Because the

Same as Exhibit F in OLHIA1

public's rights to the open space were secured decades ago through implied dedication, it is not necessary for the general public to rely upon its prescriptive easement rights outlined in this paragraph; rather it is another means to the same end.

It is important that the Planning Department understand these legal issues as any project plan (or any future project description in an Environmental Impact Report ("EIR") for the Site) cannot include development of the open land over which the public has a secured permanent rights of recreational use. It would not be a concession by the owner/developer to leave the open space undeveloped and allow public recreational use as the general public holds permanent recreational rights to this space. It is important to note that even the open space behind the walls that has been used as park space is also included in this dedication to the public. According to well-established case law, a wall or fence is not effective in preventing the development of adverse property rights if individuals go around the wall, as is the case here.

In sum, the open space at the Site cannot be developed as the public secured such rights through implied dedication prior to 1972 (or, alternatively, by prescriptive easement). In reviewing the development plans for the Site, the City cannot decide to allow development of any of the open space as the recreational rights to the space are held by the public at large. Any project description in the future EIR for the Site that contemplates development of any of the open space would be an inadequate project description and would eviscerate any lower impact alternative presented in the EIR. One only need to look to the seminal land use case decided by the California Supreme Court regarding this very Site[1] to see that an EIR will not be upheld if the project alternatives are legally inadequate. It would be misleading to the public to suggest that a lesser impact alternative is one that allows the public to use the space to which it already has permanent recreational use rights.

In sum, please be advised of the public's permanent recreational rights to all of the existing open space at the Site and please ensure that a copy of this letter is placed in the project file.

Sincerely,

*Meg Fitzgerald*

Margaret N. Fitzgerald

With copies to:
Mark Farrell, Supervisor
Dan Safir, Prado Group
Kathy DiVicenzi, Laurel Heights Improvement Association
Robert Charles Friese, Esq.

[1] Laurel Heights Improvement Association of San Francisco, Inc. v. The Regents of the University of California, 47 Cal. 3rd 376 (1988).

# EXHIBIT S

I-DEVINCENZI4



that urban decay effects might result, and the court upheld the city's determination that changing the site plan for the shopping center to allow a supercenter did not result in any new significant effects that would require revisions to an EIR that it had previously certified for the project. 183 CA4th at 52.

The difficulty of formulating effective mitigation measures for urban decay effects is illustrated by the decision in *California Clean Energy Comm. v City of Woodland* (2014) 225 CA4th 173. The court upheld a measure requiring that specific project uses consist primarily of regional retail uses that would not compete with stores in the city's downtown area. The court rejected several other measures, however, that called for submission of future market studies and development of plans for retail and other uses in areas likely to be affected by the new development, finding no basis for concluding they might be effective.

## §13.65 H. Hazardous Waste and Release Sites

When preparing an EIR, the lead agency must consult the "Cortese" list of hazardous waste sites (compiled under Govt C §65962.5) to determine whether the project or any project alternatives are located on a listed site. Pub Res C §21092.6(a). Any information derived from consultation of the Cortese list must be included in the notice of preparation and the draft EIR. Pub Res C §21092.6(a).

An EIR for a project that involves the purchase of a school site or construction of a new elementary or secondary school by a school district must include sufficient information to determine whether the site is a former hazardous or solid waste disposal site, an identified hazardous substance release site, or a site containing certain types of pipelines. Pub Res C §21151.8(a); 14 Cal Code Regs §15186.

On CEQA and hazardous waste disposal and release sites, see §§20.49–20.52.

## §13.66 I. Greenhouse Gas Emissions and Climate Change

Following enactment of the California Global Warming Solutions Act of 2006 (Health & S C §§38500–38599), the legislature directed that CEQA Guidelines be adopted addressing the mitigation of greenhouse gas (GHG) emissions. Pub Res C §21083.5. Following that directive, a number of new and amended Guidelines provisions were adopted in 2010; see,

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an EIR, depending on the specific issues presented by a particular project. A California Climate Change Adaptation Strategy was prepared by a multi-agency task force headed by the Natural Resources Agency and finalized in 2009. The December 2009 strategy document summarizes information about the impacts of climate change in various sectors as well as efforts to manage against the threats posed by climate change. These documents generally can be found on the websites of the particular state agencies or on the California Climate Change Portal website.

**Guidance from local air districts.** Some local air districts have adopted or published guidance documents with recommended thresholds of significance for GHG emissions of projects. These include interim thresholds for stationary sources within the South Coast Air Quality Management District and significance thresholds adopted by the San Joaquin Valley Air Pollution Control District and the Bay Area Air Quality Management District. On use of regulatory agency guidance documents generally, see §§6.55, 13.13–13.14.

In December 2008, the South Coast Air Quality Management District adopted an interim GHG threshold for stationary sources of 10,000 metric tons of CO2 equivalents per year (MT/yr), which applies when the district is the lead agency. See South Coast Air Quality Management District, A Resolution of the Governing Board of the South Coast Air Quality Management District Approving the Interim Greenhouse Gas Significance Threshold to Be Used by the SCAQMD for Industrial Source Projects, Rules and Plans When It Is the Lead Agency for Projects Subject to the California Environmental Quality Act (CEQA).

In December 2009, the San Joaquin Valley Air Pollution Control District adopted a threshold for all types of development projects. The district's approach is derived from AB 32's goal of reducing GHG emissions to 1990 levels by 2020, which generally would require statewide emissions to be reduced by approximately 29 percent below CARB's 2020 "business as usual" projections for California. See CARB Climate Change Scoping Plan (Dec. 2008) at ES-1. Generally, the recommended threshold bases the determination of significance on whether the analysis for a proposed project demonstrates that the project can achieve a comparable reduction against "business as usual" emissions.

In June 2010, the Bay Area Air Quality Management District adopted recommended thresholds with two alternatives for determining significance for most nonindustrial development projects. One is a bright-line threshold of 1100 MT/yr of carbon dioxide equivalent emissions. The other recommended threshold is a per capita threshold of 4.6 MT/yr of

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CO2-equivalent emissions, based on the service population of the project. For industrial projects, the threshold is emissions greater than 10,000 MT/yr of CO2 equivalents.

**NOTE➤** On the basis of the pendency of *California Bldg. Indus. Ass'n v Bay Area Air Quality Mgmt. Dist.* (2015) 62 C4th 369, the Bay Area Air Quality Management District had not been recommending that agencies use these thresholds as a general measure of a project's impacts, stating that agencies should make significance determinations on the basis of substantial evidence. See http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES.aspx. This case has been remanded to the trial court for issuance of an order partially granting the petition for writ of mandate. *California Bldg. Indus. Ass'n v Bay Area Air Quality Mgmt. Dist.* (2016) 2 CA5th 1067, 1091. In *Center for Biological Diversity,* 62 C4th at 230 n7, however, the court noted that the validity of the District's GHG thresholds was not before the court in that case. Also, the 2015 court of appeal decision in *California Bldg. Indus. Ass'n v Bay Area Air Quality Mgmt. Dist., supra,* did not discuss the District's GHG thresholds. Practitioners should check the District's website for updates to this guidance.

**Local or regional plan policies on GHGs.** An increasing number of cities and counties have adopted GHG emission reduction goals in their general plans; some jurisdictions are preparing or adopting formalized GHG reduction plans or climate action plans. In appropriate circumstances, such general plan policies can be used as a possible basis for determining the significance of emissions impacts. See generally §§6.56, 13.11. In *Center for Biological Diversity,* 62 C4th at 223, the court suggested that in appropriate circumstances local agencies could evaluate compliance with such plans to streamline the review of GHG emissions impacts. In *North Coast Rivers Alliance v Marin Mun. Water Dist.* (2013) 216 CA4th 614, 653, the court upheld an EIR that relied on a county policy of reducing GHG emissions by a specified percentage to reach AB 32 goals. Under CEQA's existing provisions for streamlining review for projects consistent with a plan (see chap 10), and under the CEQA Guidelines on tiering from adopted GHG reduction plans, the more formalized GHG reduction plans may be used in appropriate circumstances to streamline the review of consistent projects.

**Other technical reports; reports by private organizations.** Many preparers of CEQA documents rely on references to technical papers to

# EXHIBIT T

# CALIFORNIA NATURAL RESOURCES AGENCY




# FINAL STATEMENT OF REASONS FOR REGULATORY ACTION

## Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97

December 2009

## SECTION 15064.4. DETERMINING THE SIGNIFICANCE OF IMPACTS FROM GREENHOUSE GAS EMISSIONS

### Specific Purposes of the Amendment

A key component of environmental analysis under CEQA is the determination of significance. (Pub. Resources Code § 21002; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1106-07.) Guidelines on the analysis of GHG emissions must, therefore, include provisions on the determination of significance of those emissions.

New section 15064.4, on the determination of significance of GHG emissions, reflects the existing CEQA principle that there is no iron-clad definition of "significance." (State CEQA Guidelines, § 15064(b); *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm.* (2001) 91 Cal.App.4th 1344, 1380-81 ("*Berkeley Jets*").) Accordingly, lead agencies must use their best efforts to investigate and disclose all that they reasonably can regarding a project's potential adverse impacts. (*Ibid*; *see also* State CEQA Guidelines, § 15144.) Section 15064.4 is designed to assist lead agencies in performing that required investigation. In particular, it provides that lead agencies should quantify GHG emissions where quantification is possible and will assist in the determination of significance, or perform a qualitative analysis, or both as appropriate in the context of the particular project, in order to determine the amount, types and sources of GHG emissions resulting from the project. Regardless of the type of analysis performed, the analysis must be based "to the extent possible on scientific and factual data." In addition, lead agencies should also consider several factors. The specific provisions of section 15064.4 are discussed below.

Quantitative Analysis

Subdivision (a) of section 15064.4 states that lead agencies should calculate or estimate the GHG emissions resulting from the proposed project. This directive reflects the holding in the *Berkeley Jets* case, which required a Port Commission to quantify emissions of toxic air contaminants even in the absence of a universally accepted methodology for doing so. (*Berkeley Jets*, *supra*, 91 Cal.App.4th at p. 1370 ("The fact that a single methodology does not currently exist that would provide the Port with a precise, or 'universally accepted,' quantification of the human health risk from TAC exposure does not excuse the preparation of any health risk assessment--it requires the Port to do the necessary work to educate itself about the different methodologies that are available") (emphasis in original).) That case also required quantitative analysis of single-event noise, even though the applicable thresholds were expressed as cumulative noise levels. (*Id.* at 1382.) Quantification was required in that context in order to identify existing noise levels, the number of additional flights, the frequency of those flights, the degree to which the increased flights would cause increased noise levels at a given location, and ultimately, the community's reaction to that noise. (*Ibid.*) In other words, quantification would assist the lead agency in determining whether the increased noise would be potentially significant. (*Ibid.* ("CEQA requires that the Port

and the inquiring public obtain the technical information needed to assess whether the ADP will merely inconvenience the Airport's nearby residents or damn them to a somnambulate-like existence"); see also *Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1109 ("in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect").)

With the foregoing principles in mind, the quantification called for in proposed section 15064.4(a)(1) is reasonably necessary to ensure an adequate analysis of GHG emissions using available data and tools, in accordance with Public Resources Code Section 21083.05. Even where a lead agency finds that no numeric threshold of significance applies to a proposed project, the holdings in the *Berkeley Jets* and *Protect the Historic Amador Waterways* cases, described above, require quantification of emissions if such quantification will assist in determining the significance of those emissions. OPR and the Resources Agency find that quantification will, in many cases, assist in the determination of significance, as explained below. (State CEQA Guidelines, § 15142 ("An EIR shall be prepared using an interdisciplinary approach which will ensure the integrated use of the natural and social sciences and the consideration of qualitative as well as quantitative factors").)

First, quantification of GHG emissions is possible for a wide range of projects using currently available tools. Modeling capabilities have improved to allow quantification of emissions from various sources and at various geographic scales. (Office of Planning and Research, *CEQA and Climate Change: Addressing Climate Change Through the California Environmental Quality Act Review*, Attachment 2: Technical Resources/Modeling Tools to Estimate GHG Emissions (June 2008); CAPCOA White Paper, at pp. 59-78.) Moreover, one of the models that can be used in a GHG analysis, URBEMIS, is already widely used in CEQA air quality analyses. (CAPCOA White Paper, at p. 59.) Second, quantification informs the qualitative factors listed in proposed section 15064.4(b). Third, quantification indicates to the lead agency, and the public, whether emissions reductions are possible, and if so, from which sources. Thus, if quantification reveals that a substantial portion of a project's emissions result from energy use, a lead agency may consider whether design changes could reduce the project's energy demand.

Proposed section 15064.4(a)(1) also reflects existing case law that reserves for lead agencies the precise methodology to be used in a CEQA analysis. (*See, e.g.*, *Eureka Citizens for Responsible Gov't v. City of Eureka* (2007) 147 Cal.App.4th 357, 371-373.) As indicated above, a wide variety of models exist that could be used in a GHG analysis. (CAPCOA White Paper, at pp. 59-78.) Further, not every model will be appropriate for every project. For example, URBEMIS may be an appropriate tool to analyze a typical residential subdivision or commercial use project, but some public utilities projects, such as waste-water treatment plants, may require more specialized models to accurately estimate emissions. (*Id.* at pp. 60-65.) The requirement to

disclose any limitations in the model or methodology chosen also reflects the standard for adequacy of EIRs in existing State CEQA Guidelines section 15151.

Qualitative and Performance Standard Based Analysis

As explained in greater detail below in the Thematic Responses, CEQA does not require quantification of emissions in every instance. If the lead agency determines that quantification is not possible, would not yield information that would assist in analyzing the project's impacts and determining the significance of the GHG emissions, or is not appropriate in the context of the particular project, section 15064.4(a) would allow the lead agency to consider qualitative factors or performance standards. Consideration of qualitative factors is appropriate for several reasons. First, CEQA directs lead agencies to consider qualitative factors. (Pub. Resources Code, § 21001(g) (CEQA's purpose includes to: "require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment").) Second, existing section 15064.7 of the State CEQA Guidelines indicate that thresholds of significance may be qualitative, which implies that a determination of significance without a threshold could also evaluate qualitative factors. Third, the existing CEQA Guidelines state that the determination of significance requires a lead agency to use its judgment based on *all* relevant information. (State CEQA Guidelines, § 15064(b); see also *id.* at §§ 15064.7 (thresholds may be qualitative), 15142 (analysis should be interdisciplinary and both qualitative and quantitative).)

Subdivision (a) would also allow a lead agency to rely on performance-based standards to assist in the determination of significance. Just as with quantification, the purpose of engaging in a qualitative or performance standard based analysis is to develop information relevant to a significance determination. Several examples exist of the types of performance standards that might appropriately be used in determining the significance of greenhouse gas emissions. Proposed section 15183.5(b)(1)(D), for example, contemplates that a plan for the reduction of greenhouse gas emissions may contain performance based standards. Where such standards are developed as part of such a plan, a lead agency would have evidence indicating that compliance with such standards would indicate that the impact of greenhouse gas emissions would be less than significant. Further, in adopting SB375, the Legislature acknowledged that regional transportation plans, and the environmental impact reports prepared to analyze those plans, may contain performance standards that would apply to transit priority projects. (See, e.g., Public Resources Code, § 21155.2.) Other potential examples include the Bay Area Air Quality Management District's proposed Best Management Practices for Construction Greenhouse Gas Emissions (calling for use of alternative fuels, local building materials and recycling), and the California Public Utilities Commission's Performance Standard for Power Plans (requiring emissions no greater than a combined cycle gas turbine plant). Compliance with such standards may be relevant to the significance determination, when considered in conjunction with the

project's total projected emissions. Section 15064.4(a) was revised in response to comments to clarify that lead agencies may rely on quantitative or qualitative analyses, or both, in part to emphasize that qualitative analyses and performance standards may be useful supplements to a quantitative analysis.

Similar to use of a significance threshold, a lead agency must exercise care to ensure that performance standards do not replace a full analysis of all potential emissions. (*Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1109 ("in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect").) For example, while a Platinum LEED® rating could assist a lead agency in determining whether emissions related to a building's energy use may be significant, that performance standard may not reveal sufficient information to evaluate transportation-related emissions associated with that proposed project.

As indicated above, even a qualitative analysis must be based to the extent possible on scientific and factual data. Further, the type of analysis that is required will depend on the context of a particular project. Given the multitude of different project types and sizes, and different agencies subject to CEQA, the CEQA Guidelines, which are general by necessity, cannot specify precisely when a quantitative analysis may be required or a qualitative analysis may be appropriate. The following hypothetical examples may illustrate, however, how section 15064.4(a) could operate:

> **Project 1**: a small habitat restoration project is proposed in a remote part of California. Workers would drive to the site where they would camp for the duration of the project. Some gas-powered tools and machinery may be required. Cleared brush would either be burned or would decay naturally.
>
> **Project 2**: a large commercial development is proposed in an suburban context. Heavy-duty machinery would be required in various construction phases spanning many months. Following construction, the development would rely on electricity, water and wastewater services from the local utilities. Natural gas burners would be used on site. The development would employ several hundred workers and attract thousands of customers daily. A traffic study has been prepared for the project. The local air quality management district's guidance document recommends that projects of similar size and character should use of URBEMIS, or another similar model, to estimate the air quality impacts of the development.

In the context of Project 2 a quantitative analysis would likely be appropriate. The URBEMIS model, which would likely be used to analyze other emissions, could also be used to estimate emissions from both project-related transportation and on-site indirect emissions (landscaping, hot-water heaters, etc.) Modeling is typically done for projects of like size and character. Other models are readily available to estimate emissions associated with utility use. In the context of Project 2, a lead agency may

find it difficult to demonstrate a good faith effort through a purely qualitative analysis. (See, e.g., *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comm.* (2001) 91 Cal.App.4th 1344, 1370.)

In the context of Project 1, however, a qualitative analysis would likely be appropriate. Project 1's emissions are not easily modeled, and the Project is small in scale. While it may be technically possible, quantification of the emissions may not reveal any additional information that indicates the significance of those emissions or how they may be reduced that could not be provided in a qualitative assessment of emissions sources. (See, e.g., Public Resources Code, § 21003(f) ("public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment").)

Factors Potentially Indicating Significance

The qualitative factors listed in the proposed section 15064.4(b) are intended to assist lead agencies in collecting and considering information relevant to a project's incremental contribution of GHG emissions and the overall context of such emissions. Notably, while subdivision (b) provides a list of factors that should be considered by public agencies in determining the significance of a project's GHG emissions, other factors can and should be considered as appropriate.

Determine Whether Emissions Will Increase or Decrease

The first factor in subdivision (b), for example, asks lead agencies to consider whether the project will result in an increase or decrease in different types of GHG emissions relative to the existing environmental setting. All project components, including construction and operation, equipment and energy use, and development phases must be considered in this analysis. (State CEQA Guidelines, § 15378 (project includes "the whole of the action").) For example, a mass transit project may involve GHG emissions during its construction phase, but substantial evidence may also indicate that it will cause existing commuters to switch from single-occupant vehicles to mass transit use. Operation of such a project may ultimately result in a decrease in GHG emissions. Such analysis, provided that it is supported with substantial evidence and fully accounts for all project emissions, may support a lead agency's determination that GHG emissions associated with a project are not cumulatively considerable.

This section's reference to the "existing environmental setting" reflects existing law requiring that impacts be compared to the environment as it currently exists. (State CEQA Guidelines, § 15125.) This clarification is necessary to avoid a comparison of the project against a "business as usual" scenario as defined by ARB in the Scoping Plan. Such an approach would confuse "business as usual" projections used in ARB's Scoping Plan with CEQA's separate requirement of analyzing project effects in

comparison to the environmental baseline. (*Compare* Scoping Plan, at p. 9 ("The foundation of the Proposed Scoping Plan's strategy is a set of measures that will cut greenhouse gas emissions by nearly 30 percent by the year 2020 as compared to business as usual") *with Fat v. County of Sacramento* (2002) 97 Cal.App.4th 1270, 1278 (existing environmental conditions normally constitute the baseline for environmental analysis); see also *Center for Bio. Diversity v. City of Desert Hot Springs*, Riverside Sup. Ct. Case No. RIC464585 (August 6, 2008) (rejecting argument that a large subdivision project would have a "beneficial impact on CO2 emissions" because the homes would be more energy efficient and located near relatively uncongested freeways).) Business as usual may be relevant, however, in the discussion of the "no project alternative" in an EIR. (State CEQA Guidelines, § 15126.6(e)(2) (no project alternative should describe what would reasonably be expected to occur in the future in the absence of the project).)

Notably, section 15064.4(b)(1) is not intended to imply a zero net emissions threshold of significance. As case law makes clear, there is no "one molecule rule" in CEQA. (CBE, *supra*, 103 Cal.App.4th at 120.)

Thresholds of Significance

The second factor in subdivision (b) asks whether a project exceeds a threshold of significance for GHG emissions. Section 21000(d) of the Public Resources Code expressly directs public agencies to identify whether there are any critical thresholds for health and safety to identify those areas where the capacity of the environment is limited. A threshold is an "identifiable quantitative, qualitative or performance level" at which impacts are normally less than significant. (State CEQA Guidelines, § 15064.7(a); *see also Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1107.) Lead agencies may rely on thresholds developed by other agencies that have particular expertise in the subject matter under consideration. (*See, e.g.*, State CEQA Guidelines, Appendix G, Sample Question III ("[w]here available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make" a significance determination).) For example, a lead agency may look to standards included in a Basin Plan to assist in the determination of whether water quality impacts are significant. (*Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1107 ("[s]uch thresholds can be drawn from existing environmental standards, such as other statutes or regulations").)

Several agencies have developed, or are in the process of developing, thresholds of significance for GHG emissions.[3] For example, thresholds are currently being developed, or have already been adopted by the Bay Area Air Quality Management District for operations and construction,[4] the City of Davis for residential

[3] Reference to these thresholds and proposed thresholds does not reflect an endorsement of those thresholds; rather, they are cited solely for the purpose of demonstrating that agencies are developing such thresholds.

[4] BAAQMD CEQA Guidelines Update: work in progress - http://www.baaqmd.gov/pln/ ceqa/index.htm.

developments,[5] and the South Coast Air Quality Management District for industrial projects.[6] Regardless of the threshold chosen, however, this section does not alter the pre-existing rule under CEQA that if substantial evidence supports a fair argument that a project may result in significant impacts, despite compliance with a threshold, an EIR must be prepared. (*Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 342.) Further, "in preparing an EIR, the agency must consider and resolve every fair argument that can be made about the possible significant environmental effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect." (*Protect the Historic Amador Waterways*, *supra*, 116 Cal.App.4th at 1109.)

Consistent with the above, if relying on a threshold developed by another agency, lead agencies must exercise caution in selecting a threshold to ensure that the threshold is appropriately applied. For CEQA purposes, a threshold identifies a level below which an environmental impact will normally be less than significant. (State CEQA Guidelines, § 15064.7(a).) Some agencies have adopted "thresholds" pursuant to other laws that may not be applicable in the CEQA context. ARB has adopted several thresholds pursuant to AB32, for example, to address specific purposes that are unrelated to CEQA. For example, the *de minimis* threshold governs the level at which emissions will be regulated by ARB's AB32 regulations. (Health & Safety Code, § 38561(e); Scoping Plan, at pp. 96-97.) CEQA does not permit use of a *de minimis* threshold, however. (*CBE*, *supra*, 103 Cal.App.4th at p. 121.) Additionally, the Reporting Threshold is the level at which emissions from large industrial sources are required to be reported. (Scoping Plan, at pp. 108-109; *see also* CARB Board Resolution 07-54 (2007).) Again, this reporting threshold reflects a policy decision regarding regulation by the ARB, but does not address the level at which environmental harm may occur, and does not satisfy a lead agency's duties under CEQA related to review of projects which may result in significant adverse environmental impacts.

Consistency with a Plan or Regulation

Finally, the third factor in subdivision (b) directs consideration of the extent to which a project complies with a plan or regulation to reduce GHG emissions. That section further states, however, that to be used for the purpose of determining significance, a plan must contain specific requirements that result in reductions of GHG emissions to a less than significant level. This clarification is necessary because of the wide variety of climate action plans and GHG reduction plans that are currently being adopted by public agencies. ARB, for example, recently adopted its statewide Scoping Plan. That plan may not be appropriate for use in determining the significance of individual projects, however, because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping

[5] City of Davis (2009) Greenhouse Gas Emission Threshold and Standards for New Residential Development; Accessed 5/27/09, http://cityofdavis.org/pgs/sustainability/pdfs/15_4.21.09_GHG%20Standards.pdf

[6] SCAQMD (2008) Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, Accessed 5/27/09 http://www.aqmd.gov/hb/2008/December/081231a.htm.

Plan. (Scoping Plan, at p. 9.) Regulations that will require actual reductions of GHG emissions may not be adopted until 2012. (*Ibid.*) Once those regulations are adopted and being implemented, they may, if appropriate, be used to assist in the determination of significance, similar to the current use of air quality, water quality and other similar environmental regulations. (*CBE, supra*, 103 Cal. App. 4th at 111 ("a lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and regulation").)

In addition to the regulations that will be developed to implement the Scoping Plan, this factor would also allow lead agencies to consider plans that are developed to reduce GHG emissions on a regional or local level. (Scoping Plan, at p. 26.) The proposed section 15064.4(b)(3) is intended to be read in conjunction with the section 15064(h)(3), as proposed to be amended, and proposed section 15183.5. Those sections each indicate that local and regional plans may be developed to reduce GHG emissions. If such plans reduce community-wide emissions to a level that is less than significant, a later project that complies with the requirements in such a plan may be found to have a less than significant impact.

Notably, CEQA does not provide a specific definition of "comply" in the context of determining a project's consistency with a particular plan. Some guidance may be gleaned, however, from case law interpreting the requirement that a local government's activities be consistent with its General Plan. In that context, a "zoning ordinance [for example] is consistent with the city's general plan where, considering all of its aspects, the ordinance furthers the objectives and policies of the general plan and does not obstruct their attainment." (*City of Irvine v. Irvine Citizens Against Overdevelopment* (1994) 25 Cal. App. 4th 868, 879.) Reading section 15064.4 together with 15064(h)(3), however, to demonstrate consistency with an existing GHG reduction plan, a lead agency would have to show that the plan actually addresses the emissions that would result from the project. Thus, for example, a subdivision project could not demonstrate "consistency" with the ARB's Early Action Measures because those measures do not address emissions resulting from a typical housing subdivision. (ARB, Expanded List of Early Action Measures to Reduce Greenhouse Gas Emissions in California Recommended for Board Consideration, October 2007; see also State CEQA Guidelines, §§ 15063(d)(3) (initial study must be supported with information to support conclusions), 15128 (determination in an EIR that an impact is less than significant must be briefly explained).)

**Necessity**

The Legislature directed OPR and the Resources Agency to develop guidelines on the analysis of GHG emissions. (Pub. Resources Code, § 21083.05.) A key component of environmental analysis under CEQA is the determination of significance. (*Id.* at § 21002; *Protect the Historic Amador Waterways, supra,* 116 Cal.App.4th at

## SECTION 15064.7. THRESHOLDS OF SIGNIFICANCE

### Specific Purposes of the Amendment

Proposed subdivision (c) of section 15064.7 would allow a lead agency to adopt a threshold developed by another agency, or recommended by experts, provided that such threshold is supported with substantial evidence. This proposed regulation is reasonably necessary because many lead agencies perform general governmental functions, and may lack the specific expertise necessary to develop their own thresholds of significance for GHG emissions. Such agencies may rely on thresholds developed by other agencies with specialized expertise (such as an air quality management district) in conducting their CEQA analyses. (OPR, Thresholds of Significance: Criteria for Defining Environmental Significance, September 1994, at p. 7.) In fact, Appendix G of the State CEQA Guidelines expressly encourages lead agencies to rely on thresholds established by local air quality management districts. (State CEQA Guidelines, Appendix G, Question III.)

Several local and regional air districts are in the process of developing thresholds for GHG emissions. As noted above, for example, thresholds are currently being developed, or have already been adopted by the Bay Area Air Quality Management District for operations and construction, the City of Davis for residential developments, and the South Coast Air Quality Management District for industrial projects. Lead agencies within the jurisdiction of an air district, or other agency, that adopts a GHG emissions threshold may adopt such a threshold as its own. In adopting any threshold of significance, including one developed by an expert or agency with specialized expertise, the lead agency must support the threshold with substantial evidence in the administrative record. (State CEQA Guidelines, § 15064.7(b).)

Independent experts may also develop such thresholds for use by public agencies. For example, the California Air Pollution Control Officers Association has published a White Paper on developing thresholds of significance for GHG emissions. (CAPCOA White Paper, at pp. 31-58.) A lead agency could potentially use CAPCOA's suggestions in developing its own thresholds. Because any threshold must be supported with substantial evidence, and must be adopted through a public process, any threshold recommended by an expert that is ultimately adopted will undergo sufficient scrutiny to ensure its legitimacy. (State CEQA Guidelines, § 15064.7(b).)

### Necessity

The Legislature directed OPR and the Resources Agency to develop guidelines on the analysis of GHG emissions. (Pub. Resources Code, § 21083.05.) Defining "significance" is a critical step in the lead agency's impact analysis and therefore needs to be addressed as part of the Proposed Action. Section 21000(d) of the Public Resources Code encourages the development of thresholds. These sections together

## SECTION 15126.4. CONSIDERATION AND DISCUSSION OF MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS.

### Specific Purposes of the Amendment

Section 21083.05 of the Public Resources Code expressly requires OPR and the Resources Agency to develop regulations on the "mitigation of greenhouse gas emissions." The goals of this legislative mandate are to (1) reduce GHG emissions and (2) to provide consistency in the development of GHG emissions reduction measures. There is no indication, however, that the Legislature intended to alter any existing laws governing mitigation under CEQA. The Amendments, therefore, interpret and make specific existing CEQA law and regulations for mitigation of significant impacts resulting from GHG emissions.

Existing section 15126.4 provides guidance on CEQA's general mitigation requirements. To emphasize that mitigation of GHG emissions is subject to those existing CEQA requirements, OPR and the Natural Resources Agency added a new subdivision (c) to the existing section 15126.4. The Amendments identify five general methods of mitigation that may be tailored to the specific circumstances surrounding a specific project. In response to public comments, the Natural Resources Agency provided additional guidance, described below, in the lead-in sentences introducing those five broad categories of mitigation.

Mitigation of Greenhouse Gas Emissions

Comments submitted on the Amendments indicated general concerns that mitigation for GHG emissions may not be effective or reliable. To further clarify the existing mitigation requirements that would apply to measures to reduce greenhouse gas emissions, the Natural Resources Agency revised the lead-in sentences in subdivision (c). Specifically, the Natural Resources Agency added that all mitigation must be supported with substantial evidence and be capable of monitoring or reporting. This addition reflects the requirement in Public Resources Code that a lead agency's findings on mitigation be supported with substantial evidence and that it must adopt a mitigation monitoring and reporting program along with the project if mitigation measures are required. (Public Resources Code, §§ 21081(a)(1), 21081.6.)

In response to comments, the Natural Resources Agency had originally also proposed to add a sentence indicating that only emissions reductions that were not required by some other law or contract could qualify as mitigation. In response to comments on that proposed revision, that sentence is no longer proposed to be added to the lead-in section; rather, subdivision (c)(3) will be clarified, as described below.

Mitigation Identified in an Existing Plan

The first type of mitigation of GHG emissions that may be considered includes measures identified in an existing plan. As indicated above, many agencies are

Forestry Greenhouse Gas Protocols for Voluntary Purposes (October 17, 2007), at pp. 6-7.) ARB has adopted Forest Protocols for large forestry projects. (ARB, Resolution 07-44 (adopting California Climate Action Registry Forestry Sector Protocol (September 2007), Forest Project Protocol (September 2007) and Forest Verification Protocol (May 2007).) ARB has also adopted Urban Forest Protocols for urban forestry projects. (California Climate Action Registry, Urban Forest Project Reporting Protocol and Verification Protocol (August 2008) (ARB adopted on September 25, 2008).) Such projects could be located on the project site or off-site. (Urban Forest Project Reporting Protocol, at pp. 4-5.) The protocols include methods of measuring the ability of various forestry projects to store capture and store carbon.

Consistent with section 15126.4(a), a lead agency must support its choice of, and its determination of the effectiveness of, any reduction measures with substantial evidence. Substantial evidence in the record must demonstrate that any mitigation program or measure is will result in actual emissions reductions. As a practical matter, where a mitigation program or measure is consistent with protocols adopted or approved by an agency with regulatory authority to develop such a program, a lead agency will more easily be able to demonstrate that off-site mitigation will actually result in emissions reductions. Examples of such protocols include the forestry protocols described above. Where a mitigation proposal cannot be verified with an existing protocol, a greater evidentiary showing may be required.

Measures to be Implemented on a Project-by-Project Basis

Finally, the fifth type of measure that could reduce GHG emissions at a planning level is the development of binding measures to be implemented on a project-specific basis. As explained in greater detail in the discussion of proposed section 15183.5, below, ARB's Scoping Plan strongly encourages local agencies to develop plans to reduce GHG emissions throughout the community. In addition, the CEC's Power Plant Siting Committee is assessing the impacts of GHG emission from proposed new power plants and how they can be mitigated. Comments received during the CEC's informational proceedings warranted a lengthy discussion on the practical application of a programmatic approach to mitigating GHG emissions from new power plants. (CEC, *Committee Guidance on Fulfilling California Environmental Quality Act Responsibilities for Greenhouse Gas Impacts in Power Plant Siting Applications* (2009) at p. 26 to 28.) Existing State CEQA Guidelines sections 15168(b)(4) and 15168(c)(3) recognize that programmatic documents provide an opportunity to develop mitigation plans that will apply on a project-specific basis. Proposed subdivision (c)(5) recognizes that, for a planning level decision, appropriate mitigation of GHG emissions may include the development of a program to be implemented on a project-by-project basis. (State CEQA Guidelines, § 15126.4(a)(2) ("[i]n the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation or project design").)

This type of mitigation is subject to the limits of existing law, however. Thus, proposed subdivision (c)(5) should not be interpreted to allow deferral of mitigation.

Rather, it is subject to the rule in existing section 15126.4(a)(1)(B) that such measures "may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." (*See also San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal. App. 4th 645, 670-71.)

Suggestions Rejected

During its public involvement process, OPR received comments on its preliminary draft of the proposed amendments related to mitigation. Some comments suggested provisions that were not included in these Proposed Amendments. Several comments, for example, suggested that the Guidelines provide a specific "hierarchy" of mitigation requiring lead agencies to mitigate GHG emissions on-site where possible, and to allow consideration and use of off-site mitigation only if on-site mitigation is impossible or insufficient. OPR and the Resources Agency recognize that there may be circumstances in which requiring on-site mitigation may result in various co-benefits for the project and local community, and that monitoring the implementation of such measures may be easier. However, CEQA leaves the determination of the precise method of mitigation to the discretion of lead agencies. (State CEQA Guidelines, § 15126.4(a)(1)(B); *see also San Franciscans Upholding the Downtown Plan v. City & Co. of San Francisco* (2002) 102 Cal. App. 4th 656, 697.)

Several comments also suggested that mitigation for GHG emissions must be "real, permanent, quantifiable, verifiable, and enforceable." The Proposed Amendments do not include such standards, however, for several reasons. The proposed standard appears to have been derived from section 38562(d) of the Health and Safety Code, which prescribes requirements for regulations to be promulgated to implement AB32. AB32 is a separate statutory scheme, and, as noted above, there is no indication that the legislature intended to alter standards for mitigation under CEQA. Similarly, standards for mitigation under CEQA already exist and are set out in section 15126.4(a). Specifically, mitigation must be fully enforceable, which implies that the measure is also real and verifiable. Additionally, substantial evidence in the record must support an agency's conclusion that mitigation will be effective, and in the context of an EIR, courts will defer to an agency's determination of a measure's effectiveness. (*Environmental Council of Sacramento v. City of Sacramento* (2006) 147 Cal.App.4th 1018, 1041 (mitigation ratio is supportable even at less than 1:1 given the project's circumstances); *Ass'n of Irritated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1398 (lead agency has discretion to resolve dispute regarding the effectiveness of an EIR's mitigation measures).) No existing law requires CEQA mitigation to be quantifiable. Rather, mitigation need only be "roughly proportional" to the impact being mitigated. (State CEQA Guidelines, § 15126.4(a)(4)(B); see also id. at § 15142.)

**Necessity**

## SECTION 15130. DISCUSSION OF CUMULATIVE IMPACTS

### Specific Purposes of the Amendment

The Proposed Amendments include two revisions to the existing section 15130 of the State CEQA Guidelines. The two proposed amendments are described below.

Section 15130(b)(1)(B)

Section 21083(b) of the Public Resources Code requires that an EIR be prepared if the "possible effects of a project are individually limited but cumulatively considerable." That section further defines "cumulatively considerable" to mean that "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

In determining whether a project may have significant cumulative impacts, a lead agency must engage in a two-step process. First, it must determine the extent of the cumulative problem. To do so, a lead agency must examine the "effects of past projects, the effects of other current projects, and the effects of probable future projects." Once it does so, the lead agency then determines whether the project's incremental contribution to that problem is cumulatively considerable. Section 21100(e) further provides that "[p]reviously approved land use documents, including but not limited to, general plans, specific plans, and local coastal plans, may be used in a cumulative impact analysis."

The existing Guideline section 15130(b) addresses the first step of the process. It offers two options for estimating the effects resulting from past, present and reasonably foreseeable projects. A lead agency may either rely on a list of such projects, or a summary of projections to estimate cumulative impacts. Existing section 15130(b)(1)(B) allows a lead agency to rely on projections in a land use document or certified environmental document that addresses the cumulative impact under consideration.

The proposed amendments would clarify that plans providing such projections need not be limited to land use plans, so long as the plan evaluates the relevant cumulative effect. The proposed amendments would also allow a lead agency to rely on information provided in regional modeling programs. The best projections of the cumulative effect of GHG emissions may be available in up-to-date models such as the International Council for Local Environmental Initiative's Local Government GHG Protocol[8] and the California Climate Action Reserve's Registry general,[9] industry[10] and

[8] ICLEI (2008) Local Government Operations Protocol; Accessed 6/08/09, http://www.icleiusa.org/action-center/tools/lgo-protocol-1

[9] California Climate Action Registry (2009) General Reporting Protocol: Accessed 6/08/09, http://www.climateregistry.org/resources/docs/protocols/grp/GRP_3.1_January2009.pdf

project type protocols.[11] Such projections may also be supplied in plans that are not strictly "land use" plans. For example, regional transportation plans in certain areas will ultimately include sustainable community strategies which will include projections a region's GHG emissions and related cumulative effects. (Gov Code, § 65080(b)(2).) Finally, some agencies are beginning to develop GHG reduction plans or climate action plans that may also include such projections. (ARB, Scoping Plan, Appendix C, at p. C-49; OPR, Book of Lists, at pp. 92-100.)

The proposed amendments are consistent with section 21083 of the Public Resources Code and CEQA case law. Section 21083 requires consideration of "the effects of past projects, the effects of other current projects, and the effects of probable future projects." Projections in the listed types of plans and models may include inventories of existing emissions and projected future emissions. Section 21100 of the Public Resources Code provides that land use plans "may" be used in a cumulative impacts analysis, but that section does not purport to limit the types of plans that can be used in a cumulative impacts analysis to land use plans. Finally, case law has supported reliance on projections provided by industry, for example, to satisfy the requirement for a discussion of impacts caused by closely related projects. (*Ass'n of Irritated Residents*, *supra*, 107 Cal. App. 4th at 1404.)

While models may provide the most up to date information, lead agencies should still look first to information provided in adopted or certified environmental documents. First, such information has already gone through a public and agency review process. Second, to the extent the model provides information that is not provided in the prior environmental document, the relationship of the model and applicable plans must be explained, along with any changes in circumstances.

Section 15130(d)

The Office of Planning and Research had originally proposed the addition of certain plans to section 15130(d). That section states that previously approved land use plans may be used in a cumulative impacts analysis. Those additions were inadvertently excluded from the proposed amendments that were made available for public review on July 3, 2009. Therefore, the revisions were added to revisions that were made publicly available on October 23, 2009.

The added plans include regional transportation plans and plans for the reduction of greenhouse gas emissions. This change is sufficiently related to the proposal that was originally published. Those plans were proposed for addition to other sections of the proposed amendments, for example, and comments were submitted regarding the use of such plans in cumulative impacts analysis. Plans for the reduction of greenhouse gas emissions were described under section 15064(h)(3), above. Regional

[10] California Climate Action Registry (2005) Industry Specific Protocols: Accessed 06/08/09, http://www.climateregistry.org/tools/protocols/industry-specific-protocols.html
[11] California Climate Action Registry (2007) Project Protocols: Accessed 06/08/09, http://www.climateregistry.org/tools/protocols/project-protocols.html

## SECTION 15364.5. GREENHOUSE GAS

### Specific Purposes of the Amendment

The Legislature has not included a definition of "greenhouse gases" in CEQA, though it did include a definition in AB32. (Health & Saf. Code, § 38505(g).) Thus, new section 15364.5 adds a definition of greenhouse gases. The specified gases are consistent with existing law as they are defined to include those identified by the Legislature in section 38505(g) of the Health and Safety Code.

Notably, the definition in AB32 states that GHG "includes all of the following...." In so stating, the Legislature implies that other gases may also be considered GHGs. The ARB's Scoping Plan also acknowledges that other gases contribute to climate change. (Scoping Plan, at p. 11.) In fact, the EPA's Endangerment Finding explained that several other gases share attributes with GHGs but would not be appropriate for regulation under the Clean Air Act at this time. (EPA Endangerment Finding, at pp. 18896-98.) Therefore, similar to the statutory definition of GHGs in AB32, the definition in the Amendments is not exclusive to the six primary GHGs. The purpose of a more expansive definition is to ensure that lead agencies do not exclude from consideration GHGs that are not listed, so long as substantial evidence indicates that such non-listed gases may result in significant adverse effects. This approach is consistent with the Supreme Court's directive that CEQA be interpreted to provide the fullest possible protection to the environment. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 390.)

### Necessity

The Legislature directed OPR and the Resources Agency to develop guidelines on the analysis of GHG emissions. (Pub. Resources Code, § 21083.05.) Section 15364.5 is necessary to make specific the instruction to analyze GHG emissions because it states which gases are considered to be "greenhouse gases" and should be included in the analysis.

### Reasonable Alternatives to the Regulation, Including Alternatives that Would Lessen Any Adverse Impact on Small Business, and the Resources Agency's Reasons for Rejecting Those Alternatives

The Natural Resources Agency considered reasonable alternatives to the Amendments and determined that no reasonable alternative would be more effective in carrying out the purpose for which the action is proposed or would be as effective as, and less burdensome to affected private persons than, the Amendments. This conclusion is based on the Natural Resources Agency's determination that the Amendments are necessary to implement the Legislature's directive in SB97 in a manner consistent with existing statutes and case law, and the Amendments add no new substantive requirements. The Natural Resources Agency rejected the no action

# EXHIBIT U

I-DEVINCENZI4



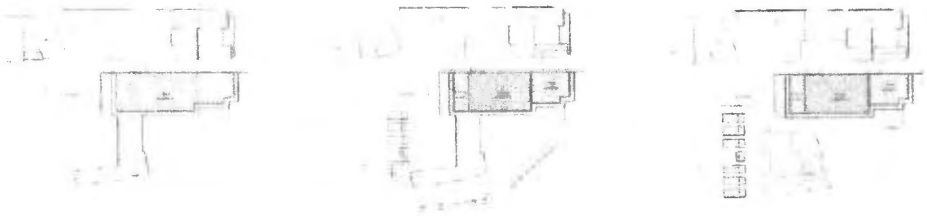
# 3333 CALIFORNIA STREET
# PRESERVATION ALTERNATIVES REPORT

PAGE & TURNBULL

REVISED
DRAFT

I-DEVINCENZI4





| | FULL PRESERVATION ALT<br>Existing building as office; Infill buildings as residential with retail on California St | PARTIAL PRESERVATION ALT (1)<br>Existing building as office; Infill buildings as residential with retail on California St | PARTIAL PRESERVATION ALT (2)<br>Existing building as office; Infill buildings as residential with retail on California St |
|---|---|---|---|
| **GROSS SF** | | | |
| RESIDENTIAL (GSF) | 335,361 | 424,462 | 571,022 |
| OFFICE (GSF) | 367,802 | 394,302 | 329,935 |
| RETAIL (GSF) | 44,306 | 44,306 | 44,306 |
| CHILDCARE (GSF) | 14,650 | 14,650 | 14,650 |
| PARKING (GSF) | 452,900 | 480,200 | 478,450 |
| **TOTAL GSF** | **1,215,019** | **1,357,920** | **1,438,363** |
| **UNIT COUNT** | | | |
| JR 1-BR | 27 | 27 | 27 |
| 1 -BR | 242 | 242 | 292 |
| 2-BR | 55 | 57 | 110 |
| 3-BR | 20 | 22 | 52 |
| 4-BR | - | 21 | 12 |
| **DWELLING UNITS** | **344** | **369** | **493** |
| **PARKING COUNT** | | | |
| RESIDENTIAL | 344 | 369 | 493 |
| OFFICE | 736 | 789 | 660 |
| RETAIL | 115 | 115 | 115 |
| CHILDCARE | 29 | 29 | 29 |
| COMMERCIAL | 60 | 60 | 60 |
| CAR SHARE | 10 | 10 | 10 |
| **TOTAL PARKING** | **1,294** | **1,372** | **1,367** |
| **OTHER** | | | |
| BUILDING HEIGHT | 45'-67' | 45'-80' | 45'-80' |
| STORIES | 4-5 | 2-6 | 2-6 |
| EXISTING GSF RETAINED | 349,998 | 349,998 | 285,631 |
| NEW BUILDINGS | 4 | 16 | 12 |

**Parking Assumptions**

| | |
|---|---|
| Residential | Required 1.0/1.0 DU |
| Office | Required 2/1000 SF |
| Retail | 4/1000 (F&B), 2/1000 (General) |
| Childcare | Required 1/25 children = 8; 29 provided |
| Commercial | 60 provided |
| Car Share | 10 required |

*Plaza A & B retail parked at 3/1000 (50% General, 50% F&B)
*Walnut retail parked at 4/1000 (general retail)
*Parking GSF Calculation Assumed 350SF/space

Laurel Heights Partners LLC and the Planning Department conducted studies to determine areas on the site that could be developed with minimum impact to the existing on-site view corridors. All new construction proposed in the preservation alternatives has been designed to the greatest extent that is technically feasible to be comparable in square footage to the proposed Project or Project Variant.

# EXHIBIT V

SAN FRANCISCO
GENERAL PLAN

Go to...



# Urban Design Element

*View table of contents: URBAN DESIGN*


| | |
|---|---|
| URB.INT | **Introduction** |
| URB.CPN | **City Pattern** |
| URB.CPN.1 | EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION. |
| URB.CPN.1.1 | Recognize and protect major views in the city, with particular attention to those of open space and water. |
| URB.CPN.1.2 | Recognize, protect and reinforce the existing street pattern, especially as it is related to topography. |
| URB.CPN.1.3 | Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts. |
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| URB.CPN.1.5 | Emphasize the special nature of each district through distinctive landscaping and other features. |
| URB.CPN.1.6 | Make centers of activity more prominent through design of street features and by other means. |
| URB.CPN.1.7 | Recognize the natural boundaries of districts, and promote connections between districts. |


## INTRODUCTION

### Nature and Purpose

The Urban Design Element concerns the physical character and order of the city, and the relationship between people and their environment.

San Francisco's environment is magnificent, and the city is a great city, but the unique relationships of natural setting and man's past creations are extremely fragile. There are constant pressures for change, some for growth, some for decay.

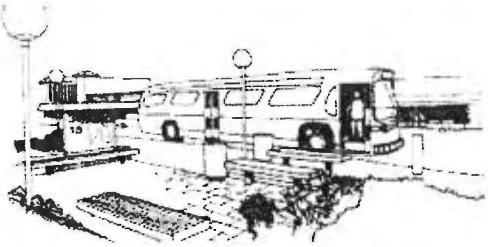


Image and Character

***POLICY 1.1***
***Recognize and protect major views in the city, with particular attention to those of open space and water.***

Views contribute immeasurably to the quality of the city and to the lives of its residents. Protection should be given to major views whenever it is feasible, with special attention to the characteristic views of open space and water that reflect the natural setting of the city and give a colorful and refreshing contrast to man's development.

Overlooks and other viewpoints for appreciation of the city and its environs should be protected and supplemented, by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations.

Visibility of open spaces, especially those on hilltops, should be maintained and improved, in order to enhance the overall form of the city, contribute to the distinctiveness of districts and permit easy identification of recreational resources. The landscaping at such locations also provides a pleasant focus for views along streets.

***POLICY 1.2***
***Recognize, protect and reinforce the existing street pattern, especially as it is related to topography.***

Streets are a stable and unifying component of the city pattern. Changes in the street system that would significantly alter this pattern should be made only after due consideration for their effects upon the environment. Such changes should not counteract the established rhythm of the streets with respect to topography, or break the grid system without compensating advantages.

The width of streets should be considered in determining the type and size of building development, so as to provide enclosing street facades and complement the nature of the street. Streets and development bordering open spaces are especially important with respect to the strength and order in their design. Where setbacks establish facade lines that form an

The stakes are high for both the developers and the future of the city, with a resulting tendency toward controversy and frustration, and unfortunate divisive effects in the community. For these reasons, the larger sites require separate and more intensive consideration in policies relating to building form.

OBJECTIVE 3

**MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLEMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT.**

As San Francisco grows and changes, new development can and must be fitted in with established city and neighborhood patterns in a complementary fashion. Harmony with existing development requires careful consideration of the character of the surroundings at each construction site. The scale of each new building must be related to the prevailing height and bulk in the area, and to the wider effects upon the skyline, views and topographic form. Designs for buildings on large sites have the most widespread effects and require the greatest attention.

## Fundamental Principles for Major New Development

These fundamental principles and their illustrations reflect the needs and characteristics with which this Plan is concerned, and describe measurable and critical urban design relationships in major new development.

1. The relationship of a building's size and shape to its visibility in the cityscape, to important natural features and to existing development determines whether it will have a pleasing or a disruptive effect on the image and character of the city.

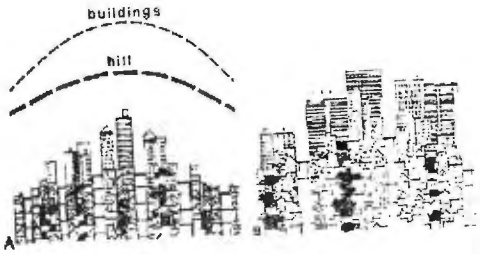
A. Tall, slender buildings near the crown on a hill emphasize the form of the hill and preserve views.

B. Extremely massive buildings on or near hills can overwhelm the natural land forms, block views, and generally disrupt the character of the city.

C. Low, smaller-scale buildings on the slopes of hills, at their base and in the valleys between complement topographic forms and permit uninterrupted views.

D. Low buildings along the waterfront contribute to the gradual tapering of height from hilltops to water that is characteristic of San Francisco and allows views of the Ocean and the Bay. Larger buildings with civic importance, as evidenced by a vote of the people, providing places of public assembly and recreation may be appropriate along the waterfront at important locations.

E. Larger, taller buildings can blend pleasantly with small-scaled areas if the change in scale is not excessive and if their






***POLICY 3.3***
***Promote efforts to achieve high quality of design for buildings to be constructed at prominent locations.***

Certain buildings will achieve prominence, whatever their design, because of their exposed locations. Among such locations are those at tops of hills; those fronting on permanent open space such as the Bay, parks, plazas and areas with height limits; those facing wide streets or closing the vista at the end of a street; and those affording a silhouette against the sky, a muted background or a formal order such as in the Civic Center.

At locations of such prominence, the quality of building design is of special significance, and special efforts should be made to promote the best architectural solutions in both public and private buildings. In such solutions, the positive potentials of the site should be emphasized.

## Height and Bulk

***POLICY 3.4***
***Promote building forms that will respect and improve the integrity of open spaces and other public areas.***

New buildings should not block significant views of public open spaces, especially large parks and the Bay. Buildings near these open spaces should permit visual access, and in some cases physical access, to them.

Buildings to the south, east and west of parks and plazas should be limited in height or effectively oriented so as not to prevent the penetration of sunlight to such parks and plazas. Larger squares and plazas will benefit, in addition, from uniform facade lines and cornice heights around them which will visually contain the open space.

Large buildings and developments should, where feasible, provide ground level open space on their sites, well situated for public access and for sunlight penetration. The location and dimensions of such open space should be carefully considered with respect to the placement of other buildings and open spaces in the area, and with respect to the siting and functioning of the building with which it is provided. Where separation of pedestrian and vehicular circulation levels is possible in provision of such open space, such separation should be considered.

***POLICY 3.5***
***Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development.***

The height of new buildings should take into account the guidelines expressed in this Plan. These guidelines are intended to promote the objectives, principles and policies of the Plan, and especially to complement the established city pattern. They weigh and apply many factors

buildings. For any given location, urban design considerations indicate the appropriateness of a height coming within the range indicated. The guidelines are not height limits, and do not have the direct effect of regulating construction in the city.

***POLICY 3.6***
***Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction.***

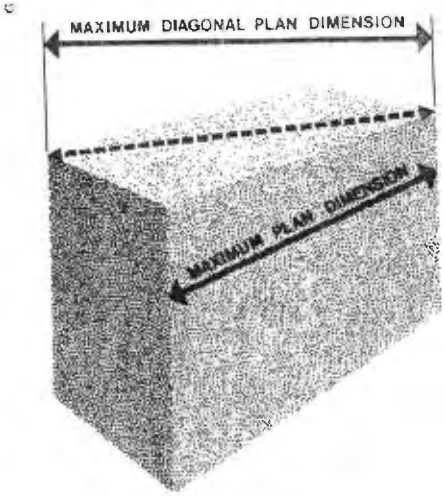
When buildings reach extreme bulk, by exceeding the prevailing height and prevailing horizontal dimensions of existing buildings in the area, especially at prominent and exposed locations, they can overwhelm other buildings, open spaces and the natural land forms, block views and disrupt the city's character. Such extremes in bulk should be avoided by establishment of maximum horizontal dimensions for new construction above the prevailing height of development in each area of the city.



***map 5*** - *Urban Design Guidelines for Bulk of Buildings*

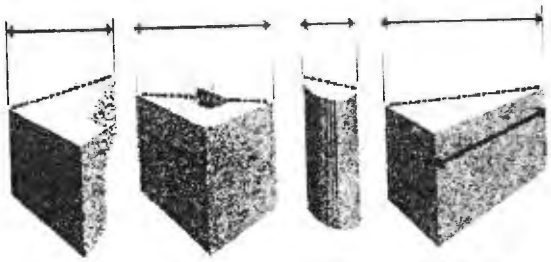
The guidelines for building bulk expressed in this Plan are intended to form an urban design basis for such regulation. These guidelines favor relatively slender construction above prevailing heights, but would not limit the horizontal dimensions of buildings below those heights. Generally speaking, the guidelines would not limit the total floor space that could be built, but would help to shape it to avoid negative external effects. If two or more towers are to be built on a single property, their total effect should be considered and a significant separation should be required between them. The precise form of the building or buildings would in large measure be left to the individual developer and his architects under these guidelines.

The guidelines of this Plan for building bulk are only minimum guidelines, and they are not intended to reduce the necessity for other expressed policies pertaining to height, visual harmony or other factors. Even with building bulk kept within these guidelines, efforts should be made to articulate and soften building surfaces to reduce the massiveness of appearance to a great degree.




METHOD OF MEASURING BULK

MAXIMUM PLAN DIMENSION: The greatest horizontal dimension along any wall of the building, measured at a height corresponding to the prevailing height of other development in the area.



BULK MEASUREMENTS APPLIED TO OTHER BUILDING FORMS

MAXIMUM DIAGONAL PLAN DIMENSION: The horizontal dimension between the two most separated points on the exterior of a building, measured at a height corresponding to the prevailing height of other development in the area.

## Large Land Areas

***POLICY 3.7***
***Recognize the special urban design problems posed in development of large properties.***

The larger a potential site for development, the greater are apt to be the size and variety of the urban design questions raised. Larger sites may mean greater visual prominence of development and greater impact upon the city pattern. As more land area is included in a single project, the possibilities are increased that the public resources in natural areas, historic buildings and street space will be affected. Larger developments also have substantial requirements for public services, including transportation.

Under normal land use controls, most large development is governed by a "floor area ratio", which permits floor space to be built in each project in proportion to the amount of land area available. The floor area ratio limit tends to be geared to development of sites of small and moderate size, but not to take account of the impact of occasional developments that take up one or more whole blocks of land. Such developments, under this type of formula, may have a single building of truly massive proportions, or a series of building forms constructed in one or more phases.

These differences in nature and impact require that large sites be given close consideration in urban design planning.

***POLICY 3.8***
***Discourage accumulation and development of large properties, unless such development is carefully designed with respect to its impact upon the surrounding area and upon the city.***

The height and bulk guidelines of this Plan will help to some extent in reducing the negative effects of development on large sites. They will not, however, deal with all the special problems raised or guarantee good quality of design.

Other measures are available and may be necessary. In some cases, ordinary zoning restrictions might be tightened, or rezoning to permit a large development might be deferred in the absence of adequate assurances of compatible development. New standards might be added to require open space in large projects, and floor area ratios might be reduced or made less advantageous for larger sites.

Because government involvement often occurs as larger sites are developed, through marketing of the site itself, through redevelopment powers, through vacation of streets or in some other manner, the government role might be made more restrictive in such involvement.

There is no substitute, however, for early and frequent communication as to the merits and design of a proposed project between the developer and his architects on the one hand and public urban design professionals and interested citizens on the other. Such communication will give an early and more reasoned assessment of the positive and negative effects of the project upon the city and the surrounding area, and will reduce the chances of later delays and controversies. Processes toward these ends should be employed for all major projects in the city.

***POLICY 3.9***
***Encourage a continuing awareness of the long-term effects of growth upon the physical form of the city.***

directly to the waterfront and provide a sense of contact with the water



## Health and Safety

***POLICY 4.1***
***Protect residential areas from the noise, pollution and physical danger of excessive traffic.***

In order to reduce the hazards and discomfort of traffic in residential neighborhoods, a plan for protected residential areas should be put into effect. Such a plan is intended to prevent or discourage heavy, fast and through traffic from using residential streets, and to put such traffic on arterial streets where the impact upon residential areas will be less disruptive. Although development of further traffic-carrying capacity on some arterials may be warranted, the local streets should remain as they are or have their capacity reduced.

The speed and volume of traffic on protected streets should be limited by all practical means. Such means include making streets discontinuous to divert traffic from a straight path, narrowing streets and intersections, creating the appearance of narrowness through landscaping and other improvements, and prohibiting access from arterial streets by signs and barriers. Such changes in streets should be so designed that they will not limit the access of vehicles for police and fire protection and other emergency purposes in the protected areas. The total effect of these changes in residential streets should be to give the dominant position to residential qualities and pedestrians rather than to vehicles.

Land uses throughout the city should be regulated in such a way that heavy traffic will not be drawn through protected streets by large commercial, industrial and institutional traffic generators. Traffic for these generators should be channeled as much as possible on arterial streets. High traffic speeds should be discouraged on non-residential streets where the traffic on those streets is destined for protected residential streets.

***POLICY 4.2***
***Provide buffering for residential properties when heavy traffic cannot be avoided.***

**From:** Jon Dishotsky
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Cc:** Jon Dishotsky
**Subject:** 3333 California Street - Letter of Support
**Date:** Monday, December 10, 2018 3:57:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Greetings hard-working, respected and gracious - Planning Commissioners, Planner Zushi and Supervisor Stefani,

As a neighbor and resident who has lived in the city for twelve years, and in Laurel Village for 5 years, I am writing to express my support for the proposed development at 3333 California Street. I am a developer of affordable and market-rate housing in San Francisco, however, for the purposes of this letter, I will take off my business hat, and write you as a neighbor, a husband, a father, and a concerned citizen. 1 (ME-1)

As many of you know, the city of San Francisco is grappling with a housing affordability crisis. The Planning Department recently published a report (2017) titled the “Family Friendly Briefing” that noted with the building boom in the city, which for the most part has introduced more studios and one-bedroom apartments, was unlikely to bring in more families. California, which has one of the world’s 10 largest economies, recently released data showing the lowest birth rate since the Great Depression. Most of these stats, from my generation, are due to the higher cost of living for families.

By creating units designed for two or more bedrooms, the project will be a great place to house families, and a great amenity for existing residents and neighbors. Our growing family is most excited about the 5 acres of open space where our daughter (and future kids) can play. It will help create a family-friendly community environment. The pedestrian walkways through the site will create a beautiful thoroughfare so that neighbors can connect and enjoy views of all of the city.

I urge you to approve this project so that families like ours can continue to thrive in San Francisco. We have benefited so much from the wonderful opportunity in this great city – we hope future families can as well.

Warmly,

Jon Dishotsky
CEO & co-founder
Starcity
415-519-2973
jon@starcity.com

**Subject:** 3333 California St DEIR
**Date:** Monday, January 7, 2019 at 2:31:05 PM Pacific Standard Time
**From:** Jane Drake
**To:** Zushi, Kei (CPC)
**CC:** Stefani, Catherine (BOS), laurelheights2016@gmail.com, frfbeagle@gmail.com

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As a homeowner and neighborhood resident for more than 20 years, I fully support projects that provide additional housing, but in a way that maintains the character of the neighborhood. The real need is for housing, not for additional retail, as proposed by the developer. There are long-time small businesses in Laurel Village, Sacramento Street, and a few blocks away at Geary and Masonic that fill this purpose. 1 (ME-1)

**I fully support the Community Full Preservation Residential Alternative for 3333** 2 (AL-2)

It preserves the Historic Characteristics of this wonderful site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 8,000 retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It is compatible with the surrounding neighborhoods for character, style, scale and bulk.

**I strongly oppose** the Developers Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 3 (ME-1)

Thank you,

Jane Drake

93 Iris Ave

San Francisco, CA 94118

**Subject:** DEIR to 3333 California St.
**Date:** Saturday, January 5, 2019 at 2:10:01 PM Pacific Standard Time
**From:** SHARON ESKER
**To:** Zushi, Kei (CPC)
**CC:** planning@rodneyfong.com, Moore, Kathrin (CPC), CatherineStefani@sfgov.org, frfbeagle@gmail.com

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To all concerned,

I have lived on Presidio Ave. between Ca. and Pine St. for 34 years. This is my home and neighborhood and I would like to voice my concerns regarding this development which will affect myself, the neighborhood, and future generations. 1 (GC-1)

I fully support the Community Full Preservation Alternative: 2 (AL-2)
- It preserves the historic character of the site
- It provides 558 housing units built in 3 years
- It does not include retail or office space, it does not generate increased auto traffic for retail
- It preserves the present childcare center and dining cafe
- It matches the surrounding neighborhoods for character and style
- It will preserve the existing small businesses in the neighborhood ( Laurel shopping and Sacramento St.)

I strongly oppose the Developer's Destructive Proposal: 3 (ME-1)
- It will bring excessive, unnecessary, and destructive noise, pollution, traffic and congestion to the area.
- It will affect the quality of life, threaten safety of pedestrians, and contribute to increased climate change

The traffic and congestion are already huge problems on Presidio Ave. The intersections are already crowded with pedestrians, bicyclists, buses, vans, and delivery trucks. I am opposed to the increased delivery traffic on Presidio ave. The soot on my building and steps is terrible, and it is difficult at rush hour getting out of my garage. I am concerned about the air pollution which will affect our health and the increased height which will cut out sunlight. The landscaping and green areas are our only relief and I think as much as possible should be preserved. 4 (TR-14) 5 (TR-10) 6 (AQ-4) 7 (TR-7) 8 (AQ-2) 9 (WS-2) 10 (PD-3)

Thank you for your time and study of this proposal.
Sharon Esker

**From:** Zhubin Fardis
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Subject:** 3333 California Draft EIR comments
**Date:** Tuesday, January 08, 2019 1:53:44 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

My wife and I live in the Laurel Heights neighborhood, on the block that would be across from the 3333 California development. I have very strong concerns about the impacts to the neighborhood mentioned in the the draft EIR. 1 (GC-1)

The huge increase in traffic, the impact on parking, the ridiculous length of time to complete this project, and environmental/pollution impact are all MAJOR concerns. The influx of hundreds of new residents and the proposed retail will greatly reduce the amount of street parking in the neighborhood (which hurts people such as us who have no garage) and create horrible traffic. Speaking of the proposed retail, there are already empty retail shops in the Laurel Village shopping center and on Sacramento street (not to mention throughout the city). It seems like adding a large retail space would hurt the existing businesses and be hard to fill up (not to mention adding a ton of time, traffic, and pollution to this project). 2 (TR-11) 3 (ME-1)

The developer's request for 15 years to complete the project is a **ludicrously** long time. It seems like something in the 3-5 year range would be more reasonable and would limit the construction impact of traffic, noise and pollution on the neighborhood. Considering that there are already several other large developments happening in the same neighborhood (e.g.3700 California, Lucky Penny) there will already be a lot of ongoing construction. The environmental report is very concerning. This has been for the most part a quite, residential neighborhood with a lot of families. Pollution, traffic, noise, etc....all have huge, negative impacts on our community. 4 (PD-1) 5 (GC-1)

As an alternative to the proposed development, I would like to support the Community Full Preservation Residential Alternative for 3333 (to be built in 3 years). Please take our concerns seriously. 6 (AL-2)

Thank you,

Zhubin Fardis

**From:** Arlene <arlenefilippi@yahoo.com>
**Sent:** Thursday, December 13, 2018 9:38 AM
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC) <Myrna.Melgar@sfgov.org>; planning@rodneyfong.com; Johnson, Milicent (CPC) <Milicent.Johnson@sfgov.org>; Koppel, Joel (CPC) <Joel.Koppel@sfgov.org>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; Richards, Dennis (CPC) <dennis.richards@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; laurelheights2016@gmail.com
**Subject:** 3333 California Street, Planning Commission Meeting Today

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Good Morning Commissioners,

I am very much disappointed that I am not able to attend today's meeting regarding 3333 California Street. For your information, I am thoroughly familiar with the Developer's Proposal (which I find to be intrusive to say the least) but **strongly support the Community Full Preservation Alternative**.
The Alternative is of great importance to my fellow neighbors, to my family and to our family business (also located near the proposed project). 1 (AL-2)

I ask that you please listen to those neighbors that will appear before you; regretfully, the Developers have had no interest in listening to our concerns.

**I strongly urge the Planning Commission to grant a 15 day extension of the due date for comments on this DEIR. Without a doubt, it is a lengthy and complex document and Christmas Eve is surely not a reasonable date for the DEIR Comments to be due. Time is needed.** 2 (GC-3)

I would appreciate your consideration and I thank you for your attention.

Arlene Filippi
42 Wood Street
San Francisco, CA 94118

**From:** Arlene
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary; Stefani, Catherine (BOS); laurelheights2016@gmail.com; Richard Frisbie
**Subject:** DEIR 3333 California Street
**Date:** Monday, January 07, 2019 8:52:52 PM

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Commissoners,

I am a long time resident of the Laurel Heights area and have attended many meetings regarding the development of the 3333 California Street property. Like so many of my neighbors, I am in opposition to the Developer's Proposal and I state this for the following reasons: 1 (ME-1)

The Developer's proposed 100,000 square feet of Retail/Office/Commercial space is unneeded. We are currently surrounded by numerous small businesses (many of them family owned). They have long provided for our needs and are greatly appreciated.

The Developer's Proposal destroys the historical characteristics of the site. Sadly, under the Developer's Proposal, much of Laurel Hill will be gone as will most of the mature trees and the very welcoming green space. 2 (CR-2)

The requested fifteen years to construct the project is unreasonable. Why should neighbors be subjected to fifteen years of demolition, excavation, noise and pollution? 3 (PD-1)

While I am very much against the Developer's Proposal, I am in favor of the Community Full Preservation Alternative. Unlike the Developer's Proposal, the Alternative does not include the massive Retail/Office/Commercial Complex. It retains the character of the neighborhood and provides 558 housing units to be built in three years and not fifteen. 4 (AL-2)

I would appreciate your consideration.

Arlene Filippi
42 Wood Street
San Francisco, CA 94118

I-FONG

**From:** Shannon Fong
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Subject:** 3333 California Draft EIR comments
**Date:** Tuesday, January 08, 2019 1:32:49 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

My husband and I live in the Laurel Heights neighborhood, on the block that would be across from the 3333 California development. I have strong concerns about the impacts to the neighborhood mentioned in the the draft EIR. 1 (GC-1)

One of our main concerns is the increase of traffic and the impact on parking and the length of time that the project will take. Since we don't have a parking spot, we rely on being able to park on the street. The influx of hundreds of new residents and the proposed retail will greatly reduce the amount of street parking in the neighborhood. 2 (TR-11) Speaking of the proposed retail, there are already empty retail shops in the Laurel Village shopping center and on Sacramento (not to mention throughout the city) it seems like adding a large retail space would hurt the existing businesses and be hard to fill up. 3 (ME-1)

The developer's request for 15 years to construct the project seems like a ludicrously long time to construct a project. It seems like something into the 3-5 year range would be more reasonable and would limit the construction impact of traffic, noise and pollution on the neighborhood. Considering that there are already several other large developments happening in the same neighborhood (e.g.3700 California, Lucky Penny) there will already be a lot of ongoing construction.. 4 (PD-1)

As an alternative to the proposed development, I would like to support the Community Full Preservation Residential Alternative for 3333 (to be built in 3 years). 5 (AL-2)

Thank you,
Shannon Fong

**From:** Jane Fridlyand
**To:** Zushi, Kei (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary
**Cc:** Stefani, Catherine (BOS); Richard Frisbie; laurelheights2016@gmail.com
**Subject:** Comments on 3333 California project
**Date:** Monday, January 07, 2019 9:30:01 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi and Commissioners,

I am writing to express my deep concerns over the current proposal for 3333 California, and to express support for the Community Alternative. 1 (GC-1) 2 (AL-2)

I have lived in Pacific Heights for 7 years, initially next to Lafayette park and for the past three years next to Alta Plaza park, with my kindergarten age daughter and my husband. We live on Jackson between Baker and Broderick, about six blocks from the corner of California and Presidio, one of the major intersections that would be affected by the project.

We use the JCC frequently, and are constantly using both California, Presidio, Masonic and other streets around the site to get to our destinations, both by car and bus (1, 3 and 43). We also shop at Laurel Village, Trader Joe's and other local destinations.

We are concerned that the proposed project would affect us in numerous ways, the most important of which I outline below: 3 (GC-1)

- The proposed 7-15 year time frame for the project is mind-boggling. It will disrupt the very fabric of the neighborhood as its very important areas will become unusable for entire childhood of kids of our daughters age. 4 (PD-1)
- The long timeframe makes it more likely that in the case of an economic downturn, such as in 2008, the project could halt indefinitely.
- The truck traffic and other construction traffic is a threat to pedestrian safety. The congestion will force cars onto nearby side streets, affecting the whole area. 5 (TR-6)
- The size and scope of the project will have major environmental impact in terms of the amount of GHG released. 6 (GHG-3)

Instead, I strongly support the Community Alternative, which will produce the same amount of much-needed housing. It will increase the density of housing in the area, but will not have the excessive and unneeded retail, office and commercial space. It also can be completed in a reasonable timeframe, thus balancing the needs of the neighborhood and the city as a whole. 7 (AL-2)

I understand that the city needs more housing, but letting developers proposal can not possibly be the right way to go. I urge the commission to work with the developer to be responsive to community concerns by scaling down the proposal. 8 (ME-1)

Thank you very much for your consideration.

Sincerely,

Jane Fridlyand
2947 Jackson Street
San Francisco, CA 94115
415-652-1920

From: Janet Frisbie <jan_wenn@hotmail.com>
Sent: Wednesday, December 12, 2018 3:51 PM
To: richhillis@gmail.com; Melgar, Myrna (CPC) <Myrna.Melgar@sfgov.org>; planning@rodneyfong.com; Johnson, Milicent (CPC) <Milicent.Johnson@sfgov.org>; Koppel, Joel (CPC) <Joel.Koppel@sfgov.org>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; Richards, Dennis (CPC) <dennis.richards@sfgov.org>; CPC- Commissions Secretary <commissions.secretary@sfgov.org>
Cc: LaurelHeights2016@gmail.com
Subject: 3333 California Street
development

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Planning Commissioners,

Please grant a 15-day extension of the 45-day comment period on the Draft EIR from December 24 to January 8, 2019. The project construction would last for 7-15 years and there is substantial community opposition to the developers concept. Sixty (60) days are allowed by law and have been granted for complex or controversial projects. Last week the SF Historic Preservation Commission expressed support for a full preservation alternative. 1 (PD-1) 2 (AL-2)

Our Community Full Preservation Residential Alternative which I totally support preserves this historic site plus offers the same amount of housing units (558 with a 744 variant) as the developers. Our Alternative plan does not destroy the award winning building and landscaping with trees dating back to the days of the Laurel Hill Cemetery. This plan is expected to be completed in approximately 3 years. It is a thoughtful, balanced and timely use of this property.

PSKS has not considered the historical significance of this property nor the consequences of dragging this construction out for up to 15 years. This length of construction would be intolerable for the surrounding neighborhoods. In addition, I find it shocking that the developers would be allowed up to 15 years to complete this project when there is a very real housing crisis in The City. 3 (CR-2) 4 (PD-1)

The amount of excavation the developers propose is of great concern. It totally destroys this beautiful and historic site. The amount of dirt, dust, noise and congestion is unimaginable. Also, there is serpentine rock on this site which, if disturbed, can release asbestos dust, clearly a documented health hazard. 5 (CR-3) 6 (GC-1) 7 (HZ-1)

Therefore, for these reasons I fully support the Community Full Preservation Residential Alternative for 3333 California Street and strongly oppose the PSKS plan. 8 (AL-2)

Very truly yours,
Janet Frisbie
525 Laurel st, 94118

Sent from my iPad

**From:** Janet Frisbie
**To:** Zushi, Kei (CPC)
**Subject:** Fwd: 3333 California Street
**Date:** Monday, January 07, 2019 5:39:45 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

My apologies for not having you on the list.

Sent from my iPad

Begin forwarded message:

**From:** Janet Frisbie <jan_wenn@hotmail.com>
**Date:** January 7, 2019 at 4:37:02 PM PST
**To:** "richhillis@gmail.com" <richhillis@gmail.com>, "myrna.melgar@sfgov.org" <myrna.melgar@sfgov.org>, "planning@rodneyfong.com" <planning@rodneyfong.com>, "milicent.johnson@sfgov.org" <milicent.johnson@sfgov.org>, "joel.koppel@sfgov.org" <joel.koppel@sfgov.org>, "kathrin.moore@sfgov.org" <kathrin.moore@sfgov.org>, "dennis.richards@sfgov.org" <dennis.richards@sfgov.org>, "commissions.secretary@sfgov.org" <commissions.secretary@sfgov.org>
**Cc:** Catherine Stefani <catherine.stefani@sfgov.org>, "LaurelHeights2016@gmail.com" <LaurelHeights2016@gmail.com>, Richard Frisbie <frfbeagle@gmail.com>
**Subject: 3333 California Street**

I completely support the Community Full Preservation Residential Alternative plan for 3333 California Street. The reasons are many including the fact that it preserves the historical characteristics of this site by keeping the existing award winning building plus the original landscape and hardscape. This Community Alternative plan provides the same number of housing units as the developers plan, that is 558 or 744 in the variant, without generating massive amounts of greenhouse gases. There will not be unnecessary excavation as in the developers plan thereby lessening the dirt, dust, noise and other pollutants. There is serpentine rock under the site that, if disturbed, can release asbestos dust, a well known health hazard. The Community Full Preservation Residential Alternative plan is expected to be completed in about 3 years. This bears repeating. The Community Full Preservation Residential Alternative plan is expected to be completed in about 3 years.

1 (AL-2)

I strongly oppose the Developers proposal with its unnecessary retail and resulting congestion, its destructive excavation and ruination of a California State Historical Site and the alarming construction time schedule. I find it shocking that the Developers would propose to need up to 15 years to complete this project.

2 (ME-1)

3 (PD-1)

Again, up to 15 years to complete this project! That makes a mockery of The City's very real and current housing crisis and shows zero concern for the residents in the surrounding neighborhoods. Fifteen years of construction would make this area unlivable for these neighborhoods. I fully expect that my husband and I will have to move out for at least part of this intolerable construction period. Not a pleasant experience to look foreword to for a couple in their 70's.

3
(PD-1)
cont'd

These desirable neighborhoods surrounding the 3333 California Street property deserve a thoughtful, balanced and relevant use of this beautiful 10+ acre parcel. The Community Full Preservation Residential Alternative plan will give them the best of the historical characteristics and a 21st century prospective that will continue the tradition for what has always been a very special area of The City. Show the 800+ signers of the petition that you understand the importance and magnitude of this decision.

4
(AL-2)

Very truly yours,

Janet Wennergren Frisbie
525 Laurel Street, 94118

Sent from my iPad

**From:** Richard Frisbie
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS); Richards, Dennis (CPC); Koppel, Joel (CPC); CPC-Commissions Secretary; Moore, Kathrin (CPC); Milicent A. Johnson - Commissioner; Melgar, Myrna (CPC); Rich Hillis - Commission President; Rodney Fong - Commissioner
**Subject:** Discrepancies and Comments with 3333 California St. DEIR
**Date:** Monday, January 07, 2019 12:31:48 PM
**Attachments:** COMMUNITY COMMENTS, CHALLENGES, DEFICIENCIES FOR THE DEIR Rev.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Find attached my general comments concerning the Project and Variant proposed in the DEIR and the supporting information. In general the DEIR is rife with inaccuracies, incorrectness and incompleteness.
I will submit more detailed and referenced comments prior to 5 pm January 8, 2018.
Richard Frisbie

1
(GC-1)

I-FRISBIER1

# SUMMARY of DEFICIENCIES/INACCURACIES for the 3333 California DEIR

**"Incorrect, Incomplete, Inaccurate"**

**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**

2 (PD-1)

## I fully support the Community Full Preservation Residential Alternative for 3333

3 (AL-2)

It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 8,000 retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It is compatible with the surrounding neighborhoods for character, style, scale and bulk.

**I strongly oppose** the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change.

4 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 8,000 retail caused the Developers Destructive Proposal.

5 (AL-2)

## The Community Full Preservation Alternative Preserves and Protects Small and Family Owned Businesses

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses.

The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more.

We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal calls for.

One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense.

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents?

5 (AL-2) cont'd

## The Community Unanimously Opposed the Developers' Massive Retail, Office, Commercial (ROC) Complex.

In a recent Petition Drive at Laurel Village over 800 residents signed the Petition opposing the Developers Full Destruction and Massive ROC plan and supporting the Community's residential Alternative. Three people opposed it the Petition. These signatures were gathered in less than 8 hours.

In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods.

"A deal is a deal "was how everyone felt.

The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted.

These signatures are in the hands of the District 2 Supervisor.

6 (PP-1)

## The Developers Destructive Proposal Generates Excessive Levels of Greenhouse Gases and Even More Destructive Climate Gases.

Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG)

7 (GHG-2)

and the many associated and far more destructive climate changing gases that accompany the primary Carbon Dioxide gas.
The Community's Full Preservation Alternative will, by comparison, generate approx. 4,100 tons of GHG.
The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.
The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required.
The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required.
**Could there be something they want to conceal from the public?**
Much like they concealed the Historic nature of 3333 for over 4 years?

Planning ignores the GHG generated by the construction materials despite the requirement to address "indirect" GHG. Planning requires the GHG generated in dispensing water to control dust, etc, to be calculated but not the GHG generated in manufacturing the materials used in the construction!
**Example: The GHG generated by the diesel fuel burned to deliver a load of concrete is calculated to the decimal point but the GHG generated by the concrete itself is ignored.**
What do the numbers show?
Assume a 30 mile round trip: the truck burns approx. 10 gallons of diesel and generates 225 lbs. of CO2. The concrete in the truck generated over 5,000 lbs. of CO2 during manufacture.
So, Planning recognizes the 225bs. but claims the 5,000lbs. is irrelevant **essentially ignoring 95% of the real GHG!**
And using this logic throughout the Initial Study Planning concludes that GHG are "Less than Significant" and therefore need not be addressed!
Folks, you can't make this stuff up as its beyond one's imagination.
The steel, glass, etc. are all treated similarly.
Apparently if you can't see the GHG actually being emitted into the air it doesn't actually exist sothere is no need to consider it. So much for a responsible approach to Climate Change.

As noted above the Community Full Preservation Alternative generates less than one third the GHG, however Planning chooses to calculate them.
**NOTE: Over 95% of the cement/concrete used in the Bay Area is totally manufactured in the Bay Area beginning with the mining process so these GHG are being injected into our air.**

7 (GHG-2) cont'd

## The Community Alternative is Superior, Sooner and Safer

8 (AL-2)

**We pollute less and protect the environment:** the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative:
**We destroy less:** we preserve the historic site.
**We build less:** 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building.
**One single level underground parking garage for 450** spaces versus a complex of parking garages, some of three levels, for 896 spaces;
**We excavate less:** 90,000cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads);
**We preserve and protect our local businesses and shops:** no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business;
**We better protect the health and well being of everyone:** no 13,000+ auto trips to pollute the air, generate the noise, put pedestrians at risk, unload trucks on the streets, etc.

**The Community's Full Preservation Alternative solution will always be three times More Climate Friendly; Far Less Disruptive; Far More Family Friendly; Far Safer for Pedestrians; Far Healthier Air Quality-wise; and Provide Critical Housing at Least Three Times Faster than Developers' solution.**

## We fully support housing

9 (ME-1)

The Community has supported the Lucky Penny (95 units), CPMC (270 units) and now 3333 (558) units. It was the Community that spearheaded the effort that led to the approval of the Lucky Penny Project.
Over 1,000 units in a half mile radius.
So please don't offend me and misrepresent the Community's position.
We support housing and history; we oppose unneeded, unwanted and unnecessary Retail and mindless destruction of a historic site.
AND we provide housing in as much as 12 years sooner than the Developers Full Destructive Plan does.
The YIMBYs should be 100% in favor of the Community's Full Preservation plan and if they're not then they are being grossly hypocritical.

10
(TR-2)

## The Community Full Preservation Alternative Prevents Excessive Traffic from the Massive ROC Complex, Uber & Lyft. Etc. from Overrunning our Neighborhoods.

Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading.
At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact.
The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco.
There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.
Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 8,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is an entirely bogus number based on questionable assumptions, such as "The SF Guidelines **do not provide a specific methodology to** assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…."
Rather amazing that these "refinements" all work in the Developers favor.
Nowhere in these "refinements" have TNCs been taken into account!

Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!

Seawall Lot 337 & Pier 48 summary:
**Project type** Mixed-use, open space, residential, commercial
**Project area** Approx. 28 acres
**Proposed building area** 1.3 – 1.7 million sf commercial; 750,000 - 1.5 million sf residential; 150,000 – 200,000 sf retail, 850,000 sf structured parking



Seawall Lot 337 & Pier 48

10
(TR-2)
cont'd

Pier 70 summary: "The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

**WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable? Simply bogus.**
**The DEIR consistently attempts to misrepresent and mislead the public.**
**It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.**

Under their previous, Level of Service, methodology they would have calculated 8,000 retail trips alone. I
I think it safe to say that the numbers presented by Planning are simply "Developer friendly!". Their VMT methodology with "refinements" will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 35% less trips! This entire section is suspect and Planning must explain this profound discrepancy.
As noted above, nowhere are the TNCs incorporated into the calculations.

**All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact.
This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.
Planning's mitigation measure is a stone age solution to a digital age problem.
How will many people respond to a perceived lack of parking?
They'll simply call a TNC and go anyway.

**Eliminating parking won't eliminate auto trips it will actually increase auto trips.**

A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past – by any mode of transport.

The VMT methodology used by the Planning Department fails to account for the impact of TNCs.

10 (TR-2) cont'd

And, the use of TNCs makes the GHG situation worse.

Let's assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles.

Data shows that many people will now use a TNC rather than drive their own cars. This will be even more pronounced if Parking is reduced!

So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles.

When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip!

So, not only do we have 8,000 retail auto trips, excluding the effect of TNCs (not addressed) to deal with we have many of them generating significant more GHG per trip!

Planning needs to do a comprehensive analysis using credible data and a credible methodology so that the public knows the extent of the GHG generated.

We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly.

In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR.

11 (GHG-1)

## The Community Full Preservation Alternative Protects the Historic Site, Protects the Greenspaces, Maintains the Existing RM-1 Zoning and Resolution 4109, Maintains the Public's Permanent Right-of-Use of the Greenspaces .

12 (AL-2)

The Developers Destructive Proposal first demolishes and destroys the Historic Characteristics and nature of 3333.

13 (CR-2)

Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft.

The only area that isn't excavated is under a portion of the existing building!

Not sure how they missed that opportunity!

14 (GEO-3)

Removal of the demolition debris and the excavated soils will require approx. 28,000 dump

15 (AQ-1)

truck loads, all of which have to pass though and pollute our neighborhoods. 15 (AQ-1) cont'd

By contrast, the Community Full Preservation Alternative generates approx. 9,000 dump truck loads, one quarter as many! 16 (AL-2)

After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings.

How many large truck loads, concrete truck loads, etc. will this require?

The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads.

A quick look at the turning radii of the trucks, ie. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution. 17 (TR-7)

In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate.

The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4. 18 (AL-2)

## The Community Full Preservation Alternative Keeps the Loading and Unloading Traffic Within the Site as Opposed to External to the Site 19 (TR-10)

The Developers Destructive Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs. A perfect storm!

I-FRISBIER2

January 8, 2019

Kei Zushi, Senior Planner
Environmental Planning Division
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103

Subject: Comments to 3333 California St. Mixed-Use Project DEIR

Planning Department Case No. 2015-014028ENV

State Clearinghouse No. 2017092053

RECEIVED
JAN 08 2019
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Dear. Mr. Zushi,

Find attached my comments concerning Deficiencies associated with the Subject document.

If there are any questions please contact me.

Respectfully.

F. Richard Frisbie

415-666-3550

# Table of Contents

Section A: DEIR Deficiencies for Greenhouse Gas Calculations and Demolition Debris Processing – Attachment E to this document is separately attached due to its size.

Section B: DEIR Deficiencies for Construction Trip Generation.

Section C: Deficiencies for Hydrology and Water Quality.

Section D: Attachment E – From Section A above.

# Section A

## DEIR Deficiencies for Greenhouse Gas Calculations and Demolition Debris Processing

# DEIR Deficiencies - Greenhouse Gas (GHG) Calculation and Demolition Debris Processing

Attachment 1: Comments on 3333 California St. GHG Calculation Deficiencies with respect to the Initial Study dated April 25, 2018 and Version 2 dated May 14, 2018.

Attachment 2: 3333 California Street Mixed-Use Project Application for Environmental Leadership Development Project including Attachment E of same.

Attachment 3: 3333 California St. Initial Study pg. 146 Impact C-AQ-1.

Attachment 4: San Francisco 2004 and 2009 Housing Element, Cover and pg.V.1-17

Attachment 5: FN 130 SF Planning Department "Compliance Checklist Greenhouse Gas Analysis" Cover and pg. 19.

Attachment 6: San Francisco Planning Department "Greenhouse Gas Analysis Pursuant to CEQA" dated November 12, 2010.

Attachment 7: Initial Study No. 2015-014028ENV. Project Description pg. 6.

1
(GHG-1)

In addition to the comments in this letter I am resubmitting my revised Initial Study Comments (Attachment 1) as the Planning Department has failed to address them and has withheld critical, pertinent and specific information from the public. The revisions reflect information gleaned from the Initial Study and subsequent documents. It also reflects corrections and adjustments to relevant criteria.
As noted below, had Planning provided the information requested it would have permitted the GHG issue to be analyzed quickly but, to date, the public has not been provided this fundamental data.
Regardless, the Community Alternative will generate less than one third the GHG generated by the Developers' Project. It will also clearly shows that the Community Alternative is a far superior solution in that it generates approx. 30% of the total GHG generated by the Developers' Plan. A significant Mitigation Measure in itself.

In the Initial Study Impact C-AQ-1 (Attachment 3) was deemed "less than Significant."
No data or analyses was provided to support this erroneous determination which was incomplete, incorrect and inadequate. The text which followed was simply a rehash of all the relevant documents but nowhere was there any analyses that showed compliance with the requirement to consider "greenhouse gas emissions, directly or indirectly".....
No Indirect GHG were calculated as noted in Attachment 1 and required by Attachments 3, 4 and 5.
The only information provided in Volume 2 dealt with construction GHG and operational GHG, nothing addressed the GHG related to the manufacture and use of the basic building materials

to be used in constructing the buildings, underground garages, etc.
Indirect GHG are required to be calculated, analyzed and incorporated into the conclusions and Mitigation Measures. The Planning Department has failed to do any of this.
Indirect GHG are also required to be similarly addressed in the San Francisco 2004 and 2009 Housing Element Impact GH-1 (Attachment 4). None of this was done.

CEQA Guidelines section 15358(a)(2) defines "effects" of a project to include "indirect" effects. These indirect effects are cumulative in nature. They are also reasonably foreseeable and the DEIR was inadequate for failure to consider them.

15358. EFFECTS "Effects" and "impacts" as used in these Guidelines are synonymous. (a) Effects include: (1) Direct or primary effects which are caused by the project and occur at the same time and place. Association of Environmental Professionals 2018 CEQA Guidelines 261 (2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems. (b) Effects analyzed under CEQA must be related to a physical change. Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21068 and 21100, Public Resources Code.

Despite multiple requests we have not been provided with an estimate of the volumes of concrete, weights of steel and glass to be used in the project. This information would quickly reveal the massive amounts of GHG involved in the Developers' 3333 Plan.
Planning supposedly oversees thousands of major projects and PSKS supposedly develops multiple large buildings/projects and yet no such estimates are available, or so we are told.

Planning has had access to a detailed GHG Study prepared by SWCA since August 2018 which specifically addresses GHG in the Attachment E AB900 Analysis by Ramboll. The SWAC Study lists total construction GHG of 4,273 metric tons (Attachment E Construction GHG Emissions Table 4 pg. 8) which clearly exceeds the limits in Attachment 6.
However, these are only "direct" GHG and do not include the "indirect" GHG generated by the manufacture of the concrete, steel, glass, etc. which will be used to construct the buildings. ALL indirect GHG are missing from ALL the Planning Department's documents and conclusions which are incorrect, incomplete, and inadequate. Nothing in Attachment 6 excludes construction materials from the process. In fact the very term "energy associated with treatment" on page 2 can refer to the treatment of raw materials. The etc. at the end of the same sentence clearly indicates that a number of other "indirect" GHG are to be considered if present. None of this has been done.

The DEIR Lacks Substantive Evidence That GHG are "Less Than Significant."

1
(GHG-1)
cont'd

**Processing of Demolition Debris**

Furthermore, nowhere in the Initial Study, the DEIR or the SWAC Report is there any mention, analyses or compilation for the GHG generated by processing the debris from the demolition of the site as required by the City's applicable Ordinance - Planning Department's Reference FN 130 "Compliance Checklist Greenhouse Gas Analysis" pg. 19 "San Francisco Construction and Demolition Debris Recovery Ordinance" (Attachment 5).

The first paragraph of the Requirements says that "All (100 percent)...to be processed for recycling."

Second paragraph says that "projects that include full demolition of a structure..." allows for the processing of a minimum 65% of the demolition debris...."

The Developer is NOT demolishing 100% of the main building and MUST recycle 100% of the demolition debris from the main building. Attachment 7 "the existing approx. 55.5-foot tall building at the center of the site would be partially demolished....." Pretty clear statement and supporting drawings.

Demolishing 100% of the Annex building does not qualify as exempting the debris from the main building from the 100% requirement.

In the Remarks column the Planning Department states that a "minimum of 65%..." and then references the Annex building in an attempt to limit the overall processing to 65%.

The Annex Building demolition is trivial with comparison to the main building and yet is used in an attempt to reduce the 100 percent processing required of the main building debris.

This is a deliberate abuse of the language and intent of the Ordinance.

The Annex building and main building are separate and distinct and the disparity in volume of debris is more than an order of magnitude.

The Developer must process 100% of all the debris from the main building demolition.

Using the annex building as a pretext for setting the processing percentages is disingenuous and violates the City's own Ordinance.

In addition, no calculation is shown that indicates the amount of GHG generated from the processing of the 65% of the Annex Building and the 100% of the main building debris as well as the parking lots, garage ramps, etc.

All of these generate the "indirect GHG" required to be addressed in the GHG totals. No calculations for the processing of the demolition debris has been presented.

The GHG analysis is further invalidated by the incorrect interpretation and implementation of the City's own Ordinance and the failure to make the appropriate GHG calculation.

Frankly this is a deliberate attempt to circumvent the City's own rules!

In addition, Attachment 2 Item 9 "Consistency with statutory Requirements for CEQA Streamlining" states "to offset GHG emissions...." certain steps will be taken. Interesting that mitigation measure are proposed for a situation that is already defined "Less than Significant" in the Initial Study. One might even consider it bizarre. (GHG-1) cont'd

However, the steps proposed fall woefully short of offsetting the "direct and indirect" (the indirect are yet to be calculated but I offer the attached table in order to assist the Planning Department in complying with CEQA) GHG generated during the construction phases(s).

It is simply impossible to conclude, as C-AQ-1 attempts to do, that the GHG generated are "less than Significant."

Furthermore, the California Air Resource Board itself requires that both direct and indirect GHG be calculated.

DEMAND is that we be provided with ALL data, calculations, documentation, etc. that have any bearing on GHG associated with 3333 California Street inclusive of Initial Study, Application for an Environmental Leadership Project, the DEIR and 3333 California Street in toto.

DEMAND is that ALL GHG, direct and indirect, including those generated by the manufacture and transport of the building materials themselves, be calculated as required by both the City and the State.

DEMAND is also that the GHG be reclassified properly as "Significant" and are as of now Unmitigated.

DEMAND is that the Community's Alternative GHG levels, one third of the Developers' levels, be used as the baseline for setting the standard for 3333 California St.

DEMAND is that the processing of demolition debris from the main building be properly calculated by requiring 100% processing of the main building debris.

DEMAND is that the GHG generated by this processing be accounted for: a minimum of 65% of the Annex Building and 100% of the main building debris. No information is provided as to the percentage of the parking lots and garage ramps that will be processed. We require this information.

**The DEIR is incomplete, inaccurate and incorrect in totally ignoring GHG from construction material manufacture and transport, demolition debris, etc.**

Attachment 1

Comments on 3333 California St. GHG Calculations Deficiencies with respect to Initial Study dated April 25, 2018 and Version 2 dated May 14, 2018

GREENHOUSE GAS EMISSIONS (see note 1)

## EXECUTIVE SUMMARY

This document is a revised and updated version with corrections to the document submitted to the Planning Department April 25, 2018. It addresses the incorrect, incomplete and inaccurate data (where provided), analyses (where provided) and conclusions stated in the Initial Study.
None of these were corrected in the DEIR.
The Initial Study's (Reference 4 to this submission) conclusion on page 146 per the Table, items 7(a) and (b) as well as on page 148 "Impact C-GG-1" that the construction phase of the project will generate "Less than significant" Greenhouse Gases is incomplete, inaccurate, inadequate and invalid.
The approximate 14,000 tons of Greenhouse Gases generated, direct and indirect, as a consequence of the construction phase of the proposed development is hardly a "less than significant" tonnage as stated in the Initial Study and not addressed in the DEIR. Essentially the subject is being ignored.

2 (GHG-1)

The Community Residential Alternative, supported by the coalition of neighbors surrounding 3333, will generate only 30% (4,100 tons) of the Greenhouse Gases generated by the PSKS plan, as a consequence of their construction phases, while protecting the historically significant main building and landscaping.
The Community Alternative provides a significant mitigation of Greenhouse Gases and the destructive impact they have on health, quality of life and climate change.

Notes:
This document addresses only the generation and release of Carbon Dioxide, direct and indirect, as a consequence of the construction phase.
However, the other Greenhouse Gases associated with this type of work –methane, nitrous oxide, etc.- although present at much lower levels than carbon dioxide have a GWP (Global Warming Potential) anywhere from 25-300 times greater than carbon dioxide (Reference 11) and need to be addressed as well.
The indirectly generated Greenhouse Gases has not been taken into account in either the Initial Study or the DEIR.
San Francisco and the California Air Resources Board (CARB) require that all Greenhouse Gases, direct and indirect, be calculated, analyzed and properly presented with mitigation measures being required.
The DEIR is incomplete, incorrect and inadequate as it fails to address the indirect Greenhouse Gases.

## INTRODUCTION

Reference 4 Section E. 7 - Greenhouse Gas Emission pages 146-150:
Impact C-AQ-1 (Potentially Significant). "Potential cumulative air quality impacts will be addressed in the EIR."

2 (GHG-1) cont'd

Table: 7 GREENHOUSE GAS EMISSIONS (page 146)

Would the project:

(a) "Generate greenhouse gas emissions, either directly or indirectly (underline added), that may have a significant impact on the environment?"
"Less Than Significant" is checked.

(b) "Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gases?"
"Less Than Significant" is checked.

Not a single calculation, analysis, compilation or comparison is presented to support these inadequate conclusions of "Less Than Significant."
These conclusions are incomplete, inaccurate, inadequate and invalid in toto.
The project proposed by the developers (PSKS) would generate as a consequence of the construction phase alone approximately:

13,525 TONS OF GREENHOUSE GASES (see Note 1)

Due to the complete absence of any supporting data, as well as Planning's delayed response to relevant questions, it has been necessary to make some assumptions in analyzing details of the PSKS plans.
By comparison, the Community Residential alternative, supported by the coalition of neighbors surrounding 3333, would generate Greenhouse Gases at levels less than 30 percent (4,100 tons) of the PSKS levels. The Community Residential alternative represents a 70% mitigation of these harmful gases to health, well-being and the environment.

Thus, without the relevant data and corresponding analyses based on available air emission models, Planning's conclusions have no basis in fact and are incorrect, incomplete, inadequate and invalid.

On page 148, first paragraph, of reference 4, it is stated "The following analysis of the proposed project....."
In reality there is no analysis whatsoever in the referenced document as to the Greenhouse Gases generated as a consequence of the construction phase which, as shown above, produces significant amounts of harmful Greenhouse gases.
Pages 148-150 speak exclusively to the Operational phase of the project while completely omitting even a reference to the construction phase.
There is no reference made as to the volume of concrete, weight of steel, weight of glass, etc. included in the project - all of which have profound implications as to the levels of Greenhouse Gases emitted into the atmosphere as a consequence of the construction phase.
I am still awaiting answers to question submitted to Planning on related issues.

It would appear that no analyses have been made, certainly none are presented, as to the Embodied Energy content of the construction methods and materials.
Such analyses would immediately highlight the significant levels of Greenhouse Gases that would be generated as a consequence of the PSKA planned construction phase and highlights the need for mitigation measures.

2 (GHG-1) cont'd

Due to the absence of data it was necessary to use information listed in the references to develop the approximate levels of Greenhouse Gas tonnages generated as a consequence of the construction phase. Had the Initial Study, which, forms the basis for the EIR, carried out some fairly straightforward analyses we could have compared the results to determine where additional study is required.
At such time as the City provides the necessary technical data, such as the energy required to recycle the main building debris (see note 1), volume of concrete and weight of steel, glass, etc. required for the re-construction, etc. the estimated Greenhouse Gas tonnages generated as a consequence of the construction phase could be re-calculated accordingly.

Notes:

1. There appears to be no calculation or consideration in any of the City's documents that addresses the Greenhouse Gases generated by the recycling of the debris from the main building.
   Recycling steel and concrete is energy intensive and needs to be properly accounted for in the Greenhouse Gases budget.
   The only thing more harmful is to simply dispose of reusable materials in a landfill.

The Greenhouse Gases generated as a consequence of the Construction phase will be discussed in the following order: 2 (GHG-1) cont'd

1. Demolition of portions of main building, service building, parking lots, garage ramps.
2. Removal of Debris generated in 1. Above.
3. Excavation of site for underground parking, building foundations, etc.
4. Removal of Spoils generated in 3. Above.
5. Reconstruction, strengthening and increased height of the main building.
6. Construction of underground parking garages.
7. Construction of Masonic, Euclid and Mayfair buildings.
8. Construction of Plaza A & B and Walnut buildings.
9. Construction of Laurel St. duplexes.

1-4: DEMOLTION, EXCAVATION AND REMOVAL OF DEBRIS AND SPOILS.

The first four activities, 1-4, listed above will be looked at together as they basically utilize energy to carry out the activity.

PSKS proposes to demolish approximately 50% of the existing main historic building as well as most of the historic landscaping. In addition, the various parking lots and roadways on the site will be demolished as well as the circular garage ramps. After demolition the debris will be removed and the site will be excavated and the spoils hauled away. Reference 26 shows the approximate amount of fuel, diesel and gasoline, and electricity consumed. Some of this is spread over the construction phase of the building cycle. As items such as the map of the routes selected (Reference 9) have not been made available, but have been requested, it is impossible to judge the reasonableness of some of these calculations.

It should be noted that the 0.05 gallons per horsepower-hour used in the Reference 26 is 10-15% lower than industry data available from multiple sources (see Reference 29, the value 0.056, as an example).

Also of significance, which is not addressed, is the volume of serpentine that could be present and which requires significantly more energy to remove than soils and clays.

The five primary boring sites related to geology are of considerable interest.

Major excavation will take place along Masonic and Euclid and yet no borings were made at any intermediate location along this >600ft segment of the property.

The boring sites appear in Reference 30.

A boring (B-3) was done at Masonic and Presidio where no excavation will take place.

The only other boring on the southern half of the property was taken very near the Euclid-Laurel intersection (B-4) where, again, no excavation will take place.

So, all the excavation for the Masonic and Euclid buildings will be done without any specific first-hand knowledge of the geology at those locations.

And yet it was deemed appropriate to do boring B-5, a site where the Laurel St. duplexes will be constructed and which require significant less critical subsoil information as they do not have underground garages supporting major buildings. 2 (GHG-1) cont'd

Outcrops of serpentine exist throughout this general area so it is probable that these areas of excavation will encounter significant deposits of serpentine, the excavation of which is far more difficult and energy intensive than for stiff clays etc. as well as posing a health risk which could be of a much greater magnitude than that presented in the Initial Study.
Frankly one could conclude that the boring sites were carefully selected to avoid discovering any controversial conditions that may well underlay the site!

The net result is that the energy discussed in Reference 26 must be considered to be at the very low end of likelihood.
Higher values should be expected and this likelihood is not addressed in the DEIR.
Despite the optimistic view of Reference 26, these phases of the project will still generate approx.

3,500 TONS OF GREENHOUSE GASES

As noted above in the Introduction, no consideration appears to have been made for the energy associated with the recycling of the reusable components of the debris from the main building.
So, what would be a more realistic estimate?
The Community Residential alternative would generate approx. 23 percent of that, or 800 tons, of Greenhouse Gases.

5. RECONSTRUCTION, STRENGTHENING AND INCREASED HEIGHT OF MAIN BUILDING

First, the remaining portions of the historical main building will require strengthening as it was not originally designed or built to accommodate three additional floors and their related infrastructure.
The volumes of concrete and steel involved will result in significant generation of Greenhouse Gases, no mention of which appears anywhere in the Initial Study or the DEIR! The DEIR is simply incorrect, incomplete and inaccurate with respect to direct and indirect greenhouse gases and also Air Quality.
The DEIR should, but did not, disclose the volumes of concrete and/or weight of wood, as well as the weights of steel and glass that would be used in the PSKS proposed development.
This information is relevant to the calculation of Greenhouse Gas Emissions.
Projects involving buildings of this size, and larger, have seen significant reductions savings of Greenhouse Gases saved through re-use of the building as opposed to major demolition and re-construction.
So, conservatively it can be estimated that this re-construction will generate approx.

2,000 TONS OF GREENHOUSE GASES

Had we been provided with information regarding volumes of concrete and weight of steel required for this rebuild, strengthening and height increases, we could have provided a more specific estimate.

It should be noted that concrete has an Embodied Energy Content of 12.5MJ/kg, Steel 11.0MJ/kg. and Wood 2.0MJ/kg.

Cement is an energy intensive product and generates significant Greenhouse Gases during its production process so a cubic yard of concrete is responsible for approximately 500 lbs. of Greenhouse Gases being released into our atmosphere. See References 16, 17, 18 and 23.

95% of the cement used in the Bay Area is manufactured here so these GHG are our GHG.

This estimated 2,000 tons of Greenhouse Gas generated by PSKS would hardly seem to be compatible with Page 146 and the "Less Than Significant" conclusion by the City, further reinforcing the conclusion that the Initial Study, and this DEIR, is inaccurate, inadequate, incomplete and invalid.

The Community Residential alternative generates 0 tons of Greenhouse Gas emissions.

There is no demolition of the main building; no additional strengthening or structure for additional floors; no rebuilding of the exterior of the main historic building.

However, to take into account modifications for providing sunlight courts, etc. let's assign a number of 200 tons of Greenhouse Gases.

2
(GHG-1)
cont'd

6. CONSTRUCTION OF UNDERGROUND PARKING GARAGES.

The site will be underpinned by underground parking garages over approx. 60% of the site.

Along California St. these are two and three levels.

Under Masonic, Euclid and Mayfair these are one level.

Construction is assumed to be steel reinforced concrete designed to support the buildings that are above all the parking garage areas.

The DEIR failed to disclose the volumes of concrete and weight of steel, glass, etc. required.

Concrete's Embodied Energy is 12.5MJ/kg., weighs approx. 2 ton per cubic yard which emits up to 500 lbs. in Greenhouse Gases, $CO_2$, during the manufacture and construction processes.

As no volumes of concrete or weight of reinforcing steel has been provided by the City, the calculations of Greenhouse Gases generated as a consequence of the construction phase has used industry standards for parking garages (Reference 25).

These are all above ground garages without any overlying buildings so the calculations should be considered on the low end when applied to an underground complex supporting 4-7 story buildings above.

The average cubic yards of concrete to square foot of structural slab ratio varies from 4.5% to 10% (Reference 25).

Assume a 6% ratio which is conservative due to the nature of the complex AND excludes any consideration of the required reinforcing steel.

When Planning provides the necessary information, these calculations can be updated.

Again, with apparently no information, no calculations, etc. Planning concluded that the

6,000 TONS OF GREENHOUSE GASES

generated as a consequence of the construction of the underground parking garages are "Less Than Significant" on page 146 of the Initial Study and not even addressed in the DEIR.

The DEIR fails to address indirect Greenhouse Gases as required; it is incomplete, inaccurate and incorrect.
The Community Residential alternative generates approx. 1,000 tons of greenhouse gases, as it requires only a new single level residential parking garage along California St.

2 (GHG-1) cont'd

7. CONSTRUCTION OF MASONIC, EUCLID AND MAYFAIR BUILDINGS.

Once again it is necessary to include the following caveat "the Initial Study provides no information as to the construction methodology proposed nor the volumes of concrete and weight of steel required."
However, at public meetings, as well as smaller private ones, it was indicated that reinforced concrete and glass would be the primary components of construction so these assumptions have been adopted herein.
Applying References 16-24 with included references to the proposed buildings for reasonably equivalent sized buildings, the proposed buildings would generate approx.

450 TONS OF GREENHOUSE GASES.

If Planning will provide the appropriate information concerning construction methodology, materials, volumes of concrete, weight of steel, etc. we can adjust the calculations accordingly.
The All Residential alternative will construct only the Mayfair Building and generate approx.. 100 tons of Greenhouse Gases as we do not intend to destroy these historically significant landscaped areas.

8. CONSTRUCTION OF PLAZA A & B AND WALNUT BUILDINGS.

The same assumptions as to construction methodology applied in 7 above is utilized herein.
These three buildings will generate

1,500 TONS OF GREENHOUSES GASES WITH THE VARIANT PROPOSED.

The Community Residential alternative would generate less than 1,000 tons of greenhouse gases. For details refer to References 16-24 with included references.

9.CONSTRUCTION OF LAUREL ST. DUPLEXES.

It is assumed that these are constructed predominantly of wood should generate less than

75 TONS OF GREENHOUSE GASES.

If this assumption is incorrect the tonnage of greenhouse gases generated would be significantly higher.
I await Planning's information on construction methodology.
The Community Residential alternative concept will generate ZERO tons of Greenhouse Gases as it does not envision destruction of the historic nature of that area.

REFERENCES


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2. FN122: Executive Order B-30-15
3. San Francisco Planning Department (Planning): "Strategies to Address Greenhouse Gas Emissions, 6 pgs.
4. Initial Study 3333 California St. Mixed Use Project (3333) Case No. 2015-014028ENV April 28, 2018
5. Version 2 of Reference 4 dated May 14, 2018.
6. FN118: Planning "2017 Green house Gas Reduction Strategy Update" Revised July 2017.
7. FN130: Planning "Compliance Checklist Greenhouse Gas Analysis.
8. FN39: "Cut and Fill Calculation Overall" Webcor Builders dated 4/12/17.
9. FN38: Email series beginning from Brad Denney to Peter Alexander Mye et al Dated October 23, 2017.
10. Email, Pedro Wong to Julie Moore dated May 25, 2018 EIR Scoping Comments.
11. "Fuel Economy Ranges for Light and Heavy Vehicles" Fact 626 DOE dated June 7, 2010.
12. "Greenhouse Gas Emissions from a Typical Passenger Vehicle" EPA-420-F-18-008 dated March 2018.
13. "Calculation Sheet-Combustible Emissions" including all references; EPA.
14. "Greenhouse Gas Benefits of Building Re-Use versus New Construction-A Presentation before the Federal Facilities Council", National Academy of Sciences dated January 29, 2013.

14a. "Comparing the Environmental Impact of Adaptive Reuse to New Construction" April 10, 2018 published at www.milrose.com.

15. "Preserving Historical Buildings: The Most Sustainable Thing is Not to Build New Stuff" The Guardian dated 12 October 2016.
16. "Estimation and Minimization of Embodied Carbon of Buildings-A Review" including all references; published In "Buildings" 4 January 2017.
17. "Carbon dioxide reduction in building life cycle: a critical review" including all references; published as Paper No. 11000005 in The Institute of Civil Engineering, ICE, 31/07/2012.

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21. 21. "The Carbon Footprint of a Renovation versus New Construction"; published in "Sustainable Product Design March 18, 2008.

22. "Plyscrapers" published in "futurism.com/plyscrapers " August 26 2017.
23. "Cutting Embodied Carbon in Construction Projects", published by Wrap "Material Change for a Better Environment" including all references.
24. "Energy and CO2 Advantages of Wood for Sustainable Buildings", Andy Buchanan University of Canterbury including all references.
25. "Parking Garages" www.clevelandcement.com.
26. FN317 "3333 California Street Mixed Use Development Energy Assessment" prepared by SWCA dated April 12 2018.
27. U.S. Energy Information Administration "How much carbon dioxide is produced per kilowatt of U.S. energy generation?" updated April 5 2018.
28. Pacific Gas and Electric Company "Carbon Footprint Calculator Assumptions" 3 pages.
29. "Diesel engine power to Fuel Consumption" published my Barrington Diesel Club, 10-01-2017
30. FN40 "Site Plan with Boring Locations" from Langan Treadwell Rollo Report.
31. "The Greenest Building: Quantifying the Environmental Value of Building Reuse" a report by Preservation Green Lab-National Trust for Historic Preservation.

2
(GHG-1)
cont'd

SUMMARY OF GREENHOUSE GENERATED (tons)

| PHASE of PROJECT | GREENHOUSE GASES-TONS PSKS | AR (1) |
|---|---|---|
| Demolition of portions of main building, service building, parking lots, garage ramps; Removal of Debris generated above; Excavation of site for underground parking, building foundations, etc.; and Removal of Spoils generated above. References: 26, 27, 28. x | 3,500 (2) | 800 |
| Reconstruction of main building with strengthening and additional floors. References: 14 thru 19. | 2,000 | 200 |
| Construction of underground parking garages. | 6,000 (3) | 2,000 |
| Construction of Masonic, Euclid & Mayfair buildings. | 450 | 100 |
| Construction of Plaza A & B and Walnut buildings. | 1,500 | 1,000 (4) |
| Construction of Laurel St. duplexes. | 75 | 0 |
| TOTALS (5) | 13,525 | 4,100 |

1. AR: All Residential alternative supported by the coalition of neighbors surrounding the site.
2. The literature indicates that the fuel consumption listed in Reference 26 is approx. 10-15% lower than other industry consumption figures. The lower SWCA (reference 26) number is used.
3. Low estimate: approx. 26,000 cubic yards of concrete; no reinforcing steel included.
4. As noted previously this number is based on a 7 story Walnut Building to be consistent with the PSKS Variant. The All Residential alternative envisions a 4 story Walnut Building which achieves the requisite 558 residential units.
5. At such time as Planning provides all the relevant data associated with the project the Greenhouse Gas tonnage estimates can be revised.
   However, regardless of revisions to the tonnages, the All Residential alternative will <u>always</u> represent a small, less than one third, portion of the PSKE proposed development and the required mitigation measures will have to reflect this.

Attachment 2

I-FRISBIER2

# 3333 CALIFORNIA STREET MIXED-USE PROJECT
## APPLICATION FOR ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT

Prepared for

**Laurel Heights Partners, LLC**
150 Post Street Suite 320
San Francisco, CA 94108

Prepared by

**SWCA Environmental Consultants**
330 Townsend Street, suite 216
San Francisco, CA 94107

August 17, 2018

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# INTRODUCTION

The Project Sponsor, Laurel Heights Partners, LLC, is submitting this Application for certification of the 3333 California Street Mixed-Use Project as an Environmental Leadership Development Project (ELDP), pursuant to AB 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code Section 21178 et. seq. Although codified within the California Environmental Quality Act (CEQA), the process for certification of the project as an ELDP is separate from all but a few of the steps required for preparing a CEQA environmental review document.

# PROJECT DESCRIPTION

## Proposed Development Project

The project site, an approximately 10.25-acre parcel in San Francisco's Laurel Heights/Jordan Park neighborhood, is developed with a 1950s-era corporate campus featuring a four-story office building at the center of the site, a three-level, partially below-grade parking garage, a one story annex building, three surface parking lots, two circular garage ramp structures leading to below-grade parking levels, and mature landscaping or landscaped open space. A portion of the space in the surface parking lots accommodates 60 parking spaces allocated to public use, with payment.

The project sponsor, Laurel Heights Partners, LLC, owns the site and leases it to the Regents of the University of California, which uses the project site for its University of California San Francisco (UCSF) Laurel Heights Campus. Prior to the project sponsor's recent acquisition of fee title to the site, the project sponsor had entered into a 99-year pre-paid ground lease with the Regents in 2014. The office building provides space for UCSF administrative, academic research, and social and behavioral science department uses (including common areas) and space for accessory uses and support programs, such as a daycare center, a conference center/auditorium, and a cafeteria.

The project sponsor is proposing to redevelop the site with adaptively reused and new buildings and shift the primary use from office to residential. The 14,000-gross-square-foot annex building and the two garage ramp structures would be demolished, and the three surface parking lots would be removed. The 455,000-gross-square-foot office building would be partially demolished, divided into two separate buildings (Center Buildings A and B), connected by a covered bridge, expanded to include two to three new levels, and adapted for residential use. A total of 13 new buildings—the Plaza A, Plaza B, Walnut, Masonic, Euclid, and Mayfair buildings, and the Laurel Duplexes (seven buildings)—would be constructed along the California Street, Masonic Avenue, Euclid Avenue, and Laurel Street edges of the project site. **Attachment A,** Project Drawings, provides a site plan, elevations of buildings along each street frontage, and representative floor plans of proposed buildings. **Attachment B,** Project Photo-simulations, presents the proposed project in context of existing surrounding streets and buildings.

All of the renovated or new buildings except one, the Walnut Building, would contain residential uses; the Walnut Building would provide space for two different uses—office and a childcare center. Retail space would be provided on the ground floor in the proposed Plaza A, Plaza B, Walnut, and Euclid buildings. Overall, the proposed project would include 558 dwelling units within 824,691 gross square feet of residential floor area; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; a 14,690-gross-square-foot childcare center; 428,773 gross square feet of parking with 895 parking spaces; and approximately 236,000 square feet of open areas.

The proposed parking program would replace the existing 543 surface and subsurface parking spaces on the project site and would provide 352 more parking spaces than are currently on the site. The spaces would be allocated to offer 558 spaces for residential uses, 138 spaces for retail uses, 100 spaces for office uses, 29 spaces for the childcare use, 60 spaces for commercial (paid) parking, and 10 spaces for car-share vehicles. Four separate below-grade parking garages with 883 spaces are planned: the California Street Garage, which would be constructed under the Plaza A, Plaza B, and Walnut buildings; the Center Building B Garage, which would encompass the two renovated below-grade parking levels under Center Building B; the Masonic Garage, which would be developed under the Masonic and Euclid buildings; and the Mayfair Garage, which would be developed under the Mayfair Building. In addition, six two-car parking garages would be provided for the Laurel Duplexes. The seventh Laurel Duplex would have two parking spaces in the Masonic Garage.

The project site is proposed to be laid out so that it would be newly integrated with the existing street grid. New pedestrian promenades would align with Walnut Street and connect to Masonic and Euclid avenues (north/south direction), and with Mayfair Drive connecting to Presidio and Masonic avenues and Pine Street (east/west direction) These interior promenades would be closed to vehicular traffic, except at the Walnut Street extension a short distance into the site where a driveway and roundabout would allow for passenger drop-off and pick-up as well as provide access to the California Street Garage. Sidewalks along the project boundaries on Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street would be widened.

Approximately 53 percent of the overall lot area (approximately 236,000 square feet, excluding green roofs) would be retained as open area, with portions developed as a combination of common open space (some of which would be open to the public) and private open space such as ground-level terraces, interior courtyards and private internal walkways. Overall, the proposed project would provide approximately 103,000 square feet of common useable open area that meets the San Francisco Planning Code section 135 definition of open space. New landscaped open space would be added throughout the project site. The proposed project would remove 185 of the approximately 195 trees on the site, retaining 10 of the mature trees. The 15 street trees along California Street would be removed and replaced. The project includes installation of 270 replacement trees on the project site plus 92 street trees to be planted along California Street, Masonic Avenue, Euclid Avenue and Laurel Street.

The project sponsor is considering a project variant, the Walnut Building Variant, that would change the uses and height of the proposed Walnut Building. With the variant, the building's proposed office space would be replaced with residential uses, three new residential floors would be added, and the retail space and the childcare center space would be reduced. Overall, with the variant there would be 186 additional residential units, for a total of 744 residential units within 978,611 gross square feet of residential floor area; no office space; 48,593 gross square feet of retail floor area; a 14,650-gross-square-foot childcare center; and 435,133 gross square feet of parking with 971 parking spaces. The amount of space devoted to open areas would be the same as under the proposed project.

The proposed project or variant would be constructed in four overlapping development phases, with full build-out expected to occur approximately seven years after project entitlements, if executed from start to finish of the prescribed overlapping development phases.

The project sponsor submitted a Transportation Demand Management (TDM) Plan Application to the San Francisco Planning Department in August 2017 and has agreed to implement selected TDM measures, such as improving walking conditions and providing onsite child care, bicycle parking, and car share parking, to reduce per capita automobile use. The project sponsor has committed to meeting and exceeding the requirements of the San Francisco Green Building Ordinance (part of the San Francisco Building Code) by achieving Leadership in Energy and Environmental Design (LEED) for Neighborhood

Development certification at a minimum Gold level for the full development. The Applicant is considering living (green) roofs, solar photovoltaic systems for some roofs, solar thermal hot water systems for other roof areas, and water-smart landscaping, among other sustainability features. Each of the new buildings would comply with the San Francisco Non-Potable Water Ordinance that requires use of onsite alternate water sources including graywater and/or rainwater.

The proposed project would include affordable housing units as required under San Francisco Planning Code section 415 and/or as set forth in a Development Agreement (DA) for the proposed project between the project sponsor and the City. The terms of the DA regarding provision of affordable housing and other matters are still under discussion, and, in addition, the project sponsor is gathering community input regarding this matter.

## Project Site

3333 California Street is a Midcentury Modern-designed corporate campus originally constructed in 1956-1957. The approximately 10.25-acre project site occupies Lot 003 on Assessor's Block 1032 in the Laurel Heights/Jordan Park area of San Francisco's Presidio Heights neighborhood. The irregularly shaped parcel is bounded by California Street to the north (an approximately 730-foot-long frontage), Presidio Avenue to the east (an approximately 280-foot-long frontage), Masonic Avenue to southeast (an approximately 422-foot-long frontage), Euclid Avenue to the south (an approximately 348-foot-long frontage), and Laurel Street/Mayfair Drive to the west (an approximately 742-foot-long frontage).

The campus contains a four-story office building with three levels of partially below-grade parking; a one-story annex building (which contains equipment such as boilers, chillers and water treatment facilities for the office building, other plant operations systems, office space for the physical plant engineers, and unused laboratory office space) at the northwestern corner of the project site; approximately 2.75 acres of surface parking in three lots; and 3 acres of designed landscape or landscaped open space. Approximately 63 percent of the site is covered by buildings or other impermeable surfaces, such as internal roadways and surface parking lots, and 37 percent is landscaping or landscaped open space. UCSF currently grants public access to the grass lawns on the site at the corner of Euclid Avenue and Laurel Street, extending partially down Euclid Avenue, and at Presidio Avenue just north of the Masonic Avenue and Pine Street intersection.

The project site is well-served by Muni transit service, with the 1 California, 1 BX California Express (AM and PM peak hours only), and 2 Clement bus routes on California Street; the 3 Jackson bus route on Presidio Avenue, California Street, and Walnut Street; and the 43 Masonic bus route on Presidio Avenue.

The area in which the project site is located is highly urbanized and essentially fully built out. Low- to mid-rise mainly multi-family residential uses surround the project site to the north, east, and south, across California Street, Presidio Avenue, and Euclid Avenue. The west side of Laurel Street across from the project site is lined by single-family houses between Euclid and Mayfair avenues. Other nearby land uses include the SF Fire Credit Union, at the southwest corner of California Street and Presidio Avenue, adjacent to the project site; the Jewish Community Center of San Francisco, across California Street from the project site; San Francisco Fire Station 10, across Masonic Avenue southeast of the project site; the San Francisco Municipal Railway's (Muni) Presidio Yard bus storage depot, across Euclid and Masonic avenues south of the project site; and the Laurel Village Shopping Center along California Street, across Laurel Street west of the project site.

# CONSISTENCY WITH STATUTORY REQUIREMENTS FOR CEQA STREAMLINING

This Application was prepared in accordance with the Governor's Guidelines for Streamlining Judicial Review under CEQA, provided on the Governor's Office of Planning and Research (OPR) website and updated in January 2018 to comply with Senate Bill 734 (2016) and Assembly Bill 246 (2017).[1] The following information (including all Attachments) is submitted to show that the project and variant each satisfies the statutory requirements for CEQA streamlining, as further set forth in the Governor's Guidelines, pursuant to Public Resources Code Section 21187 *et seq*.

### *1. Information to show the project or variant is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature.*

The proposed project or variant is residential, commercial, and retail in nature. As explained above, the proposed project would have approximately 558 dwelling units, 49,999 gross square feet of office floor area, 54,117 gross square feet of retail floor area, and a 14,690-gross-square-foot childcare center, in addition to parking, circulation and loading space, and approximately 236,000 square feet of open space. The project variant would replace the office space with 186 additional dwelling units for a total of 744 units, approximately 48,593 gross square feet of retail space and a 14,650 gross square foot childcare center, with parking, circulation and loading space and open space similar to the proposed project.

The proposed project and variant would demolish a portion of the existing office building and adapt it for residential use. The perimeter of the site is proposed to be developed with 13 new buildings, with all except the Walnut Building containing primarily residential uses (with ground floor retail in some buildings). The Walnut Building, located at the Walnut Street entrance to the project site from California Street, is proposed with office, childcare, and retail uses. The new buildings would front on California Street, Masonic Avenue, Euclid Avenue, and Laurel Street. The variant would construct residential, childcare, and retail uses in a taller Walnut Building, replacing the proposed office use.

Open space would be provided on the site in the form of public plazas and walkways, and as private open space for the use of new residents. A total of approximately 236,000 square feet of open space is included, excluding green roofs. One of the publicly accessible open areas, the proposed Euclid Green, would maintain most of the existing open space along Euclid Avenue to which UCSF has been granting public access (although privately owned).

The site plans for the proposed project and variant are included in **Attachment A**. Several renderings of the proposed project in the existing urban context are shown in **Attachment B**.

[1] Governor's Office of Planning and Research, *Governor's Guidelines for Streamlining Judicial Review under the California Environmental Quality Act Pursuant to AB 900 (Chapter 352, Statutes of 2011)*, available at http://opr.ca.gov/docs/20180103-AB_900_Guidelines_January_2018.pdf. Accessed July 11, 2018.

***2. Information to show that the project or variant, upon completion, will qualify for LEED Gold Certification or better. The Application shall specify those design elements that make the project or variant eligible for LEED Gold Certification, and the Applicant shall submit a binding commitment to delay the project or variant until it receives LEED Gold Certification or better. If, upon completion of construction, LEED Gold Certification or better is delayed as a result of the certification process rather than a project deficiency, the Applicant may petition the Governor to approve project operation pending completion of the LEED certification process.***

The design for the proposed project or variant would meet or exceed current uniform codes, and is created to achieve at the minimum a Leadership in Energy and Environmental Design (LEED) Neighborhood Development (ND) Gold rating. The LEED ND certification has four certification levels that correspond to the number of credits that are achieved in five categories: Smart Location and Linkage (SLL), Neighborhood Pattern and Design (NPD), Green Infrastructure and Buildings (GIB), Innovation (IN), and Regional Priority (RP). The number of points that a project earns within the credits it achieves determines the level of certification that it will receive:

- LEED Certified™: 40-49 points earned
- LEED Silver®: 50-59 points earned
- LEED Gold®: 60-79 points earned
- LEED Platinum®: 80+ points earned.

LEED provides a level of flexibility for projects to choose the credits and project features that will contribute to certification. The proposed project and variant will each integrate low-impact development and transportation demand management, energy efficiency, water conservation, and other green-building practices to achieve a minimum LEED ND Gold certification; however, at the time of submitting this Application, the exact LEED credits that would contribute to the achievement of LEED ND Gold certification (i.e., 60-79 LEED points) have not yet been determined. That said, most or all of the following features will contribute to LEED certification.

In the charts below, "yes" indicates high confidence points and "likely" indicates other anticipated points. Additional points will also be targeted as the design develops to increase confidence in achievement of LEED Gold. The stars (*) indicate prerequisites, which are required for all LEED certifications and carry no points.

## SMART LOCATION AND LINKAGE (SLL)

A proposal earns many conservation and proximity credits by virtue of its location. The project or variant is situated on a previously developed infill site that is served by existing water and wastewater infrastructure and within walking distance of enough full-time equivalent jobs to serve the anticipated number of residents. Additionally, transit access credits are earned through existing service: multiple types of transit service currently serve this site, with numerous trips made daily. All trips are made available to 100% of the proposed dwelling units.

**Smart Location and Linkage – LEED ND v4 Preliminary Checklist**

| Yes | Likely | Prerequisite or Credit | Key Applicable Requirements and Assumptions |
|---|---|---|---|
| * | | Smart Location | Project site is served by existing water/wastewater infrastructure. |
| | * | Imperiled Species and Ecological Communities | No listed endangered species on the project site. |
| * | | Wetland and Water Body Conservation | No wetlands or water bodies on site |
| * | | Agricultural Land Conservation | Project site is an infill site with no agricultural use or zoning designation |
| * | | Floodplain avoidance | Project site is outside flood hazard area based on San Francisco's Preliminary Floodplain Maps. |
| 5 | | Preferred Locations | Project site is an infill site that is also a previously developed site → 5 points.<br>There are only 179 intersections in closest 1 square mile → 0 additional points. |
| 7 | | Access to quality transit | Minimum daily transit service with multiple transit types:<br>Project site has 470 weekday trips total.<br>293 weekend trips from bus lines 1, 2, 3, 43.<br>All trips are available to 100% of dwelling units. |
| 2 | 1 | Housing and Jobs Proximity | Proposal is at least 30% Residential AND is within a 1/2-mile walking distance of enough existing full-time equivalent jobs to serve residents→2 points AND<br>Provide affordable housing meeting various criteria for a minimum of 15 years →1 point |
| 1 | | Site Design for Habitat or Wetland and Water Body Conservation | No significant habitat and no wetland/water bodies on proposed site. |
| **15** | **1** | | |

Source: ARUP, 2018

## NEIGHBORHOOD PATTERN AND DESIGN (NPD)

The proposal's location within a dense, mixed-use neighborhood, as well as its strong internal connectivity, walkability, community connectivity, and integrated parking all contribute to its achievement of numerous Neighborhood Pattern and Design credits. The proposed parking integration strategies contribute to the achievement of the Compact Development, Walkable Streets, and Community Connectivity prerequisites and credits. The existing transit infrastructure and the transportation demand management strategies contribute to the achievement of the Transit Facilities, Transportation Demand Management, and Reduced Parking Footprint credits. The site location and internal connectivity contribute to its achievement of several prerequisites and credits, including the Walkable Streets, Access to Civic and Public Space, Connected and Open Community, Mixed-Use Neighborhoods, and Neighborhood Schools credits. The integrated design approach, which has been highly inclusive of the community, contributes directly to the achievement of the Community Outreach and Involvement credit, but the approach has also indirectly contributed to the majority of credits achieved in this category.

## Neighborhood Planning & Design – LEED ND v4 Preliminary Checklist

| Yes | Likely | Prerequisite or Credit | Key Applicable Requirements and Assumptions |
|---|---|---|---|
| * | | Walkable Streets | 90% of proposed buildings have a functional entry onto the circulation network/public space. At least 15% of the block length of the existing/planned circulation networks within and bordering the project have a minimum building-height-to-street-centerline ratio of 1:1.5 for every 1.5 feet of width from street centerline to building façade. The proposal provides continuous sidewalks or equivalent all-weather routes for walking along both sides of 90% of the circulation network block length within the project. No more than 20% of the block length of the circulation network within the proposal is faced directly by garage and service bay openings. |
| * | | Compact Development | The proposal includes 54.7 dwelling units per acre of buildable land are available for residential uses, well over the 12 required and a floor-area ratio of 1.8 for non-residential components. |
| * | | Connected and Open Community | Proposal includes over 140 intersections per square mile and 13 internal intersections. No more than 10% of the project area may be accessed via gated circulation network.<br>The proposal includes more than one through-connection that terminates at the project boundary and intersects the circulation network. These connections are approximately 400' between entries |
| 5 | 2 | Walkable Streets | Proposal includes a high total linear distance of building façades that face the circulation network, with high ground-level window and door percentages, parking, and safe pedestrian and bicycle travel lanes. |
| 4 | | Compact Development | The residential density per acre of the proposed project is 54.7, which is between the 38 and 63 thresholds. |
| 4 | | Mixed-Use Neighborhoods | 100% of proposed units are within a ¼-mile walk of >23 uses. |
| 4 | 2 | Housing Types and Affordability | Proposal includes many different housing types of diverse sizes and 12% of housing priced up to 120% of area median income. |
| | 1 | Reduced Parking Footprint | Proposed project includes no new off-street surface parking lots and provides preferred parking for carpool or shared-use vehicle parking space that is equivalent to at least 10% of the total off-street parking space for each nonresidential and mixed-use building on the site. |
| 2 | | Connected and Open Community | Proposed site has 805 intersections within 1 square mile → 2 points |
| | 1 | Transit Facilities | Proposed site includes existing transit agency-approved shelters that meet minimum LEED criteria at existing stops. |
| | 1 | Transportation Demand Management | Proposed project will include unbundled parking and will likely include vehicle sharing → 1 Point |
| 1 | | Access to Civic & Public Space | 90% of planned dwelling units and nonresidential entrances within a ¼-mile walk of at least one civic and passive use space. |
| 1 | | Access to Recreation Facilities | 90% of planned dwelling units in the proposed project are located within a ½-mile walking distance of a publicly accessible indoor recreational facility of at least 25,000 square feet. |
| | 1 | Visitability and Universal Design | Proposal will likely include a minimum of 20% of units with one of: 1) Universal Design Throughout the Home; 2) Universal Design Kitchen Features; 3) Universal Design Bedroom and Bathroom Features. |
| 2 | | Community Outreach and Involvement | Community has been included in predesign, preliminary design, and ongoing communication<br>Proposal has obtained endorsement from local NGOs, including the Housing Action Coalition and the San Francisco Bay Area Planning and Urban Research Association (SPUR) |
| 1 | 2 | Local Food Production | Proposal includes ample landscaped space, some of which has been allocated for food production → 1 Point<br>Tenants in proposal may enroll in CSA programs → 1 Point<br>Proposal is less than ½ mile to Kaiser Farmer's Market → 1 Point |

| | | | |
|---|---|---|---|
| 2 | | Tree-Lined and Shaded Streetscapes | Proposal provides trees at intervals of no more than 50 feet along at least 60% of the total existing and planned block length within the project → 1Point<br>Proposal provides shade from trees or permanent structures over at least 40% of the total length of existing and planned sidewalks within or bordering the project → 1Point |
| 1 | | Neighborhood Schools | Proposed project at least 30% residential, AND at least 50% of the proposed units are within a 1/2-mile walk of the entry of an existing or new elementary or middle school or within a 1-mile walk of the entry of an existing or new high school. |
| | | | |
| **27** | **10** | | |

Source: ARUP, 2018

## GREEN INFRASTRUCTURE AND BUILDINGS (GIB)

Water credits are achieved through the integration of ultra-low flow fixtures in residential restrooms and non-potable water reuse strategies, which reduce indoor water use by at least 40 percent from baseline. Outdoor water use reductions are achieved through the use of native/adapted plant species and minimal turf grass. Energy performance credits are achieved through optimized orientation and massing strategies, high-performance mechanical equipment, and on-site renewable energy production, which collectively reduce building energy by an estimated average of 20% from baseline. Materials credits are achieved through the partial reuse of the existing building on site and a detailed and progressive solid waste management strategy.

**Green Infrastructure and Buildings – LEED ND v4 Preliminary Checklist**

| Yes | Likely | Prerequisite or Credit | Key Applicable Requirements and Assumptions |
|---|---|---|---|
| * | | Certified Green Building | The proposal includes one building to be certified under LEED-BD+C. |
| * | | Minimum Building Energy Performance | Each building in the proposal performs well above the required 5% modeled energy savings compared to baseline (ASHRAE 90.1 2010). |
| * | | Indoor Water Use Reduction | The proposal reduces indoor water usage by an estimated average of 20% from baseline. |
| * | | Construction Activity Pollution Prevention | The proposal includes an erosion and sedimentation control plan. |
| | 1 | Certified Green Buildings | The proposal anticipates that one building will be certified, which account for more than 10% and less than 20% of the total floor area. |
| | 2 | Optimize Building Energy Performance | Whole building energy simulation of the proposal shows an average estimated improvement of 20% over baseline. |
| | 1 | Indoor Water Use Reduction | The proposal integrates water reuse for flushing, which reduces indoor water usage by an average of 40% from baseline. |
| 1 | 1 | Outdoor Water Use Reduction | The proposal integrates the extensive use of native/adapted plants to achieve an estimated 50% reduction in outdoor water use versus baseline. |
| 1 | | Building Reuse (50% of 1) | The proposal retains 59% of the floor plate of the main existing building. |
| 1 | | Heat Island Reduction | The proposal includes both cool and vegetated roofs to reduce heat island effect. |
| 1 | | Solar Orientation | The project site has favorable solar orientation, with a longer east-west than north-south axis. |

| | | | |
|---|---|---|---|
| | 3 | Renewable Energy Production | The proposed photovoltaic panels will reduce annual electrical and thermal energy production costs by approximately 20%. |
| 1 | | Solid Waste Management | The proposal integrates several progressive solid waste management strategies that far exceed the requirements for this credit. |
| | 1 | Light Pollution Reduction | Various requirements including full cutoff fixtures in circulation areas |
| **5** | **9** | | |

Source: ARUP 2018

***3. Information to show the project or variant will achieve at least 15 percent greater transportation efficiency, as defined in Public Resources Code section 21180(c), than comparable projects. The Applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the proposed project will achieve at least 15 percent greater transportation efficiency. For residential projects, the Applicant shall also submit information demonstrating that the number of vehicle trips by residents divided by the number of residents is 15 percent more efficient than for comparable projects. For the purpose of this provision, comparable means a project of the same size, capacity, and location type.***

The *AB 900 Transportation Assessment* for the 333 California Street Project, dated July 2018, provides detailed trip generation calculations and other information about the proposed project and project variant as well as a comparison with vehicle trips generated by a comparable project. The *AB900 Transportation Assessment* is attached to this Application as **Attachment C, Transportation Efficiency**, and is summarized here.

The proposed project or project variant would replace the existing office building, the existing 212- space partially below-grade garage and 331 surface parking spaces, and the annex building at the corner of California Street and Laurel Street with a primarily residential mixed-use development on the project site. The proposed project and variant each include a mix of neighborhood-serving commercial uses (day care and retail) that would provide convenient local destinations for the development project's residents without having to drive to other locations. The proposed project also includes office space that could serve project residents as well as other residents in the neighborhood. Office space is not included in the project variant.

The project site is located close to pedestrian networks and bicycle facilities, major transit services, and a diversity of land uses. The project site is in a highly-walkable area of San Francisco with an established pedestrian network. All nearby streets have sidewalks, and crosswalks are well marked. The proposed project and project variant both would improve pedestrian facilities by widening the existing 10-foot-wide sidewalks on Presidio Avenue and Masonic Avenue (adjacent to the project site) to meet the 15-foot recommended width identified in the San Francisco Better Streets Plan.[2] The existing sidewalks on Euclid Avenue (10.5 feet wide) and Laurel Street (10 feet wide) would be widened to meet the 12-foot minimum width identified in the Better Streets Plan. The proposed project and project variant both include other streetscape changes as part of a series of proposed improvements resulting in changes to the intersections of Presidio Avenue/Masonic Avenue/Pine Street, Masonic Avenue/Euclid Avenue, and Mayfair Drive/Laurel Street to enhance pedestrian safety. There are striped bicycle lanes in nearby streets on Arguello Boulevard from Washington Street in the Presidio to John F. Kennedy Drive in Golden Gate Park; on Euclid Avenue from Arguello Boulevard to Masonic Avenue and connecting to the signed route on Presidio Avenue that runs north-south between Lincoln Boulevard in the Presidio and Page Street via

[2] San Francisco Planning Department, San Francisco Better Streets Plan, January 2011, http://www.sf-planning.org/ftp/BetterStreets/proposals.htm#Final_Plan, accessed July 27, 2018.

Masonic Avenue; and on Post Street from Presidio Avenue to Steiner Street and continuing as a signed route to Market Street in downtown San Francisco.

The proposed project and variant are close to major transit services. The San Francisco Municipal Railway (Muni) operates ten bus routes with stops located within one half mile of the project site (1 California, 1BX California 'B' Express, 2 Clement, 3 Jackson, 31BX Balboa 'B' Express, 33 Ashbury-18th, 38 Geary, 38BX Geary 'B' Express, 38R Geary Rapid, and 43 Masonic). Bus stops are located adjacent to the project site and across the street at nearby corners on California Street, and on Walnut Street north of California Street. All are less than one block from the project site.

The project site is also served indirectly by a network of regional transportation facilities that provide access to the greater Bay Area. Regional transit provides service to the East Bay via Bay Area Regional Transit (BART) commuter rail service, Alameda-Contra Costa Transit buses, and Water Emergency Transportation Authority ferries; service to the North Bay via Golden Gate Transit buses and ferries; and service to the Peninsula/South Bay via Caltrain commuter rail, BART, and San Mateo County Transit buses. Regional transit services are generally not within walking distance of the project site, but can be reached by bicycle or from various Muni lines. The project site is also served by Chariot, a private commuter shuttle.

## PROJECT AND VARIANT TRIP GENERATION

The proposed development project, with 558 residential units, 49,999 gross square feet of office space, 54,117 gross square feet of retail space, a child care center, and 895 off-street vehicle parking spaces,[3] would generate 16,462 daily person trips by residents, employees, and visitors to the project site. The calculations of person trips accounts for existing activity on the site by current occupants, and also accounts for internal trip capture. Internalization is dependent on the quantity and mix of uses as well as the varying levels of activity they generate at various times of day. As a result, the internalization percentage is different for each scenario and time period. These internal trips begin and end on the project site and would not be made by automobile but by walking and bicycling. Approximately 17.6 percent of the trips generated by the proposed project would be internal to the project site in the a.m. peak hour, and 18.9 percent would be internal in the p.m. peak hour. The proposed project would generate approximately 5,760 daily vehicle trips external to the project site, with 691 weekday a.m. peak hour vehicle trips, and 752 weekday p.m. peak hour vehicle trips.

The project variant would have the same land uses as the proposed project, with the exception that the 49,999 square feet of office space would not be included and in its place an additional 186 residential units would be constructed, for a total of 744 dwelling units on the site. In addition, the retail and child care spaces would be slightly reduced. With the additional residential units but reduced commercial space, there would be 971 off-street vehicle parking spaces. The project variant would generate approximately 16,171 daily person trips by residents, employees, and visitors. Approximately 19 percent of the trips would be internal to the project site in the a.m. peak hour and approximately 19.2 percent would be internal to the site in the p.m. peak hour. The project variant would result in approximately 5,744 daily vehicle trips external to the project site, with 726 a.m. weekday peak hour vehicle trips, and 804 weekday p.m. peak hour vehicle trips.

Both the proposed project and project variant include bicycle parking in the amounts required in the San Francisco Planning Code. The proposed project includes 592 class 1 secure bicycle parking spaces for residents and employees and 101 class 2 bicycle parking spaces in bike racks for public use. The project

[3] Note that for both the proposed project and the project variant, 60 of these parking spaces would replace 60 existing parking spaces on the site that are available for public parking on a paid hourly basis.

variant includes 768 class 1 secure bicycle parking spaces and 122 class 2 bicycle parking spaces in bike racks.

## COMPARABLE PROJECT TRIP GENERATION

To analyze the transportation efficiency of the proposed and variant projects, the projects' vehicle trip generation was examined against that of comparable developments. The comparable project is assumed to be a project with similar land uses as the proposed project but with vehicle trip generation that is more typical of national averages. In addition to the same numbers of residential units and a childcare center, the comparable project includes a low-rise shopping center, a donut shop, and a quality restaurant to make its land uses similar to the retail uses in the proposed project and project variant, and includes general office space in the same amount as in the proposed project. The comparable development's vehicle trip generation was calculated using the standard national reference, the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*.[4] The comparable project has the same land uses and quantities (size/number of units) as the proposed project and project variant, but may not have the same characteristics as the proposed project and project variant that would lead to trip reductions, such as an urban location near transit on an infill site.

The comparable project that corresponds to the proposed project would generate 13,532 total daily vehicle trips, including 1,374 total vehicle trips in the weekday AM peak hour and 975 total vehicle trips in the weekday PM peak hour. The comparable project that corresponds to the project variant would generate 13,847 total daily vehicle trips, including 1,350 total weekday a.m. peak hour vehicle trips and 962 total weekday p.m. peak hour vehicle trips.

## VEHICLE MILES TRAVELED

In addition to vehicle trip generation, there are other factors related to vehicular travel. These factors include housing density, diversity of land uses, design of the transportation network, and distance to high-quality transit, among others. Typically, low-density development at greater distances from other land uses and located in areas with poor access to transit generates more automobile travel and higher vehicle miles traveled (VMT) than development in urban areas with higher densities, a greater mix of land uses, and more travel options than private automobiles. San Francisco has a lower average VMT traveled ratio than the San Francisco Bay Area region, because it has higher residential densities, is well-served by transit and other travel modes such as the bicycle network, and has multiple neighborhood-serving commercial areas.

The project site is located in transportation analysis zone (TAZ) 709, which is close to transit services and bicycle and pedestrian networks, and has a diversity of land uses. Therefore, a project located in TAZ 709 has substantially reduced vehicle trips and shorter vehicle distances, and thus reduced VMT per capita and per employee, compared to other areas of the region. The average daily VMT per capita for residential uses in TAZ 709 is 7.3 miles, which is approximately 58% below the regional average daily VMT per capita of 17.2 miles. Additionally, the average daily VMT per employee for office uses in TAZ 709 is 10.1 miles, which is approximately 47% below the regional average daily VMT per employee of 19.1 miles. The average daily VMT per employee for retail uses in TAZ 709 is 8.3 miles, which is approximately 44% below the regional average daily VMT per employee of 14.9 miles.

## TRANSPORTATION DEMAND MANAGEMENT (TDM) PROGRAM

The project sponsor will be required to implement a Transportation Demand Management (TDM) Program to encourage the use of non-auto modes and reduce vehicle trips, pursuant to San Francisco

[4] *Trip Generation Manual 10th Edition.* Institute of Transportation Engineers, 2017.

Planning Code section 169. The measures in the project's TDM Program would reduce vehicle trips generated by the proposed project or project variant; however, they have not been taken into account in calculating trip generation for the proposed project or project variant and therefore are not reflected in the comparison with the comparable project.

The project sponsor currently proposes the following TDM measures. These measures are subject to revision during the planning review process for project entitlements.

- **Improve Walking Conditions (TDM Measure Active-1A)**: Streetscape improvements proposed along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue and Laurel Street will be consistent with the Better Streets Plan. The proposed Mayfair and Walnut walks are intended to integrate the 10-acre site with the existing pedestrian network.
- **Bicycle Parking (TDM Measure Active-2)**: Bicycle parking would be provided for residential, office, and retail uses. For residential uses the project will provide the required class 1 secure space for each dwelling unit and two class 2 spaces for every 20 units. The number of spaces provided for office, childcare, and retail uses will comply with the San Francisco Planning Code.
- **Showers and Lockers (TDM Measure Active-3)**: At least one shower and at least six clothes lockers will be provided for every 30 class 1 bicycle parking spaces. The number of showers and clothes lockers will meet San Francisco Planning Code requirements.
- **Bicycle Repair Station (TDM Measure Active-5)**: A bicycle repair station, with tools and supplies such as a bicycle pump and wrenches, is proposed on the project site.
- **Car Share Parking (TDM Measure Cshare-1)**: Ten car share spaces will be provided in Basement Level B3 of the California Street Garage in accordance with the San Francisco Planning Code.
- **Delivery Supportive Amenities (TDM Measure Delivery-1)**: An area for the receipt and temporary storage of package deliveries will be provided in the off-street loading areas or other location on the project site.
- **Onsite Childcare (TDM Measure Family-2)**: An onsite childcare facility in the Walnut Building is part of the proposed project or project variant.
- **Multimodal Wayfinding Signage (TDM Measure Info-1)**: Multimodal wayfinding signage that directs tenants, residents, visitors, and employees to nearby transportation services will be provided. Signage will comply with San Francisco standards.
- **Real Time Information Displays (TDM Measure Info-2)**: Real time information displays (showing information about transit lines, walk time to transit locations, or the location of onsite car share vehicles, for example) will be provided in prominent locations on the project site.
- **Tailored Transportation Marketing (TDM Measure Info-3)**: Individualized, tailored marketing and communication campaigns regarding sustainable transportation modes will be implemented. A TDM coordinator will manage these marketing services, to include promotions and welcome packets with information about transportation options. Personal consultations will be offered to new residents and retail employees along with a request for a commitment to try sustainable transportation options.
- **Unbundle Parking (TDM Measure Pkg-1)**: All accessory parking for the proposed project will be leased or sold separately from the rental or purchase fees.

Based on the analysis included in the TDM Technical Justification Memo,[5] prepared by various San Francisco city agencies in support of the TDM ordinance, measures from the TDM Program such as improving walking conditions could reduce VMT by up to two percent, and unbundled parking could reduce VMT by up to 4.5 percent. As such, implementation of the proposed TDM package would result in a further reduction in vehicle trips to and from the site.

## TRIP GENERATION AND VMT COMPARISON SUMMARY

To compare the overall trip generation of the proposed project and project variant to the comparable project, the trip generation estimates for the proposed project and project variant were adjusted to account for existing uses and internal trips. The resulting vehicle-trip generation estimates were then compared to the trip generation estimates for the comparable project.

As shown in the following tables both the proposed project and the project variant would result in a decrease in vehicle trip generation compared to the respective comparable project. Table 1, Trip Generation Comparison for Proposed Project, shows that the proposed project would generate 7,772 fewer daily vehicle trips than the respective comparable project. This equates to a 57 percent decrease in daily vehicle trips, a 50 percent decrease in weekday a.m. peak hour vehicle trips, and a 23 percent decrease in weekday p.m. peak hour vehicle trips.

**Table 1: Trip Generation Comparison for Proposed Project**

| Project | Land Use | Size | Total Daily Trips | Weekday AM Peak Hour Total (In and Out) | Weekday PM Peak Hour Total (In and Out) |
|---|---|---|---|---|---|
| Comparable Development | Residential | 558 units | 13,532 | 1,374 | 975 |
| | Retail/ Childcare | 68,807 gsf | | | |
| | Office | 49,999 gsf | | | |
| Proposed Project | Residential | 558 units | 5760 | 689 | 751 |
| | Retail/Childcare | 68,807 gsf | | | |
| | Office | 49,999 gsf | | | |
| | **Vehicle Trip Decrease** | -- | **7,772** | **685** | **224** |
| | **Percent Decrease** | | **57%** | **50%** | **23%** |

*Source:* ITE Trip Generation Manual, 10th Edition; Kittelson & Associates, Inc., 2018

As shown in Table 2: Trip Generation Comparison for Project Variant, it is estimated that there would be 8,103 fewer daily vehicle trips generated compared to the comparable project, which corresponds to a 59 percent decrease in daily vehicle trips, a 46 percent decrease in weekday AM peak hour vehicle trips, and a 16 percent decrease in weekday PM peak hour vehicle trips.

In comparison to the regional average daily VMT per capita/employee, as discussed above, the average daily VMT per capita within TAZ 709 for residential, office, and retail uses is 58 percent, 47 percent, and 44 percent lower, respectively, when compared to the regional averages. This shows that, for both the proposed project and the project variant, there is expected to be lower than average daily VMT when compared to the regional average daily VMT, substantially more than a 15 percent reduction.

[5] City and County of San Francisco, *Transportation Demand Management Technical Justification*, Appendix B, January 2018. Available online at http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification_update2018.pdf, accessed July 27, 2018

**Table 2: Trip Generation Comparison for Project Variant**

| Project | Land Use | Size | Total Daily Trips | Weekday AM Peak Hour Total (In and Out) | Weekday PM Peak Hour Total (In and Out) |
|---|---|---|---|---|---|
| Comparable Development | Residential | 744 units | 13,847 | 1,350 | 962 |
| | Retail/ Childcare | 63,243 gsf | | | |
| Project Variant | Residential | 744 units | 5,744 | 726 | 804 |
| | Retail/ Childcare | 63,243 gsf | | | |
| | **Vehicle Trip Decrease** | -- | **8,103** | **624** | **158** |
| | **Percent Decrease** | | **59%** | **46%** | **16%** |

*Source:* ITE Trip Generation Manual, 10th Edition; Kittelson & Associates, Inc., 2018

## CONCLUSION

The combined effects of the project's urban infill location along a major transit corridor that is close to transit, bicycle, and pedestrian amenities would reduce the anticipated daily vehicular trip generation estimates by approximately 57 percent (project) or 59 percent (variant) as compared to a comparable mixed-use project. Therefore, the proposed project or project variant would exceed the 15 percent greater transportation efficiency threshold for an Environmental Leadership Development Project. Implementation of the TDM Program will enhance the transportation efficiency even more.

### *4. Information to show that the project is located on an infill site as defined at Public Resources Code Section 21061.3, and in an urbanized area, as defined at Public Resources Code Section 21071.*

The project site is located in San Francisco on an infill site surrounded by existing residential, commercial, and institutional development. An infill site is defined in Public Resources Code section 21061.3 as a site that "has been previously developed for qualified urban uses." A "qualified urban use" is defined in Public Resources Code section 21072 as "any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses." The project site meets this definition as it is currently a commercial office use and a public institutional use occupied by the University of California, San Francisco, with associated parking and landscaping.

The project site is located in an urbanized area as defined in Public Resources Code section 21071, as it is in "an incorporated city" that has a population of at least 100,000 persons. The City and County of San Francisco is an incorporated city that has an estimated population of 884,363 according to the 2017 estimates prepared by the United States Census Bureau.

Thus, the proposed project and variant would be an urban infill development because it is located on an infill site previously developed with a qualified urban use in an urbanized area.

***5. Information required by Public Resources Code section 21180(b)(1) is available for projects within a metropolitan planning organization for which a sustainable communities strategy or alternate planning strategy is in effect. For the purposes of this provision, "in effect" means that the sustainable communities strategy or the alternative planning strategy has been adopted by the metropolitan planning organization, and that the Air Resources Board has accepted the metropolitan planning organization's determination that the sustainable communities strategy or alternative planning strategy meets the adopted greenhouse gas reduction targets and is not the subject of judicial challenge.***

Senate Bill (SB) 375 was adopted by the legislature in August 2008 and signed into law by the Governor in September 2008. This legislation links regional planning for housing and transportation with the greenhouse gas (GHG) reduction goals in Assembly Bill 32. Each Metropolitan Planning Organization is required to adopt a Sustainable Communities Strategy to encourage compact land development to reduce passenger vehicle miles traveled and vehicle trips so that the region will meet targets established by the California Air Resources Board (CARB) for reducing GHG emissions. In September 2010, the CARB adopted regional GHG targets for passenger vehicles and light trucks for the years 2020 and 2035 for the various Municipal Planning Organizations in California. Two climate protection targets were established for the San Francisco Bay Area by the CARB: a per capita reduction of GHG emissions by 7 percent by year 2020 and 15 percent by year 2035.[6]

The project is within the jurisdiction of the Association of Bay Area Governments (ABAG). ABAG and the Metropolitan Transportation Commission (MTC) published the draft Plan Bay Area, the region's proposed Regional Transportation Plan/Sustainable Communities Strategy, in 2010. ABAG and MTC adopted the final Sustainable Communities Strategy in 2013 and submitted the final Plan Bay Area, containing the final Sustainable Communities Strategy, to the CARB in early 2014. The supporting documentation for the Sustainable Communities Strategy shows that the Plan would accomplish a 10 percent per capita carbon dioxide emissions reduction from passenger vehicles by 2020 and a 16 percent per capita reduction by 2035. CARB Executive Order G-14-028, approved in April 2014, indicated that the CARB accepted ABAG's quantification of GHG emissions from the Sustainable Communities Strategy and determined that if implemented, Plan Bay Area would achieve the established reduction targets in compliance with SB 375. Plan Bay Area was challenged in court in 2014 in multiple actions; each of the challenges has either been settled or the Plan was upheld in the courts.

More recently, MTC and ABAG prepared and adopted Plan Bay Area 2040 in July 2017, containing updates to the original Plan Bay Area based on new forecasts of regional population and employment growth and distribution using upgraded models, and on adjusted approaches to some GHG reduction strategies based on surveys of their effectiveness. The basic land use and transportation strategies from the 2013 Sustainable Communities Strategy remain, promoting infill development with higher densities and more multi-family housing in mixed-use communities focused on neighborhoods with transit. Transportation strategies focus on enhancing transit and improving roadways, with more high-occupancy vehicle lanes and toll lanes.

Plan Bay Area 2040 would exceed the GHG emissions target established by the CARB in 2010, achieving a 16 percent reduction by the year 2035 and an 18 percent reduction in emissions between 2005 and 2040,

[6] In March 2018 CARB adopted updated targets for ABAG/MTC that will be applicable beginning in October 2018. These new targets are a per capita reduction in GHG emissions of 10 percent by year 2020 and 19 percent by 2025. SB 375 Regional Greenhouse Gas Emissions Reduction Targets, CARB Resolution 18-12, adopted March 22, 2018. Resolution is available at https://www.arb.ca.gov/cc/sb375/finalres18-12.pdf. Updated targets are available at https://www.arb.ca.gov/cc/sb375/finaltargets2018.pdf.

according to the *Performance Assessment Report* for Plan Bay Area 2040, published by ABAG and MTC in July 2017 [p. 11]. The CARB staff reviewed Plan Bay Area 2040 and approved a technical evaluation of the GHG reduction quantifications in June 2018.[7]

Plan Bay Area focuses on where the region is expected to grow and what transportation investments will support that growth. It encourages infill development and multifamily development particularly close to public transit and in walkable neighborhoods. The proposed project or variant, once approved, will be consistent with the "general use designation, density, building intensity, and applicable policies specified for the project area in …a sustainable communities strategy" as required in Public Resources Code section 21180(b)(1). The development program provides for reasonable-density infill development in a transit priority area as defined in Public Resources Code Section 21099(a)(7). Although the project site is not in a Priority Development Area designated in Plan Bay Area 2040, it fulfills many of the strategies contained in the plan, as the site is located in a mixed-use neighborhood with retail, restaurant, childcare and other community services that will encourage residents to walk or bicycle to nearby services. The project or project variant will include retail space and a childcare center on the site that will further reduce automobile travel generated.

***6. If the project is a multi-family residential project, evidence that (1) private vehicle parking spaces are priced and rented or purchased separately from dwelling units; or (2) the dwelling units are subject to affordability restrictions that prescribe rent or sale prices, and the cost of parking spaces cannot be unbundled from the cost of dwelling units.***

The project or variant proposes to provide unbundled parking for all residential units except for any dwelling units subject to affordability restrictions that prescribe rent or sale prices and for which the cost of parking spaces cannot be unbundled from the cost of the affordable dwelling units.

***7. Information establishing that the project entails a minimum investment of $100 million in California through the time of completion of construction.***

The proposed project includes 558 residential units in addition to office, retail and childcare space and subsurface parking. The project variant includes 744 residential units in addition to retail and childcare space and subsurface parking. The project or variant will have expended over $175 million in construction costs by the time construction is completed, according to the estimate presented in the Applicant's Environmental Evaluation Application to the San Francisco Planning Department in March 2016. In addition, with a range of approximately 75 to 175 construction workers on the site on a typical day during construction, based on current prevailing wages, construction labor costs alone could be approximately $150 to $175 million. Thus, the project or variant will exceed the minimum investment of $100 million by the time of completion of construction.

***8. Information establishing that the prevailing and living wage requirements of Public Resources Code section 21183(b) will be satisfied.***

Public Resources Code section 21183(b) requires that a project to be certified by the Governor must create "high-wage, highly skilled jobs that pay prevailing wages for construction jobs and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment." Up to 75 to 175 construction workers would be on the project site on a typical day during the approximately 7-year construction period estimated for the proposed project or variant.

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[7] California Air Resources Board staff, *Technical Evaluation of the Greenhouse Gas Reduction Quantification for the Association of Bay Area Government's and Metropolitan Transportation Commission's SB375 2017 Sustainable Communities Strategy, June 2018. Available at* http://www.arb.ca.gov/cc/sb375/sb375.htm Accessed on August 3, 2018.

Public Resources Code section 21183(b) defines "jobs that pay prevailing wages" as "all construction workers employed in the execution of the project will receive at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code." The Applicant will include the prevailing wage requirement in all construction contracts.

The proposed project or variant will create high-wage, highly skilled jobs, both during construction and during operation. Approximately 395 permanent jobs would be created with the proposed project, and approximately 206 permanent jobs would be created by the project variant. In addition to the prevailing wage requirements for construction workers, the Applicant will be required to comply with local ordinances that require payment of living wages. Chapter 12R of the San Francisco Administrative Code requires payment of a minimum wage that is higher than that required by the State of California. As of July 1, 2018, the minimum wage in San Francisco is $15.00 per hour, substantially higher than the California minimum wage of $11.00 per hour in 2018. The San Francisco ordinance provides for annual increases in July of each year after 2018 based on the Consumer Price Index for urban wage earners for the San Francisco-Oakland-San Jose, California metropolitan statistical area. The requirements of Chapter 12R are not applicable to employees who are covered by a collective bargaining agreement if the agreement expressly waives the ordinance's requirements. A copy of Chapter 12R is presented in **Attachment D** to this Application, along with a copy of the California Department of Industrial Relations' letter approving the San Francisco Office of Labor Standards Enforcement's Labor Compliance Program.

### *9. Information establishing that the project will not result in any net additional greenhouse gas emissions. This information is subject to a determination signed by the Executive Officer of the Air Resources Board that the project does not result in any net additional greenhouse gas emissions, following the procedures set forth in section 6 of the Governor's Guidelines.*

The California Air Resources Board (CARB) must review the analysis of greenhouse gas emissions (GHG) from construction and operation of the proposed project or project variant. The analysis should include the technical basis for characterizing and analyzing GHG emissions and for identifying and quantifying the GHG reduction potential of proposed strategies to fully offset any GHG emissions generated by a proposed project. A Memorandum prepared by Ramboll presents the technical methodology for and results of quantifying the GHG emissions from the existing activities on the project site and the GHG emissions from construction and operation of the proposed project or project variant. The Memorandum and its Appendix materials are in **Attachment E**.

The baseline for the analysis of the proposed project and project variant is the emissions from existing activities on the project site. Project-generated emissions were calculated yearly during construction phases, with operation of earlier phases overlapping with later construction phases. Construction was assumed to occur over a 7-year period; however, the applicant may choose to develop the project site over a timeframe of up to 15 years. The calculations assume a seven-year timeframe to present the most conservative approach to the analysis with the most concentrated emissions. Operational emissions were calculated for 2020 through 2057 to account for an approximately 30-year lifespan of the project following buildout.

Total construction emissions of GHG would be 4,273 metric tons (MT) of $CO_2e$ for both the proposed project and project variant. Total operational emissions would be 3,703 MT for the proposed project and 6,235 MT for the project variant. Total gross operational emissions for the lifetime of the proposed project or project variant do not include any credits from years where existing emissions were calculated to be higher than those from the proposed project or the project variant. By 2038 for the proposed project

and by 2044 for the project variant, with anticipated reductions from the California Renewables Portfolio Standard and fleet turnover, operational emissions of the proposed project or project variant would be below existing emissions.

To offset GHG emissions from construction in 2020 through 2027 and from operation in 2026 through 2037 for the proposed project or through 2044 for the project variant, the project sponsor commits to measures to ensure there would be no net additional GHG emissions from the project or project variant. This would be achieved through on-site measures such as installing additional solar panels, additional on-site electric vehicle charging stations, or through the purchase of qualified GHG credits, or a combination of on-site measures and credits.

### *10. Information establishing that the project will comply with the requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with Public Resources Code section 42649) and 12.9 (commencing with Public Resources Code Section 42649.8), as applicable.*

California has had statutory and regulatory requirements related to solid waste recycling for well over 10 years requiring local governments to reduce solid waste in landfills with waste diversion programs. The two more recent statutes, in Chapters 12.8 and 12.9 of Division 30 of the Public Resources Code related to waste management, require recycling of solid waste and organic waste. Chapter 12.8 requires that businesses and multi-family residential buildings with five units or more that generate more than four cubic yards of solid waste per week source separate its solid waste and subscribe to some kind of recycling service consistent with local ordinances or state regulations. Chapter 12.9 requires that businesses generating over specified amounts of organic solid waste per week arrange for recycling services for that organic solid waste, and also requires that if the state has not reached a reduction of 50 percent below the 2014 level of disposal of organic waste by 2020, businesses that generate more than two cubic yards of solid waste per week must source separate and arrange for recycling of organic solid waste. These statutes also require local jurisdictions to establish a commercial solid waste recycling program if it did not already have one as of July 2012, and an organic solid waste recycling program by January 2016 if it did not already have one.

The proposed project or variant will be subject to these statutory requirements, and will comply by following all of the requirements of San Francisco's local recycling and composting ordinances.

San Francisco's Mandatory Recycling and Composting Ordinance (No. 100-09) in Chapter 19 of the San Francisco Environment Code is a local municipal ordinance requiring all persons located in San Francisco to separate their recyclables, compostable and landfilled trash and to participate in recycling and composting programs. The Applicant has included appropriate recycling and composting collection facilities in the design of each building and in the overall site design so that these materials can be easily disposed of by residents and employees and easily collected by the various solid waste collection and disposal companies that serve the project site.

Demolition and construction of the proposed project would generate an estimated 47,000 cubic yards of debris, and an estimated 241,300 net cubic yards of soil from excavation of the site. The San Francisco Construction and Demolition Debris Recovery Ordinance (No. 27-06), Chapter 14 in the San Francisco Environment Code, requires that substantial amounts of construction and demolition debris material removed from a project must be recycled or reused. All demolition and construction debris must be transported by a registered transporter and processed by a registered facility. The processing facility must divert a minimum of 65 percent of total waste received from landfills, including materials separated for reuse and recycling. No construction and demolition debris can be taken to landfill or put in the garbage, according to San Francisco Health Code Section 288. Copies of these local ordinances are provided in **Attachment F**.

Thus, the Applicant will be required to comply not only with the Public Resources Code requirements for commercial and organic waste recycling, but also with the requirements of San Francisco's local ordinances requiring recycling and composting solid waste both during construction and during operation of the proposed project or variant.

***11. Information documenting a binding agreement between the project proponent and the lead agency establishing the requirements set forth in Public Resources Code section 21183(e) (all mitigation measures will be conditions of approval and enforceable, and environmental mitigation measures will be monitored and enforced for the life of the obligation), (f) applicant will pay costs for hearing by Court of Appeal, and (g) (applicant will pay costs of preparing the record of proceedings).***

Written acknowledgement from the project sponsor containing commitments regarding Public Resources Code sections 21183(e)(f) and (g) is included as **Attachment G.** The Applicant is committed to comply with all Mitigation Monitoring and Reporting Program measures from the EIR that are included as conditions of approval and that those conditions will be fully enforceable by the San Francisco Planning Department, Department of Building Inspection, Health Department, and/or the Department of the Environment. The Applicant agrees to pay the costs for hearing by the Court of Appeal, and will pay the costs of preparing the record of proceedings.

# REFERENCES

Association of Bay Area Governments/Metropolitan Transportation Commission, *Performance Assessment Report, Plan Bay Area 2040*, July 2017.

California Air Resources Board, Executive Order G-14-028, April 10, 2014.

California Air Resources Board, Resolution 18-12, March 18, 2018.

California Air Resources Board, SB375 Regional Greenhouse Gas Emissions Reduction Targets.

California Air Resources Board, *Technical Evaluation of the Greenhouse Gas Reduction Quantification for the Association of Bay Area Government's and Metropolitan Transportation Commission's SB375 2017 Sustainable Communities Strategy, June 2018.*

Environmental Evaluation Application, 3333 California Street, submitted to San Francisco Planning Department by The Prado Group on March 29, 2016.

City and County of San Francisco, *Transportation Demand Management Technical Justification*, Appendix B, January 2018.

Institute of Transportation Engineers, *Trip Generation Manual, 10th edition*, 2017.

Office of Planning and Research, *Governor's Guide for Streamlining Judicial Review under the California Environmental Quality Act Pursuant to AB900*, January 2018.

San Francisco Planning Department, *Better Streets Plan*, January 2011.

Attachment 3

Operation of the proposed new land uses, which are typical urban land uses, are not anticipated to create significant sources of new odors. Thus, odors would not be expected to occur as a result of the operation of the proposed project or project variant.

Therefore, odor impacts related to the construction and operation of the proposed project or project variant would be less than significant, and no mitigation measures are necessary. This topic will not be discussed in the EIR.

**Impact C-AQ-1: The proposed project or project variant, in combination with past, present, and reasonably foreseeable future projects, could contribute to cumulative air quality impacts. (*Potentially Significant*)**

The construction and operational emissions discussed above would be evaluated at a project level. Air quality impacts associated with the proposed project or project variant could substantially contribute to cumulative impacts. For these reasons, the proposed project or project variant, in combination with other past, present, and reasonably foreseeable future projects, could result in a cumulatively considerable air quality impact. Therefore, potential cumulative air quality impacts will be addressed in the EIR.

| *Topics:* | *Potentially Significant Impact* | *Less Than Significant with Mitigation Incorporated* | *Less Than Significant Impact* | *No Impact* | *Not Applicable* |
|---|---|---|---|---|---|
| 7. **GREENHOUSE GAS EMISSIONS.— Would the project:** | | | | | |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ | ☐ |
| b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ | ☐ |

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts.

The Bay Area Air Quality Management District (air district) has prepared guidelines and methodologies for analyzing GHGs. These guidelines are consistent with CEQA Guidelines sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of GHGs and describes the required contents of such a plan.

Attachment 4

I-FRISBIER2




# DRAFT ENVIRONMENTAL IMPACT REPORT

# San Francisco 2004 and 2009 Housing Element

Volume I: Draft EIR (Section I to Section V.G)

PLANNING DEPARTMENT
CASE NO. **2007.1275E**

STATE CLEARINGHOUSE NO. 2008102033

| | |
|---|---|
| Draft EIR Publication Date: | **June 30, 2010** |
| Draft EIR Public Hearing Date: | **August 5, 2010** |
| Draft EIR Public Comment Period: | **June 30, 2010 – August 16, 2010** |

SAN FRANCISCO
PLANNING
DEPARTMENT

*Written comments should be sent to:*
Environmental Review Officer | 1650 Mission Street, Suite 400 | San Francisco, CA 94103

## IMPACTS

### Significance Thresholds

The proposed Housing Elements would normally have a significant effect on the environment if they would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

As climate change is an irreversible, significant cumulative impact on a global scale, consideration of an impact to climate change is essentially an analysis of the contribution to a cumulatively significant global impact through its emission of GHGs and therefore addressed in the cumulative evaluation.

As discussed previously, the 2004 Housing Element and 2009 Housing Element would not change the land use objectives and policies in the City's area and redevelopment plans. According to Part I of the 2009 Housing Element (Data and Needs Analysis), the City has available capacity to meet the RHNA. Therefore, the rezoning of land uses is not required. To meet the City's share of the RHNA, the proposed Housing Elements aim to do the following: 1) preserve and upgrade existing housing units to ensure they do not become dilapidated, abandoned, or unsound, and 2) provide direction for how new housing development in the City should occur. With respect to the latter, the 2004 Housing Element encourages new housing in Downtown and in underutilized commercial and industrial areas. The 2004 Housing Element also encourages increased housing in neighborhood commercial districts and mixed-use districts near Downtown. On the other hand, the 2009 Housing Element encourages housing in new commercial or institutional projects and accommodating housing through existing community planning processes.

### Cumulative Impacts

***Impact GH-1: The proposed Housing Elements would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment and would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. (Less than Significant)***

The subject of this EIR is the proposed revision of the Housing Element of the San Francisco General Plan. The 2004 and 2009 Housing Elements are updates to the 1990 Residence Element of the San Francisco General Plan, a public policy document that addresses issues of housing needs for San Francisco residents and households. As discussed above, new residential development would occur regardless of the proposed Housing Elements; the proposed Housing Elements provide direction for how new housing should occur.

Attachment 5

SAN FRANCISCO
**PLANNING DEPARTMENT**

# Compliance Checklist
# Greenhouse Gas Analysis

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

## A. GENERAL PROJECT INFORMATION:

**Case No**: 2015-014028ENV

**Project name/Address**: 3333 California Street Mixed-Use Project

**Block/Lot**: 1032/003

**Brief Project description**: The 10.25-acre project site is currently occupied by the University of California San Francisco Laurel Heights Campus in the Presidio Heights neighborhood of San Francisco. The project would demolish an existing annex building, surface parking lots, and circular garage ramp structures. The existing four-story office building would be partially demolished and divided into two separate buildings, expanded to include new levels (80 to 92 feet in height), and adapted for residential use. Portions of the below-grade parking garage would be retained and incorporated into a larger parking structure. Thirteen new buildings, ranging in height from 30 to 45 feet, would be constructed on the site with of mix of residential, office, retail, and child care uses. The proposed project would result in 558 dwelling units within 824,691 gross square feet of residential floor area; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; and a 14,690- gross-square-foot child care center. The proposed project would include 895 vehicle parking spaces in four below-grade garages and six individual, two-car garages; 592 class 1 and 101 class 2 bicycle parking spaces; and 236,000 square feet of open areas, including publicly accessible plazas and public walkways. A project variant that would add two levels and replace the proposed office space in one of the buildings with 186 residential units (for a total of 744 dwelling units) is also being considered.

## B. COMPLIANCE CHECKLIST TABLE

Complete and attach to this form the appropriate compliance table by determining project compliance with the identified regulations and providing project-level details in the discussion column. Please note that Table 1 applies to Private Development Projects, Table 2 applies to Municipal Projects, and Table 3 is for plan-level analysis. Projects that do not comply with an ordinance/regulation may be determined to be inconsistent with San Francisco's qualified GHG reduction strategy.

Compliance Checklist Table attached: ☒ Table 1. Private Development

☐ Table 2. Municipal Project

| Regulation | Requirements | Project Compliance | Remarks |
|---|---|---|---|
| | | | project site's solid waste collection rooms at the basement levels of the proposed California Street Garage (Basement Level B3) and Masonic Garage (Basement Level B1) to pick up collected solid waste on a regularly scheduled basis. Pickup would also occur off Laurel Street to service the Laurel Street Duplexes and the Mayfair Building. |
| San Francisco Construction and Demolition Debris Recovery Ordinance (San Francisco Environment Code, chapter 14, San Francisco Building Code, chapter 13B, and San Francisco Health Code, section 288) | Applies to all projects: No construction and demolition material may be taken to landfill or placed in the garbage. All (100 percent of) mixed debris must be transported by a registered hauler to a registered facility to be processed for recycling. Source separated material must be taken to a facility that recycles or reuses those materials.<br><br>Additionally, projects that include full demolition of an existing structure must submit a waste diversion plan to the Director of the Department of Environment and the plan must provide for a minimum of 65 percent diversion from landfill of construction and demolition debris, including materials source separated for reuse or recycling. | ☒Project Complies<br><br>☐Not Applicable<br><br>☐Project Does Not Comply | The proposed project or project variant would comply with San Francisco Construction and Demolition Debris Recovery Ordinance. The project sponsor would not plan to truck construction and demolition material directly to a landfill or place it directly in the garbage. Project sponsor would use a registered hauler to transport the mixed debris to a registered facility for processing and recycling. A waste diversion plan documenting a minimum 65 percent diversion of construction and demolition debris from landfills would be required due to the proposed demolition of the existing annex building. The waste diversion plan would be prepared by the general contractor and submitted to the Director of the Department of Environment. |



I-FRISBIER2

Attachment 6

SAN FRANCISCO
**PLANNING DEPARTMENT**

**MEMO**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

DATE: **November 12, 2010**

TO: **Major Environmental Analysis and Environmental Consultants**

FROM: **Jessica Range, Environmental Planner**

RE: **Greenhouse Gas Analyses Pursuant to CEQA**

This memorandum supercedes that titled "Consultant Prepared_GHGMemorandums_030408", dated March 4, 2008. This update is necessary to address recent requirements for greenhouse gas (GHG) analyses pursuant to CEQA, namely amendments to the State CEQA guidelines as per Senate Bill (SB) 97 and the Bay Area Air Quality Management District's (BAAQMD) *2010 CEQA Air Quality Guidelines* and updated thresholds of significance. SB 97 amended the State CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs, and added a new section to the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding a project's potential to emit GHGs.

Additionally, on June 2, 2010, BAAQMD adopted new and revised CEQA air quality thresholds of significance and issued revised guidelines that replace the 1999 air quality guidelines. The *2010 CEQA Air Quality Guidelines* provide for the first time CEQA thresholds of significance for greenhouse gas emissions. The BAAQMD has identified three options for determining whether a project's GHG emissions are significant. These options are as follows:

1. Compliance with a Qualified Greenhouse Gas Reduction Strategy, or
2. Whether a project's GHG emissions exceed 1,100 metric tons of carbon dioxide equivalents ($MTCO_2E$), or
3. Whether a project's GHG emissions exceed 4.6 $MTCO_2E$ per service population.

A lead agency may choose which threshold to analyze a project against for determining whether the project's GHG emissions are significant, however BAAQMD encourages lead agencies to prepare a Qualified GHG Reduction Strategy. On August 12, 2010, the San Francisco Planning Department submitted to the BAAQMD a draft of the City and County of San Francisco's *Strategies to Address Greenhouse Gas Emissions*. This document presents a comprehensive assessment of policies, programs and ordinances that collectively represent San Francisco's Qualified Greenhouse Gas Reduction Strategy. The BAAQMD reviewed San Francisco's GHG reduction strategy and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy as outlined in BAAQMD's CEQA Guidelines (2010).[1] Therefore, projects that

[1] San Francisco's *Strategies to Address Greenhouse Gas Emissions* and BAAQMD's letter are available online at: http://www.sfplanning.org/index.aspx?page=1570.

are consistent with San Francisco's GHG reduction strategy would result in less than significant GHG emissions.

**Compliance with a Qualified GHG Reduction Strategy**

In order to facilitate a determination of compliance with San Francisco's GHG reduction strategy, the Planning Department has prepared a Greenhouse Gas Analysis Compliance Checklist. Projects that are seeking a determination of CEQA GHG significance based on compliance with San Francisco's GHG reduction strategy must complete the Greenhouse Gas Analysis Compliance Checklist. The MEA planner or CEQA consultant in coordination with the project sponsor can prepare this checklist. However, only an MEA planner may make a determination of whether the project is consistent with San Francisco's GHG reduction strategy. Only projects located within the City and County of San Francisco are eligible to seek a determination of compliance with San Francisco's GHG reduction strategy.

For those projects that are seeking a determination of compliance with San Francisco's GHG reduction strategy, the MEA planner or CEQA consultant should prepare the Greenhouse Gas Analysis Compliance Checklist. If the CEQA consultant is preparing the checklist, it should be submitted to the MEA planner for a determination of compliance. The signed checklist should be included in the project file and is used to complete the required CEQA document. For projects that do comply with San Francisco's GHG reduction strategy, the MEA planner or CEQA consultant should follow the Standard Climate Change Language v.7, and include appropriate information from the Greenhouse Gas Analysis Compliance Checklist. A quantitative greenhouse gas analysis is not required.

**CEQA Significance Based on Quantitative Thresholds**

Generally, projects that do not comply with San Francisco's *Strategies to Address Greenhouse Gas Emissions,* or projects that are located outside of the City and County of San Francisco, or are otherwise not eligible to be analyzed qualitatively must conduct a quantitative analysis of the project's GHG emissions. The quantitative analysis must be prepared pursuant to BAAQMD's *2010 CEQA Air Quality Guidelines* and supporting documents. These projects are required to submit a GHG Technical Memorandum that at a minimum includes the following:

(1) A summary of the **direct** (on-road and off-road mobile sources, heating, electricity generation, and land conversion, etc.) and **indirect** (off-site electricity generation, methane released from landfills, energy associated with water use, transport and treatment, etc.) project induced greenhouse gas emissions. Calculations should be conducted for both project operations and construction emissions.

(2) Methodology and assumptions used for calculating a project's greenhouse gas emissions. This section should clearly identify the models used, each input and its source (e.g., transportation report, etc.), and any other assumptions relied upon. Calculations should

be included as an attachment, if not directly written into the memorandum. All models and inputs must be referenced appropriately.

(3) Results of the total direct and indirect project induced greenhouse gas emissions resulting from project operations and construction. Construction emissions should be presented as total emissions as well as amortized emissions over the life of the project.

   a. If the project is seeking a determination using the service population threshold, the Results section should identify the project's service population and emissions based on this service population.

Greenhouse gas technical memoranda should be submitted to the MEA case planner. The MEA case planner will enter the project into the GHG Review Log. The GHG analysis will be assigned to an MEA planner for review. CEQA consultants should anticipate at least one draft and one final GHG technical memorandum. General practice is that if a project is being prepared by a CEQA consultant, the consultant must also prepare the GHG analysis. For projects in which MEA is preparing the CEQA document in-house, the GHG analysis may also be conducted in-house. However, large or particularly complex projects may require a consultant to prepare the GHG analysis. For in-house GHG analyses, the MEA planner must complete a [Greenhouse Gas Analysis Request Form].

For questions regarding this memorandum, the Greenhouse Gas Analysis Compliance Checklist, or greenhouse gas analyses, please contact Jessica Range at (415) 575-9018 or Debra Dwyer at (415) 575-9031.

Attachment 7

I-FRISBIER2

## OVERVIEW OF PROPOSED PROJECT AND PROJECT VARIANT

The project sponsor is requesting rezoning and adoption of a Special Use District, Conditional Use authorization and approval of a planned unit development, and approval of a Development Agreement for a multiphase, mixed-use development on the project site to be developed over a 7-to 15-year construction timeframe. The project site plan is shown in Figure 3, p. 5. As envisioned, the proposed project would include phased development (four phases) of residential uses (anticipated to include both market-rate and affordable dwelling units), retail uses, office uses, a child care center, parking, streetscape improvements, and open space. The project sponsor is also studying a variant to the proposed project: the Walnut Building Variant that replaces the proposed office use in the Walnut Building with residential uses and less retail space.[7]

Under the proposed project, the existing annex building, surface parking lots, and circular garage ramp structures along California Street would be demolished. The existing approximately 55.5-foot-tall office building at the center of the site (exclusive of the approximately 13-foot-tall mechanical penthouse) would be partially demolished and adapted to serve as two separate buildings, Center Building A and Center Building B, connected by a covered bridge. Dividing the building would allow for the development of a linear north-south connection from California Street to Euclid Avenue through the middle of the project site. The proposed north-south connection would align with Walnut Street (the proposed Walnut Walk) incorporating the site into the surrounding street grid. Center Building A and Center Building B would be renovated, adapted for residential use, and strengthened to accommodate vertical additions (see Figure 3, p. 5). Two residential levels would be added to Center Building A for a building height of approximately 80 feet tall. Two residential levels would be added to the east portion of Center Building B and three residential levels would be added to the west portion, for a building height ranging from approximately 80 feet on the east portion to 92 feet on the west portion. The heights are measured from the proposed residential lobbies adjacent to the proposed Walnut Walk to the top of the roof. A total of 13 new buildings would be constructed along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street for a total of 15 buildings on site. The new buildings would consist of the following:

- The Plaza A and Plaza B buildings, two four-story mixed-use residential buildings with ground floor retail along California Street between Laurel and Walnut streets with proposed heights of 45 feet[8]
- The Walnut Building, a three-story mixed-use office building with ground floor retail and child care space along California Street east of Walnut Street with a proposed height of 45 feet

[7] The project variant is also identified as the Mixed-Use Multi-Family Housing Variant in the technical background studies and background supporting documentation.

[8] The overall heights referenced above, below and throughout the document are determined as described in Planning Code section 260 or will require a modification to the methodology through the planned unit development approval process.

# Developers' Demolition of Existing Historic Building

Existing
362,000 GSF

Proposed Removal
(185,958 GSF)
51% Removed

Proposed New
322,888 GSF
New Levels Added




I-FRISBIER2

# Section B

## DEIR Deficiencies for Construction Trip Generation

## DEFICIENCIES -CONSTRUCTION TRIP CALCULATIONs in the DEIR.

3
(GHG-1)

Attachment 1: SWAC Report 3333 California Street Mixed-Use Project Application for Environmental Leadership Development Project - Attachment E (Ramboll) - Table Con-5 Project Construction Trip Assumptions.

Attachment 2: 3333 California St. Mixed-Use Project DEIR Volume 2c: Appendices D-G Cover: EIR Appendix D "Transportation and Circulation"; Table of Contents: Section 8 "Truck Turning Templates."

Table Con-5 grossly understates the number of trips that will be required to remove the demolition debris and excavated soils from the site. Neither the authors of the reference nor the Planning Department have shown by analyses or data that this information is accurate or correct. The data is provided strictly by the "Project Sponsor" and no one has performed the basic due diligence needed to validate it.

The Project Sponsor understates the number of Hauling Trips by approx. 45% which directly under-represents the GHG calculations (in violation of FN 130 Planning Department "Compliance Checklist for GHG Analysis"; of Impact C-AQ-1 "less than Significant" conclusion pg. 146 of the Initial Study dated April 25, 2018; and of San Francisco 2004 and 2009 Housing element), under-reports the impact on Air Quality calculations and the resulting conclusions based on this discrepancy are simply erroneous and incorrect.

Table Con-5 shows a total of 18,020 Hauling Trips to remove the 288,000 cubic yards of demolition debris and Excavated Soils. This is an average of 16 cubic yards per trip. A dump truck capable of hauling 16 cubic yards would be unable to safely navigate 5 of the 6 major intersections around the site and pass safely through the surrounding neighborhoods. The DEIR Section 8 Truck Turning Templates of Volume 2 Appendix D "Transportation & Circulation Section 8 "truck Turning Templates."

A large tandem dump truck can haul approx. 11 cubic yards of soil and less of a mixed debris such as concrete, asphalt, steel. It is approx. 30ft in length and is also wider, by 11%, than the truck shown on Template SU-30. The narrower truck barely is able to make legal turns and this assume ideal conditions, no obstructions-cyclists, pedestrians, rain, etc. A wider dump truck would impinge on incoming traffic. A 16 cubic yard truck would be significantly more hazardous as s can be seen from Template WB-40 Circulation Exhibit; such a vehicle could not operate safely in any of the neighborhoods surrounding the site.

The number of trips is grossly underestimated by the Project Sponsor.
Assuming approx. 88,000 cubic yards of hard debris – concrete, asphalt, steel, aluminum, etc. - and an average load of 9 cubic yards results in approx. 9,800 dump truck loads.
Assuming the remaining 200,000 cubic yards to be soil, some wet, and an average load of 11

cubic yards results in 18,200 loads for a total of 28,000 loads or 1.55 times the number submitted by the Project Sponsor and accepted without validation by the Planning Department.

3
(GHG-1)
cont'd

As a result the GHG calculations in the Attachment are significantly understated by approx. 45% and the GHG are in fact "Significant" and require that they be correctly and accurately studied in the EIR. The Air Quality around the site will also be impacted by this gross under-calculation and the DEIR GHG, Air Quality and Traffic Analysis conclusions are, by definition, defective and invalid. The information is incomplete, incorrect, inaccurate.

Our DEMAND is that the number of Hauling Loads be recalculated using appropriate load factors; that the resulting GHG be properly and accurately re-calculated; that the Air Quality issues be revised to reflect the higher number of trips by the largest pieces of site equipment; that the Traffic Circulation be redone to reflect accurate information.

Our DEMAND is that GHG be correctly re-classified as "Signicant" and addressed appropriately.

Our DEMAND is that the Developer's excessive, unmitigated "Significant" GHG be compared against the Community Alternative Plan which generates less than one third of the GHG; impacts Air Quality by having one third the impact on the Hauling Trip totals alone (9,000 vs 27,000+).
The Community Alternative actually meets the standard for "Less than Significant."

The failure to validate key information provided by the Project Sponsor and their sub-contractors is a major failing of the DEIR. The Planning Department's failure to exercise the appropriate oversight of the information it uses to reach conclusions results in the DEIR being a collection of erroneous and self- serving conclusions that fails to meet the criteria for accuracy, completeness and correctness.

Attachment 1

# 3333 CALIFORNIA STREET MIXED-USE PROJECT
## APPLICATION FOR ENVIRONMENTAL LEADERSHIP DEVELOPMENT PROJECT

Prepared for

**Laurel Heights Partners, LLC**
150 Post Street Suite 320
San Francisco, CA 94108

Prepared by

**SWCA Environmental Consultants**
330 Townsend Street, suite 216
San Francisco, CA 94107

August 17, 2018

I-FRISBIER2

Prepared for
**The Prado Group**
**San Francisco, CA**

Prepared by
**Ramboll US Corporation**
**San Francisco, CA**

Project Number
**1690008541**

Date
**August 2018**

# AB900 ANALYSIS
## 3333 CALIFORNIA STREET
## SAN FRANCISCO, CALIFORNIA

**Table Con-5. Project Construction Trip Assumptions**
**3333 California Street**
**San Francisco, California**

| Phase | Trip Category | Total Trips[1] | Total Trip Length[2] (miles) |
|---|---|---|---|
| 1 | Worker | 58,050 | 21 |
| 2 | | 38,625 | |
| 3 | | 69,570 | |
| 4 | | 32,175 | |
| 1 | Non-hauling | 2,500 | 14 |
| 2 | | 500 | |
| 3 | | 3,500 | |
| 4 | | 400 | |
| 1 | Vendor | 1,300 | 14 |
| 2 | | 1,000 | |
| 3 | | 1,500 | |
| 4 | | 850 | |
| 1 | Hauling (Hazardous Waste) | 1,636 | 60 |
| 2 | | 24 | |
| 3 | | 1,631 | |
| 4 | | 313 | |
| 1 | Hauling (Non-Hazardous Waste) | 3,271 | 17 |
| 2 | | 48 | |
| 3 | | 3,263 | |
| 4 | | 626 | |
| 1 | | 3,271 | 48 |
| 2 | | 48 | |
| 3 | | 3,263 | |
| 4 | | 626 | |

**Notes:**

1. Trips were provided by the Project Sponsor.
2. Worker, non-hauling, and vendor trip lengths assume CalEEMod® default values. Hauling trip lengths were provided by the Project Sponsor.

**Abbreviations:**

CalEEMod® - California Emissions Estimator MODel

Attachment 2

I-FRISBIER2

# 3333 CALIFORNIA STREET MIXED-USE PROJECT



# DRAFT ENVIRONMENTAL IMPACT REPORT VOLUME 2c: APPENDICES D-G

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT: CASE NO. 2015-014028ENV
STATE CLEARINGHOUSE NO. 2017092053

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - DECEMBER 24, 2018

WRITTEN COMMENTS SHOULD REFERENCE
THE CASE NO. AND BE SENT TO:
**Kei Zushi, EIR Coordinator**
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103
CPC.3333CaliforniaEIR@sfgov.org

SAN FRANCISCO
PLANNING
DEPARTMENT

# 3333 California Street Mixed-Use Project

Case No. 2015-014028ENV

## EIR Appendix D

## Transportation and Circulation

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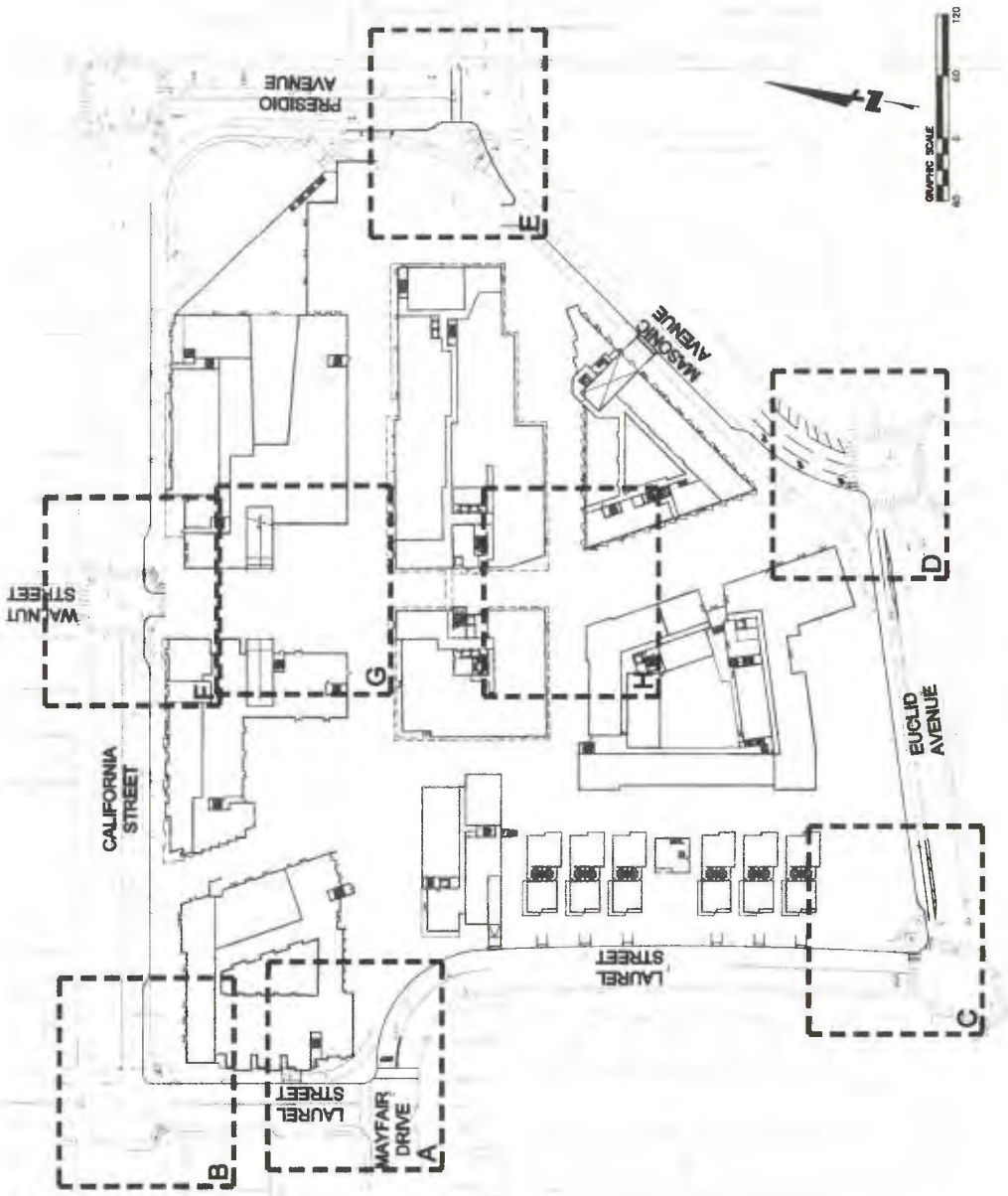
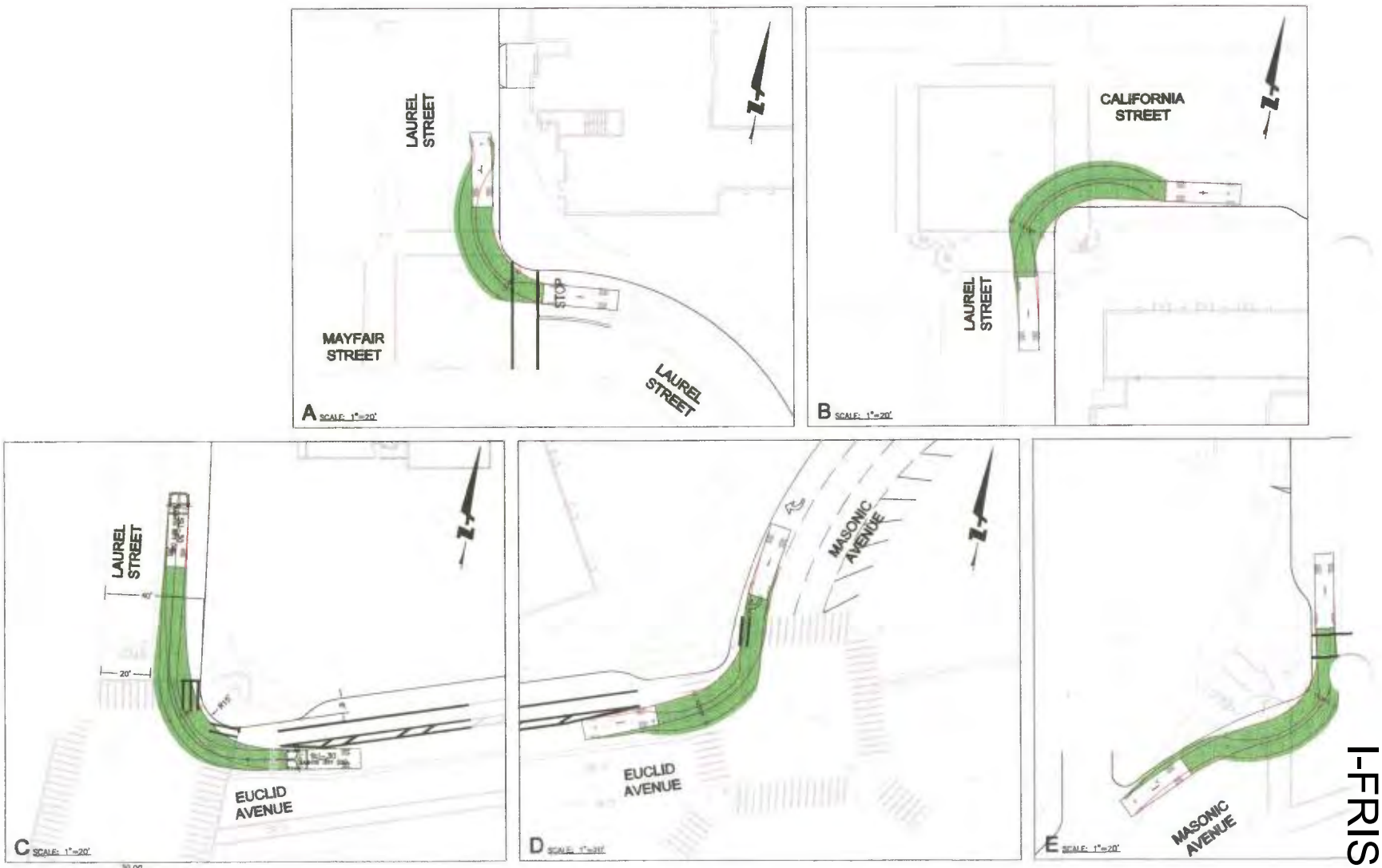
# 8. Truck Turning Templates

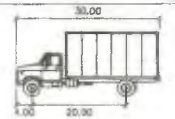
I-FRISBIER2




3333 CALIFORNIA

TRUCK TURNING INDEX




| SU-30 | feet |
|---|---|
| Width | : 8.00 |
| Track | : 8.00 |
| Lock to Lock Time | : 6.0 |
| Steering Angle | : 31.8 |

# 3333 CALIFORNIA

SU-30 CIRCULATION EXHIBIT

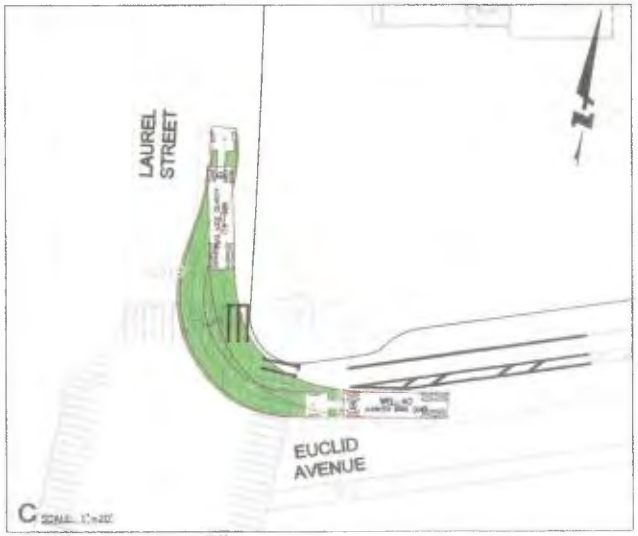
I-FRISBIER2

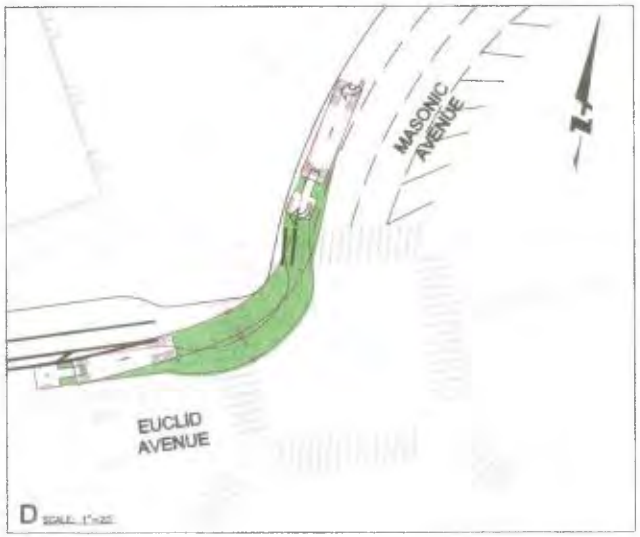
I-FRISBIER2

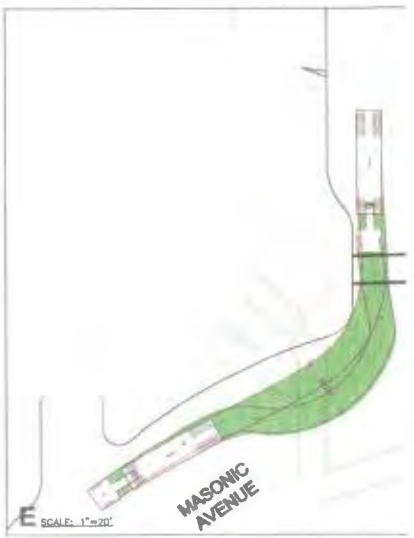


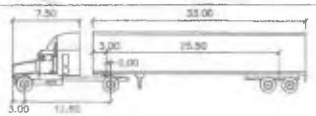







WB-40

| | feet | | |
|---|---|---|---|
| Tractor Width | : 8.00 | Lock to Lock Time | 6.0 |
| Trailer Width | : 8.00 | Steering Angle | 20.3 |
| Tractor Track | : 8.00 | Articulating Angle | 70.0 |
| Trailer Track | : 8.00 | | |

# 3333 CALIFORNIA

WB-40 CIRCULATION EXHIBIT

# Section C

## Deficiencies for Hydrology and Water Quality

COMMENTS TO E 14: HYDROLOGY AND WATER QUALITY; INITIAL STUDY 3333 CALIFORNIA STREET MIXED USE PROJECT

Planning Department Case No. 2015-014028ENV April 25, 2018(reference 1)

On page 216 of the Initial Study (IS), reference 1, the IS states that the project could have significant impact if it could: 4 (HWQ-1)

c) "Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?"
This is restated in Impact HY-3 on page 222 of reference 1.
An underground stream or flow of water is equally as relevant (and potentially more impactful) as a more visible surface stream. There is no indication in the Initial Study that this has been considered.
Planning nevertheless checked "Less Than Significant Impact."

d) "Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increased the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?"
This is also restated In Impact HY-3 on page 222.
Again, as noted above, underground flow of water is equally as important and requires equal consideration.
Planning checked "Less Than Significant Impact."

As discussed below these conclusions are not supported by substantial evidence inasmuch as the factual data and analysis upon which they are based are insufficient to support the determination of "no-significant impact."
The City failed to use best efforts to investigate and disclose all that it reasonably can with respect to the project's potential adverse impacts.
The IS's analysis failed to consider the impact of the project on underground flows of water and did not make a finding as to whether the existing underground drainage patterns of the site or area could be affected.

DISCUSSION

4 (HWQ-1) cont'd

The Preliminary Geotechnical Investigation conducted (FN40) by Langan Treadwell Rollo dated 3 Dec. 2014 (Reference 2), page 5, table 1 shows 5 borings with Depth to Groundwater varying from 18.8 feet to 38.8 feet.
However the Phase I Environmental Site Assessment (FN244) by Langan Treadwell Rollo dated 3 Dec. 2014 (Reference 3) page 8 states "However, two borings at the Firemen's Credit Union site (northeast of the site) encountered groundwater levels as shallow as 13 feet bgs."
The Firemen's Credit Union is immediately adjacent to 3333, and is part of the same block. It is not a separate site geologically or hydrologically.

Reference 3 further states "The direction of groundwater flow is *assumed* (italics and underlining added) to be to the northeast, based on topography and the groundwater monitoring reports for 3201 California Street; *however* the site is located near the boundary between the Downtown and Westside Groundwater Basins, *so it is possible* that the groundwater flow direction *varies* across the site."
It is clear from the above that Langan Treadwell Rollo, as well as Planning, has not conducted an investigation that would be adequate to assess the hydrology of the site, including the direction to which the groundwater flows.

The IS states that dewatering the groundwater would likely be required during construction because the depth of excavation would be up as much as 40 feet below ground surface and the groundwater level at the project site is "about 18 to 39 feet below ground surface (IS, page 219).
Actually the groundwater is almost certainly much closer to the surface as noted in reference 3 above as well as for reasons that will be discussed in this section.

There is clearly a subsurface flow of this groundwater. What is it, what is its flow rate and in what direction does it flow?
It would appear prudent to better understand the situation before beginning to excavate up to 40 feet bgs as well as essentially building a concrete dam in the form of underground garages that would stretch from Laurel St. to Presidio Ave., and completely block off any flow across the entire site.
At present there is only minimal obstruction, as the underground garage is a very small portion of the Laurel to Presidio distance and the buildings foundations present a minimal barrier to this subsurface flow.

What is the underground water going to do if this project is constructed?
We know the groundwater under the site will be diverted.
It is reasonable (if we had better data it would probably show with certainty) to conclude that the groundwater diverted by the below ground construction will have considerably higher flow velocities and energy at whatever point(s) it departs the site as the flow will be concentrated at the end(s) of the underground concrete barrier (parking garages).
We know that these higher subsurface flow rates and energies will create higher erosion rates and could lead to flooding at a downstream location due to these higher flow rates.
What are these higher erosion rates going to do to the foundations of buildings exposed to an entirely

new flow regime, none of which existed when they were constructed?
What analysis has been done concerning these potential impacts on the buildings along the lower portion of Laurel St and Presidio Ave.?

4
(HWQ-1)
cont'd

Unfortunately these are not the only shortcomings of the data presented in the Initial Study.
Nor are they the most damaging to the conclusions reached as to Impact HY-3.
A review of the boring logs indicates the borings were carried out August 20-26, 2014 and generated the groundwater bgs data that appears in table 1, page 5 of FN40, reference 2.
The August 2014 date leaps out like a red flag; as it should have for everyone associated with FN 40 and the Initial Study.

California entered the most severe drought in its history in 2011 and did not exit it until 2017.
August 2014 is the approximate midpoint in this period so any of the FN40 groundwater levels quoted are those determined three years into a prolonged severe drought.
Essentially such data are irrelevant for a normal year(s) and consequentially egregiously understate the hydrological condition of the site.

According to Wikipedia (with additional support in the article's references), "2011-2017 California Drought" (reference 4) page 2: "By February 1, 2014, Felicia Marcus, the chairwoman of the State Water Resources Control Board, claimed the 2014 drought 'is the most serious drought we've faced in modern times.'"
On the same page; "According to NASA, tests published in January 2014 have shown that the twelve months prior to January 2014 were the driest on record, since record-keeping began in 1885."
The references included in this document further reinforce the historic shortfalls of rain during this drought.

Per weather.com/science/environment/news/california-drought-seconds-20141009 (reference 5) page 1: "As a result, 2013 was California's **driest year ever recorded** (emphasis in the report).
San Francisco, which usually averages 23.65 inches of rain a year, only experienced 5.60." This is approximately 24% of a normal year.
The map on page 16 of "275 California drought maps show deep drought and recovery" LA Times April 7, 2017 (reference 6), included at the end of this document, shows the extent and severity of the drought as of Aug.3, Aug. 12, Aug. 19, Aug. 26, Sept.2 – which is the precise period in which the borings took place.

So, in the midst of a record drought, one that was already three years in extent; after the driest year on record (2013); after a year that produced less than 24% of the normal rainfall; and then after five months of a normal zero rainfall dry season the developer commissioned Langan Treadwell and Rollo to carry out borings with one of the specific objectives to determine the depth of groundwater below surface!
It is inconceivable, literally, to conjure up a more perfect set of circumstances to produce a more misleading series of conclusions more amenable and favorable to the developers' plan.
It is also perplexing that Planning has accepted these results on face value, has done no analysis or

research of its own to validate the reasonableness of these results; and has used these results as the basis for a finding of "Less Than Significant."

As a minimum, the conclusions of Impact HY-3 are inaccurate, inadequate, incomplete and invalid. Due to the total absence of relevant analysis and data, the IS failed to consider the impact on the existing underground drainage patterns of the site. The IS discusses impacts on surface runoff and fails to analyze the impact of the construction of the project on the alteration of the existing drainage pattern of the site, including through the alteration of the course of a subsurface stream or river. The EIR should analyze whether the project could alter the existing drainage pattern of groundwater or alter the course and/or characteristics of the underground water flows.
It should also analyze the potential impact on existing buildings in the vicinity of the site as a result of the alterations to underground water flows.

**The Initial Study and the DEIR Lack Substantive Evidence that the "Less than Significant" finding for Hydrology and Water Quality, Section E-14 of the Initial Study, is correct, complete and accurate. In fact the evidence shows that there is no basis for this conclusion and it must be re-studied and re-concluded using credible evidence.**

4
(HWQ-1)
cont'd

REFERENCES


1. Initial Study 3333 California Street Mixed Use Project Planning Department Case No. 2015-014028ENV dated April 25, 2018.
2. FN40: Langan Treadwell Rollo " Preliminary Geotechnical Investigation 3333 California Street" dated 3 Dec. 2014.
3. FN244: Langan Treadwell Rollo "Phase I Environmental Site Assessment 3333 California Street" dated 3 Dec. 2014
4. "2011-2017 California Drought" www.en.wikipeida.org and references.
5. "weather.com/science/environment/news/california-drought-seconds-20141009
6. "275 California drought maps show deep drought and recovery" LA Times April 7, 2017 with data from US Drought Monitor.

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PLANNING DEPARTMENT
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Section D

Attachment E to Section A

# ATTACHMENT E

## 3333 California Street

## Greenhouse Gas Emissions Analysis

I-FRISBIER2

Prepared for
**The Prado Group**
**San Francisco, CA**

Prepared by
**Ramboll US Corporation**
**San Francisco, CA**

Project Number
**1690008541**

Date
**August 2018**

# AB900 ANALYSIS
## 3333 CALIFORNIA STREET
## SAN FRANCISCO, CALIFORNIA

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## APPENDICES

Appendix 1: Construction and Operation Supporting Tables
Appendix 2: Operational CalEEMod® Output Files
Appendix 3: Additional Supporting Information

# 1. INTRODUCTION

The mixed-use development project located at 3333 California Street in San Francisco, California (herein referred to as the "Proposed Project" or "Project") has applied for California Environmental Quality Act (CEQA) judicial streamlining under Public Resources Code (PRC) Section 21178 et seq. The Application also addresses a variant to the Proposed Project that removes proposed office space and replaces it with additional residences (hereinafter referred to as the "Project Variant"). In support of the Application, Ramboll US Corporation (Ramboll) quantified both direct and indirect greenhouse gas (GHG) emissions associated with the Proposed Project's and Project Variant's operation, including ongoing emissions reductions associated with transportation and building energy usage, to show the Project and Project Variant meet the requirement for no "net additional emission of greenhouse gases [GHG], including greenhouse gas emissions from employee transportation" [California PRC §21183(c)].

Throughout this report, GHG emissions are reported in units of metric tons of carbon dioxide equivalents (MT $CO_2e$). Carbon dioxide equivalents are emissions of carbon dioxide ($CO_2$), methane ($CH_4$), and nitrous oxide ($N_2O$), weighted by the global warming potentials (GWP) from Title 40 of the Code of Federal Regulations (CFR), Part 98, Table A-1, as referenced by the California Mandatory Reporting Rule for GHG (Title 17 of the California Code of Regulations, §§95100- 95158). GHG emissions are quantified for this Project (including construction and operational emissions) as well as existing uses. This document summarizes the assumptions and calculation methodologies Ramboll used to estimate GHG emissions. Summary tables are provided in the text, while more detailed calculation tables are provided in Appendix 1.

## 1.1 Project Description

### 1.1.1 Existing Conditions

The project site is currently developed with a four-story office building at the center of the site, a three-level partially subsurface parking garage, three surface parking lots, and a one-story annex building. The site currently has a diesel emergency generator located within Basement Level B1 (within a mechanical room in the easternmost circular garage ramp structure) and an above-ground fuel storage tank immediately east of Basement Level B2 near the Presidio Avenue entry driveway. The emergency diesel generator and above-ground fuel storage tank would be removed from the site during Phase 2 of construction, prior to the installation of a new emergency generator. Land uses are shown in **Table 1.**

The existing buildings contain University of California San Francisco (UCSF) administrative, academic research, social, behavioral, and policy science research department uses (including common areas and space for accessory uses and support programs, such as a daycare center, a conference center/auditorium, and a cafeteria). Prior to commencing Phase 1 of the four-phase construction program for the Proposed Project or Project Variant (see descriptions below), all existing UCSF uses and services are anticipated to be moved to other existing UCSF locations, such as the Mission Bay or Parnassus campuses.

### 1.1.2 Proposed Project

The Proposed Project would be a mixed-use development with predominantly residential uses and a mix of other uses (office, retail, and childcare). The development site is approximately 446,490 square feet or 10.252 acres located in San Francisco's Presidio

Heights neighborhood. The Proposed Project would include development of 558 residential units, 54,117 gross square feet of retail uses, 49,999 gross square feet of office uses, 14,690 gross square feet of childcare uses, 895 parking spaces in 428,773 gross square feet of below-grade garages, streetscape improvements, and open space. These proposed uses would be located in 13 new buildings and in the adaptively reused office building, which would be divided into two separate residential buildings. Plaza A and Plaza B buildings would be mixed-use residential buildings with ground floor retail units. The Walnut building would be a mixed-used office building with ground floor retail and childcare uses. The Masonic building and Laurel Duplexes (7 buildings) would contain only residential units and the Euclid building would be a mixed-use residential building with ground floor retail space.

Land uses for the Proposed Project are shown in **Table 1.**

### 1.1.3 Proposed Project Variant

Under the Project Variant, 744 dwelling units would be developed on the project site (186 more than the Proposed Project). The 49,999 gross square feet of commercial office space in the Proposed Project's Walnut Building would be replaced with a larger residential use, the retail floor area would be reduced, and the childcare use would be retained but slightly reduced. Overall, the Walnut Building under the Project Variant would be approximately 368,170 gross square feet, compared to 263,453 gross square feet under the Proposed Project, and would be 22 feet taller. There would be an additional 76 vehicle parking spaces provided under the Project Variant. The other proposed new buildings would not change relative to the Proposed Project.

Land uses for the Proposed Project Variant are shown in **Table 1.**

**Table 1: Land Use**

| Land Use | Units | Existing Conditions | Project | Project Variant |
|---|---|---|---|---|
| Office Building* | Square Feet | 364,500 | 49,999 | N/A |
| Childcare Center | Square Feet | 11,500 | 14,690 | 14,650 |
| Open Space | Acres | 3.79 | 5.42 | 5.42 |
| Apartments (categorized as Mid Rise) | Dwelling Units | N/A | 558 | 744 |
| Retail | Square Feet | N/A | 54,117 | 48,593 |
| Parking Garage | Spaces | 212 | 895 | 971 |
| Parking Lot | Spaces | 331 | N/A | N/A |
| Bicycle Parking | Spaces | 15 | 693 | 890 |

* Includes annex and storage space for the existing conditions scenario.

# 2. CONSTRUCTION GHG EMISSIONS

Construction of the Proposed Project and Project Variant will generate "one-time" emissions, that is, discrete emissions that are not associated with ongoing Project/Project Variant operation. These emissions are quantified and disclosed for the Proposed Project and Project Variant. Methodologies for quantifying construction GHG emissions are detailed in the following sections.

## 2.1 Construction Phasing

The Proposed Project and Project Variant would be constructed in four overlapping development phases with full buildout expected to occur approximately seven years after project entitlements. This analysis is based on an approximately seven-year construction duration and four-phase program that would constitute maximum development on the site; however, the project sponsor may choose to develop the Proposed Project or Project Variant over a timeframe of up to 15 years. Under an up to 15-year construction timeframe the same development program would be implemented; however, periods of dormancy would be introduced between construction phases, and some construction activities currently assumed as concurrent would occur separately over a longer timeframe. Thus, potential physical environmental effects of the Proposed Project or Project Variant under a longer construction timeframe would be similar to, but less severe, than those under a condensed construction timeframe.[1]

This analysis conservatively assumes that the residential buildings constructed in each phase of the construction program (i.e., Phase 1, Phase 2, or Phase 3) would be occupied and fully operational as soon as construction of a phase is completed. This is conservative because occupancy and operation of each phase would likely ramp up over time. The analysis also assumes that operational emissions from a phase can overlap with construction emissions from subsequent phases.

The first phase of the construction program (Phase 1) would commence after all existing uses at the UCSF Laurel Heights Campus, including the existing daycare center, have vacated. The preliminary construction schedule assumes that construction would start in 2020, that it would last approximately seven years or longer, and that it would take place for five days per week with different equipment operating for different hours. Due to the similar nature of the Proposed Project and Project Variant (including similar overall square footage), construction phasing, equipment, and schedule would be similar for both. See **Table 2** for a summary of the expected construction phasing timeline, provided by the project sponsor. Table Con-1 in Appendix 1 shows the phased construction duration by year for different phases. Appendix 3 contains construction information provided by the project sponsor.

[1] San Francisco Planning Department. 2018. Initial Study 3333 California Street Mixed Use Project. April 25. Available at: http://sfmea.sfplanning.org/3333%20California%20Street%20Initial%20Study_4-25-18.pdf

**Table 2: Construction and Operation Timeline**

| Phase | Construction | | | | Operation |
|---|---|---|---|---|---|
| | Phase Name | Start Date | End Date | Total Number of Work Days | Start Date |
| 1 | Masonic/Euclid | 3/2/2020 | 8/19/2022 | 645 | 8/20/2022 |
| 2 | Center Building A/B | 9/10/2021 | 8/31/2023 | 515 | 9/1/2023 |
| 3 | Plaza A/Plaza B/ Walnut | 12/4/2022 | 11/18/2025 | 773 | 11/19/2025 |
| 4 | Mayfair/Laurel Townhouse/Euclid Park | 5/22/2025 | 1/12/2027 | 429 | 1/13/2027 |
| | | | **TOTAL** | **2,362** | |

Source: Webcor and Prado, 2017.

Phase 1 would include demolition of the existing annex building and the southern portion of the existing office building. After demolition, Phase 1 would include excavation on the southern portion of the site for the proposed Masonic Garage and construction of the Masonic and Euclid buildings, as well as portions of the privately owned common open spaces that would be open to the public. Phase 2 would include demolition of the northern portion of the existing building and the circular ramp structures, the partial demolition of the existing office building (to be separated into two structures, Center Buildings A and B), as well as some interior renovations, vertical additions of two to three stories, and seismic upgrades to adaptively reuse the existing office building as two separate residential buildings. The existing emergency generator would be removed during this phase and a new emergency generator would be installed.

Phase 3 would include demolition of the existing surface parking lots along California Street, followed by the excavation for the California Street Garage and construction of the California Street buildings (Plaza A, Plaza B and Walnut buildings). The new childcare facility is planned to be occupied by the end of Phase 3 construction. In Phase 4, there would be a limited amount of demolition of surface parking lots, as well as excavation for the Mayfair Garage and the private parking garages for the Laurel Duplexes and construction of the Mayfair Building and Laurel Duplexes. Land uses and amounts are shown by phase in **Table 3**.

**Table 3: Project Land Use by Construction Phase**

| Land Use | Size Units | Phase 1 | Phase 2 | Phase 3 | | Phase 4 |
|---|---|---|---|---|---|---|
| | | | | Project | Project Variant | |
| Apartments (categorized as Mid Rise) | Dwelling Units | 196 | 190 | 128 | 314 | 44 |
| Childcare Center | Square Feet | -- | -- | 14,690 | 14,650 | -- |
| General Office Building | Square Feet | -- | -- | 49,999 | -- | -- |
| Open Space | Acres | 1.4 | 1.4 | 2.2 | | 0.5 |
| Retail | Square Feet | 4,287 | -- | 49,830 | 44,306 | -- |
| Parking | Spaces | 209 | 190 | 452 | 528 | 44 |

## 2.2 Construction-Related GHG Emissions

Construction emissions include emissions from both off-road construction equipment (diesel and electric powered) and on-road construction vehicles, including haul trucks, concrete deliveries, and vendor trips. Due to the similarity in nature of the Proposed Project and Project Variant including construction equipment, phasing, and schedule, estimated construction emissions for the Proposed Project and Project Variant would be similar. Therefore, only one analysis was completed for the two scenarios.

### 2.2.1 Emissions from Diesel-Fueled Construction Equipment

Emissions calculations associated with off-road construction equipment are based on the construction schedule, type and quantity of equipment and hours of operation for each piece of equipment based on project specific information provided by the project sponsor[2] which is summarized in Table Con-2 of Appendix 1. GHG emissions from off-road construction equipment are estimated using methodologies consistent with the California Emissions Estimator Model (CalEEMod®) version 2016.3.2. All off-road equipment is assumed to have CalEEMod® default diesel engines without any mitigation. Electric equipment is discussed in section 2.2.2. Emissions associated with diesel fuel include only running exhaust emissions since starting emissions are assumed to be minimal for diesel-fueled equipment. Exhaust emissions calculations are based on California Air Resources Board's (CARB's) OFFROAD 2011 methodology as below:

[2] Bell, Joe, Webcor Builders, e-mail correspondence with Peter Mye at SWCA regarding construction data, September 14, 2017.

$$E_C = \sum(EF_C * HP * LF * Hr * Red * C)$$

Where:

$E_C$: off-road equipment exhaust emissions in pounds (lbs.)

$EF_C$: emission factor (g/bhp-hr). Emission factors for diesel equipment are default CalEEMod emission factors by Tier

HP: equipment horsepower. Project-specific equipment horsepower were provided by the project sponsor.

LF: equipment load factor. Project-specific or CalEEMod defaults

Hr: equipment operating hours

Red: reduction from Diesel Particulate Filter (DPF), as applicable

C: unit conversion factor

GHG emissions for each year of construction were then calculated based on the overall construction duration for each phase in a given year. Table Con-3 in Appendix 1 represents the yearly GHG emissions for each phase from off-road diesel equipment. The total GHG emissions associated with off-road construction diesel equipment are shown in **Table 4**. Supporting construction information provided by the project sponsor is included in Appendix 3.

### 2.2.2 Emissions from Electric Construction Equipment

GHG emissions from the use of electrical off-road equipment are estimated based on type and usage of each equipment. Usage information for all the electrical construction equipment is from SWCA's "Energy Assessment".[3] The Energy Assessment is attached in Appendix 3. Table Con-4 in Appendix 1 shows the yearly electricity consumption by construction equipment and GHG emission by year. Total electricity usage from operation of equipment is estimated to be about 7,170 MWh per year for both the Project and Project Variant.

Yearly GHG emissions were calculated by multiplying the $CO_2e$ intensity factor with the scaled electricity consumption for each year. Electricity consumption was scaled by the overall construction duration of each phase and by the fraction of construction duration of each phase in a given year. The total GHG emissions associated with off-road construction electric equipment are shown in **Table 4**.

### 2.2.3 Emissions from On-Road Construction Trips

On-road construction vehicles such as passenger vehicles for workers and vendors, and trucks for soil and material hauling generate GHG emissions. These emissions are calculated based on the number of trips and vehicle miles traveled (VMT) along with emissions factors from Emission Factors Model (EMFAC2014).[4] Trip counts are provided

[3] SWCA. 2018. 3333 California Street Mixed-Use Project Energy Assessment / Case No. 2015-015028ENV. April 12. Revised July 23.

[4] A more recent version of EMFAC, EMFAC2017, has now been released. However, this model has not yet been approved by the USEPA or incorporated into CalEEMod®. Ramboll carried out a preliminary analysis of construction emissions using EMFAC 2017. The preliminary EMFAC2017 results confirmed that results would not change any of the original conclusions. If EMFAC2017 were incorporated, it would not be expected to significantly affect results.

by the project sponsor and CalEEMod® default trip lengths for worker, vendors and haul trips are used in the analysis. Trip counts and trip lengths are shown in Table Con-5 in Appendix 1. Sponsor provided construction data is included in Appendix 3. Running emission factors include running exhaust and running losses estimated for the years 2020-2027. Running emissions are calculated as,

$$E_R = \sum(EF_R * VMT * C)$$

Where:

VMT or Vehicle Miles Traveled: Trip Length*Trip Number

$EF_R$: running emission factor (g/mile) from EMFAC2014

C: unit conversion factor

On-road emissions also include exhaust emissions from vehicle idling. Idling emissions from EMFAC2014 are estimated only for heavy duty trucks since idling emissions occur during extended idling events for these trucks, and EMFAC-2014 takes account of idling emissions from light duty vehicles and other vehicle types in running emissions estimates. Idling emissions are estimated as,

$$E_I = \sum(EF_I * Idle\ Time * Trip\ Number)$$

Where:

$EF_I$ = vehicle idling emissions factor (g/trip) from EMFAC 2014.

Idle Time = assumed to be 5 minutes of idling per one-way trip.

Trip Number = heavy duty truck trips provided by project sponsor

Idle time is consistent with California ATCM to limit diesel-fueled commercial motor vehicle idling (Title 13, CCR, section 2485)

GHG emissions for each year of construction are estimated based on the overall construction duration for each phase in a year. Table Con-3 in Appendix 1 reports the yearly GHG on-road emissions for each phase. The total GHG emissions associated with on-road construction trucks are shown in **Table 4**.

### 2.2.4 Watering for Dust Control

GHG emissions associated with the electricity consumed during watering for construction dust control are calculated based on the total water consumption, electricity use for watering, and the electricity intensity for water supply, distribution and treatment over the phased construction period. Total water consumption is from the Water Supply Assessment[5] which was summarized in the Energy Assessment. Table Con-6 in Appendix 1 reports the electricity construction and GHG emissions split by phase and year. Total GHG emissions associated with watering for dust control are shown in **Table 4**.

## 2.3 Summary of Construction GHG Emissions

The total emissions from construction are summarized in **Table 4**. Total GHG emissions from diesel off-road equipment, on-road trucks and electrical off-road equipment are 1,465, 1,716 and 1,090 MT $CO_2e$, respectively. Total GHG emissions from construction activities are approximately 4,273 MT $CO_2e$.

[5] San Francisco Water Power Sewer. 2017. Water Supply Assessment. June 13.

| Table 4: Construction GHG Emissions (MT/year) | | | | | |
|---|---|---|---|---|---|
| **Year** | **Diesel Off-Road Equipment** | **On-Road Trucks** | **Electric Equipment** | **Electricity Use for Watering Dust Control** | **Total GHG Emissions** |
| **2020** | 173 | 259 | 109 | 0.028 | 541 |
| **2021** | 248 | 318 | 167 | 0.035 | 733 |
| **2022** | 277 | 243 | 212 | 0.028 | 732 |
| **2023** | 281 | 271 | 201 | 0.030 | 752 |
| **2024** | 194 | 252 | 118 | 0.026 | 564 |
| **2025** | 216 | 278 | 170 | 0.029 | 664 |
| **2026** | 74 | 92 | 111 | 0.012 | 277 |
| **2027** | 2.2 | 2.8 | 3.2 | 0.0003 | 8.3 |
| **Total GHG emissions from construction (MT)** | | | | | **4,273** |

# 3. OPERATIONAL GHG EMISSIONS

GHG emissions are quantified using the California Air Resources Board's current approved model, CalEEMod® version 2016.3.2. CalEEMod® was run for several scenarios including operation of the existing site, the Proposed Project (by phase), and Project Variant (by phase). Emissions categories include on-road vehicle exhaust (mobile), stationary sources within the project site (generators), energy (indirect emissions from electricity and direct emissions from natural gas), water and wastewater, solid waste disposal and area sources such as landscaping equipment.

## 3.1 GHG Emissions from Existing Conditions

Total GHG emissions from operation of the existing site in 2020 are shown in **Table 5**. Total GHG emissions are 3,873 MT $CO_2e$/year, with mobile sources being the largest contributor to GHG emissions, followed by electricity and natural gas use. The site currently includes one diesel emergency generator, three natural gas boilers, and two electrical substations within the Basement Levels B1 and B2, respectively and an above-ground diesel fuel storage tank located adjacent to Basement Level B2. The diesel emergency generator along with the substations will be decommissioned in 2023 during the completion of Phase 2 (Center Buildings A and B) of the Proposed Project or Project Variant. Emissions from the natural gas boilers are included in the building natural gas emissions. Emissions from the electrical substations are included in the building electrical emissions. Emissions from the diesel storage tank are minimal and are therefore not quantified.

To calculate emissions, CalEEMod® was run for year 2020 using data on existing land uses, with adjustments from defaults as described below. The lifetime of a building is assumed to be 30 years from full build out. Full build out of the Project and Project Variant was assumed to be 2028 so corresponding lifetime operational emissions occur until 2057. GHG emissions for existing conditions are assumed to be constant between 2020 and 2057, to compare existing emissions to lifetime operational emissions for a full 30 years after the Proposed Project or Project Variant is fully built out. No adjustments are made to existing emissions post-2020, consistent with CEQA methodology. CalEEMod® outputs and detailed calculations for the existing conditions are presented in Appendix 2 and Tables Ops-1 through Ops-17 of Appendix 1.

### 3.1.1 Mobile

CalEEMod® estimates mobile GHG emissions from running, idling, and starting exhaust for the aggregated projected vehicle fleet in a given calendar year and county. Mobile emissions for existing conditions for trips associated with workers and visitors are estimated using CalEEMod® based on the land uses shown in **Table 1**. Trip rates for the land use sub-types are estimated using the AM and PM peak hour driveway counts from the travel demand memorandum from Kittelson & Associates,[6] as shown in Table Ops-1a of Appendix 1. Trip lengths, trip types, and vehicle fleet mix are default values from CalEEMod®. Vehicle emission factors are the default values in CalEEMod®, which are obtained from EMFAC2014. Emissions are summarized in **Table 5**.

### 3.1.2 Energy

Energy emissions include indirect emissions from electricity used by buildings and direct natural gas combustion emissions. For each type of emissions, the historic energy

[6] Kittelson & Associates. 2018. Travel Demand Memorandum – Final. March 9.

consumption is multiplied by the relevant emission factor per energy unit. Pacific Gas & Electric (PGE) utility bill data is used from 2012-2014 to reflect the existing condition energy use, as shown in Table Ops-2 of Appendix 1. PGE data is included in Appendix 3.

Indirect GHG emissions, which occur when electricity is used, are typically due to electricity generation from offsite power plant locations. Electrical power is supplied to the study area by PGE. To estimate emissions, the electricity usage is multiplied by the emission intensity factors for the GHGs. Emission intensity factors are GHG emission rates from a given source in terms of the amount of GHG released (lbs) per megawatt hour (MWh) of energy produced. The GHG emission factors for electricity use change over time due to the California Renewables Portfolio Standard (RPS), a program designed to meet statewide GHG reduction targets. The RPS requires grid electricity to come from 33% renewable sources by 2020. Ramboll used emission factors and renewables percentages for 2014 through 2016 from PGE to project future electricity intensity based on the State achieving the 2020 target for the baseline inventory. The default electricity intensity for methane ($CH_4$) and nitrous oxide ($N_2O$) were obtained from CalEEMod® Appendix D (using PGE values) and were conservatively not adjusted for future inventory years. This calculation is shown in Table Ops-3 of Appendix 1.

GHG emissions from natural gas combustion are generated from commercial usage (e.g., cooking and heating) and industrial usage (e.g., boilers). CalEEMod® default emission factors are used.

Energy emissions are summarized in **Table 5**.

### 3.1.3 Water and Wastewater

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of the water. Water for the study area is sourced from the San Francisco Public Utilities Commission (SFPUC). Additional emissions from wastewater treatment include $CH_4$ and $N_2O$, which are emitted directly from the wastewater.

Water use rates are based on CalEEMod® defaults for San Francisco County. The electricity intensity factor is the same as used for electricity emissions, as described in Section 3.1.2. Emissions are summarized in **Table 5**.

### 3.1.4 Solid Waste Disposal

Emissions from the transport and processing of solid waste are calculated using solid waste generation rates from CalEEMod® for San Francisco County. Indirect GHG emissions associated with waste disposal include $CH_4$ generation from the decomposition of waste and the $CO_2$ emissions associated with the combustion of $CH_4$, if applicable. GHG emissions associated with non-landfill diverted waste streams are not considered, because it is generally assumed that these diversions do not result in any appreciable amounts of GHG emissions when operated effectively. These waste diversion alternatives may result in differences in life-cycle emissions of GHGs, but it is not appropriate to combine life-cycle emissions for only one category of emissions. Biogenic $CO_2$ emissions were not included when CARB analyzed the GHG emissions inventory under Assembly Bill (AB) 32. Therefore, they are not included in the emissions inventory. Emissions are summarized in **Table 5**.

### 3.1.5 Area Sources

GHG emissions from area sources, such as architectural coatings and landscaping equipment, were estimated using CalEEMod® based on the type and size of land uses associated with the existing conditions. Emissions are summarized in **Table 5**.

### 3.1.6 Back-Up Generator

The site contains an existing 380 horsepower (HP) diesel generator that directly emits GHGs. Emissions are calculated as a product of engine horsepower, a $CO_2$ emission factor of 523.5 grams per horsepower hour (g/hp-hr) based on the CalEEMod® default factor, and 20 hours of annual operation for routine maintenance and testing based on the existing BAAQMD permit. Emissions calculations are shown in Table Ops-4 of Appendix 1.

**Table 5: Existing Conditions Emissions Summary**

| Category | $CO_2e$ Emissions (MT/year) |
|---|---|
| Mobile | 2,199 |
| Electricity | 671 |
| Natural Gas | 659 |
| Water and Wastewater | 167 |
| Solid Waste | 172 |
| Area Sources | 0.0174 |
| Stationary Source | 4.0 |
| **Total[1]** | **3,873** |

Notes:
[1] Sub-totals may not sum to the total due to rounding.

## 3.2 GHG Emissions from Proposed Project and Project Variant

Project GHG emissions at the first full year of buildout (2028) would be 4,410 MT $CO_2e$/year, with mobile sources being the largest contributor to GHG emissions, followed by electricity and natural gas. Project Variant GHG emissions at the first full year of buildout (2028) would be 4,585 MT $CO_2e$/year, with mobile sources being the largest contributor to GHG emissions, followed by electricity and natural gas. An emissions summary at the full buildout year is shown in **Table 6**. Total GHG emissions from operation of the Proposed Project and Project Variant from 2020 to 2057 are shown in **Table 7**.

To calculate emissions, CalEEMod® was run for the buildout year of each phase, with adjustments from defaults and for future years as described below. CalEEMod® outputs and detailed calculations for the Proposed Project and Project Variant are presented in Appendix 2 and Tables Ops-1 through Ops-17 of Appendix 1.

### 3.2.1 Mobile

Mobile source emissions for the Proposed Project and Project Variant are calculated using the same methodology as described in Section 3.1.1 and represent emissions associated with resident, worker, and visitor trips. Emissions are based on daily vehicle trip data provided in the travel demand memorandum, with adjustments as shown in Table Ops-1b of Appendix 1. Trips were adjusted to remove double-counted internal trips, non-automobile trips, and double-counted carpool trips.

$CO_2e$ emission factors from mobile sources are assumed to decrease over time to reflect fleet turnover and more efficient vehicle standards. Fleet-average emission factors through 2050 were calculated using EMFAC2017, and mobile emissions from the Proposed Project were adjusted to reflect the decreasing factors each year.[7] The fleet-average mobile emission factors decrease over time due to fleet turnover and regulations such as Advanced Clean Cars (ACC). Table Ops-5 of Appendix 1 summarizes the fleet-average mobile $CO_2e$ emission factors and percent change that was used in the yearly analysis. Tables Ops-6 and Ops-7 of Appendix 1 summarize the yearly mobile emissions for the Proposed Project and Project Variant, respectively.

### 3.2.2 Energy

As described in Section 3.1.2, energy emissions include indirect emissions from electricity used by buildings and direct natural gas combustion emissions. Energy emissions for the Proposed Project and Project Variant were quantified using the same methodology as for the existing conditions, but reflect buildings constructed to 2013 Title 24 Building Energy Efficiency Standards and incorporate conservation measures such as increased lighting, cooling, and water heating efficiencies, solar photovoltaic (PV) electricity generation, and solar hot water heating. Annual energy use totals for the Proposed Project and Project Variant are taken from the Energy Assessment and supporting CEQA Energy Inputs from Arup ("CEQA Energy Inputs").[8] The Energy Assessment and supporting CEQA Energy Inputs report are attached in Appendix 3. Project and Project Variant energy use totals are shown in Table Ops-8 of Appendix 1. Energy use is further reduced through solar PV electricity generation and solar hot water heating, as described below and as shown in Table Ops-9 of Appendix 1.

#### 3.2.2.1 Electricity

Indirect electricity emissions for the Proposed Project and Project Variant are estimated using the same methodology as described for the existing conditions in Section 3.1.2, except that intensity factors decrease each year up to 2050. The intensity factors assume that California achieves the State's Senate Bill (SB) 350 requirement to acquire 50 percent of energy from renewable sources by 2030.[9] For 2050, it assumes that to achieve California's 2050 GHG goal of 80% GHG emissions below 1990 levels, the State will similarly achieve 80% RPS by 2050. This is consistent with the RPS assumptions in the CARB 2017 Climate Change Scoping Plan.[10]

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[7] Since these fleet-average emission factors were calculated outside of CalEEMod®, the newest version of the EMFAC model (EMFAC2017) was used to estimate percent change over time.

[8] Arup. 2018. 3333 California St. CEQA Energy Calculations, Draft 2. January 12.

[9] CEC. 2016. Clean Energy & Pollution Reduction Act SB 350 Overview. Available at: http://www.energy.ca.gov/sb350/. Accessed: July 2018.

[10] CARB. 2017. 2017 Scoping Plan, Appendix D: PATHWAYS, pg. 12 (November). Available at: https://www.arb.ca.gov/cc/scopingplan/2030sp_appd_pathways_final.pdf

Energy use rates from the Energy Assessment that reflect 2013 Title 24 and energy conservation measures are used. Energy use is estimated by phase and calendar year based on the Energy Assessment's supporting data, with maximum energy use at full buildout. Renewable electricity due to rooftop solar PV is projected to offset a portion of the Proposed Project and Project Variant's electricity consumption and emissions. The amount of electricity offset by renewables is taken from the Energy Assessment and the CEQA Energy Inputs.

Emissions are summarized in Table 6. Tables Ops-5 and Ops-10 of Appendix 1 summarize the $CO_2e$ intensity factors used in the yearly analysis and the yearly electricity emissions, respectively. Table Ops-9 of Appendix 1 summarizes the annual reductions due to solar PV.

#### 3.2.2.2 Natural Gas

GHG emissions from natural gas combustion are generated from residential usage, commercial usage (e.g., cooking and heating) and industrial usage. Energy usage rates from the Energy Assessment that reflect 2013 Title 24 and energy conservation measures are used.

Energy use is estimated by phase and calendar year based on the Energy Assessment's supporting data, with maximum energy use at full buildout. Hot water generated by rooftop solar tubes is projected to offset a portion of the Proposed Project and Project Variant's natural gas consumption and emissions. The amount of natural gas offset by solar hot water is taken from the Energy Assessment and the CEQA Energy Inputs.

CalEEMod® default emission factors are used. Emissions are summarized in **Table 6**. Table Ops-10 of Appendix 1 summarizes the yearly natural gas emissions. Table Ops-9 of Appendix 1 summarizes the annual reductions due to solar water heating.

### 3.2.3 Water and Wastewater

Emissions from water and wastewater use for the Proposed Project and Project Variant are calculated using the same methodology as described in Section 3.1.3. Project-specific water use totals are estimated by phase and calendar year based on the Energy Assessment and supporting SFPUC's Water Supply Assessment[11] and CEQA Energy Inputs, with maximum annual water use at full buildout. Water use is shown in Table Ops-8 of Appendix 1. Indirect electricity emissions to supply, treat, and distribute water decrease over time as the electricity intensity factor decreases. The indirect electricity emissions per gallon of water are taken from the CEQA Energy Inputs. Direct and indirect emissions from wastewater are based on CalEEMod® defaults and are shown in Tables Ops-11 and Ops-12 of Appendix 1. Emissions are summarized in **Table 6**, with year-by-year emissions shown in Table Ops-13 of Appendix 1.

### 3.2.4 Solid Waste Disposal

Emissions from solid waste disposal for the Proposed Project and Project Variant are calculated using the same methodology as described in Section 3.1.4. Project-specific waste use totals are estimated by phase and calendar year based on the Energy Assessment and CEQA Energy Inputs, with maximum annual waste disposal at full buildout. Waste generation and emissions are shown in Table Ops-14 of Appendix 1. Emissions are summarized in **Table 6**.

[11] San Francisco Public Utilities Commission (SFPUC). 2017. Water Supply Assessment for the 3333 California Street Project. May 17.

### 3.2.5 Area

GHG emissions from area sources, such as architectural coatings and landscaping equipment, for the Proposed Project and Project Variant were calculated using the same methodology as described in Section 3.1.5. Emissions are based on the type and size of land uses associated with the Proposed Project and Project Variant. Emissions are summarized in **Table 6**.

### 3.2.6 Back-Up Generator

Operation of standby emergency engines will result in direct emissions of GHGs. The Proposed Project includes the installation of one 1,073 horsepower (HP) diesel generator. Emissions are calculated as a product of engine horsepower, a $CO_2e$ emission factor of 523.5 g/hp-hr based on Tier 2 diesel equipment, and a limit of 50 hours of operation for routine maintenance and testing. This is consistent with the maximum allowed testing time from the Airborne Toxics Control Measure (ATCM) for Stationary Compression Ignition Engines (17 CCR 93115) for a Tier 2 engine. The final BAAQMD permit for the generator may have a condition for fewer hours of operation for routine maintenance and testing (such as the 20 hours for the existing generator at the site); however, for this analysis we conservatively assumed the highest limit allowed by the ATCM. This is shown in Table Ops-4 of Appendix 1.

### 3.2.7 Vegetation Changes

The Project and Project Variant propose to create a net increase in new trees and grassland, which sequester GHG emissions over their lifetime. Emissions calculations are shown in Table Ops-15 of Appendix 1.

### 3.2.8 Emissions by Phase

The fraction of land use subtypes built in each phase is shown in Table Ops-16 of Appendix 1, while area and mobile source emissions by phase for each year of ongoing construction from 2022 through 2028 are presented in Table Ops-17 of Appendix 1.

## 3.3 Summary of Operational GHG Emissions

Operational source emissions are slightly different for the Project compared to the Project Variant due to differences in land use. Project and Project Variant operational emissions for full buildout are shown in **Table 6**.

**Table 6: Project and Project Variant Operational Emissions for Full Build Out Year (2028)**

| Category | Project $CO_2e$ Emissions (MT) | Project Variant $CO_2e$ Emissions (MT) |
|---|---|---|
| Mobile | 3,339 | 3,396 |
| Electricity | 662 | 695 |
| Natural Gas | 568 | 638 |
| Water and Wastewater | 43 | 54 |
| Solid Waste | 37 | 32 |
| Area Sources | 29 | 39 |
| Stationary Source | 28 | 28 |
| Solar Reductions | -284 | -284 |
| Vegetation Reductions | -13 | -13 |
| **Total** | **4,410** | **4,585** |

# 4. MEASURES FOR OFFSETTING NET INCREASE GHG EMISSIONS

## 4.1 Overall Year-by-Year Emissions

The year-by-year summary comparison of the existing condition to the Proposed Project and Project Variant is shown in **Table 7**. Detailed yearly GHG emissions for construction and concurrent operations for the Project and Project Variant are presented in Tables Ops-6 and Ops-7 of Appendix 1. Project emissions would exceed existing condition emissions from 2026 through 2037. Project Variant emissions would exceed existing emissions from 2026 through 2043.

From 2020 to 2025, the Project and Project Variant would not be fully operational and emissions from phases 1 and 2 of operation would be below existing condition emissions. The added operation of phase 3 in 2026 would increase the Project and Project Variant emissions above existing condition emissions. By 2038 for the Proposed Project and by 2044 for the Project Variant, with anticipated reductions from the RPS and fleet turnover, Project and Project Variant emissions would be below existing emissions.

Total construction emissions would be 4,273 MT for both the Project and the Project Variant. Total gross operational emissions would be 3,703MT for the Project and 6,235 MT for the Project Variant. Total gross operational emissions for the lifetime of the Project or Project Variant do not include any benefits or credits from any years where the existing conditions are higher than Project or Project Variant emissions.

**Table 7: Year-by-Year Comparison of GHG Emissions**

| Year | GHG Emissions ($MT CO_2e$/year) | | | | | |
|---|---|---|---|---|---|---|
| | **Existing Condition Emissions** | **Project Operational Emissions** | **Project Operational Difference[1]** | **Project Variant Operational Emissions** | **Project Variant Operational Difference[1]** | **Construction Emissions[2]** |
| 2020 | 3,873 | 0 | **-3,873** | 0 | **-3,873** | 541 |
| 2021 | 3,873 | 0 | **-3,873** | 0 | **-3,873** | 733 |
| 2022 | 3,873 | 340 | **-3,533** | 331 | **-3,542** | 732 |
| 2023 | 3,873 | 1,235 | **-2,637** | 1,201 | **-2,672** | 752 |
| 2024 | 3,873 | 1,733 | **-2,140** | 1,678 | **-2,195** | 564 |
| 2025 | 3,873 | 1,858 | **-2,015** | 1,832 | **-2,041** | 664 |
| 2026 | 3,873 | 4,481 | **609** | 4,669 | **796** | 277 |
| 2027 | 3,873 | 4,496 | **623** | 4,674 | **801** | 8 |
| 2028 | 3,873 | 4,410 | **537** | 4,585 | **712** | -- |
| 2029 | 3,873 | 4,326 | **453** | 4,498 | **626** | -- |
| 2030 | 3,873 | 4,251 | **378** | 4,421 | **548** | -- |

**Table 7: Year-by-Year Comparison of GHG Emissions**

| Year | GHG Emissions ($MT CO_2e$/year) | | | | | |
|---|---|---|---|---|---|---|
| | Existing Condition Emissions | Project Operational Emissions | Project Operational Difference[1] | Project Variant Operational Emissions | Project Variant Operational Difference[1] | Construction Emissions[2] |
| 2031 | 3,873 | 4,184 | 311 | 4,352 | 480 | -- |
| 2032 | 3,873 | 4,123 | 251 | 4,290 | 418 | -- |
| 2033 | 3,873 | 4,069 | 197 | 4,235 | 362 | -- |
| 2034 | 3,873 | 4,021 | 148 | 4,184 | 311 | -- |
| 2035 | 3,873 | 3,977 | 104 | 4,139 | 266 | -- |
| 2036 | 3,873 | 3,937 | 64 | 4,098 | 225 | -- |
| 2037 | 3,873 | 3,901 | 28 | 4,060 | 187 | -- |
| 2038 | 3,873 | 3,868 | -4 | 4,026 | 153 | -- |
| 2039 | 3,873 | 3,839 | -34 | 3,995 | 122 | -- |
| 2040 | 3,873 | 3,812 | -61 | 3,967 | 94 | -- |
| 2041 | 3,873 | 3,787 | -86 | 3,941 | 68 | -- |
| 2042 | 3,873 | 3,764 | -109 | 3,917 | 44 | -- |
| 2043 | 3,873 | 3,742 | -130 | 3,894 | 21 | -- |
| 2044 | 3,873 | 3,722 | -151 | 3,872 | 0 | -- |
| 2045 | 3,873 | 3,702 | -170 | 3,852 | -21 | -- |
| 2046 | 3,873 | 3,683 | -189 | 3,832 | -41 | -- |
| 2047 | 3,873 | 3,677 | -196 | 3,824 | -49 | -- |
| 2048 | 3,873 | 3,658 | -214 | 3,805 | -68 | -- |
| 2049 | 3,873 | 3,641 | -232 | 3,786 | -87 | -- |
| 2050 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| 2051 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| 2052 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| 2053 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| 2054 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| 2055 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| 2056 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |

**Table 7: Year-by-Year Comparison of GHG Emissions**

| Year | GHG Emissions ($MT CO_2e$/year) | | | | | |
|---|---|---|---|---|---|---|
| | **Existing Condition Emissions** | **Project Operational Emissions** | **Project Operational Difference[1]** | **Project Variant Operational Emissions** | **Project Variant Operational Difference[1]** | **Construction Emissions[2]** |
| 2057 | 3,873 | 3,625 | -248 | 3,769 | -104 | -- |
| **Total Gross Emissions (MT)[2]** | **--** | **--** | **3,703** | **--** | **6,235** | **4,273** |

Notes:
[1] Where existing emissions are greater than operational emissions, no credit has been taken in the "Total Gross Operational Emissions" summation.
[2] Project and Project Variant emissions for 2020 through 2021 include only construction-related emissions. Project and Project Variant emissions for 2022 through 2027 include both construction-related and operational emissions. All construction emissions are considered to be a net increase for those analysis years and apply to both the Proposed Project and Project Variant.

## 4.2 Mitigation Measures/Voluntary Carbon Credits/Conclusions

To offset the increase in GHG emissions from construction in 2020 through 2027 and from operation in 2026 through 2037 (Project) and 2043 (Project Variant), the project sponsor commits to measures to ensure there will be no net additional GHG emissions associated with the Project or Project Variant. This could be achieved through on-site mitigation measures such as installing additional solar panels or electric vehicle charging stations, or through the purchase of qualified GHG credits.

## APPENDIX 1
## RAMBOLL SUPPORTING TABLES

**Table Con-1. Construction Phase Duration by Year**
**3333 California St AB900**
**San Francisco, CA**

| Phase | Phase Name | Start Date | End Date | Total number of work days | Construction phase duration by year[1,2] | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | Masonic/Euclid | 3/2/2020 | 8/19/2022 | 645 | 34% | 41% | 26% | -- | -- | -- | -- | -- |
| 2 | Center Building A/B | 9/10/2021 | 8/31/2023 | 515 | -- | 16% | 51% | 34% | -- | -- | -- | -- |
| 3 | Plaza A/Plaza B/ Walnut | 12/4/2022 | 11/18/2025 | 773 | -- | -- | 3% | 34% | 34% | 30% | -- | -- |
| 4 | Mayfair/Townhouse/Euclid Park | 5/22/2025 | 1/12/2027 | 429 | -- | -- | -- | -- | -- | 37% | 61% | 2% |
| | | | TOTAL | 2,362 | | | | | | | | |

**Notes:**

[1] Construction duration per year is calculated as construction duration of phase in a year/total construction duration.

[2] Total percentages in the table may not add up to 100% due to rounding.

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**Table Con-2. Project Off-Road Diesel Construction Equipment List**
**3333 California Street**
**San Francisco, California**

| Subphase[1] | Equipment Type | Number | Hours/day | Horsepower | Load Factor | Phase |
|---|---|---|---|---|---|---|
| Exterior | Aerial Lifts | 2 | 8 | 63 | 0.31 | All |
| Demolition | Air Compressors | 2 | 5 | 78 | 0.48 | All |
| Excavation | Crawler Tractors with Rippers | 1 | 8 | 208 | 0.43 | All |
| Excavation | Excavators | 2 | 8 | 163 | 0.38 | All |
| Excavation | Excavators with Hoe Ram | 2 | 8 | 163 | 0.38 | All |
| Exterior | Forklifts | 1 | 8 | 89 | 0.20 | All |
| Exterior | Pavers | 1 | 8 | 126 | 0.42 | Street Paving[1] |
| Exterior | Paving Equipment | 1 | 8 | 131 | 0.36 | Street Paving[1] |
| Structure | Pumps | 1 | 8 | 84 | 0.74 | Pouring Days[2] |
| Exterior | Rollers | 1 | 6 | 81 | 0.38 | Street Paving[1] |
| All | Rough Terrain Forklifts | 2 | 8 | 100 | 0.40 | All |
| Demolition | Skid Steer Loaders (Bobcat) | 1 | 8 | 65 | 0.37 | All |
| All | Sweepers/Scrubbers | 1 | 3 | 64 | 0.46 | All |
| Excavation | Tractors/Loaders/Backhoes | 2 | 8 | 98 | 0.37 | All |

**Notes:**

1. Street paving occurs for one day at the completion of each construction phase.
2. There will be approximately 50 pouring days during Phase 1, 15 pouring days during Phase 2, 70 pouring days during Phase 3, and 12 pouring days during Phase 4.

**Table Con-3. Construction Offroad and Onroad GHG Emissions**
**3333 California St AB900**
**San Francisco, CA**

| Emission Source | Phase | Total $CO_2e$ Emissions (MT) | $CO_2e$ Emissions by Year[1] | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| Offroad Diesel Equipment[2] | 1 | 512 | 173 | 207 | 131 | -- | -- | -- | -- | -- |
| | 2 | 259 | -- | 41 | 131 | 87 | -- | -- | -- | -- |
| | 3 | 573 | -- | -- | 15 | 194 | 194 | 170 | -- | -- |
| | 4 | 122 | -- | -- | -- | -- | -- | 46 | 74 | 2 |
| Onroad Trucks and Vehicles[3] | 1 | 763 | 259 | 309 | 195 | -- | -- | -- | -- | -- |
| | 2 | 58 | -- | 9 | 29 | 19 | -- | -- | -- | -- |
| | 3 | 745 | -- | -- | 19 | 252 | 252 | 221 | -- | -- |
| | 4 | 152 | -- | -- | -- | -- | -- | 57 | 92 | 3 |
| **Total** | All | 3,182 | 432 | 567 | 520 | 552 | 447 | 494 | 167 | 5 |

**Notes:**

[1] Yearly emissions split by fraction of phase in each year.

[2] Emissions are calculated based on default CalEEMod® off-road construction equipment tiers for each piece of equipment in the emissions year modeled. A construction equipment list and hours of operation for each piece of equipment for each phase were provided by the Project Sponsor.

[3] Total number of hauling, concrete, and delivery trips and trip distances are discussed in Table Con-5.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric ton

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**Table Con-4. Electricity Usage and Emissions from Construction Electric Equipment**
**3333 California St AB900**
**San Francisco, California**

**Electricity Usage[1]**

| | | |
|---|---|---|
| Total Electricity Usage | 7,169,549 | kWh |

| Phase | Number of Days | Electric Equipment Usage (kWh) | Usage by Year[2] (kWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 645 | 1,957,815 | 663,482 | 794,003 | 500,331 | -- | -- | -- | -- | -- |
| 2 | 515 | 1,563,217 | -- | 245,338 | 792,464 | 525,414 | -- | -- | -- | -- |
| 3 | 773 | 2,346,343 | -- | -- | 60,831 | 792,977 | 795,149 | 697,385 | -- | -- |
| 4 | 429 | 1,302,175 | -- | -- | -- | -- | -- | 486,145 | 792,156 | 23,873 |
| Total | 2,362 | 7,169,549 | 663,482 | 1,039,341 | 1,353,626 | 1,318,391 | 795,149 | 1,183,530 | 792,156 | 23,873 |

| Phase | $CO_2e$ Intensity Factor by Year[3] (lb $CO_2e$/MWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| All | 363 | 354 | 345 | 335 | 326 | 317 | 308 | 299 |

| Phase | $CO_2e$ Emissions by Year (MT/yr) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 109 | 127 | 78 | -- | -- | -- | -- | -- |
| 2 | -- | 39 | 124 | 80 | -- | -- | -- | -- |
| 3 | -- | -- | 9.5 | 121 | 118 | 100 | -- | -- |
| 4 | -- | -- | -- | -- | -- | 70 | 111 | 3.2 |
| Total | 109 | 167 | 212 | 201 | 118 | 170 | 111 | 3.2 |

**Notes:**

[1] Total electricity usage from SWCA's Energy Assessment report (July 2018).

[2] Yearly electricity usage split by fraction of phase in each year. Electricity usage and GHG emissions are same for both Project and Project Variant.

[3] See Table Ops-5 for $CO_2e$ intensity factor calculations.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
kWh - kilowatt hour
lb - pound
MT - metric ton
MWh - megawatt hour
yr - year



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**Table Con-5. Project Construction Trip Assumptions**
**3333 California Street**
**San Francisco, California**

| Phase | Trip Category | Total Trips[1] | Total Trip Length[2] (miles) |
|---|---|---|---|
| 1 | Worker | 58,050 | 21 |
| 2 | | 38,625 | |
| 3 | | 69,570 | |
| 4 | | 32,175 | |
| 1 | Non-hauling | 2,500 | 14 |
| 2 | | 500 | |
| 3 | | 3,500 | |
| 4 | | 400 | |
| 1 | Vendor | 1,300 | 14 |
| 2 | | 1,000 | |
| 3 | | 1,500 | |
| 4 | | 850 | |
| 1 | Hauling (Hazardous Waste) | 1,636 | 60 |
| 2 | | 24 | |
| 3 | | 1,631 | |
| 4 | | 313 | |
| 1 | Hauling (Non-Hazardous Waste) | 3,271 | 17 |
| 2 | | 48 | |
| 3 | | 3,263 | |
| 4 | | 626 | |
| 1 | | 3,271 | 48 |
| 2 | | 48 | |
| 3 | | 3,263 | |
| 4 | | 626 | |

**Notes:**

1. Trips were provided by the Project Sponsor.
2. Worker, non-hauling, and vendor trip lengths assume CalEEMod® default values. Hauling trip lengths were provided by the Project Sponsor.

**Abbreviations:**

CalEEMod® - California Emissions Estimator MODel

**Table Con-6. Water Usage and Emissions from Construction Dust Control**
**3333 California St AB900**
**San Francisco, California**

**Usage Information[1]**

| | | |
|---|---|---|
| Total water consumption | 226,500 | gallons |
| Energy intensity | 0.005411 | kWh/gallon |
| Total electricity use | 1,226 | kWh |

| Phase | Number of Days | Total Electricity (kWh) | Electricity by Year[2] (kWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 147 | 509 | 172 | 206 | 130 | -- | -- | -- | -- | -- |
| 2 | 20 | 69 | -- | 11 | 35 | 23 | -- | -- | -- | -- |
| 3 | 147 | 509 | -- | -- | 13 | 172 | 172 | 151 | -- | -- |
| 4 | 40 | 138 | -- | -- | -- | -- | -- | 52 | 84 | 2.5 |
| Total | 354 | 1,226 | 172 | 217 | 178 | 195 | 172 | 203 | 84 | 2.5 |

| Phase | $CO_2e$ Intensity Factor by Year[3] (lb $CO_2e$/MWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| All | 363 | 354 | 345 | 335 | 326 | 317 | 308 | 299 |

| Phase | $CO_2e$ Emissions by Year (MT/yr) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 0.028 | 0.033 | 0.020 | -- | -- | -- | -- | -- |
| 2 | -- | 0.002 | 0.005 | 0.004 | -- | -- | -- | -- |
| 3 | -- | -- | 0.002 | 0.026 | 0.026 | 0.022 | -- | -- |
| 4 | -- | -- | -- | -- | -- | 0.007 | 0.012 | 0.0003 |
| Total | 0.028 | 0.035 | 0.028 | 0.030 | 0.026 | 0.029 | 0.012 | 0.0003 |

**Notes:**
[1] Total water consumption and energy intensity from San Francisco Water Power Sewer's Water Supply Assessment and SWCA's Energy Assessment report.
[2] Yearly electricity usage split by fraction of phase in each year.
[3] See Table Ops-5 for $CO_2e$ intensity factor calculations.

**Abbreviations:**
$CO_2e$ - carbon dioxide equivalents
kWh - kilowatt hour
lb - pound
MT - metric ton
MWh - megawatt hour
yr - year

**Table Ops-1a. Trip Rates - Existing Conditions**
**3333 California St AB900**
**San Francisco, California**

| Land Use Data | | CalEEMod Defaults[1] | | | | | | Driveway Count[2] | | | | ITE Trips[2] | | Calculated Rates[3] | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use Sub-Type | Size | Weekday Trip Rate | Saturday Trip Rate | Sunday Trip Rate | Weekday Trips | Saturday Trips | Sunday Trips | AM Peak Hour | PM Peak Hour | Scaled AM Peak Hour Trips | Scaled PM Peak Hour Trips | % of Daily Trips in AM Count | % of Daily Trips in PM Count | Weekday Trip Counts | Weekday Trip Rate | Saturday Trip Rate | Sunday Trip Rate |
| | ksf | trips/ksf/day | | | trips/day | | | trips/hr | trips/hr | trips | trips | % | % | trips/day | trips/ksf/day | | |
| General Office Building | 352 | 11.03 | 2.46 | 1.05 | 3,883 | 866 | 370 | 266 | 296 | 218 | 243 | 8.2% | 8.5% | 2,758 | 7.84 | 1.75 | 0.75 |
| Day-care Center | 11.5 | 74.06 | 6.21 | 5.83 | 852 | 71 | 67 | | | 48 | 53 | 17.6% | 18% | 284 | 24.68 | 2.07 | 1.94 |

**Notes:**

[1] CalEEMod version 2016.3.2 default trip rates for San Francisco County, urban setting.

[2] AM and PM peak hour driveway counts and percent of daily trips in AM and PM count from Project Travel Demand Memorandum (Kittelson & Associates, March 2018). Scaled by land use using CalEEMod default trips.

[3] Weekday trip counts estimated by dividing AM and PM peak hour trips by ITE percent of daily trips in AM and PM trips and taking the average of the two values. Weekend trip rates estimated using ratio of CalEEMod default weekday to weekend rates.

**Abbreviations:**

hr - hour

ksf - thousand square feet

ITE - Institute of Transportation Engineers

**Table Ops-1b. Trip Rates - Project and Project Variant**
**3333 California St AB900**
**San Francisco, California**

**Project[1]**

| Land Use Sub-Type | Size Metric | Size | Person-Trips | Adjusted Person-Trips | Vehicle Trips | Trip Rate |
|---|---|---|---|---|---|---|
| | | | (trips/day) | (trips/day) | (trips/day) | (trip/size/day) |
| Apartments Mid Rise | Dwelling Unit | 558 | 5,002 | 2,498 | 1,431 | 2.56 |
| Open Space | Acre | 5.42 | 0 | 0 | 0 | 0 |
| Day-Care Center | 1000sqft | 14.69 | 984 | 491 | 281 | 19.16 |
| Enclosed Parking Structure | Spaces | 895 | 0 | 0 | 0 | 0 |
| General Office Building | 1000sqft | 49.999 | 905 | 452 | 259 | 5.18 |
| Parking Lot | 1000sqft | 10.836 | 0 | 0 | 0 | 0 |
| Strip Mall | 1000sqft | 54.117 | 12,753 | 6,370 | 3,648 | 67.41 |

**Variant[1]**

| Land Use Sub-Type | Size Metric | Size | Person-Trips | Adjusted Person-Trips | Vehicle Trips | Trip Rate |
|---|---|---|---|---|---|---|
| | | | (trips/day) | (trips/day) | (trips/day) | (trip/size/day) |
| Apartments Mid Rise | Dwelling Unit | 744 | 6,670 | 3,274 | 1,917 | 2.58 |
| Open Space | Acre | 5.42 | 0 | 0 | 0 | 0 |
| Day-Care Center | 1000sqft | 14.65 | 984 | 483 | 283 | 19.30 |
| Enclosed Parking Structure | Spaces | 971 | 0 | 0 | 0 | 0 |
| General Office Building | 1000sqft | 0 | 0 | 0 | 0 | 0 |
| Parking Lot | 1000sqft | 10.836 | 0 | 0 | 0 | 0 |
| Strip Mall | 1000sqft | 48.593 | 11,925 | 5,854 | 3,427 | 70.52 |

**Notes:**

[1] Project and Variant trip rates from the traffic memorandum (Kittelson & Associates, March 2018). Strip mall is assumed to include "General Retail", "Sit-Down", and "Composite" land uses. Daily person-trips are adjusted to remove double-counted internal trips, non-auto trips, and double-counted carpool trips. For emissions purposes, daily trips are assumed constant for weekdays and weekends. These factors are shown below.

| Variable | Project | Variant |
|---|---|---|
| Total Vehicle-Trips/ Total Person-Trips | 0.57 | 0.59 |
| % internal, average | 18.25 | 19.10 |
| % external auto, average | 61.10 | 60.68 |

**Abbreviations:**

1000sqft - thousand square feet

**Table Ops-2. Existing Conditions Energy Emissions**
**3333 California St AB900**
**San Francisco, California**

| Energy Sector | Average Monthly Data[1] | Average Annual Usage | Usage Units | Emission Factor | Emissions Factor Units | $CO_2e$ Emissions (MT/year) |
|---|---|---|---|---|---|---|
| Electricity | 340 | 4,076 | MWh | 363 | lbs $CO_2e$/MWh delivered | 671 |
| Natural Gas | 1,028 | 12,332 | MMBtu | 117.77 | lb $CO_2e$/MMBtu | 659 |
| | | | | | **Total** | 1,330 |

**Notes:**

[1] Average monthly usage from PG&E bills July 2012 - September 2014. Data provided by Project Sponsor.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
lb - pound
MMBTU - million British Thermal Units
MT - metric ton
MWh - megawatt-hour
PG&E - Pacific Gas and Electric

**Table Ops-3. Electricity Intensity Factor Derivations**
**3333 California St AB900**
**San Francisco, California**

| | 2014[1,2] | 2015[1,3] | 2016[1,4] | Average[5] | Units |
|---|---|---|---|---|---|
| $CO_2$ Intensity Factor per Total Energy Delivered | 434.92 | 404.51 | 293.7 | 377.7 | lbs $CO_2$/MWh delivered |
| % of Total Energy From Renewables | 27% | 29.5% | 32.8% | 29.8% | |
| $CO_2$ Intensity Factor per Total Non-Renewable Energy[6] | 595.78 | 573.77 | 437 | 537.8 | lbs $CO_2$/MWh delivered |
| | | | | | |
| **Estimated Intensity Factor for Total Energy Delivered[7,8]** | | | | | |
| 2020 RPS (33%) | 399.2 | 384.4 | 292.8 | 360.3 | lbs $CO_2$/MWh delivered |
| | 401.7 | 387.0 | 295.4 | 362.9 | lbs $CO_2e$/MWh delivered |
| 2030 RPS (50%)[9] | 297.9 | 286.9 | 218.5 | 268.9 | lbs $CO_2$/MWh delivered |
| | 300.5 | 289.5 | 221.1 | 271.453 | lbs $CO_2e$/MWh delivered |
| 2050 RPS (80%)[10] | 119.2 | 114.8 | 87.4 | 107.6 | lbs $CO_2$/MWh delivered |
| | 121.7 | 117.3 | 90.0 | 110.1 | lbs $CO_2e$/MWh delivered |

**Notes:**

[1] Total $CO_2$ emission factor from The Climate Registry. Available at: https://www.theclimateregistry.org/our-members/cris-public-reports/. Accessed: June 2018.

[2] Percent of total energy from eligible renewables is from the PGE 2015 Corporate Responsibility Report. Available at: http://www.pgecorp.com/corp_responsibility/reports/2015/PGE_CRSR_2015.pdf.

[3] Percent of total energy from eligible renewables is from the PGE 2016 Corporate Responsibility Report. Available at: http://www.pgecorp.com/corp_responsibility/reports/2016/PGE_CRSR_Environment.pdf.

[4] Percent of total energy from eligible renewables is from the PGE 2017 Corporate Responsibility Report. Available at: http://www.pgecorp.com/corp_responsibility/reports/2017/assets/PGE_CRSR_2017_Environment.pdf.

[5] This average uses the most recent three years of data.

[6] The emissions metric presented here is calculated based on the total $CO_2$ intensity factor divided by the percent of energy delivered from non-renewable sources.

[7] The intensity factor for total energy delivered is estimated by multiplying the percentage of energy delivered from non-renewable energy by the $CO_2$ emissions per total non-renewable energy metric calculated above. The estimate provided here and the energy reports issued by PGE assume that renewable energy sources do not result in any $CO_2$ emissions.

[8] Global Warming Potentials (GWP) are based on the IPCC Fourth Assessment Report. $CH_4$ and $N_2O$ emission factors are from the CalEEMod version 2016.3.2 defaults for PGE, and are conservatively assumed not to change from these estimates. As more renewable energy is integrated into the electricity grid, these intensity factors will also decrease.

[9] Emission factor presented here is 50% projected RPS for 2030 consistent with SB 32 and SB 350. Available at: http://www.energy.ca.gov/sb350/.

[10] The projected 2050 RPS target is based on 80% RPS in 2050, consistent with the CARB Final 2017 Scoping Plan, Appendix D PATHWAYS, pg 12 (November, 2017). Available at: https://www.arb.ca.gov/cc/scopingplan/2030sp_appd_pathways_final.pdf

**Abbreviations:**

CARB - California Air Resources Board
$CO_2$ - carbon dioxide
GHG - greenhouse gases
IPCC - Intergovernmental Panel on Climate Change
lbs - pounds
MWh - megawatt-hour
RPS - Renewable Portfolio Standards
PGE - Pacific Gas & Electric
SB - Senate Bill

**Table Ops-4. Stationary Source Emissions**
**3333 California St AB900**
**San Francisco, California**

| Stationary Source | Engine Tier | HP | Fuel Type | Operation[1] | $CO_2e$ Emission Factor[2] | $CO_2e$ Emissions |
|---|---|---|---|---|---|---|
| | | | | hrs/yr | g/bhp-hr | MT/yr |
| Existing Generator | None | 380 | Diesel | 20 | 523.5 | 4.0 |
| Proposed Generator | Tier 2 | 1,073 | Diesel | 50 | 523.5 | 28.1 |

**Notes:**

[1] Operation of existing generator is 20 hours, based on the existing BAAQMD Permit. Operation of proposed generator is assumed to be 50 hours per year for routine maintenance and testing. This is consistent with the Maximum Allowed Testing Time from the Airborne Toxics Control Measure for Stationary Compression Ignition Engines (17 CCR 93115) for a Tier 2 engine.

[2] Generator emission factors are from CalEEMod and do not depend on engine tier.

**Abbreviations:**

BAAQMD - Bay Area Air Quality Management District
bhp - brake-horsepower
CO2e - carbon dioxide equivalents
g - grams
hrs - hours
MT - metric tons
yr - year

**Table Ops-5. Electricity and Mobile Emission Factors**
**3333 California St AB900**
**San Francisco, California**

| Year | CO2e Intensity Factor | Fleet CO2e EF | Change in carbon intensity from previous year | Change in Fleet EF from previous year |
|---|---|---|---|---|
| | lb CO2e/MWh | metric ton/mi | % | % |
| 2020 | 363 | 4.00E-04 | -- | -- |
| 2021 | 354 | 3.90E-04 | -3% | -2% |
| 2022 | 345 | 3.80E-04 | -3% | -3% |
| 2023 | 335 | 3.69E-04 | -3% | -3% |
| 2024 | 326 | 3.59E-04 | -3% | -3% |
| 2025 | 317 | 3.49E-04 | -3% | -3% |
| 2026 | 308 | 3.40E-04 | -3% | -3% |
| 2027 | 299 | 3.32E-04 | -3% | -2% |
| 2028 | 290 | 3.25E-04 | -3% | -2% |
| 2029 | 281 | 3.18E-04 | -3% | -2% |
| 2030 | 271 | 3.12E-04 | -3% | -2% |
| 2031 | 263 | 3.07E-04 | -3% | -2% |
| 2032 | 255 | 3.03E-04 | -3% | -1% |
| 2033 | 247 | 2.99E-04 | -3% | -1% |
| 2034 | 239 | 2.96E-04 | -3% | -1% |
| 2035 | 231 | 2.93E-04 | -3% | -1% |
| 2036 | 223 | 2.90E-04 | -3% | -1% |
| 2037 | 215 | 2.88E-04 | -4% | -1% |
| 2038 | 207 | 2.86E-04 | -4% | -1% |
| 2039 | 199 | 2.85E-04 | -4% | -1% |
| 2040 | 191 | 2.83E-04 | -4% | 0% |
| 2041 | 183 | 2.82E-04 | -4% | 0% |
| 2042 | 175 | 2.81E-04 | -4% | 0% |
| 2043 | 167 | 2.81E-04 | -5% | 0% |
| 2044 | 159 | 2.80E-04 | -5% | 0% |
| 2045 | 150 | 2.80E-04 | -5% | 0% |
| 2046 | 142 | 2.79E-04 | -5% | 0% |
| 2047 | 134 | 2.79E-04 | -6% | 0% |
| 2048 | 126 | 2.78E-04 | -6% | 0% |
| 2049 | 118 | 2.78E-04 | -6% | 0% |
| 2050 | 110 | 2.78E-04 | -7% | 0% |
| 2051 | 110 | 2.78E-04 | 0% | 0% |
| 2052 | 110 | 2.78E-04 | 0% | 0% |
| 2053 | 110 | 2.78E-04 | 0% | 0% |
| 2054 | 110 | 2.78E-04 | 0% | 0% |
| 2055 | 110 | 2.78E-04 | 0% | 0% |

| Year | CO2e Intensity Factor | Fleet CO2e EF | Change in carbon intensity from previous year | Change in Fleet EF from previous year |
|---|---|---|---|---|
| | lb CO2e/MWh | metric ton/mi | % | % |
| 2056 | 110 | 2.78E-04 | 0% | 0% |
| 2057 | 110 | 2.78E-04 | 0% | 0% |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Approximation of the decrease in vehicle emission factors over time, based on San Francisco fleet-average emission factors from 2020-2050. Assumes no change after 2050, since EMFAC2017 does not project past 2050.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

EF - emission factor

lb - pound

mi - mile

MWh - megawatt-hour

**Table Ops-6. Project Operational $CO_2e$ Emissions by Year**
**3333 California St AB900**
**San Francisco, California**

| Year | $CO_2e$ (MT/yr)[3] | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Area | Energy | | Mobile[2] | Waste | Water | | Stationary Source[4] | Construction | Solar Reductions | Vegetation Reduction | Total |
| | | Electricity[1] | Natural Gas | | | Treatment | Transportation | | | | | |
| **2020** | -- | -- | -- | -- | -- | -- | -- | -- | 541 | 0 | 0 | 541 |
| 2021 | -- | -- | -- | -- | -- | -- | -- | -- | 733 | 0 | 0 | 733 |
| 2022 | 4 | 74 | 65 | 233 | 2 | 4 | 2 | -- | 732 | -45 | 0 | 1,071 |
| 2023 | 14 | 245 | 235 | 761 | 7 | 13 | 8 | 9 | 752 | -56 | 0 | 1,988 |
| 2024 | 20 | 334 | 347 | 1,019 | 10 | 19 | 11 | 28 | 564 | -55 | 0 | 2,297 |
| 2025 | 21 | 367 | 369 | 1,286 | 13 | 20 | 11 | 28 | 664 | -256 | 0 | 2,522 |
| 2026 | 27 | 664 | 529 | 3,408 | 36 | 27 | 14 | 28 | 277 | -252 | 0 | 4,759 |
| 2027 | 29 | 681 | 567 | 3,412 | 37 | 29 | 15 | 28 | 8 | -290 | -13 | 4,504 |
| 2028 | 29 | 662 | 568 | 3,339 | 37 | 29 | 15 | 28 | -- | -284 | -13 | 4,410 |
| 2029 | 29 | 641 | 568 | 3,271 | 37 | 29 | 14 | 28 | -- | -279 | -13 | 4,326 |
| **2030** | 29 | 620 | 568 | 3,211 | 37 | 29 | 14 | 28 | -- | -273 | -13 | 4,251 |
| 2031 | 29 | 602 | 568 | 3,159 | 37 | 29 | 13 | 28 | -- | -268 | -13 | 4,184 |
| 2032 | 29 | 583 | 568 | 3,112 | 37 | 29 | 13 | 28 | -- | -264 | -13 | 4,123 |
| 2033 | 29 | 565 | 568 | 3,072 | 37 | 29 | 12 | 28 | -- | -259 | -13 | 4,069 |
| 2034 | 29 | 546 | 568 | 3,037 | 37 | 29 | 12 | 28 | -- | -254 | -13 | 4,021 |
| 2035 | 29 | 528 | 568 | 3,008 | 37 | 29 | 12 | 28 | -- | -249 | -13 | 3,977 |
| 2036 | 29 | 510 | 568 | 2,982 | 37 | 29 | 11 | 28 | -- | -244 | -13 | 3,937 |
| 2037 | 29 | 491 | 568 | 2,960 | 37 | 29 | 11 | 28 | -- | -240 | -13 | 3,901 |
| 2038 | 29 | 473 | 568 | 2,941 | 37 | 29 | 10 | 28 | -- | -235 | -13 | 3,868 |
| 2039 | 29 | 454 | 568 | 2,926 | 37 | 29 | 10 | 28 | -- | -230 | -13 | 3,839 |
| 2040 | 29 | 436 | 568 | 2,913 | 37 | 29 | 10 | 28 | -- | -225 | -13 | 3,812 |
| 2041 | 29 | 417 | 568 | 2,902 | 37 | 29 | 9 | 28 | -- | -220 | -13 | 3,787 |
| 2042 | 29 | 399 | 568 | 2,893 | 37 | 29 | 9 | 28 | -- | -215 | -13 | 3,764 |
| 2043 | 29 | 381 | 568 | 2,885 | 37 | 29 | 8 | 28 | -- | -211 | -13 | 3,742 |
| 2044 | 29 | 362 | 568 | 2,879 | 37 | 29 | 8 | 28 | -- | -206 | -13 | 3,722 |
| 2045 | 29 | 344 | 568 | 2,874 | 37 | 29 | 8 | 28 | -- | -201 | -13 | 3,702 |
| 2046 | 29 | 325 | 568 | 2,868 | 37 | 29 | 7 | 28 | -- | -196 | -13 | 3,683 |
| 2047 | 29 | 307 | 568 | 2,863 | 37 | 29 | 7 | 28 | -- | -191 | 0 | 3,677 |
| 2048 | 29 | 288 | 568 | 2,859 | 37 | 29 | 6 | 28 | -- | -187 | 0 | 3,658 |
| 2049 | 29 | 270 | 568 | 2,855 | 37 | 29 | 6 | 28 | -- | -182 | 0 | 3,641 |
| 2050 | 29 | 252 | 568 | 2,853 | 37 | 29 | 6 | 28 | -- | -177 | 0 | 3,625 |
| 2051 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2052 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2053 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2054 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2055 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2056 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2057 | 29 | 252 | 568 | 2,853 | 37 | 29 | 6 | 28 | -- | -177 | 0 | 3,625 |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Approximation of the decrease in vehicle emission factors over time, based on San Francisco fleet-average emission factors from 2020-2050. Assumes no change after 2050, since EMFAC2017 does not project past 2050.

[3] Assume all buildings become operational as soon as phase is constructed, based on percent of operational land uses by Phase as shown in Table Ops-16. The only changes in emissions are due to transportation and electricity becoming cleaner.

[4] Assumes generator operational with phase 2

**Abbreviations:**

AB - Assembly Bill
CARB - California Air Resources Board
$CO_2e$ - carbon dioxide equivalent
EMFAC - CARB Emissions Factor model
g - gram
lb - pound
mi - mile
MWh - megawatt-hour
MT - metric ton
RPS - Renewables Portfolio Standard

**Table Ops-7. Project Variant Operational $CO_2e$ Emissions by Year**
**3333 California St AB900**
**San Francisco, California**

| Year | $CO_2e$ (MT/yr)[3] | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Area | Energy | | Mobile[2] | Waste | Water | | Stationary Source | Construction | Solar Reductions | Vegetation Reduction | Total |
| | | Electricity[1] | Natural Gas | | | Treatment | Transportation | | | | | |
| **2020** | -- | -- | -- | -- | -- | -- | -- | -- | 541 | 0 | 0 | 541 |
| 2021 | -- | -- | -- | -- | -- | -- | -- | -- | 733 | 0 | 0 | 733 |
| 2022 | 3.8 | 68 | 58 | 238 | 2 | 3.5 | 2.1 | -- | 732 | -45 | 0 | 1,063 |
| 2023 | 14 | 225 | 209 | 774 | 6 | 12 | 7 | 9 | 752 | -56 | 0 | 1,953 |
| 2024 | 20 | 304 | 309 | 1,033 | 8 | 18 | 11 | 28 | 564 | -55 | 0 | 2,242 |
| 2025 | 22 | 346 | 344 | 1,305 | 11 | 20 | 11 | 28 | 664 | -256 | 0 | 2,496 |
| 2026 | 37 | 702 | 603 | 3,467 | 31 | 34 | 18 | 28 | 277 | -252 | 0 | 4,946 |
| 2027 | 39 | 716 | 637 | 3,470 | 32 | 36 | 19 | 28 | 8 | -290 | -13 | 4,682 |
| 2028 | 39 | 695 | 638 | 3,396 | 32 | 36 | 18 | 28 | -- | -284 | -13 | 4,585 |
| 2029 | 39 | 673 | 638 | 3,326 | 32 | 36 | 18 | 28 | -- | -279 | -13 | 4,498 |
| 2030 | 39 | 651 | 638 | 3,266 | 32 | 36 | 17 | 28 | -- | -273 | -13 | 4,421 |
| 2031 | 39 | 632 | 638 | 3,212 | 32 | 36 | 17 | 28 | -- | -268 | -13 | 4,352 |
| 2032 | 39 | 612 | 638 | 3,165 | 32 | 36 | 16 | 28 | -- | -264 | -13 | 4,290 |
| 2033 | 39 | 593 | 638 | 3,125 | 32 | 36 | 16 | 28 | -- | -259 | -13 | 4,235 |
| 2034 | 39 | 574 | 638 | 3,089 | 32 | 36 | 15 | 28 | -- | -254 | -13 | 4,184 |
| 2035 | 39 | 554 | 638 | 3,059 | 32 | 36 | 15 | 28 | -- | -249 | -13 | 4,139 |
| 2036 | 39 | 535 | 638 | 3,033 | 32 | 36 | 14 | 28 | -- | -244 | -13 | 4,098 |
| 2037 | 39 | 516 | 638 | 3,010 | 32 | 36 | 14 | 28 | -- | -240 | -13 | 4,060 |
| 2038 | 39 | 496 | 638 | 2,991 | 32 | 36 | 13 | 28 | -- | -235 | -13 | 4,026 |
| 2039 | 39 | 477 | 638 | 2,975 | 32 | 36 | 13 | 28 | -- | -230 | -13 | 3,995 |
| 2040 | 39 | 458 | 638 | 2,962 | 32 | 36 | 12 | 28 | -- | -225 | -13 | 3,967 |
| 2041 | 39 | 438 | 638 | 2,951 | 32 | 36 | 12 | 28 | -- | -220 | -13 | 3,941 |
| 2042 | 39 | 419 | 638 | 2,942 | 32 | 36 | 11 | 28 | -- | -215 | -13 | 3,917 |
| 2043 | 39 | 399 | 638 | 2,934 | 32 | 36 | 10 | 28 | -- | -211 | -13 | 3,894 |
| 2044 | 39 | 380 | 638 | 2,928 | 32 | 36 | 10 | 28 | -- | -206 | -13 | 3,872 |
| 2045 | 39 | 361 | 638 | 2,923 | 32 | 36 | 9 | 28 | -- | -201 | -13 | 3,852 |
| 2046 | 39 | 341 | 638 | 2,917 | 32 | 36 | 9 | 28 | -- | -196 | -13 | 3,832 |
| 2047 | 39 | 322 | 638 | 2,912 | 32 | 36 | 8 | 28 | -- | -191 | 0 | 3,824 |
| 2048 | 39 | 303 | 638 | 2,907 | 32 | 36 | 8 | 28 | -- | -187 | 0 | 3,805 |
| 2049 | 39 | 283 | 638 | 2,904 | 32 | 36 | 7 | 28 | -- | -182 | 0 | 3,786 |
| 2050 | 39 | 264 | 638 | 2,902 | 32 | 36 | 7 | 28 | -- | -177 | 0 | 3,769 |
| 2051 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2052 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2053 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2054 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2055 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2056 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2057 | 39 | 264 | 638 | 2,902 | 32 | 36 | 7 | 28 | -- | -177 | 0 | 3,769 |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Approximation of the decrease in vehicle emission factors over time, based on San Francisco fleet-average emission factors from 2020-2050. Assumes no change after 2050, since EMFAC2017 does not project past 2050.

[3] Assume all buildings become operational as soon phase is constructed, based on percent of operational land uses by Phase as shown in Table Ops-16.. The only changes in emissions are due to transportation and electricity becoming cleaner.

[4] Assumes generator operational with phase 2.

**Abbreviations:**

AB - Assembly Bill
CARB - California Air Resources Board
$CO_2e$ - carbon dioxide equivalent
EMFAC - CARB Emissions Factor model
g - gram
lb - pound
mi - mile
MWh - megawatt-hour
MT - metric ton
RPS - Renewables Portfolio Standard

**Table Ops-8. Energy and Water Use Values**
**3333 California St AB900**
**San Francisco, California**

**Scaled Building Energy Use (kBTU/year)[1]**

| Building Type | Project Case | | Project Variant | |
|---|---|---|---|---|
| | Natural Gas | Electricity | Natural Gas | Electricity |
| Apartments | 9,289,299 | 8,968,899 | 11,023,050 | 10,642,850 |
| Day-Care Center | 96,402 | 278,149 | 96,139 | 277,392 |
| Parking Structure | 0 | 5,374,715 | 0 | 5,454,439 |
| General Office Building | 330,377 | 708,129 | 0 | 0 |
| Parking Lot | 0 | 0 | 0 | 0 |
| Strip Mall | 922,059 | 1,853,528 | 827,940 | 1,664,329 |
| **Total (kBTU/yr)** | **10,638,137** | **17,183,420** | **11,947,129** | **18,039,010** |

**Water Use and Electricity for Water Use[2]**

| Type | Water | | | | Electricity to Supply, Treat, and Distribute Water | | | |
|---|---|---|---|---|---|---|---|---|
| | Project Case | | Project Variant | | Project | | Project Variant | |
| | Indoor (gal) | Outdoor (gal) | Indoor (gal) | Outdoor (gal) | kWh/year | Kwh/gal | kWh/year | Kwh/gal |
| Commercial | 422,000 | 0 | 229,000 | 0 | 2,280 | 0.0054 | 1,238 | 0.0054 |
| Residential | 17,125,000 | 0 | 22,398,000 | 0 | 92,663 | 0.0054 | 121,194 | 0.0054 |
| HVAC/Cooling | 1,995,000 | 0 | 1,995,000 | 0 | 10,795 | 0.0054 | 10,795 | 0.0054 |
| Landscape/Irrigation | 0 | 1,626,000 | 0 | 1,626,000 | 5,689 | 0.0035 | 5,689 | 0.0035 |
| **Total** | **19,542,000** | **1,626,000** | **24,622,000** | **1,626,000** | **111,427** | **-** | **138,916** | **-** |

**Distributing Water Use for CalEEMod Land Uses[3]**

| Land Use Sub-Type | CalEEMod Default Indoor Water Use | Project Case | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|---|
| | (gal/land use size/year) | Land Use | Land Use (sq ft) | Indoor (gal/year) | Outdoor (gal/year) | Land Use | Land Use (sq ft) | Indoor (gal/year) | Outdoor (gal/year) |
| Apartments (DU) | 65,154 | 558 | 824,691 | 18,868,788 | 0 | 744 | 978,611 | 24,271,899 | 0 |
| Open Space (Acres) | 0 | 5.42 | 236,000 | 0 | 1,626,000 | 5.42 | 236,000 | - | 1,626,000 |
| Day-Care Center (ksf) | 42,890 | 14.69 | 14,690 | 50,720 | 0 | 14.65 | 14,650 | 62,087 | |
| General Office Building (ksf) | 177,734 | 49.999 | 49,999 | 382,990 | 0 | 0 | 0 | 0 | 0 |
| Strip Mall (ksf) | 74,073 | 54.117 | 54,117 | 239,502 | 0 | 48.593 | 48,593 | 288,014 | 0 |
| **Total** | - | - | - | **19,542,000** | **1,626,000** | - | - | **24,622,000** | **1,626,000** |

**Notes:**

[1] From 3333 California CEQA Energy Inputs, Arup (January 2018), Tables 10 and 11, including energy conservation measures. CEQA Energy Inputs is supporting information for the Energy Assessment.

[2] From 3333 California CEQA Energy Inputs, Arup (January 2018), Tables 4 and 5. CEQA Energy Inputs is supporting information for the Energy Assessment.

[3] Water use is distributed among land uses on a square footage basis for CalEEMod purposes. The total water use is from San Francisco Water Power Sewer's Water Supply Assessment (June 2017) which is summarized in the Energy Assessment.

**Abbreviations:**

DU - dwelling units
gal - gallon
kBTU - thousand British Thermal Units
sq ft - square feet

**Table Ops-9. GHG Emissions Reductions from Solar Energy**
**3333 California St AB900**
**San Francisco, California**

**Energy Assessment Solar Data by Building and Phase[1]**

| Building | Proposed Total Solar Equipment Area (sqft) | Estimated PV Energy Output (kBTU/year) | Estimated Solar Hot Water Energy Output (kBTU/year) | Construction Phase |
|---|---|---|---|---|
| Center Building A | 0 | 0 | 0 | 2 |
| Center Building B | 2,597 | 180,864 | 82,000 | 2 |
| Plaza A Building | 12,190 | 795,497 | 380,000 | 3 |
| Plaza B Building | 11,812 | 828,163 | 384,000 | 3 |
| Walnut Building | 19,771 | 1,397,159 | 635,000 | 3 |
| Masonic Building | 0 | 0 | 0 | 1 |
| Euclid Building | 9,036 | 638,342 | 289,000 | 1 |
| Laurel Duplexes | 6,384 | 394,514 | 207,000 | 4 |
| Mayfair Building | 3,550 | 251,107 | 107,000 | 4 |
| **Total** | **65,340** | **4,485,646** | **2,084,000** | |

**Year-By-Year Reductions due to Solar**

| Year | $CO_2e$ Intensity Factor (lb $CO_2e$/MWh)[2] | Solar PV Reductions (MT) | $CO_2e$ Intensity Factor NG (lb $CO_2e$/kBTU)[3] | Solar Heating Reductions (MT) | Latest completed Phase[4] |
|---|---|---|---|---|---|
| 2020 | 363 | 0 | 0.118 | 0 | - |
| 2021 | 354 | 0 | 0.118 | 0 | - |
| 2022 | 345 | -29 | 0.118 | -15 | 1 |
| 2023 | 335 | -37 | 0.118 | -20 | 2 |
| 2024 | 326 | -36 | 0.118 | -20 | 2 |
| 2025 | 317 | -162 | 0.118 | -95 | 3 |
| 2026 | 308 | -157 | 0.118 | -95 | 3 |
| 2027 | 299 | -178 | 0.118 | -111 | 4 |
| 2028 | 290 | -173 | 0.118 | -111 | 4 |
| 2029 | 281 | -167 | 0.118 | -111 | 4 |
| 2030 | 271 | -162 | 0.118 | -111 | 4 |
| 2031 | 263 | -157 | 0.118 | -111 | 4 |
| 2032 | 255 | -152 | 0.118 | -111 | 4 |
| 2033 | 247 | -147 | 0.118 | -111 | 4 |
| 2034 | 239 | -143 | 0.118 | -111 | 4 |
| 2035 | 231 | -138 | 0.118 | -111 | 4 |
| 2036 | 223 | -133 | 0.118 | -111 | 4 |
| 2037 | 215 | -128 | 0.118 | -111 | 4 |
| 2038 | 207 | -123 | 0.118 | -111 | 4 |
| 2039 | 199 | -119 | 0.118 | -111 | 4 |
| 2040 | 191 | -114 | 0.118 | -111 | 4 |
| 2041 | 183 | -109 | 0.118 | -111 | 4 |
| 2042 | 175 | -104 | 0.118 | -111 | 4 |
| 2043 | 167 | -99 | 0.118 | -111 | 4 |
| 2044 | 159 | -95 | 0.118 | -111 | 4 |
| 2045 | 150 | -90 | 0.118 | -111 | 4 |
| 2046 | 142 | -85 | 0.118 | -111 | 4 |
| 2047 | 134 | -80 | 0.118 | -111 | 4 |
| 2048 | 126 | -75 | 0.118 | -111 | 4 |
| 2049 | 118 | -70 | 0.118 | -111 | 4 |

| Year | $CO_2e$ Intensity Factor (lb $CO_2e$/MWh)[2] | Solar PV Reductions (MT) | $CO_2e$ Intensity Factor NG (lb $CO_2e$/kBTU)[3] | Solar Heating Reductions (MT) | Latest completed Phase[4] |
|---|---|---|---|---|---|
| 2050 | 110 | -66 | 0.118 | -111 | 4 |
| 2051 | 110 | -66 | 0.118 | -111 | 4 |
| 2052 | 110 | -66 | 0.118 | -111 | 4 |
| 2053 | 110 | -66 | 0.118 | -111 | 4 |
| 2054 | 110 | -66 | 0.118 | -111 | 4 |
| 2055 | 110 | -66 | 0.118 | -111 | 4 |
| 2056 | 110 | -66 | 0.118 | -111 | 4 |
| 2057 | 110 | -66 | 0.118 | -111 | 4 |

**Notes:**

[1] From SWCA's Energy Assessment (July 2018), Table 10.

[2] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[3] $CO_2e$ intensity factor for natural gas is from CalEEMod Appendix D.

[4] The solar for each building is assumed to become active when the relevant Phase is complete.

**Abbreviations:**

CalEEMod - California Emissions Estimator Model
$CO_2e$ - carbon dioxide equivalents
kBTU - thousand British Thermal Units
lb - pound
MT - metric ton
MWh - megawatt-hour
sqft - square feet

**Table Ops-10. Energy Emissions Year-by-Year**
**3333 California St AB900**
**San Francisco, California**

| Year | CO2e Intensity Factor[1] | | Project Case[2] | | | | Project Variant[2] | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Electricity | Natural Gas | Electricity Use[3] | Natural Gas Use[3] | Electricity Emissions | Natural Gas Emissions | Electricity Use[3] | Natural Gas Use[3] | Electricity Emissions | Natural Gas Emissions |
| | lb CO2e/MWh | lb CO2e/kBTU | MWh | kBTU | MT CO2e/year | | MWh | kBTU | MT CO2e/year | |
| 2020 | 363 | 0.118 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2021 | 354 | 0.118 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2022 | 345 | 0.118 | 473 | 1,224,705 | 74 | 65 | 436 | 1,092,913 | 68 | 58 |
| 2023 | 335 | 0.118 | 1,612 | 4,393,180 | 245 | 235 | 1,478 | 3,917,878 | 225 | 209 |
| 2024 | 326 | 0.118 | 2,255 | 6,498,974 | 334 | 347 | 2,055 | 5,791,991 | 304 | 309 |
| 2025 | 317 | 0.118 | 2,550 | 6,900,308 | 367 | 369 | 2,405 | 6,440,318 | 346 | 344 |
| 2026 | 308 | 0.118 | 4,754 | 9,905,647 | 664 | 529 | 5,027 | 11,295,228 | 702 | 603 |
| 2027 | 299 | 0.118 | 5,027 | 10,614,055 | 681 | 567 | 5,278 | 11,925,697 | 716 | 637 |
| 2028 | 290 | 0.118 | 5,036 | 10,638,137 | 662 | 568 | 5,287 | 11,947,129 | 695 | 638 |
| 2029 | 281 | 0.118 | 5,036 | 10,638,137 | 641 | 568 | 5,287 | 11,947,129 | 673 | 638 |
| 2030 | 271 | 0.118 | 5,036 | 10,638,137 | 620 | 568 | 5,287 | 11,947,129 | 651 | 638 |
| 2031 | 263 | 0.118 | 5,036 | 10,638,137 | 602 | 568 | 5,287 | 11,947,129 | 632 | 638 |
| 2032 | 255 | 0.118 | 5,036 | 10,638,137 | 583 | 568 | 5,287 | 11,947,129 | 612 | 638 |
| 2033 | 247 | 0.118 | 5,036 | 10,638,137 | 565 | 568 | 5,287 | 11,947,129 | 593 | 638 |
| 2034 | 239 | 0.118 | 5,036 | 10,638,137 | 546 | 568 | 5,287 | 11,947,129 | 574 | 638 |
| 2035 | 231 | 0.118 | 5,036 | 10,638,137 | 528 | 568 | 5,287 | 11,947,129 | 554 | 638 |
| 2036 | 223 | 0.118 | 5,036 | 10,638,137 | 510 | 568 | 5,287 | 11,947,129 | 535 | 638 |
| 2037 | 215 | 0.118 | 5,036 | 10,638,137 | 491 | 568 | 5,287 | 11,947,129 | 516 | 638 |
| 2038 | 207 | 0.118 | 5,036 | 10,638,137 | 473 | 568 | 5,287 | 11,947,129 | 496 | 638 |
| 2039 | 199 | 0.118 | 5,036 | 10,638,137 | 454 | 568 | 5,287 | 11,947,129 | 477 | 638 |
| 2040 | 191 | 0.118 | 5,036 | 10,638,137 | 436 | 568 | 5,287 | 11,947,129 | 458 | 638 |
| 2041 | 183 | 0.118 | 5,036 | 10,638,137 | 417 | 568 | 5,287 | 11,947,129 | 438 | 638 |
| 2042 | 175 | 0.118 | 5,036 | 10,638,137 | 399 | 568 | 5,287 | 11,947,129 | 419 | 638 |
| 2043 | 167 | 0.118 | 5,036 | 10,638,137 | 381 | 568 | 5,287 | 11,947,129 | 399 | 638 |
| 2044 | 159 | 0.118 | 5,036 | 10,638,137 | 362 | 568 | 5,287 | 11,947,129 | 380 | 638 |
| 2045 | 150 | 0.118 | 5,036 | 10,638,137 | 344 | 568 | 5,287 | 11,947,129 | 361 | 638 |
| 2046 | 142 | 0.118 | 5,036 | 10,638,137 | 325 | 568 | 5,287 | 11,947,129 | 341 | 638 |
| 2047 | 134 | 0.118 | 5,036 | 10,638,137 | 307 | 568 | 5,287 | 11,947,129 | 322 | 638 |
| 2048 | 126 | 0.118 | 5,036 | 10,638,137 | 288 | 568 | 5,287 | 11,947,129 | 303 | 638 |
| 2049 | 118 | 0.118 | 5,036 | 10,638,137 | 270 | 568 | 5,287 | 11,947,129 | 283 | 638 |
| 2050 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2051 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2052 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2053 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2054 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2055 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2056 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2057 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Does not include the benefits of solar photovoltaics or solar water heating. These are shown in Table Ops-9.

[3] While construction is underway, energy use is based on the percent of operational land uses by Phase as shown in Table Ops-16.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
EF - emission factor
lb - pound
kBTU - thousand British Thermal Units
MT - metric ton
MWh - megawatt-hour

**Table Ops-11. Wastewater Treatment Types and Electricity Intensity**
**3333 California St AB900**
**San Francisco, California**

**Wastewater Electricity Intensity**

| County | Electricity to Treat Wastewater (kWh/million gal)[1] |
|---|---|
| San Francisco | 1,911 |

**Wastewater Treatment Types[2]**

| County | Septic Tank | Aerobic | Anaerobic, Facultative Lagoons | Anaerobic, Combustion of Gas | Anaerobic, Cogeneration of Gas |
|---|---|---|---|---|---|
| San Francisco | 10.33% | 87.46% | 2.21% | 100% | 0% |

**Wastewater Treatment Direct Emission Factors[3]**

| Wastewater Treatment Type | $CO_2$ Biogenic, ton/gal | $CO_2$ Non-Biogenic, ton/gal | $CH_4$, ton/gal | $N_2O$, ton/gal |
|---|---|---|---|---|
| Septic | 0 | 0 | 2.50E-07 | 8.48E-10 |
| Aerobic | 3.90E-07 | 0 | 1.34E-09 | 8.48E-10 |
| Anaerobic Facultative | 3.90E-07 | 0 | 4.02E-07 | 8.48E-10 |
| Digester Burn | 0 | 0 | 0 | 0 |
| Digester Cogen | 0 | 0 | 0 | 0 |

**Notes:**

[1] Water Electricity Intensity from Table 9.2 of Appendix D of the CalEEMod User's Guide.

[2] Water Treatment Types from Table 9.3 of Appendix D of the CalEEMod User's Guide.

[3] Wastewater Treatment Direct Emission Factors from Table 9.4 of Appendix D of the CalEEMod User's Guide.

**Abbreviations:**

CalEEMod - California Emissions Estimator Model
$CH_4$ - methane
$CO_2$ - carbon dioxide
gal - gallon
kWh - kilowatt-hours
$N_2O$ - nitrogen oxides

**Table Ops-12. Water Treatment Emissions**
**3333 California St AB900**
**San Francisco, California**

| Land Use | Project Case | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|
| | Septic Tank Direct Emissions | Aerobic Direct Emissions | Facultative Lagoon Direct Emissions | Total Treatment Emissions | Septic Tank Direct Emissions | Aerobic Direct Emissions | Facultative Lagoon Direct Emissions | Total Treatment Emissions |
| | MT CO2e/year | | | | | | | |
| Apartments (DU) | 11.51 | 10.12 | 4.04 | 25.68 | 14.81 | 13.02 | 5.20 | 33.04 |
| Day-Care Center (ksf) | 0.03 | 0.03 | 0.01 | 0.07 | 0.04 | 0.03 | 0.01 | 0.08 |
| Parking Structure | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| General Office Building (ksf) | 0.23 | 0.21 | 0.08 | 0.52 | 0.00 | 0.00 | 0.00 | 0.00 |
| Strip Mall (ksf) | 0.15 | 0.13 | 0.05 | 0.33 | 0.18 | 0.15 | 0.06 | 0.39 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Open Space (Acres) | 0.99 | 0.87 | 0.35 | 2.21 | 0.99 | 0.87 | 0.35 | 2.21 |
| **Total** | **12.92** | **11.36** | **4.54** | **28.81** | **16.02** | **14.08** | **5.63** | **35.73** |

**Notes:**

[1] Treatment factors are shown in Table Ops-11.

[2] Water usage is shown in Table Ops-8.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

DU - dwelling units

ksf - thousand square feet

MT - metric tons

**Table Ops-13. Water Emissions Year-by-Year**
**3333 California St AB900**
**San Francisco, California**

| Year | CO2e Intensity Factor | Project Case | | | Variant | | |
|---|---|---|---|---|---|---|---|
| | | Electricity Consumption[1] | Distribution Emissions | Treatment Emissions[2] | Electricity Consumption[1] | Distribution Emissions | Treatment Emissions[2] |
| | lb $CO_2e$/MWh | MWh | MT $CO_2e$ | | MWh | MT $CO_2e$ | |
| 2020 | 363 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2021 | 354 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2022 | 345 | 14 | 2.2 | 3.6 | 13 | 2.1 | 3.5 |
| 2023 | 335 | 50 | 7.6 | 13 | 48 | 7.4 | 12 |
| 2024 | 326 | 74 | 11 | 19 | 72 | 11 | 18 |
| 2025 | 317 | 78 | 11 | 20 | 79 | 11 | 20 |
| 2026 | 308 | 103 | 14 | 27 | 131 | 18 | 34 |
| 2027 | 299 | 111 | 15 | 29 | 139 | 19 | 36 |
| 2028 | 290 | 111 | 15 | 29 | 139 | 18 | 36 |
| 2029 | 281 | 111 | 14 | 29 | 139 | 18 | 36 |
| 2030 | 271 | 111 | 14 | 29 | 139 | 17 | 36 |
| 2031 | 263 | 111 | 13 | 29 | 139 | 17 | 36 |
| 2032 | 255 | 111 | 13 | 29 | 139 | 16 | 36 |
| 2033 | 247 | 111 | 12 | 29 | 139 | 16 | 36 |
| 2034 | 239 | 111 | 12 | 29 | 139 | 15 | 36 |
| 2035 | 231 | 111 | 12 | 29 | 139 | 15 | 36 |
| 2036 | 223 | 111 | 11 | 29 | 139 | 14 | 36 |
| 2037 | 215 | 111 | 11 | 29 | 139 | 14 | 36 |
| 2038 | 207 | 111 | 10 | 29 | 139 | 13 | 36 |
| 2039 | 199 | 111 | 10 | 29 | 139 | 13 | 36 |
| 2040 | 191 | 111 | 10 | 29 | 139 | 12 | 36 |
| 2041 | 183 | 111 | 9.2 | 29 | 139 | 12 | 36 |
| 2042 | 175 | 111 | 8.8 | 29 | 139 | 11 | 36 |
| 2043 | 167 | 111 | 8.4 | 29 | 139 | 10 | 36 |
| 2044 | 159 | 111 | 8.0 | 29 | 139 | 10 | 36 |
| 2045 | 150 | 111 | 7.6 | 29 | 139 | 9.5 | 36 |
| 2046 | 142 | 111 | 7.2 | 29 | 139 | 9.0 | 36 |
| 2047 | 134 | 111 | 6.8 | 29 | 139 | 8.5 | 36 |
| 2048 | 126 | 111 | 6.4 | 29 | 139 | 8.0 | 36 |
| 2049 | 118 | 111 | 6.0 | 29 | 139 | 7.4 | 36 |
| 2050 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2051 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2052 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2053 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2054 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2055 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2056 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2057 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |

**Notes:**

[1] Electricity use is calculated based on phased water use and usage factors from the Energy Assessment (SWCA, July 2018) and supporting Water Supply Assessment (San Francisco Water Power Sewer, June 2017) and CEQA Energy Inputs (Arup, 2018). While construction is underway, water use is based on the percent of operational land uses by Phase as shown in Table Ops-16. Electricity Usage Factors taken from the Energy Assessment are shown below.

| Indoor (kwh/gal) | Outdoor (kwh/gal) |
|---|---|
| 0.0054 | 0.0035 |

[2] Emissions from wastewater treatment are calculated in Table Ops-12.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
lb - pounds
MT - metric tons
MWh - megawatt-hour

**Table Ops-14. Waste Generation and Emissions**
**3333 California St AB900**
**San Francisco, California**

| Space Type | Project | | Variant | |
|---|---|---|---|---|
| | Waste Generated | $CO_2e$ Emissions[1] | Waste Generated | $CO_2e$ Emissions[1] |
| | Cubic yards/day | MT/yr | Cubic yards/day | MT/yr |
| Residential | 18.3 | 12.9 | 19.8 | 13.9 |
| Commercial | 34 | 23.9 | 25.5 | 17.9 |
| **Total** | **52.5** | **36.8** | **45.3** | **31.8** |

| Land Use[2] | Total $CO_2e$ (MT/yr) | |
|---|---|---|
| | Project | Variant |
| Apartments | 13 | 14 |
| Day-Care Center | 3.0 | 4.1 |
| Parking Structure | 0 | 0 |
| General Office Building | 10 | 0 |
| Parking Lot | 0 | 0 |
| Retail | 11 | 14 |

| Year | Total $CO_2e$ (MT/yr)[3] | |
|---|---|---|
| | Project | Variant |
| 2022 | 2.0 | 1.8 |
| 2023 | 6.9 | 6.1 |
| 2024 | 9.8 | 8.4 |
| 2025 | 13 | 11 |
| 2026 | 36 | 31 |
| 2027 | 37 | 32 |
| 2028 | 37 | 32 |

**Notes:**

[1] Total waste emissions are from CEQA Energy Inputs (ARUP, January 2018).

[2] Commercial waste generation was split by total land uses among daycare, office, and retail based on square footage.

[3] While construction is underway, waste is based on the percent of operational land uses by Phase as shown in Table Ops-16.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric tons

yr - year

**Table Ops-15. GHG Emissions Sequestration from Vegetation**
**3333 California St AB900**
**San Francisco, California**

| Number of Net New Trees[1] | Units | Broad Species Class | Annual $CO_2$ accumulation per tree (MT $CO_2$/tree/year)[2] | Project GHG Sequestration (MT $CO_2e$) |
|---|---|---|---|---|
| 162 | Trees | Miscellaneous | -0.0354 | -115 |
| **Number of Net New Acres[1]** | **Units** | **Vegetation Land Use Subtype** | **Annual $CO_2$ accumulation per acre (MT $CO_2$/acre/year)[2]** | **Project GHG Sequestration (MT $CO_2e$)** |
| 1.63 | Acres | Grassland | -4.31 | -140 |
| | | | **Total, Trees and Acres Covered** | -255 |

**Notes:**

1. Number of net new trees from Project Description. Total number of trees - number of existing trees
2. From CalEEMod User's Guide Appendix A.
3. All vegetation types are assumed to have a growing period of 20 years.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric tones

**Table Ops-16. Phased Land Use**
**3333 California St AB900**
**San Francisco, California**

| Land Use | Size Metric | Phase[1] | | | | | % Total in Phase[2] | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Phase 1 | Phase 2 | Phase 3 | Phase 4 | All | Phase 1 | Phase 2 | Phase 3 | Phase 4 |
| **Project Case** | | | | | | | | | | |
| Apartments | DU | 196 | 190 | 128 | 44 | 558 | 35% | 34% | 23% | 8% |
| Day-Care Center | ksf | 0 | 0 | 14.69 | 0.00 | 14.69 | 0% | 0% | 100% | 0% |
| Parking Structure | ksf | 87.98 | 19.26 | 301.06 | 20.48 | 428.77 | 21% | 4% | 70% | 5% |
| General Office Building | ksf | 0 | 0 | 50.00 | 0.00 | 50 | 0% | 0% | 100% | 0% |
| Parking Lot | ksf | 3.936 | 2.51 | 3.82 | 0.58 | 10.84 | 36% | 23% | 35% | 5% |
| Retail | ksf | 4.287 | 0 | 49.83 | 0 | 54.12 | 8% | 0% | 92% | 0% |
| Open Space | acre | 1.42 | 1.35 | 2.19 | 0.46 | 5.42 | 26% | 25% | 40% | 9% |
| **Project Variant** | | | | | | | | | | |
| Apartments | DU | 196 | 190 | 314 | 44 | 744 | 26% | 26% | 42% | 6% |
| Day-Care Center | ksf | 0 | 0 | 14.65 | 0.00 | 14.65 | 0% | 0% | 100% | 0% |
| Parking Structure | ksf | 87.98 | 19.26 | 307.42 | 20.48 | 435.13 | 20% | 4% | 71% | 5% |
| General Office Building | ksf | 0 | 0 | - | 0.00 | 0 | - | - | - | - |
| Parking Lot | ksf | 3.94 | 2.51 | 6.18 | 0.58 | 13.2 | 30% | 19% | 47% | 4% |
| Retail | ksf | 4.29 | 0 | 44.31 | 0 | 48.59 | 9% | 0% | 91% | 0% |
| Open Space | acre | 1.42 | 1.35 | 2.19 | 0.46 | 5.42 | 26% | 25% | 40% | 9% |

**Notes:**

[1] Land use totals and Phase descriptions provided by Project sponsor.

[2] Percent of total in Phase is used to quantify emissions at buildout of each Phase. Phases 1, 2, 3, and 4 are assumed to be operational in 2022, 2023, 2025, and 2027, respectively.

**Abbreviations:**

DU - dwelling units

ksf - thousand square feet

**Table Ops-17. Area and Mobile Emissions by Phase**
**3333 California St AB900**
**San Francisco, California**

| Phase[1] | Operational Year | % Change in Mobile Emissions Factor[2] | Project | | Variant | |
|---|---|---|---|---|---|---|
| | | | Area | Mobile | Area | Mobile |
| | | | $CO_2e$ (MT/yr)[3] | | | |
| 1 | 2022 | -- | 3.8 | 233 | 3.8 | 238 |
| 1 | 2023 | -2.81% | 10 | 618 | 10 | 630 |
| 1 | 2024 | -2.67% | 10 | 602 | 10 | 613 |
| 1 | 2025 | -2.82% | 10 | 585 | 10 | 596 |
| 1 | 2026 | -2.54% | 10 | 570 | 10 | 580 |
| 1 | 2027 | -2.39% | 10 | 556 | 10 | 567 |
| 1 | 2028 | -2.23% | 10 | 544 | 10 | 554 |
| 2 | 2022 | -- | 0 | 0 | 0 | 0 |
| 2 | 2023 | -2.81% | 3.3 | 143 | 3.3 | 144 |
| 2 | 2024 | -2.67% | 10 | 417 | 10 | 421 |
| 2 | 2025 | -2.82% | 10 | 406 | 10 | 409 |
| 2 | 2026 | -2.54% | 10 | 395 | 10 | 398 |
| 2 | 2027 | -2.39% | 10 | 386 | 10 | 389 |
| 2 | 2028 | -2.23% | 10 | 377 | 10 | 380 |
| 3 | 2022 | -- | 0 | 0 | 0 | 0 |
| 3 | 2023 | -2.81% | 0 | 0 | 0 | 0 |
| 3 | 2024 | -2.67% | 0 | 0 | 0 | 0 |
| 3 | 2025 | -2.82% | 0.8 | 295 | 1.9 | 301 |
| 3 | 2026 | -2.54% | 6.7 | 2,443 | 17 | 2,488 |
| 3 | 2027 | -2.39% | 6.7 | 2,384 | 17 | 2,428 |
| 3 | 2028 | -2.23% | 6.7 | 2,331 | 17 | 2,374 |
| 4 | 2022 | -- | 0 | 0 | 0 | 0 |
| 4 | 2023 | -2.81% | 0 | 0 | 0 | 0 |
| 4 | 2024 | -2.67% | 0 | 0 | 0 | 0 |
| 4 | 2025 | -2.82% | 0 | 0 | 0 | 0 |
| 4 | 2026 | -2.54% | 0 | 0 | 0 | 0 |
| 4 | 2027 | -2.39% | 2.2 | 85 | 2.2 | 86 |
| 4 | 2028 | -2.23% | 2.3 | 86 | 2.3 | 87 |

**Notes:**

[1] Operational year and fraction of operation in Table Ops-16.

[2] Mobile emissions change is shown in Table Ops-5.

[3] Area and mobile emissions from buildout year for each Phase are from CalEEMod outputs. Emissions from energy, water, waste, stationary sources, and reductions from solar and vegetation are shown in Tables Ops-7 and Ops-8.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric ton

yr - year

# APPENDIX 2
# CALEEMOD® OUTPUT FILES

# 3333 CalSF Existing Emissions - 2020

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 352.00 | 1000sqft | 8.08 | 352,000.00 | 0 |
| Day-Care Center | 11.50 | 1000sqft | 0.26 | 11,500.00 | 0 |
| Enclosed Parking Structure | 212.00 | Space | 1.91 | 105,500.00 | 0 |
| Parking Lot | 331.00 | Space | 2.98 | 134,680.00 | 0 |
| City Park | 3.79 | Acre | 3.79 | 165,200.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2020 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 360.31 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

3333 CalSF Existing Emissions - 2020 - San Francisco County, Annual

Project Characteristics - Updated CO2 Intensity Factor

Land Use - Parking area updated based on initial study.

Construction Phase - Construction not evaluated.

Grading -

Architectural Coating -

Vehicle Trips - Trip rates based on data from traffic engineers dated March 2018.

Consumer Products - Updated ROG EF

Energy Use - Not modeling energy use for baseline operations

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 300.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 30.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 3.11 | 0.00 |
| tblEnergyUse | LightingElect | 2.63 | 0.00 |
| tblEnergyUse | LightingElect | 4.34 | 0.00 |
| tblEnergyUse | LightingElect | 0.88 | 0.00 |
| tblEnergyUse | NT24E | 1.27 | 0.00 |
| tblEnergyUse | NT24E | 4.80 | 0.00 |
| tblEnergyUse | NT24NG | 1.62 | 0.00 |
| tblEnergyUse | NT24NG | 1.01 | 0.00 |
| tblEnergyUse | T24E | 0.86 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | T24E | 5.42 | 0.00 |
| tblEnergyUse | T24NG | 17.50 | 0.00 |
| tblEnergyUse | T24NG | 22.58 | 0.00 |
| tblLandUse | LandUseSquareFeet | 84,800.00 | 105,500.00 |
| tblLandUse | LandUseSquareFeet | 132,400.00 | 134,680.00 |
| tblLandUse | LandUseSquareFeet | 165,092.40 | 165,200.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 360.31 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | ST_TR | 6.21 | 2.07 |
| tblVehicleTrips | ST_TR | 2.46 | 1.75 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | SU_TR | 5.83 | 1.94 |
| tblVehicleTrips | SU_TR | 1.05 | 0.75 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblVehicleTrips | WD_TR | 74.06 | 24.68 |
| tblVehicleTrips | WD_TR | 11.03 | 7.84 |

## 2.0 Emissions Summary

I-FRISBIER2

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2019 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2019 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

I-FRISBIER2

3333 CalSF Existing Emissions - 2020 - San Francisco County, Annual

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.2141 | 8.0000e-005 | 8.4200e-003 | 0.0000 | | 3.0000e-005 | 3.0000e-005 | | 3.0000e-005 | 3.0000e-005 | 0.0000 | 0.0163 | 0.0163 | 4.0000e-005 | 0.0000 | 0.0174 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.6616 | 2.6104 | 7.1980 | 0.0240 | 1.9679 | 0.0333 | 2.0012 | 0.5304 | 0.0314 | 0.5618 | 0.0000 | 2,196.9475 | 2,196.9475 | 0.0982 | 0.0000 | 2,199.4035 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 69.5528 | 0.0000 | 69.5528 | 4.1105 | 0.0000 | 172.3142 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 20.0046 | 81.0050 | 101.0096 | 2.0612 | 0.0499 | 167.3986 |
| **Total** | **1.8758** | **2.6105** | **7.2064** | **0.0240** | **1.9679** | **0.0333** | **2.0013** | **0.5304** | **0.0314** | **0.5618** | **89.5574** | **2,277.9687** | **2,367.5262** | **6.2699** | **0.0499** | **2,539.1337** |

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## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.2141 | 8.0000e-005 | 8.4200e-003 | 0.0000 | | 3.0000e-005 | 3.0000e-005 | | 3.0000e-005 | 3.0000e-005 | 0.0000 | 0.0163 | 0.0163 | 4.0000e-005 | 0.0000 | 0.0174 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.6616 | 2.6104 | 7.1980 | 0.0240 | 1.9679 | 0.0333 | 2.0012 | 0.5304 | 0.0314 | 0.5618 | 0.0000 | 2,196.9475 | 2,196.9475 | 0.0982 | 0.0000 | 2,199.4035 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 69.5528 | 0.0000 | 69.5528 | 4.1105 | 0.0000 | 172.3142 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 20.0046 | 81.0050 | 101.0096 | 2.0612 | 0.0499 | 167.3986 |
| **Total** | **1.8758** | **2.6105** | **7.2064** | **0.0240** | **1.9679** | **0.0333** | **2.0013** | **0.5304** | **0.0314** | **0.5618** | **89.5574** | **2,277.9687** | **2,367.5262** | **6.2699** | **0.0499** | **2,539.1337** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

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3333 CalSF Existing Emissions - 2020 - San Francisco County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 5/17/2018 | 5/16/2018 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 6/14/2018 | 6/13/2018 | 5 | 0 | |
| 3 | Grading | Grading | 6/28/2018 | 6/27/2018 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 8/9/2018 | 8/8/2018 | 5 | 0 | |
| 5 | Paving | Paving | 10/3/2019 | 10/2/2019 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 10/31/2019 | 10/30/2019 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 4.89**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 545,250; Non-Residential Outdoor: 181,750; Striped Parking Area: 14,411 (Architectural Coating – sqft)**

**OffRoad Equipment**

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3333 CalSF Existing Emissions - 2020 - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

3333 CalSF Existing Emissions - 2020 - San Francisco County, Annual

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 288.00 | 126.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 58.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.2 Demolition - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2018

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.4 Grading - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.6 Paving - 2019

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.6 Paving - 2019

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2019

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.7 Architectural Coating - 2019

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.7 Architectural Coating - 2019

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.7 Architectural Coating - 2019

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.6616 | 2.6104 | 7.1980 | 0.0240 | 1.9679 | 0.0333 | 2.0012 | 0.5304 | 0.0314 | 0.5618 | 0.0000 | 2,196.9475 | 2,196.9475 | 0.0982 | 0.0000 | 2,199.4035 |
| Unmitigated | 0.6616 | 2.6104 | 7.1980 | 0.0240 | 1.9679 | 0.0333 | 2.0012 | 0.5304 | 0.0314 | 0.5618 | 0.0000 | 2,196.9475 | 2,196.9475 | 0.0982 | 0.0000 | 2,199.4035 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Day-Care Center | 283.82 | 23.81 | 22.31 | 246,497 | 246,497 |
| Enclosed Parking Structure | 0.00 | 0.00 | 0.00 | | |
| General Office Building | 2,759.68 | 616.00 | 264.00 | 5,011,107 | 5,011,107 |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Total | 3,043.50 | 639.81 | 286.31 | 5,257,604 | 5,257,604 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Day-Care Center | 9.50 | 7.30 | 7.30 | 12.70 | 82.30 | 5.00 | 28 | 58 | 14 |
| Enclosed Parking Structure | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| General Office Building | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |

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### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| City Park | 0.607015 | 0.041018 | 0.191033 | 0.087570 | 0.015386 | 0.004865 | 0.027149 | 0.008727 | 0.004280 | 0.004624 | 0.006947 | 0.000926 | 0.000460 |
| Day-Care Center | 0.607015 | 0.041018 | 0.191033 | 0.087570 | 0.015386 | 0.004865 | 0.027149 | 0.008727 | 0.004280 | 0.004624 | 0.006947 | 0.000926 | 0.000460 |
| Enclosed Parking Structure | 0.607015 | 0.041018 | 0.191033 | 0.087570 | 0.015386 | 0.004865 | 0.027149 | 0.008727 | 0.004280 | 0.004624 | 0.006947 | 0.000926 | 0.000460 |
| General Office Building | 0.607015 | 0.041018 | 0.191033 | 0.087570 | 0.015386 | 0.004865 | 0.027149 | 0.008727 | 0.004280 | 0.004624 | 0.006947 | 0.000926 | 0.000460 |
| Parking Lot | 0.607015 | 0.041018 | 0.191033 | 0.087570 | 0.015386 | 0.004865 | 0.027149 | 0.008727 | 0.004280 | 0.004624 | 0.006947 | 0.000926 | 0.000460 |

## 5.0 Energy Detail

Historical Energy Use: Y

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

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## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking Structure | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking Structure | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking Structure | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking Structure | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 1.2141 | 8.0000e-005 | 8.4200e-003 | 0.0000 | | 3.0000e-005 | 3.0000e-005 | | 3.0000e-005 | 3.0000e-005 | 0.0000 | 0.0163 | 0.0163 | 4.0000e-005 | 0.0000 | 0.0174 |
| Unmitigated | 1.2141 | 8.0000e-005 | 8.4200e-003 | 0.0000 | | 3.0000e-005 | 3.0000e-005 | | 3.0000e-005 | 3.0000e-005 | 0.0000 | 0.0163 | 0.0163 | 4.0000e-005 | 0.0000 | 0.0174 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1946 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 1.0188 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 7.9000e-004 | 8.0000e-005 | 8.4200e-003 | 0.0000 | | 3.0000e-005 | 3.0000e-005 | | 3.0000e-005 | 3.0000e-005 | 0.0000 | 0.0163 | 0.0163 | 4.0000e-005 | 0.0000 | 0.0174 |
| **Total** | **1.2141** | **8.0000e-005** | **8.4200e-003** | **0.0000** | | **3.0000e-005** | **3.0000e-005** | | **3.0000e-005** | **3.0000e-005** | **0.0000** | **0.0163** | **0.0163** | **4.0000e-005** | **0.0000** | **0.0174** |

I-FRISBIER2

### 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1946 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 1.0188 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 7.9000e-004 | 8.0000e-005 | 8.4200e-003 | 0.0000 | | 3.0000e-005 | 3.0000e-005 | | 3.0000e-005 | 3.0000e-005 | 0.0000 | 0.0163 | 0.0163 | 4.0000e-005 | 0.0000 | 0.0174 |
| **Total** | **1.2141** | **8.0000e-005** | **8.4200e-003** | **0.0000** | | **3.0000e-005** | **3.0000e-005** | | **3.0000e-005** | **3.0000e-005** | **0.0000** | **0.0163** | **0.0163** | **4.0000e-005** | **0.0000** | **0.0174** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 101.0096 | 2.0612 | 0.0499 | 167.3986 |
| Unmitigated | 101.0096 | 2.0612 | 0.0499 | 167.3986 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| City Park | 0 / 4.51571 | 2.5831 | 2.1000e-004 | 4.0000e-005 | 2.6011 |
| Day-Care Center | 0.49323 / 1.26831 | 1.3182 | 0.0162 | 4.0000e-004 | 1.8412 |
| Enclosed Parking Structure | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 62.5623 / 38.3446 | 97.1083 | 2.0448 | 0.0494 | 162.9564 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **101.0096** | **2.0612** | **0.0499** | **167.3987** |

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## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| City Park | 0 / 4.51571 | 2.5831 | 2.1000e-004 | 4.0000e-005 | 2.6011 |
| Day-Care Center | 0.49323 / 1.26831 | 1.3182 | 0.0162 | 4.0000e-004 | 1.8412 |
| Enclosed Parking Structure | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 62.5623 / 38.3446 | 97.1083 | 2.0448 | 0.0494 | 162.9564 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **101.0096** | **2.0612** | **0.0499** | **167.3987** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 69.5528 | 4.1105 | 0.0000 | 172.3142 |
| Unmitigated | 69.5528 | 4.1105 | 0.0000 | 172.3142 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| City Park | 0.33 | 0.0670 | 3.9600e-003 | 0.0000 | 0.1660 |
| Day-Care Center | 14.95 | 3.0347 | 0.1794 | 0.0000 | 7.5184 |
| Enclosed Parking Structure | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 327.36 | 66.4511 | 3.9272 | 0.0000 | 164.6298 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **69.5528** | **4.1105** | **0.0000** | **172.3142** |

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## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| City Park | 0.33 | 0.0670 | 3.9600e-003 | 0.0000 | 0.1660 |
| Day-Care Center | 14.95 | 3.0347 | 0.1794 | 0.0000 | 7.5184 |
| Enclosed Parking Structure | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 327.36 | 66.4511 | 3.9272 | 0.0000 | 164.6298 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **69.5528** | **4.1105** | **0.0000** | **172.3142** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

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**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF Project Case Masonic/Euclid Project

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Enclosed Parking with Elevator | 87.98 | 1000sqft | 2.02 | 87,977.00 | 0 |
| Parking Lot | 3.94 | 1000sqft | 0.09 | 3,936.00 | 0 |
| City Park | 1.42 | Acre | 1.42 | 61,855.20 | 0 |
| Apartments Mid Rise | 196.00 | Dwelling Unit | 5.16 | 266,251.00 | 561 |
| Strip Mall | 4.29 | 1000sqft | 0.10 | 4,287.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2022 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 342.03 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

3333 CalSF Project Case Masonic/Euclid Project - San Francisco County, Annual

Project Characteristics - CO2 intensity factor for 2022.

Land Use - Land uses for Phase 1 construction (Masonic/Euclid)

Construction Phase - No construction in this run

Grading -

Vehicle Trips - Upddated with trip rates from traffic memo

Woodstoves - No woodstoves or wood fireplaces

Consumer Products - Updatd ROG factor

Energy Use - Not modeling energy sources of operational emissions

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 230.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | LightingElect | 4.88 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24E | 3.36 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |

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3333 CalSF Project Case Masonic/Euclid Project - San Francisco County, Annual

| | | | |
|---|---|---|---|
| tblEnergyUse | NT24NG | 0.70 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |
| tblEnergyUse | T24E | 2.24 | 0.00 |
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblEnergyUse | T24NG | 3.90 | 0.00 |
| tblFireplaces | NumberGas | 29.40 | 62.72 |
| tblFireplaces | NumberWood | 33.32 | 0.00 |
| tblLandUse | LandUseSquareFeet | 87,980.00 | 87,977.00 |
| tblLandUse | LandUseSquareFeet | 3,940.00 | 3,936.00 |
| tblLandUse | LandUseSquareFeet | 196,000.00 | 266,251.00 |
| tblLandUse | LandUseSquareFeet | 4,290.00 | 4,287.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 342.03 |
| tblSolidWaste | SolidWasteGenerationRate | 90.16 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.12 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 4.50 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.56 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 67.41 |
| tblVehicleTrips | SU_TR | 5.86 | 2.56 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | SU_TR | 20.43 | 67.41 |
| tblVehicleTrips | WD_TR | 6.65 | 2.56 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 67.41 |
| tblWater | IndoorWaterUseRate | 12,770,189.02 | 0.00 |
| tblWater | IndoorWaterUseRate | 317,771.12 | 0.00 |

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| | | | |
|---|---|---|---|
| tblWater | OutdoorWaterUseRate | 8,050,771.34 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,691,903.52 | 0.00 |
| tblWater | OutdoorWaterUseRate | 194,762.94 | 0.00 |
| tblWoodstoves | NumberCatalytic | 3.92 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 3.92 | 0.00 |

## 2.0 Emissions Summary

I-FRISBIER2

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2020 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2021 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2020 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2021 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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3333 CalSF Project Case Masonic/Euclid Project - San Francisco County, Annual

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1852 | 0.7221 | 1.9679 | 6.9100e-003 | 0.6000 | 7.7800e-003 | 0.6077 | 0.1616 | 7.2800e-003 | 0.1689 | 0.0000 | 635.2422 | 635.2422 | 0.0274 | 0.0000 | 635.9278 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.1737** | **0.7456** | **3.4285** | **7.0300e-003** | **0.6000** | **0.0164** | **0.6163** | **0.1616** | **0.0159** | **0.1775** | **0.0000** | **645.4511** | **645.4511** | **0.0299** | **1.4000e-004** | **646.2407** |

I-FRISBIER2

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1852 | 0.7221 | 1.9679 | 6.9100e-003 | 0.6000 | 7.7800e-003 | 0.6077 | 0.1616 | 7.2800e-003 | 0.1689 | 0.0000 | 635.2422 | 635.2422 | 0.0274 | 0.0000 | 635.9278 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.1737** | **0.7456** | **3.4285** | **7.0300e-003** | **0.6000** | **0.0164** | **0.6163** | **0.1616** | **0.0159** | **0.1775** | **0.0000** | **645.4511** | **645.4511** | **0.0299** | **1.4000e-004** | **646.2407** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

3333 CalSF Project Case Masonic/Euclid Project - San Francisco County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 3/2/2020 | 3/1/2020 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 3/28/2020 | 3/27/2020 | 5 | 0 | |
| 3 | Grading | Grading | 4/11/2020 | 4/10/2020 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 5/9/2020 | 5/8/2020 | 5 | 0 | |
| 5 | Paving | Paving | 3/27/2021 | 3/26/2021 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 4/24/2021 | 4/23/2021 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 2.11**

**Residential Indoor: 539,158; Residential Outdoor: 179,719; Non-Residential Indoor: 6,431; Non-Residential Outdoor: 2,144; Striped Parking Area: 5,515 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

3333 CalSF Project Case Masonic/Euclid Project - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 1 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | 3 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 207.00 | 47.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 41.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.2 Demolition - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.4 Grading - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.5 Building Construction - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.6 Paving - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2021

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.7 Architectural Coating - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.7 Architectural Coating - 2021

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.7 Architectural Coating - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.1852 | 0.7221 | 1.9679 | 6.9100e-003 | 0.6000 | 7.7800e-003 | 0.6077 | 0.1616 | 7.2800e-003 | 0.1689 | 0.0000 | 635.2422 | 635.2422 | 0.0274 | 0.0000 | 635.9278 |
| Unmitigated | 0.1852 | 0.7221 | 1.9679 | 6.9100e-003 | 0.6000 | 7.7800e-003 | 0.6077 | 0.1616 | 7.2800e-003 | 0.1689 | 0.0000 | 635.2422 | 635.2422 | 0.0274 | 0.0000 | 635.9278 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 501.76 | 501.76 | 501.76 | 1,158,869 | 1,158,869 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 289.19 | 289.19 | 289.19 | 445,360 | 445,360 |
| Total | 790.95 | 790.95 | 790.95 | 1,604,229 | 1,604,229 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Strip Mall | 9.50 | 7.30 | 7.30 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

I-FRISBIER2

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| City Park | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| Enclosed Parking with Elevator | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| Parking Lot | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| Strip Mall | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |
| Unmitigated | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1916 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.7521 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.9000e-004 | 6.7600e-003 | 2.8800e-003 | 4.0000e-005 | | 5.5000e-004 | 5.5000e-004 | | 5.5000e-004 | 5.5000e-004 | 0.0000 | 7.8299 | 7.8299 | 1.5000e-004 | 1.4000e-004 | 7.8765 |
| Landscaping | 0.0441 | 0.0168 | 1.4578 | 8.0000e-005 | | 8.0500e-003 | 8.0500e-003 | | 8.0500e-003 | 8.0500e-003 | 0.0000 | 2.3790 | 2.3790 | 2.3000e-003 | 0.0000 | 2.4364 |
| **Total** | **0.9885** | **0.0236** | **1.4607** | **1.2000e-004** | | **8.6000e-003** | **8.6000e-003** | | **8.6000e-003** | **8.6000e-003** | **0.0000** | **10.2089** | **10.2089** | **2.4500e-003** | **1.4000e-004** | **10.3129** |

I-FRISBIER2

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1916 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.7521 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.9000e-004 | 6.7600e-003 | 2.8800e-003 | 4.0000e-005 | | 5.5000e-004 | 5.5000e-004 | | 5.5000e-004 | 5.5000e-004 | 0.0000 | 7.8299 | 7.8299 | 1.5000e-004 | 1.4000e-004 | 7.8765 |
| Landscaping | 0.0441 | 0.0168 | 1.4578 | 8.0000e-005 | | 8.0500e-003 | 8.0500e-003 | | 8.0500e-003 | 8.0500e-003 | 0.0000 | 2.3790 | 2.3790 | 2.3000e-003 | 0.0000 | 2.4364 |
| **Total** | **0.9885** | **0.0236** | **1.4607** | **1.2000e-004** | | **8.6000e-003** | **8.6000e-003** | | **8.6000e-003** | **8.6000e-003** | **0.0000** | **10.2089** | **10.2089** | **2.4500e-003** | **1.4000e-004** | **10.3129** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

I-FRISBIER2

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF Masonic/Euclid Variant

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Enclosed Parking with Elevator | 87.98 | 1000sqft | 2.02 | 87,977.00 | 0 |
| Parking Lot | 3.94 | 1000sqft | 0.09 | 3,936.00 | 0 |
| City Park | 1.42 | Acre | 1.42 | 61,855.20 | 0 |
| Apartments Mid Rise | 196.00 | Dwelling Unit | 5.16 | 266,251.00 | 561 |
| Strip Mall | 4.29 | 1000sqft | 0.10 | 4,287.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2022 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 342.03 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

3333 CalSF Masonic/Euclid Variant - San Francisco County, Annual

Project Characteristics - CO2 intensity factor for 2022.

Land Use - Land uses for Phase 1 construction (Masonic/Euclid)

Construction Phase - No construction in this run.

Grading -

Vehicle Trips - Updated trip rates from traffic memo

Woodstoves - No woodstoves or wood fireplaces

Consumer Products - Updated ROG Factor

Energy Use - Not modeling energy sources of operational emissions

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 230.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | LightingElect | 4.88 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24E | 3.36 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | NT24NG | 0.70 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |
| tblEnergyUse | T24E | 2.24 | 0.00 |
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblEnergyUse | T24NG | 3.90 | 0.00 |
| tblFireplaces | NumberGas | 29.40 | 62.72 |
| tblFireplaces | NumberWood | 33.32 | 0.00 |
| tblLandUse | LandUseSquareFeet | 87,980.00 | 87,977.00 |
| tblLandUse | LandUseSquareFeet | 3,940.00 | 3,936.00 |
| tblLandUse | LandUseSquareFeet | 196,000.00 | 266,251.00 |
| tblLandUse | LandUseSquareFeet | 4,290.00 | 4,287.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 342.03 |
| tblSolidWaste | SolidWasteGenerationRate | 90.16 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.12 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 4.50 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.58 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | ST_TR | 42.04 | 70.52 |
| tblVehicleTrips | SU_TR | 5.86 | 2.58 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | SU_TR | 20.43 | 70.52 |
| tblVehicleTrips | WD_TR | 6.65 | 2.58 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblVehicleTrips | WD_TR | 44.32 | 70.52 |
| tblWater | IndoorWaterUseRate | 12,770,189.02 | 0.00 |
| tblWater | IndoorWaterUseRate | 317,771.12 | 0.00 |

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| | | | |
|---|---|---|---|
| tblWater | OutdoorWaterUseRate | 8,050,771.34 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,691,903.52 | 0.00 |
| tblWater | OutdoorWaterUseRate | 194,762.94 | 0.00 |
| tblWoodstoves | NumberCatalytic | 3.92 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 3.92 | 0.00 |

## 2.0 Emissions Summary

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## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2020 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2021 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2020 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2021 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1890 | 0.7364 | 2.0060 | 7.0400e-003 | 0.6110 | 7.9200e-003 | 0.6190 | 0.1646 | 7.4200e-003 | 0.1720 | 0.0000 | 647.0609 | 647.0609 | 0.0280 | 0.0000 | 647.7595 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.1775** | **0.7600** | **3.4667** | **7.1600e-003** | **0.6110** | **0.0165** | **0.6276** | **0.1646** | **0.0160** | **0.1806** | **0.0000** | **657.2698** | **657.2698** | **0.0304** | **1.4000e-004** | **658.0724** |

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## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1890 | 0.7364 | 2.0060 | 7.0400e-003 | 0.6110 | 7.9200e-003 | 0.6190 | 0.1646 | 7.4200e-003 | 0.1720 | 0.0000 | 647.0609 | 647.0609 | 0.0280 | 0.0000 | 647.7595 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.1775** | **0.7600** | **3.4667** | **7.1600e-003** | **0.6110** | **0.0165** | **0.6276** | **0.1646** | **0.0160** | **0.1806** | **0.0000** | **657.2698** | **657.2698** | **0.0304** | **1.4000e-004** | **658.0724** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 3/2/2020 | 3/1/2020 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 3/28/2020 | 3/27/2020 | 5 | 0 | |
| 3 | Grading | Grading | 4/11/2020 | 4/10/2020 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 5/9/2020 | 5/8/2020 | 5 | 0 | |
| 5 | Paving | Paving | 3/27/2021 | 3/26/2021 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 4/24/2021 | 4/23/2021 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 2.11**

**Residential Indoor: 539,158; Residential Outdoor: 179,719; Non-Residential Indoor: 6,431; Non-Residential Outdoor: 2,144; Striped Parking Area: 5,515 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

3333 CalSF Masonic/Euclid Variant - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 1 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | 3 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 207.00 | 47.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 41.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.4 Grading - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.4 Grading - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.5 Building Construction - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.5 Building Construction - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.6 Paving - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.6 Paving - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.7 Architectural Coating - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.7 Architectural Coating - 2021

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.7 Architectural Coating - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

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| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.1890 | 0.7364 | 2.0060 | 7.0400e-003 | 0.6110 | 7.9200e-003 | 0.6190 | 0.1646 | 7.4200e-003 | 0.1720 | 0.0000 | 647.0609 | 647.0609 | 0.0280 | 0.0000 | 647.7595 |
| Unmitigated | 0.1890 | 0.7364 | 2.0060 | 7.0400e-003 | 0.6110 | 7.9200e-003 | 0.6190 | 0.1646 | 7.4200e-003 | 0.1720 | 0.0000 | 647.0609 | 647.0609 | 0.0280 | 0.0000 | 647.7595 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 505.68 | 505.68 | 505.68 | 1,167,922 | 1,167,922 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 302.53 | 302.53 | 302.53 | 465,907 | 465,907 |
| Total | 808.21 | 808.21 | 808.21 | 1,633,830 | 1,633,830 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Strip Mall | 9.50 | 7.30 | 7.30 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

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### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| City Park | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| Enclosed Parking with Elevator | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| Parking Lot | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |
| Strip Mall | 0.605720 | 0.039347 | 0.191789 | 0.088945 | 0.014469 | 0.004989 | 0.029396 | 0.009044 | 0.004299 | 0.004006 | 0.006568 | 0.000937 | 0.000492 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |
| Unmitigated | 0.9885 | 0.0236 | 1.4607 | 1.2000e-004 | | 8.6000e-003 | 8.6000e-003 | | 8.6000e-003 | 8.6000e-003 | 0.0000 | 10.2089 | 10.2089 | 2.4500e-003 | 1.4000e-004 | 10.3129 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1916 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.7521 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.9000e-004 | 6.7600e-003 | 2.8800e-003 | 4.0000e-005 | | 5.5000e-004 | 5.5000e-004 | | 5.5000e-004 | 5.5000e-004 | 0.0000 | 7.8299 | 7.8299 | 1.5000e-004 | 1.4000e-004 | 7.8765 |
| Landscaping | 0.0441 | 0.0168 | 1.4578 | 8.0000e-005 | | 8.0500e-003 | 8.0500e-003 | | 8.0500e-003 | 8.0500e-003 | 0.0000 | 2.3790 | 2.3790 | 2.3000e-003 | 0.0000 | 2.4364 |
| **Total** | **0.9885** | **0.0236** | **1.4607** | **1.2000e-004** | | **8.6000e-003** | **8.6000e-003** | | **8.6000e-003** | **8.6000e-003** | **0.0000** | **10.2089** | **10.2089** | **2.4500e-003** | **1.4000e-004** | **10.3129** |

I-FRISBIER2

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1916 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.7521 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.9000e-004 | 6.7600e-003 | 2.8800e-003 | 4.0000e-005 | | 5.5000e-004 | 5.5000e-004 | | 5.5000e-004 | 5.5000e-004 | 0.0000 | 7.8299 | 7.8299 | 1.5000e-004 | 1.4000e-004 | 7.8765 |
| Landscaping | 0.0441 | 0.0168 | 1.4578 | 8.0000e-005 | | 8.0500e-003 | 8.0500e-003 | | 8.0500e-003 | 8.0500e-003 | 0.0000 | 2.3790 | 2.3790 | 2.3000e-003 | 0.0000 | 2.4364 |
| **Total** | **0.9885** | **0.0236** | **1.4607** | **1.2000e-004** | | **8.6000e-003** | **8.6000e-003** | | **8.6000e-003** | **8.6000e-003** | **0.0000** | **10.2089** | **10.2089** | **2.4500e-003** | **1.4000e-004** | **10.3129** |

# 7.0 Water Detail

## 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

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**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF - Phase 2 Project - Center Building AB
**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Enclosed Parking with Elevator | 19.26 | 1000sqft | 0.44 | 19,258.00 | 0 |
| Parking Lot | 2.51 | 1000sqft | 0.06 | 2,508.00 | 0 |
| City Park | 1.35 | Acre | 1.35 | 58,806.00 | 0 |
| Apartments Mid Rise | 190.00 | Dwelling Unit | 5.00 | 322,888.00 | 543 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2023 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 332.89 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

Project Characteristics - CO2 intensity factor in 2023 accounting for RPS

Land Use - Phase 2 land uses from Project sponsor

Construction Phase - No construction emissions in this run.

Grading - no grading

Vehicle Trips - Updated trip rates from trip memo

Woodstoves - No woodstoves or wood fireplaces

Consumer Products - Updated ROG factor

Energy Use - Not modeling energy sources of operational emissions.

Water And Wastewater - Not modeling water and wastewater sources of operational emissions.

Solid Waste - Not modeling solid waste sources of operational emissions.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 230.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblFireplaces | NumberGas | 28.50 | 60.80 |
| tblFireplaces | NumberWood | 32.30 | 0.00 |
| tblLandUse | LandUseSquareFeet | 19,260.00 | 19,258.00 |
| tblLandUse | LandUseSquareFeet | 2,510.00 | 2,508.00 |
| tblLandUse | LandUseSquareFeet | 190,000.00 | 322,888.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 332.89 |
| tblSolidWaste | SolidWasteGenerationRate | 87.40 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.12 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.56 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | SU_TR | 5.86 | 2.56 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | WD_TR | 6.65 | 2.56 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblWater | IndoorWaterUseRate | 12,379,264.87 | 0.00 |
| tblWater | OutdoorWaterUseRate | 7,804,319.16 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,608,499.82 | 0.00 |
| tblWoodstoves | NumberCatalytic | 3.80 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 3.80 | 0.00 |

## 2.0 Emissions Summary

I-FRISBIER2

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2021 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2021 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1119 | 0.4264 | 1.2523 | 4.6500e-003 | 0.4200 | 4.9500e-003 | 0.4250 | 0.1131 | 4.6200e-003 | 0.1178 | 0.0000 | 428.4388 | 428.4388 | 0.0178 | 0.0000 | 428.8847 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.2747** | **0.4492** | **2.6664** | **4.7700e-003** | **0.4200** | **0.0133** | **0.4333** | **0.1131** | **0.0130** | **0.1261** | **0.0000** | **438.3339** | **438.3339** | **0.0202** | **1.4000e-004** | **438.8804** |

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## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Area | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1119 | 0.4264 | 1.2523 | 4.6500e-003 | 0.4200 | 4.9500e-003 | 0.4250 | 0.1131 | 4.6200e-003 | 0.1178 | 0.0000 | 428.4388 | 428.4388 | 0.0178 | 0.0000 | 428.8847 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Total | 1.2747 | 0.4492 | 2.6664 | 4.7700e-003 | 0.4200 | 0.0133 | 0.4333 | 0.1131 | 0.0130 | 0.1261 | 0.0000 | 438.3339 | 438.3339 | 0.0202 | 1.4000e-004 | 438.8804 |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

3333 CalSF - Phase 2 Project - Center Building AB - San Francisco County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 9/10/2021 | 9/9/2021 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 10/8/2021 | 10/7/2021 | 5 | 0 | |
| 3 | Grading | Grading | 10/22/2021 | 10/21/2021 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 11/19/2021 | 11/18/2021 | 5 | 0 | |
| 5 | Paving | Paving | 10/7/2022 | 10/6/2022 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 11/4/2022 | 11/3/2022 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0.5**

**Residential Indoor: 653,848; Residential Outdoor: 217,949; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 1,306 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 1 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | 3 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

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| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 171.00 | 34.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 34.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.2 Demolition - 2021

### Unmitigated Construction Off-Site

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.3 Site Preparation - 2021

### Unmitigated Construction Off-Site

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2021

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2021

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2021

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.5 Building Construction - 2021

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.6 Paving - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.6 Paving - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.6 Paving - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.7 Architectural Coating - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.7 Architectural Coating - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.7 Architectural Coating - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Category | | | | | | | | | | | | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Total | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| Category | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.1119 | 0.4264 | 1.2523 | 4.6500e-003 | 0.4200 | 4.9500e-003 | 0.4250 | 0.1131 | 4.6200e-003 | 0.1178 | 0.0000 | 428.4388 | 428.4388 | 0.0178 | 0.0000 | 428.8847 |
| Unmitigated | 0.1119 | 0.4264 | 1.2523 | 4.6500e-003 | 0.4200 | 4.9500e-003 | 0.4250 | 0.1131 | 4.6200e-003 | 0.1178 | 0.0000 | 428.4388 | 428.4388 | 0.0178 | 0.0000 | 428.8847 |

## 4.2 Trip Summary Information

| Land Use | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 486.40 | 486.40 | 486.40 | 1,123,393 | 1,123,393 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Total | 486.40 | 486.40 | 486.40 | 1,123,393 | 1,123,393 |

## 4.3 Trip Type Information

| Land Use | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |

## 4.4 Fleet Mix

I-FRISBIER2

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |
| City Park | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |
| Enclosed Parking with Elevator | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |
| Parking Lot | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |
| Unmitigated | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.2278 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.8918 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.7000e-004 | 6.5500e-003 | 2.7900e-003 | 4.0000e-005 | | 5.3000e-004 | 5.3000e-004 | | 5.3000e-004 | 5.3000e-004 | 0.0000 | 7.5902 | 7.5902 | 1.5000e-004 | 1.4000e-004 | 7.6353 |
| Landscaping | 0.0425 | 0.0163 | 1.4113 | 7.0000e-005 | | 7.8100e-003 | 7.8100e-003 | | 7.8100e-003 | 7.8100e-003 | 0.0000 | 2.3049 | 2.3049 | 2.2200e-003 | 0.0000 | 2.3603 |
| **Total** | **1.1628** | **0.0228** | **1.4141** | **1.1000e-004** | | **8.3400e-003** | **8.3400e-003** | | **8.3400e-003** | **8.3400e-003** | **0.0000** | **9.8951** | **9.8951** | **2.3700e-003** | **1.4000e-004** | **9.9956** |

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## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | tons/yr | | | | | | | | | | MT/yr | | | | | |
| SubCategory | | | | | | | | | | | | | | | | |
| Architectural Coating | 0.2278 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.8918 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.7000e-004 | 6.5500e-003 | 2.7900e-003 | 4.0000e-005 | | 5.3000e-004 | 5.3000e-004 | | 5.3000e-004 | 5.3000e-004 | 0.0000 | 7.5902 | 7.5902 | 1.5000e-004 | 1.4000e-004 | 7.6353 |
| Landscaping | 0.0425 | 0.0163 | 1.4113 | 7.0000e-005 | | 7.8100e-003 | 7.8100e-003 | | 7.8100e-003 | 7.8100e-003 | 0.0000 | 2.3049 | 2.3049 | 2.2200e-003 | 0.0000 | 2.3603 |
| **Total** | **1.1628** | **0.0228** | **1.4141** | **1.1000e-004** | | **8.3400e-003** | **8.3400e-003** | | **8.3400e-003** | **8.3400e-003** | **0.0000** | **9.8951** | **9.8951** | **2.3700e-003** | **1.4000e-004** | **9.9956** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

# 8.0 Waste Detail

## 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

I-FRISBIER2

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF - Phase 2 Variant - Center Building AB
## San Francisco County, Annual

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Enclosed Parking with Elevator | 19.26 | 1000sqft | 0.44 | 19,258.00 | 0 |
| Parking Lot | 2.51 | 1000sqft | 0.06 | 2,508.00 | 0 |
| City Park | 1.35 | Acre | 1.35 | 58,806.00 | 0 |
| Apartments Mid Rise | 190.00 | Dwelling Unit | 5.00 | 322,888.00 | 543 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2023 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 332.89 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

Project Characteristics - CO2 intensity factor in 2023 accounting for RPS

Land Use - Phase 2 land uses from Project sponsor

Construction Phase - No construction in this analysis

Grading -

Vehicle Trips - Updated trip rates from traffic memo

Woodstoves - No woodstoves or wood bruining fireplaces

Consumer Products - Updated ROG EF

Energy Use - Not modeling energy sources of operational emissions

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 230.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblFireplaces | NumberGas | 28.50 | 60.80 |
| tblFireplaces | NumberWood | 32.30 | 0.00 |
| tblLandUse | LandUseSquareFeet | 19,260.00 | 19,258.00 |
| tblLandUse | LandUseSquareFeet | 2,510.00 | 2,508.00 |
| tblLandUse | LandUseSquareFeet | 190,000.00 | 322,888.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 332.89 |
| tblSolidWaste | SolidWasteGenerationRate | 87.40 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.12 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.58 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | SU_TR | 5.86 | 2.58 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | WD_TR | 6.65 | 2.58 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblWater | IndoorWaterUseRate | 12,379,264.87 | 0.00 |
| tblWater | OutdoorWaterUseRate | 7,804,319.16 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,608,499.82 | 0.00 |
| tblWoodstoves | NumberCatalytic | 3.80 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 3.80 | 0.00 |

## 2.0 Emissions Summary

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2019 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2019 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1127 | 0.4297 | 1.2621 | 4.6900e-003 | 0.4233 | 4.9800e-003 | 0.4283 | 0.1140 | 4.6600e-003 | 0.1187 | 0.0000 | 431.7859 | 431.7859 | 0.0180 | 0.0000 | 432.2354 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.2755** | **0.4525** | **2.6762** | **4.8100e-003** | **0.4233** | **0.0133** | **0.4366** | **0.1140** | **0.0130** | **0.1270** | **0.0000** | **441.6810** | **441.6810** | **0.0203** | **1.4000e-004** | **442.2311** |

I-FRISBIER2

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.1127 | 0.4297 | 1.2621 | 4.6900e-003 | 0.4233 | 4.9800e-003 | 0.4283 | 0.1140 | 4.6600e-003 | 0.1187 | 0.0000 | 431.7859 | 431.7859 | 0.0180 | 0.0000 | 432.2354 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Total | 1.2755 | 0.4525 | 2.6762 | 4.8100e-003 | 0.4233 | 0.0133 | 0.4366 | 0.1140 | 0.0130 | 0.1270 | 0.0000 | 441.6810 | 441.6810 | 0.0203 | 1.4000e-004 | 442.2311 |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

3333 CalSF - Phase 2 Variant - Center Building AB - San Francisco County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 5/25/2018 | 5/24/2018 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 6/22/2018 | 6/21/2018 | 5 | 0 | |
| 3 | Grading | Grading | 7/6/2018 | 7/5/2018 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 8/3/2018 | 8/2/2018 | 5 | 0 | |
| 5 | Paving | Paving | 6/21/2019 | 6/20/2019 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 7/19/2019 | 7/18/2019 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 0.5**

**Residential Indoor: 653,848; Residential Outdoor: 217,949; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 1,306 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

3333 CalSF - Phase 2 Variant - Center Building AB - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 1 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | 3 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 171.00 | 34.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 34.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.2 Demolition - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.3 Site Preparation - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.3 Site Preparation - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2018

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.6 Paving - 2019

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.6 Paving - 2019

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2019

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.7 Architectural Coating - 2019

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.7 Architectural Coating - 2019

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.7 Architectural Coating - 2019

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.1127 | 0.4297 | 1.2621 | 4.6900e-003 | 0.4233 | 4.9800e-003 | 0.4283 | 0.1140 | 4.6600e-003 | 0.1187 | 0.0000 | 431.7859 | 431.7859 | 0.0180 | 0.0000 | 432.2354 |
| Unmitigated | 0.1127 | 0.4297 | 1.2621 | 4.6900e-003 | 0.4233 | 4.9800e-003 | 0.4283 | 0.1140 | 4.6600e-003 | 0.1187 | 0.0000 | 431.7859 | 431.7859 | 0.0180 | 0.0000 | 432.2354 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 490.20 | 490.20 | 490.20 | 1,132,169 | 1,132,169 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Total | 490.20 | 490.20 | 490.20 | 1,132,169 | 1,132,169 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |

## 4.4 Fleet Mix

I-FRISBIER2

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |
| City Park | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |
| Enclosed Parking with Elevator | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |
| Parking Lot | 0.605107 | 0.038687 | 0.192108 | 0.089453 | 0.014064 | 0.005036 | 0.030434 | 0.009181 | 0.004309 | 0.003768 | 0.006404 | 0.000941 | 0.000505 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |
| Unmitigated | 1.1628 | 0.0228 | 1.4141 | 1.2000e-004 | | 8.3400e-003 | 8.3400e-003 | | 8.3400e-003 | 8.3400e-003 | 0.0000 | 9.8951 | 9.8951 | 2.3600e-003 | 1.4000e-004 | 9.9957 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.2278 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.8918 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.7000e-004 | 6.5500e-003 | 2.7900e-003 | 4.0000e-005 | | 5.3000e-004 | 5.3000e-004 | | 5.3000e-004 | 5.3000e-004 | 0.0000 | 7.5902 | 7.5902 | 1.5000e-004 | 1.4000e-004 | 7.6353 |
| Landscaping | 0.0425 | 0.0163 | 1.4113 | 7.0000e-005 | | 7.8100e-003 | 7.8100e-003 | | 7.8100e-003 | 7.8100e-003 | 0.0000 | 2.3049 | 2.3049 | 2.2200e-003 | 0.0000 | 2.3603 |
| **Total** | **1.1628** | **0.0228** | **1.4141** | **1.1000e-004** | | **8.3400e-003** | **8.3400e-003** | | **8.3400e-003** | **8.3400e-003** | **0.0000** | **9.8951** | **9.8951** | **2.3700e-003** | **1.4000e-004** | **9.9956** |

I-FRISBIER2

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.2278 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.8918 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 7.7000e-004 | 6.5500e-003 | 2.7900e-003 | 4.0000e-005 | | 5.3000e-004 | 5.3000e-004 | | 5.3000e-004 | 5.3000e-004 | 0.0000 | 7.5902 | 7.5902 | 1.5000e-004 | 1.4000e-004 | 7.6353 |
| Landscaping | 0.0425 | 0.0163 | 1.4113 | 7.0000e-005 | | 7.8100e-003 | 7.8100e-003 | | 7.8100e-003 | 7.8100e-003 | 0.0000 | 2.3049 | 2.3049 | 2.2200e-003 | 0.0000 | 2.3603 |
| **Total** | **1.1628** | **0.0228** | **1.4141** | **1.1000e-004** | | **8.3400e-003** | **8.3400e-003** | | **8.3400e-003** | **8.3400e-003** | **0.0000** | **9.8951** | **9.8951** | **2.3700e-003** | **1.4000e-004** | **9.9956** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

I-FRISBIER2

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF - Plaza A/B Walnut Project

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| General Office Building | 50.00 | 1000sqft | 1.15 | 49,999.00 | 0 |
| Day-Care Center | 14.69 | 1000sqft | 0.34 | 14,690.00 | 0 |
| Enclosed Parking with Elevator | 301.06 | 1000sqft | 6.91 | 301,060.00 | 0 |
| Parking Lot | 3.82 | 1000sqft | 0.09 | 3,816.00 | 0 |
| City Park | 2.19 | Acre | 2.19 | 95,396.40 | 0 |
| Apartments Mid Rise | 128.00 | Dwelling Unit | 3.37 | 138,370.00 | 366 |
| Strip Mall | 49.83 | 1000sqft | 1.14 | 49,830.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2025 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 314.6 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

3333 CalSF - Plaza A/B Walnut Project - San Francisco County, Annual

Project Characteristics - CO2 intensity for 2025 accounting for RPS

Land Use - Phase 3 land uses from project sponsor

Construction Phase - No construction in this analysis

Grading -

Vehicle Trips - Updated trip rates from traffic memo

Woodstoves - No woodstoves or wood burning fireplaces

Consumer Products - Updated ROG factor

Energy Use - Not modeling energy sources of operational emissions.

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions.

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 300.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 30.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 2.51 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 3.58 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | LightingElect | 4.88 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 1.27 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24E | 4.80 | 0.00 |
| tblEnergyUse | NT24E | 3.36 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |
| tblEnergyUse | NT24NG | 1.62 | 0.00 |
| tblEnergyUse | NT24NG | 1.01 | 0.00 |
| tblEnergyUse | NT24NG | 0.70 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 0.66 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |
| tblEnergyUse | T24E | 4.10 | 0.00 |
| tblEnergyUse | T24E | 2.24 | 0.00 |
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblEnergyUse | T24NG | 14.85 | 0.00 |
| tblEnergyUse | T24NG | 18.32 | 0.00 |
| tblEnergyUse | T24NG | 3.90 | 0.00 |
| tblFireplaces | NumberGas | 19.20 | 40.96 |
| tblFireplaces | NumberWood | 21.76 | 0.00 |
| tblLandUse | LandUseSquareFeet | 50,000.00 | 49,999.00 |
| tblLandUse | LandUseSquareFeet | 3,820.00 | 3,816.00 |
| tblLandUse | LandUseSquareFeet | 128,000.00 | 138,370.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 314.6 |
| tblSolidWaste | SolidWasteGenerationRate | 58.88 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.19 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 19.10 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 46.50 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 52.32 | 0.00 |

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| | | | |
|---|---|---|---|
| tblVehicleTrips | ST_TR | 6.39 | 2.56 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | ST_TR | 6.21 | 19.16 |
| tblVehicleTrips | ST_TR | 2.46 | 5.18 |
| tblVehicleTrips | ST_TR | 42.04 | 67.41 |
| tblVehicleTrips | SU_TR | 5.86 | 2.56 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | SU_TR | 5.83 | 19.16 |
| tblVehicleTrips | SU_TR | 1.05 | 5.18 |
| tblVehicleTrips | SU_TR | 20.43 | 67.41 |
| tblVehicleTrips | WD_TR | 6.65 | 2.56 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblVehicleTrips | WD_TR | 74.06 | 19.16 |
| tblVehicleTrips | WD_TR | 11.03 | 5.18 |
| tblVehicleTrips | WD_TR | 44.32 | 67.41 |
| tblWater | IndoorWaterUseRate | 8,339,715.28 | 0.00 |
| tblWater | IndoorWaterUseRate | 630,047.75 | 0.00 |
| tblWater | IndoorWaterUseRate | 8,886,687.40 | 0.00 |
| tblWater | IndoorWaterUseRate | 3,691,033.75 | 0.00 |
| tblWater | OutdoorWaterUseRate | 5,257,646.59 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,609,344.16 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,620,122.78 | 0.00 |
| tblWater | OutdoorWaterUseRate | 5,446,679.37 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,262,246.49 | 0.00 |
| tblWoodstoves | NumberCatalytic | 2.56 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 2.56 | 0.00 |

I-FRISBIER2

## 2.0 Emissions Summary

### 2.1 Overall Construction

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2023 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2022 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2023 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9104 | 0.0154 | 0.9553 | 8.0000e-005 | | 5.6400e-003 | 5.6400e-003 | | 5.6400e-003 | 5.6400e-003 | 0.0000 | 6.6734 | 6.6734 | 1.6000e-003 | 9.0000e-005 | 6.7415 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.7587 | 2.8768 | 7.5116 | 0.0271 | 2.5707 | 0.0291 | 2.5998 | 0.6922 | 0.0272 | 0.7193 | 0.0000 | 2,503.7046 | 2,503.7046 | 0.1073 | 0.0000 | 2,506.3859 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.6690** | **2.8922** | **8.4668** | **0.0272** | **2.5707** | **0.0348** | **2.6055** | **0.6922** | **0.0328** | **0.7250** | **0.0000** | **2,510.3780** | **2,510.3780** | **0.1089** | **9.0000e-005** | **2,513.1273** |

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## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9104 | 0.0154 | 0.9553 | 8.0000e-005 | | 5.6400e-003 | 5.6400e-003 | | 5.6400e-003 | 5.6400e-003 | 0.0000 | 6.6734 | 6.6734 | 1.6000e-003 | 9.0000e-005 | 6.7415 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.7587 | 2.8768 | 7.5116 | 0.0271 | 2.5707 | 0.0291 | 2.5998 | 0.6922 | 0.0272 | 0.7193 | 0.0000 | 2,503.7046 | 2,503.7046 | 0.1073 | 0.0000 | 2,506.3859 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **1.6690** | **2.8922** | **8.4668** | **0.0272** | **2.5707** | **0.0348** | **2.6055** | **0.6922** | **0.0328** | **0.7250** | **0.0000** | **2,510.3780** | **2,510.3780** | **0.1089** | **9.0000e-005** | **2,513.1273** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

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3333 CalSF - Plaza A/B Walnut Project - San Francisco County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 4/12/2022 | 4/11/2022 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 5/10/2022 | 5/9/2022 | 5 | 0 | |
| 3 | Grading | Grading | 5/24/2022 | 5/23/2022 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 7/5/2022 | 7/4/2022 | 5 | 0 | |
| 5 | Paving | Paving | 8/29/2023 | 8/28/2023 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 9/26/2023 | 9/25/2023 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 0**

**Acres of Paving: 7**

**Residential Indoor: 280,199; Residential Outdoor: 93,400; Non-Residential Indoor: 171,779; Non-Residential Outdoor: 57,260; Striped Parking Area: 18,293 (Architectural Coating – sqft)**

**OffRoad Equipment**

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3333 CalSF - Plaza A/B Walnut Project - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

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| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 298.00 | 98.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 60.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.2 Demolition - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2022

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.4 Grading - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2022

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2022

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.5 Building Construction - 2022

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.6 Paving - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.6 Paving - 2023

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.6 Paving - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.7 Architectural Coating - 2023

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.7 Architectural Coating - 2023

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.7 Architectural Coating - 2023

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.7587 | 2.8768 | 7.5116 | 0.0271 | 2.5707 | 0.0291 | 2.5998 | 0.6922 | 0.0272 | 0.7193 | 0.0000 | 2,503.7046 | 2,503.7046 | 0.1073 | 0.0000 | 2,506.3859 |
| Unmitigated | 0.7587 | 2.8768 | 7.5116 | 0.0271 | 2.5707 | 0.0291 | 2.5998 | 0.6922 | 0.0272 | 0.7193 | 0.0000 | 2,503.7046 | 2,503.7046 | 0.1073 | 0.0000 | 2,506.3859 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 327.68 | 327.68 | 327.68 | 756,812 | 756,812 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Day-Care Center | 281.46 | 281.46 | 281.46 | 331,456 | 331,456 |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| General Office Building | 259.00 | 259.00 | 259.00 | 618,946 | 618,946 |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 3,359.04 | 3,359.04 | 3359.04 | 5,173,033 | 5,173,033 |
| Total | 4,227.18 | 4,227.18 | 4,227.18 | 6,880,247 | 6,880,247 |

## 4.3 Trip Type Information

I-FRISBIER2

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Day-Care Center | 9.50 | 7.30 | 7.30 | 12.70 | 82.30 | 5.00 | 28 | 58 | 14 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| General Office Building | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 77 | 19 | 4 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Strip Mall | 9.50 | 7.30 | 7.30 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| City Park | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Day-Care Center | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Enclosed Parking with Elevator | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| General Office Building | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Parking Lot | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Strip Mall | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.9104 | 0.0154 | 0.9553 | 8.0000e-005 | | 5.6400e-003 | 5.6400e-003 | | 5.6400e-003 | 5.6400e-003 | 0.0000 | 6.6734 | 6.6734 | 1.6000e-003 | 9.0000e-005 | 6.7415 |
| Unmitigated | 0.9104 | 0.0154 | 0.9553 | 8.0000e-005 | | 5.6400e-003 | 5.6400e-003 | | 5.6400e-003 | 5.6400e-003 | 0.0000 | 6.6734 | 6.6734 | 1.6000e-003 | 9.0000e-005 | 6.7415 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1635 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.7175 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 5.2000e-004 | 4.4200e-003 | 1.8800e-003 | 3.0000e-005 | | 3.6000e-004 | 3.6000e-004 | | 3.6000e-004 | 3.6000e-004 | 0.0000 | 5.1134 | 5.1134 | 1.0000e-004 | 9.0000e-005 | 5.1438 |
| Landscaping | 0.0289 | 0.0110 | 0.9534 | 5.0000e-005 | | 5.2800e-003 | 5.2800e-003 | | 5.2800e-003 | 5.2800e-003 | 0.0000 | 1.5600 | 1.5600 | 1.5100e-003 | 0.0000 | 1.5977 |
| **Total** | **0.9104** | **0.0154** | **0.9553** | **8.0000e-005** | | **5.6400e-003** | **5.6400e-003** | | **5.6400e-003** | **5.6400e-003** | **0.0000** | **6.6734** | **6.6734** | **1.6100e-003** | **9.0000e-005** | **6.7415** |

I-FRISBIER2

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1635 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.7175 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 5.2000e-004 | 4.4200e-003 | 1.8800e-003 | 3.0000e-005 | | 3.6000e-004 | 3.6000e-004 | | 3.6000e-004 | 3.6000e-004 | 0.0000 | 5.1134 | 5.1134 | 1.0000e-004 | 9.0000e-005 | 5.1438 |
| Landscaping | 0.0289 | 0.0110 | 0.9534 | 5.0000e-005 | | 5.2800e-003 | 5.2800e-003 | | 5.2800e-003 | 5.2800e-003 | 0.0000 | 1.5600 | 1.5600 | 1.5100e-003 | 0.0000 | 1.5977 |
| **Total** | **0.9104** | **0.0154** | **0.9553** | **8.0000e-005** | | **5.6400e-003** | **5.6400e-003** | | **5.6400e-003** | **5.6400e-003** | **0.0000** | **6.6734** | **6.6734** | **1.6100e-003** | **9.0000e-005** | **6.7415** |

# 7.0 Water Detail

## 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| General Office Building | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

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**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF - Plaza A/B Walnut Variant

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Day-Care Center | 14.65 | 1000sqft | 0.34 | 14,650.00 | 0 |
| Enclosed Parking with Elevator | 307.42 | 1000sqft | 7.06 | 307,420.00 | 0 |
| Parking Lot | 6.18 | 1000sqft | 0.14 | 6,180.00 | 0 |
| City Park | 2.19 | Acre | 2.19 | 95,396.40 | 0 |
| Apartments Mid Rise | 314.00 | Dwelling Unit | 8.26 | 292,290.00 | 898 |
| Strip Mall | 44.31 | 1000sqft | 1.02 | 44,306.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2025 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 314.6 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

3333 CalSF - Plaza A/B Walnut Variant - San Francisco County, Annual

Project Characteristics - estimated intensity factor (CO2)

Land Use - Phase 3 land uses from Project Sponsor

Construction Phase - Not modeling construction emissions

Vehicle Trips - Given trips

Woodstoves - no woodstoves, only gas fireplaces

Consumer Products - ROG EF changed to 1.51E-5

Energy Use - Not modeling energy sources of operational emissions

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 300.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 30.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 2.51 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | LightingElect | 4.88 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 1.27 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24E | 3.36 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |
| tblEnergyUse | NT24NG | 1.62 | 0.00 |
| tblEnergyUse | NT24NG | 0.70 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 0.66 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |
| tblEnergyUse | T24E | 2.24 | 0.00 |
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblEnergyUse | T24NG | 14.85 | 0.00 |
| tblEnergyUse | T24NG | 3.90 | 0.00 |
| tblFireplaces | NumberGas | 47.10 | 100.48 |
| tblFireplaces | NumberWood | 53.38 | 0.00 |
| tblGrading | AcresOfGrading | 0.00 | 75.00 |
| tblLandUse | LandUseSquareFeet | 314,000.00 | 292,290.00 |
| tblLandUse | LandUseSquareFeet | 44,310.00 | 44,306.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 314.6 |
| tblSolidWaste | SolidWasteGenerationRate | 144.44 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.19 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 19.05 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 46.53 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.58 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | ST_TR | 6.21 | 19.30 |
| tblVehicleTrips | ST_TR | 42.04 | 70.52 |
| tblVehicleTrips | SU_TR | 5.86 | 2.58 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | SU_TR | 5.83 | 19.30 |

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| | | | |
|---|---|---|---|
| tblVehicleTrips | SU_TR | 20.43 | 70.52 |
| tblVehicleTrips | WD_TR | 6.65 | 2.58 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblVehicleTrips | WD_TR | 74.06 | 19.30 |
| tblVehicleTrips | WD_TR | 44.32 | 70.52 |
| tblWater | IndoorWaterUseRate | 20,458,364.05 | 0.00 |
| tblWater | IndoorWaterUseRate | 628,332.16 | 0.00 |
| tblWater | IndoorWaterUseRate | 3,282,153.43 | 0.00 |
| tblWater | OutdoorWaterUseRate | 12,897,664.29 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,609,344.16 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,615,711.28 | 0.00 |
| tblWater | OutdoorWaterUseRate | 2,011,642.42 | 0.00 |
| tblWoodstoves | NumberCatalytic | 6.28 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 6.28 | 0.00 |

## 2.0 Emissions Summary

I-FRISBIER2

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2025 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2026 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2025 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2026 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.3037 | 0.0377 | 2.3373 | 1.9000e-004 | | 0.0138 | 0.0138 | | 0.0138 | 0.0138 | 0.0000 | 16.3590 | 16.3590 | 3.9000e-003 | 2.3000e-004 | 16.5251 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.7628 | 2.8997 | 7.6092 | 0.0276 | 2.6215 | 0.0296 | 2.6511 | 0.7058 | 0.0276 | 0.7335 | 0.0000 | 2,550.0140 | 2,550.0140 | 0.1089 | 0.0000 | 2,552.7365 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **2.0664** | **2.9374** | **9.9465** | **0.0278** | **2.6215** | **0.0434** | **2.6649** | **0.7058** | **0.0415** | **0.7473** | **0.0000** | **2,566.3729** | **2,566.3729** | **0.1128** | **2.3000e-004** | **2,569.2616** |

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## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.3037 | 0.0377 | 2.3373 | 1.9000e-004 | | 0.0138 | 0.0138 | | 0.0138 | 0.0138 | 0.0000 | 16.3590 | 16.3590 | 3.9000e-003 | 2.3000e-004 | 16.5251 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.7628 | 2.8997 | 7.6092 | 0.0276 | 2.6215 | 0.0296 | 2.6511 | 0.7058 | 0.0276 | 0.7335 | 0.0000 | 2,550.0140 | 2,550.0140 | 0.1089 | 0.0000 | 2,552.7365 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **2.0664** | **2.9374** | **9.9465** | **0.0278** | **2.6215** | **0.0434** | **2.6649** | **0.7058** | **0.0415** | **0.7473** | **0.0000** | **2,566.3729** | **2,566.3729** | **0.1128** | **2.3000e-004** | **2,569.2616** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

3333 CalSF - Plaza A/B Walnut Variant - San Francisco County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 11/19/2025 | 3/19/2025 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 12/17/2025 | 8/13/2025 | 5 | 0 | |
| 3 | Grading | Grading | 12/31/2025 | 12/3/2024 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 2/11/2026 | 2/10/2026 | 5 | 0 | |
| 5 | Paving | Paving | 4/7/2027 | 10/27/2026 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 5/5/2027 | 7/9/2020 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 75**

**Acres of Paving: 7.2**

**Residential Indoor: 591,887; Residential Outdoor: 197,296; Non-Residential Indoor: 88,434; Non-Residential Outdoor: 29,478; Striped Parking Area: 18,816 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

3333 CalSF - Plaza A/B Walnut Variant - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Grading | Excavators | 2 | 8.00 | 158 | 0.38 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 2 | 8.00 | 367 | 0.48 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 8 | 20.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 418.00 | 110.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 84.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2025

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.2 Demolition - 2025

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.2 Demolition - 2025

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2025

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.3 Site Preparation - 2025

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.3 Site Preparation - 2025

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2026

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.5 Building Construction - 2026

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.5 Building Construction - 2026

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.7628 | 2.8997 | 7.6092 | 0.0276 | 2.6215 | 0.0296 | 2.6511 | 0.7058 | 0.0276 | 0.7335 | 0.0000 | 2,550.0140 | 2,550.0140 | 0.1089 | 0.0000 | 2,552.7365 |
| Unmitigated | 0.7628 | 2.8997 | 7.6092 | 0.0276 | 2.6215 | 0.0296 | 2.6511 | 0.7058 | 0.0276 | 0.7335 | 0.0000 | 2,550.0140 | 2,550.0140 | 0.1089 | 0.0000 | 2,552.7365 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 810.12 | 810.12 | 810.12 | 1,871,059 | 1,871,059 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Day-Care Center | 282.75 | 282.75 | 282.75 | 332,969 | 332,969 |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Strip Mall | 3,124.74 | 3,124.74 | 3124.74 | 4,812,205 | 4,812,205 |
| Total | 4,217.61 | 4,217.61 | 4,217.61 | 7,016,233 | 7,016,233 |

## 4.3 Trip Type Information

I-FRISBIER2

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Day-Care Center | 9.50 | 7.30 | 7.30 | 12.70 | 82.30 | 5.00 | 28 | 58 | 14 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Strip Mall | 9.50 | 7.30 | 7.30 | 16.60 | 64.40 | 19.00 | 45 | 40 | 15 |

### 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| City Park | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Day-Care Center | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Enclosed Parking with Elevator | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Parking Lot | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |
| Strip Mall | 0.604343 | 0.037677 | 0.192702 | 0.090337 | 0.013384 | 0.005111 | 0.031913 | 0.009324 | 0.004273 | 0.003317 | 0.006138 | 0.000948 | 0.000534 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

3333 CalSF - Plaza A/B Walnut Variant - San Francisco County, Annual

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 1.3037 | 0.0377 | 2.3373 | 1.9000e-004 | | 0.0138 | 0.0138 | | 0.0138 | 0.0138 | 0.0000 | 16.3590 | 16.3590 | 3.9000e-003 | 2.3000e-004 | 16.5251 |
| Unmitigated | 1.3037 | 0.0377 | 2.3373 | 1.9000e-004 | | 0.0138 | 0.0138 | | 0.0138 | 0.0138 | 0.0000 | 16.3590 | 16.3590 | 3.9000e-003 | 2.3000e-004 | 16.5251 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.2430 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.9891 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.2700e-003 | 0.0108 | 4.6100e-003 | 7.0000e-005 | | 8.8000e-004 | 8.8000e-004 | | 8.8000e-004 | 8.8000e-004 | 0.0000 | 12.5439 | 12.5439 | 2.4000e-004 | 2.3000e-004 | 12.6184 |
| Landscaping | 0.0703 | 0.0269 | 2.3327 | 1.2000e-004 | | 0.0129 | 0.0129 | | 0.0129 | 0.0129 | 0.0000 | 3.8151 | 3.8151 | 3.6600e-003 | 0.0000 | 3.9068 |
| **Total** | **1.3037** | **0.0377** | **2.3373** | **1.9000e-004** | | **0.0138** | **0.0138** | | **0.0138** | **0.0138** | **0.0000** | **16.3590** | **16.3590** | **3.9000e-003** | **2.3000e-004** | **16.5251** |

I-FRISBIER2

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.2430 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.9891 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.2700e-003 | 0.0108 | 4.6100e-003 | 7.0000e-005 | | 8.8000e-004 | 8.8000e-004 | | 8.8000e-004 | 8.8000e-004 | 0.0000 | 12.5439 | 12.5439 | 2.4000e-004 | 2.3000e-004 | 12.6184 |
| Landscaping | 0.0703 | 0.0269 | 2.3327 | 1.2000e-004 | | 0.0129 | 0.0129 | | 0.0129 | 0.0129 | 0.0000 | 3.8151 | 3.8151 | 3.6600e-003 | 0.0000 | 3.9068 |
| **Total** | **1.3037** | **0.0377** | **2.3373** | **1.9000e-004** | | **0.0138** | **0.0138** | | **0.0138** | **0.0138** | **0.0000** | **16.3590** | **16.3590** | **3.9000e-003** | **2.3000e-004** | **16.5251** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Day-Care Center | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Strip Mall | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

I-FRISBIER2

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF - Mayfair Townhouse Project

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Enclosed Parking with Elevator | 20.48 | 1000sqft | 0.47 | 20,478.00 | 0 |
| Parking Lot | 0.58 | 1000sqft | 0.01 | 576.00 | 0 |
| City Park | 0.46 | Acre | 0.46 | 20,037.60 | 0 |
| Apartments Mid Rise | 44.00 | Dwelling Unit | 1.16 | 97,182.00 | 126 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2027 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 296.32 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

Project Characteristics - Projected intensity factor in 2027

Land Use - Calculated square footage

Construction Phase - Zeroed out construction

Vehicle Trips - updated vehicle trips

Woodstoves - set woodstoves to 0, made all fireplaces gas

Consumer Products - ROG EF changed to 1.51E-5

Energy Use - Not modeling energy sources of operational emissions

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConstructionPhase | NumDays | 220.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 6.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConstructionPhase | NumDays | 3.00 | 0.00 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |

I-FRISBIER2

| | | | |
|---|---|---|---|
| tblFireplaces | NumberGas | 6.60 | 14.08 |
| tblFireplaces | NumberWood | 7.48 | 0.00 |
| tblGrading | AcresOfGrading | 0.00 | 3.00 |
| tblGrading | AcresOfGrading | 0.00 | 4.50 |
| tblLandUse | LandUseSquareFeet | 20,480.00 | 20,478.00 |
| tblLandUse | LandUseSquareFeet | 580.00 | 576.00 |
| tblLandUse | LandUseSquareFeet | 44,000.00 | 97,182.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 296.32 |
| tblSolidWaste | SolidWasteGenerationRate | 20.24 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.04 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.56 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | SU_TR | 5.86 | 2.56 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | WD_TR | 6.65 | 2.56 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblWater | IndoorWaterUseRate | 2,866,777.13 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,807,316.02 | 0.00 |
| tblWater | OutdoorWaterUseRate | 548,081.42 | 0.00 |
| tblWoodstoves | NumberCatalytic | 0.88 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 0.88 | 0.00 |

## 2.0 Emissions Summary

I-FRISBIER2

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Maximum | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Maximum | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

I-FRISBIER2

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0211 | 0.0864 | 0.2340 | 9.5000e-004 | 0.0972 | 9.6000e-004 | 0.0981 | 0.0262 | 8.9000e-004 | 0.0271 | 0.0000 | 88.1513 | 88.1513 | 3.5800e-003 | 0.0000 | 88.2407 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.3693** | **0.0917** | **0.5613** | **9.8000e-004** | **0.0972** | **2.8900e-003** | **0.1001** | **0.0262** | **2.8200e-003** | **0.0290** | **0.0000** | **90.4431** | **90.4431** | **4.1300e-003** | **3.0000e-005** | **90.5558** |

I-FRISBIER2

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0211 | 0.0864 | 0.2340 | 9.5000e-004 | 0.0972 | 9.6000e-004 | 0.0981 | 0.0262 | 8.9000e-004 | 0.0271 | 0.0000 | 88.1513 | 88.1513 | 3.5800e-003 | 0.0000 | 88.2407 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.3693** | **0.0917** | **0.5613** | **9.8000e-004** | **0.0972** | **2.8900e-003** | **0.1001** | **0.0262** | **2.8200e-003** | **0.0290** | **0.0000** | **90.4431** | **90.4431** | **4.1300e-003** | **3.0000e-005** | **90.5558** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 1/13/2018 | 10/18/2017 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 2/10/2018 | 8/16/2017 | 5 | 0 | |
| 3 | Grading | Grading | 2/15/2018 | 9/13/2017 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 2/23/2018 | 2/2/2011 | 5 | 0 | |
| 5 | Paving | Paving | 12/28/2018 | 3/7/2018 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 1/11/2019 | 6/14/2017 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 4.5**

**Acres of Grading (Grading Phase): 3**

**Acres of Paving: 0.48**

**Residential Indoor: 196,794; Residential Outdoor: 65,598; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 1,263 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

3333 CalSF - Mayfair Townhouse Project - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Demolition | Tractors/Loaders/Backhoes | 3 | 8.00 | 97 | 0.37 |
| Site Preparation | Graders | 1 | 8.00 | 187 | 0.41 |
| Site Preparation | Scrapers | 1 | 8.00 | 367 | 0.48 |
| Site Preparation | Tractors/Loaders/Backhoes | 1 | 7.00 | 97 | 0.37 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | 2 | 7.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 8.00 | 231 | 0.29 |
| Building Construction | Forklifts | 2 | 7.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 1 | 6.00 | 97 | 0.37 |
| Building Construction | Welders | 3 | 8.00 | 46 | 0.45 |
| Paving | Cement and Mortar Mixers | 1 | 8.00 | 9 | 0.56 |
| Paving | Pavers | 1 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 1 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Paving | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 5 | 13.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 3 | 8.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 4 | 10.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 8 | 49.00 | 11.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 10.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.6 Paving - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.6 Paving - 2018

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.0211 | 0.0864 | 0.2340 | 9.5000e-004 | 0.0972 | 9.6000e-004 | 0.0981 | 0.0262 | 8.9000e-004 | 0.0271 | 0.0000 | 88.1513 | 88.1513 | 3.5800e-003 | 0.0000 | 88.2407 |
| Unmitigated | 0.0211 | 0.0864 | 0.2340 | 9.5000e-004 | 0.0972 | 9.6000e-004 | 0.0981 | 0.0262 | 8.9000e-004 | 0.0271 | 0.0000 | 88.1513 | 88.1513 | 3.5800e-003 | 0.0000 | 88.2407 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 112.64 | 112.64 | 112.64 | 260,154 | 260,154 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Total | 112.64 | 112.64 | 112.64 | 260,154 | 260,154 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |

## 4.4 Fleet Mix

I-FRISBIER2

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |
| City Park | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |
| Enclosed Parking with Elevator | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |
| Parking Lot | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |
| Unmitigated | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0689 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.2694 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.8000e-004 | 1.5200e-003 | 6.5000e-004 | 1.0000e-005 | | 1.2000e-004 | 1.2000e-004 | | 1.2000e-004 | 1.2000e-004 | 0.0000 | 1.7577 | 1.7577 | 3.0000e-005 | 3.0000e-005 | 1.7682 |
| Landscaping | 9.8200e-003 | 3.7600e-003 | 0.3266 | 2.0000e-005 | | 1.8100e-003 | 1.8100e-003 | | 1.8100e-003 | 1.8100e-003 | 0.0000 | 0.5341 | 0.5341 | 5.1000e-004 | 0.0000 | 0.5469 |
| **Total** | **0.3482** | **5.2800e-003** | **0.3272** | **3.0000e-005** | | **1.9300e-003** | **1.9300e-003** | | **1.9300e-003** | **1.9300e-003** | **0.0000** | **2.2918** | **2.2918** | **5.4000e-004** | **3.0000e-005** | **2.3150** |

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## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0689 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.2694 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.8000e-004 | 1.5200e-003 | 6.5000e-004 | 1.0000e-005 | | 1.2000e-004 | 1.2000e-004 | | 1.2000e-004 | 1.2000e-004 | 0.0000 | 1.7577 | 1.7577 | 3.0000e-005 | 3.0000e-005 | 1.7682 |
| Landscaping | 9.8200e-003 | 3.7600e-003 | 0.3266 | 2.0000e-005 | | 1.8100e-003 | 1.8100e-003 | | 1.8100e-003 | 1.8100e-003 | 0.0000 | 0.5341 | 0.5341 | 5.1000e-004 | 0.0000 | 0.5469 |
| **Total** | **0.3482** | **5.2800e-003** | **0.3272** | **3.0000e-005** | | **1.9300e-003** | **1.9300e-003** | | **1.9300e-003** | **1.9300e-003** | **0.0000** | **2.2918** | **2.2918** | **5.4000e-004** | **3.0000e-005** | **2.3150** |

# 7.0 Water Detail

## 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

I-FRISBIER2

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# 3333 CalSF - Mayfair Townhouse Variant

**San Francisco County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Enclosed Parking with Elevator | 20.48 | 1000sqft | 0.47 | 20,478.00 | 0 |
| Parking Lot | 0.58 | 1000sqft | 0.01 | 576.00 | 0 |
| City Park | 0.46 | Acre | 0.46 | 20,037.60 | 0 |
| Apartments Mid Rise | 44.00 | Dwelling Unit | 1.16 | 97,182.00 | 126 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 4.6 | **Precipitation Freq (Days)** | 64 |
| **Climate Zone** | 5 | | | **Operational Year** | 2027 |
| **Utility Company** | Pacific Gas & Electric Company | | | | |
| **CO2 Intensity (lb/MWhr)** | 296.32 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

I-FRISBIER2

3333 CalSF - Mayfair Townhouse Variant - San Francisco County, Annual

Project Characteristics - Projected intensity factor in 2027

Land Use - Calculated square footage

Construction Phase - Zeroed out construction

Vehicle Trips - updated vehicle trips for variant case

Woodstoves - set woodstoves to 0, made all fireplaces gas

Consumer Products - ROG EF changed to 1.51E-5

Energy Use - Not modeling energy sources of operational emissions

Water And Wastewater - Not modeling water and wastewater sources of operational emissions

Solid Waste - Not modeling solid waste sources of operational emissions

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConstructionPhase | NumDays | 220.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 6.00 | 0.00 |
| tblConstructionPhase | NumDays | 10.00 | 0.00 |
| tblConstructionPhase | NumDays | 3.00 | 0.00 |
| tblConstructionPhase | PhaseEndDate | 1/24/2019 | 1/10/2019 |
| tblConstructionPhase | PhaseEndDate | 12/27/2018 | 2/22/2018 |
| tblConstructionPhase | PhaseEndDate | 2/9/2018 | 1/12/2018 |
| tblConstructionPhase | PhaseEndDate | 2/22/2018 | 2/14/2018 |
| tblConstructionPhase | PhaseEndDate | 1/10/2019 | 12/27/2018 |
| tblConstructionPhase | PhaseEndDate | 2/14/2018 | 2/9/2018 |
| tblConsumerProducts | ROG_EF | 2.14E-05 | 1.51E-05 |
| tblEnergyUse | LightingElect | 741.44 | 0.00 |
| tblEnergyUse | LightingElect | 1.75 | 0.00 |
| tblEnergyUse | LightingElect | 0.35 | 0.00 |

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| | | | |
|---|---|---|---|
| tblEnergyUse | NT24E | 3,054.10 | 0.00 |
| tblEnergyUse | NT24E | 0.19 | 0.00 |
| tblEnergyUse | NT24NG | 2,615.00 | 0.00 |
| tblEnergyUse | T24E | 426.45 | 0.00 |
| tblEnergyUse | T24E | 3.92 | 0.00 |
| tblEnergyUse | T24NG | 6,115.43 | 0.00 |
| tblFireplaces | NumberGas | 6.60 | 14.08 |
| tblFireplaces | NumberWood | 7.48 | 0.00 |
| tblGrading | AcresOfGrading | 0.00 | 3.00 |
| tblGrading | AcresOfGrading | 0.00 | 4.50 |
| tblLandUse | LandUseSquareFeet | 20,480.00 | 20,478.00 |
| tblLandUse | LandUseSquareFeet | 580.00 | 576.00 |
| tblLandUse | LandUseSquareFeet | 44,000.00 | 97,182.00 |
| tblProjectCharacteristics | CO2IntensityFactor | 641.35 | 296.32 |
| tblSolidWaste | SolidWasteGenerationRate | 20.24 | 0.00 |
| tblSolidWaste | SolidWasteGenerationRate | 0.04 | 0.00 |
| tblVehicleTrips | ST_TR | 6.39 | 2.58 |
| tblVehicleTrips | ST_TR | 22.75 | 0.00 |
| tblVehicleTrips | SU_TR | 5.86 | 2.58 |
| tblVehicleTrips | SU_TR | 16.74 | 0.00 |
| tblVehicleTrips | WD_TR | 6.65 | 2.58 |
| tblVehicleTrips | WD_TR | 1.89 | 0.00 |
| tblWater | IndoorWaterUseRate | 2,866,777.13 | 0.00 |
| tblWater | OutdoorWaterUseRate | 1,807,316.02 | 0.00 |
| tblWater | OutdoorWaterUseRate | 548,081.42 | 0.00 |
| tblWoodstoves | NumberCatalytic | 0.88 | 0.00 |
| tblWoodstoves | NumberNoncatalytic | 0.88 | 0.00 |

I-FRISBIER2

## 2.0 Emissions Summary

### 2.1 Overall Construction

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2019 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2018 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| 2019 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Maximum** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| | | Highest | | |

## 2.2 Overall Operational

### Unmitigated Operational

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0212 | 0.0871 | 0.2359 | 9.6000e-004 | 0.0979 | 9.6000e-004 | 0.0989 | 0.0264 | 9.0000e-004 | 0.0273 | 0.0000 | 88.8400 | 88.8400 | 3.6000e-003 | 0.0000 | 88.9301 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.3694** | **0.0924** | **0.5631** | **9.9000e-004** | **0.0979** | **2.8900e-003** | **0.1008** | **0.0264** | **2.8300e-003** | **0.0292** | **0.0000** | **91.1318** | **91.1318** | **4.1500e-003** | **3.0000e-005** | **91.2451** |

I-FRISBIER2

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |
| Energy | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Mobile | 0.0212 | 0.0871 | 0.2359 | 9.6000e-004 | 0.0979 | 9.6000e-004 | 0.0989 | 0.0264 | 9.0000e-004 | 0.0273 | 0.0000 | 88.8400 | 88.8400 | 3.6000e-003 | 0.0000 | 88.9301 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.3694** | **0.0924** | **0.5631** | **9.9000e-004** | **0.0979** | **2.8900e-003** | **0.1008** | **0.0264** | **2.8300e-003** | **0.0292** | **0.0000** | **91.1318** | **91.1318** | **4.1500e-003** | **3.0000e-005** | **91.2451** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Percent Reduction | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

## 3.0 Construction Detail

**Construction Phase**

I-FRISBIER2

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 1/13/2018 | 1/12/2018 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 2/10/2018 | 2/9/2018 | 5 | 0 | |
| 3 | Grading | Grading | 2/15/2018 | 2/14/2018 | 5 | 0 | |
| 4 | Building Construction | Building Construction | 2/23/2018 | 2/22/2018 | 5 | 0 | |
| 5 | Paving | Paving | 12/28/2018 | 12/27/2018 | 5 | 0 | |
| 6 | Architectural Coating | Architectural Coating | 1/11/2019 | 1/10/2019 | 5 | 0 | |

**Acres of Grading (Site Preparation Phase): 4.5**

**Acres of Grading (Grading Phase): 3**

**Acres of Paving: 0.48**

**Residential Indoor: 196,794; Residential Outdoor: 65,598; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 1,263 (Architectural Coating – sqft)**

**OffRoad Equipment**

I-FRISBIER2

3333 CalSF - Mayfair Townhouse Variant - San Francisco County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Demolition | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Demolition | Tractors/Loaders/Backhoes | 3 | 8.00 | 97 | 0.37 |
| Site Preparation | Graders | 1 | 8.00 | 187 | 0.41 |
| Site Preparation | Scrapers | 1 | 8.00 | 367 | 0.48 |
| Site Preparation | Tractors/Loaders/Backhoes | 1 | 7.00 | 97 | 0.37 |
| Grading | Graders | 1 | 8.00 | 187 | 0.41 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Grading | Tractors/Loaders/Backhoes | 2 | 7.00 | 97 | 0.37 |
| Building Construction | Cranes | 1 | 8.00 | 231 | 0.29 |
| Building Construction | Forklifts | 2 | 7.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Building Construction | Tractors/Loaders/Backhoes | 1 | 6.00 | 97 | 0.37 |
| Building Construction | Welders | 3 | 8.00 | 46 | 0.45 |
| Paving | Cement and Mortar Mixers | 1 | 8.00 | 9 | 0.56 |
| Paving | Pavers | 1 | 8.00 | 130 | 0.42 |
| Paving | Paving Equipment | 1 | 8.00 | 132 | 0.36 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Paving | Tractors/Loaders/Backhoes | 1 | 8.00 | 97 | 0.37 |
| Architectural Coating | Air Compressors | 1 | 6.00 | 78 | 0.48 |

**Trips and VMT**

I-FRISBIER2

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Demolition | 5 | 13.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 3 | 8.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 4 | 10.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 8 | 49.00 | 11.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Architectural Coating | 1 | 10.00 | 0.00 | 0.00 | 10.80 | 7.30 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

## 3.2 Demolition - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2,5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 3.2 Demolition - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.2 Demolition - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.3 Site Preparation - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.3 Site Preparation - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.3 Site Preparation - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.4 Grading - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.4 Grading - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.4 Grading - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.5 Building Construction - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2018

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.5 Building Construction - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.6 Paving - 2018

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2018

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Paving | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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### 3.6 Paving - 2018

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### 3.7 Architectural Coating - 2019

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

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## 3.7 Architectural Coating - 2019

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

### 3.7 Architectural Coating - 2019

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.0212 | 0.0871 | 0.2359 | 9.6000e-004 | 0.0979 | 9.6000e-004 | 0.0989 | 0.0264 | 9.0000e-004 | 0.0273 | 0.0000 | 88.8400 | 88.8400 | 3.6000e-003 | 0.0000 | 88.9301 |
| Unmitigated | 0.0212 | 0.0871 | 0.2359 | 9.6000e-004 | 0.0979 | 9.6000e-004 | 0.0989 | 0.0264 | 9.0000e-004 | 0.0273 | 0.0000 | 88.8400 | 88.8400 | 3.6000e-003 | 0.0000 | 88.9301 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Apartments Mid Rise | 113.52 | 113.52 | 113.52 | 262,187 | 262,187 |
| City Park | 0.00 | 0.00 | 0.00 | | |
| Enclosed Parking with Elevator | 0.00 | 0.00 | 0.00 | | |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Total | 113.52 | 113.52 | 113.52 | 262,187 | 262,187 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Apartments Mid Rise | 10.80 | 4.80 | 5.70 | 31.00 | 15.00 | 54.00 | 86 | 11 | 3 |
| City Park | 9.50 | 7.30 | 7.30 | 33.00 | 48.00 | 19.00 | 66 | 28 | 6 |
| Enclosed Parking with Elevator | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Parking Lot | 9.50 | 7.30 | 7.30 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |

## 4.4 Fleet Mix

I-FRISBIER2

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Apartments Mid Rise | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |
| City Park | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |
| Enclosed Parking with Elevator | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |
| Parking Lot | 0.603481 | 0.036963 | 0.193002 | 0.091056 | 0.012889 | 0.005184 | 0.033230 | 0.009471 | 0.004272 | 0.002983 | 0.005952 | 0.000956 | 0.000561 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| NaturalGas Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.2 Energy by Land Use - NaturalGas

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 5.3 Energy by Land Use - Electricity

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 6.0 Area Detail

### 6.1 Mitigation Measures Area

I-FRISBIER2

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |
| Unmitigated | 0.3482 | 5.2800e-003 | 0.3272 | 3.0000e-005 | | 1.9300e-003 | 1.9300e-003 | | 1.9300e-003 | 1.9300e-003 | 0.0000 | 2.2918 | 2.2918 | 5.5000e-004 | 3.0000e-005 | 2.3150 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0689 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.2694 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.8000e-004 | 1.5200e-003 | 6.5000e-004 | 1.0000e-005 | | 1.2000e-004 | 1.2000e-004 | | 1.2000e-004 | 1.2000e-004 | 0.0000 | 1.7577 | 1.7577 | 3.0000e-005 | 3.0000e-005 | 1.7682 |
| Landscaping | 9.8200e-003 | 3.7600e-003 | 0.3266 | 2.0000e-005 | | 1.8100e-003 | 1.8100e-003 | | 1.8100e-003 | 1.8100e-003 | 0.0000 | 0.5341 | 0.5341 | 5.1000e-004 | 0.0000 | 0.5469 |
| **Total** | **0.3482** | **5.2800e-003** | **0.3272** | **3.0000e-005** | | **1.9300e-003** | **1.9300e-003** | | **1.9300e-003** | **1.9300e-003** | **0.0000** | **2.2918** | **2.2918** | **5.4000e-004** | **3.0000e-005** | **2.3150** |

I-FRISBIER2

## 6.2 Area by SubCategory

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.0689 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.2694 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Hearth | 1.8000e-004 | 1.5200e-003 | 6.5000e-004 | 1.0000e-005 | | 1.2000e-004 | 1.2000e-004 | | 1.2000e-004 | 1.2000e-004 | 0.0000 | 1.7577 | 1.7577 | 3.0000e-005 | 3.0000e-005 | 1.7682 |
| Landscaping | 9.8200e-003 | 3.7600e-003 | 0.3266 | 2.0000e-005 | | 1.8100e-003 | 1.8100e-003 | | 1.8100e-003 | 1.8100e-003 | 0.0000 | 0.5341 | 0.5341 | 5.1000e-004 | 0.0000 | 0.5469 |
| **Total** | **0.3482** | **5.2800e-003** | **0.3272** | **3.0000e-005** | | **1.9300e-003** | **1.9300e-003** | | **1.9300e-003** | **1.9300e-003** | **0.0000** | **2.2918** | **2.2918** | **5.4000e-004** | **3.0000e-005** | **2.3150** |

# 7.0 Water Detail

## 7.1 Mitigation Measures Water

I-FRISBIER2

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

I-FRISBIER2

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Apartments Mid Rise | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

I-FRISBIER2

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Unmitigated | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Apartments Mid Rise | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| City Park | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Enclosed Parking with Elevator | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

I-FRISBIER2

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

I-FRISBIER2

# APPENDIX 3
# ADDITIONAL SUPPORTING INFORMATION

**Construction**

- **CO-1**: *Please provide construction schedule for the new buildings and the renovation schedule for the existing office building and show all overlaps.*

  *Describe demolition, excavation, and construction activities for the new buildings that will occur while the existing office building is still occupied?*

  *Will new buildings on the project site be occupied when demolition of the south wing of the existing building and demolition of portions of the existing buildings' east and west wings (for interior renovations and seismic upgrade work) commences?*

  *Construction stages are: demolition, excavation, foundations, structure, exterior finishing, interior.*

  - *Duration (weeks) for each stage*
  - *Duration (weeks) of lane closures and sidewalk closures by stage*
  - *Timing of shifts*
  - *Hours of construction on weekdays and weekends for each stage*

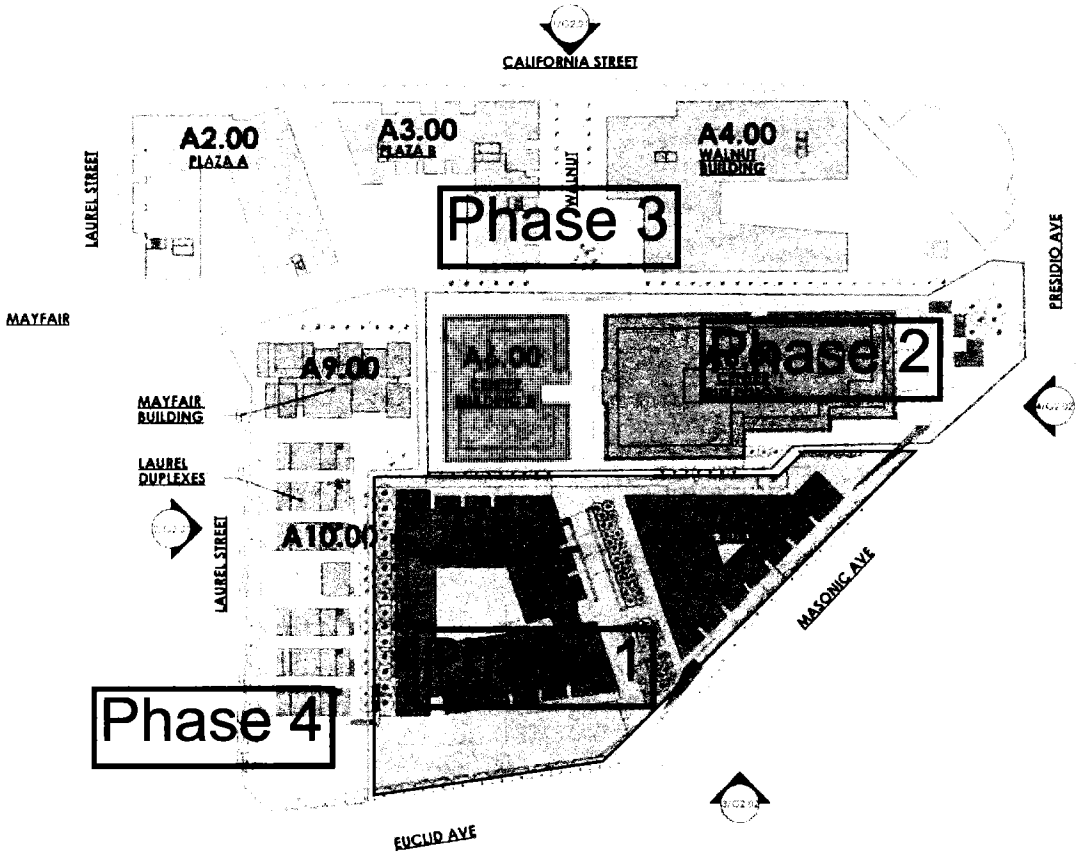
1. **See attached preliminary project schedule showing new buildings (Phases 1, 3 and 4), Renovation (Phase 2) and Overlaps.**

2. From the onset of Phase 1 the entire site will be unoccupied. The existing building demolition will commence in sequence with the Phased construction plan. Interior renovations for the Phase 2 building will be ongoing when the Phase 1 project nears completion and becomes occupied.

3. Project shift times will be weekdays from 7am – 3:30pm with occasional weekend work required.

| **Duration for Each stage** | | | |
|---|---|---|---|
| **Project Element/Phase** | **Start Date** | **End Date** | **Number of Work Days** |
| **1. 3333 California Street** | | | |
| Masonic/Euclid | 3/2/2020 | 8/19/2022 | 645 |
| Center Buildings A/B | 9/10/2021 | 8/31/2023 | 515 |
| Plaza A/Plaza B/Walnut | 12/4/2022 | 11/18/2025 | 773 |
| Mayfair/T-house/Euclid Park | 5/22/2025 | 1/12/2027 | 429 |
| **Shift Times** | | | |
| **Project Element/Phase** | **Weekdays** | **Weekends** | **Number of Work Days** |
| **2. 3333 California Street** | | | |
| Masonic/Euclid | 7 AM - 3:30PM | 7 AM - 3:30PM | 645 |
| Center Buildings A/B | 7 AM - 3:30PM | 7 AM - 3:30PM | 515 |
| Plaza A/Plaza B/Walnut | 7 AM - 3:30PM | 7 AM - 3:30PM | 773 |
| Mayfair/T-house/Euclid Park | 7 AM - 3:30PM | 7 AM - 3:30PM | 429 |

# Phasing Diagram




"PRESIDIO BUILDING" REMOVED FROM PROJECT
A5 SERIES OMITTED

I-FRISBIER2

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

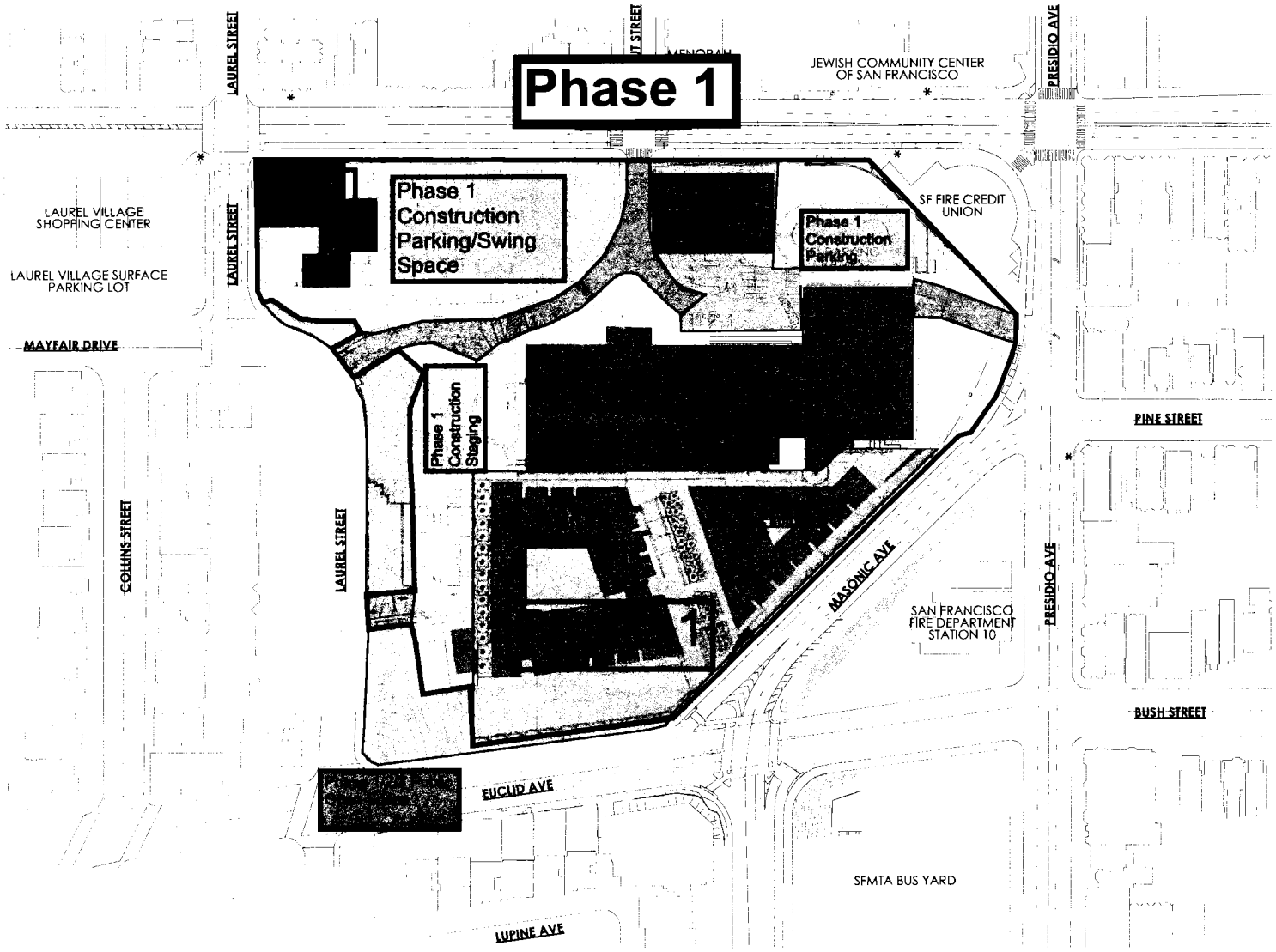
SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

KEYING SITE PLAN - PROPOSED

03.06.2017
REVISED EEA SUBMITTAL

0 30' 60' 120' 180'

G1.02




* DENOTES (E) BUS STOP

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

SITE PLAN - EXISTING

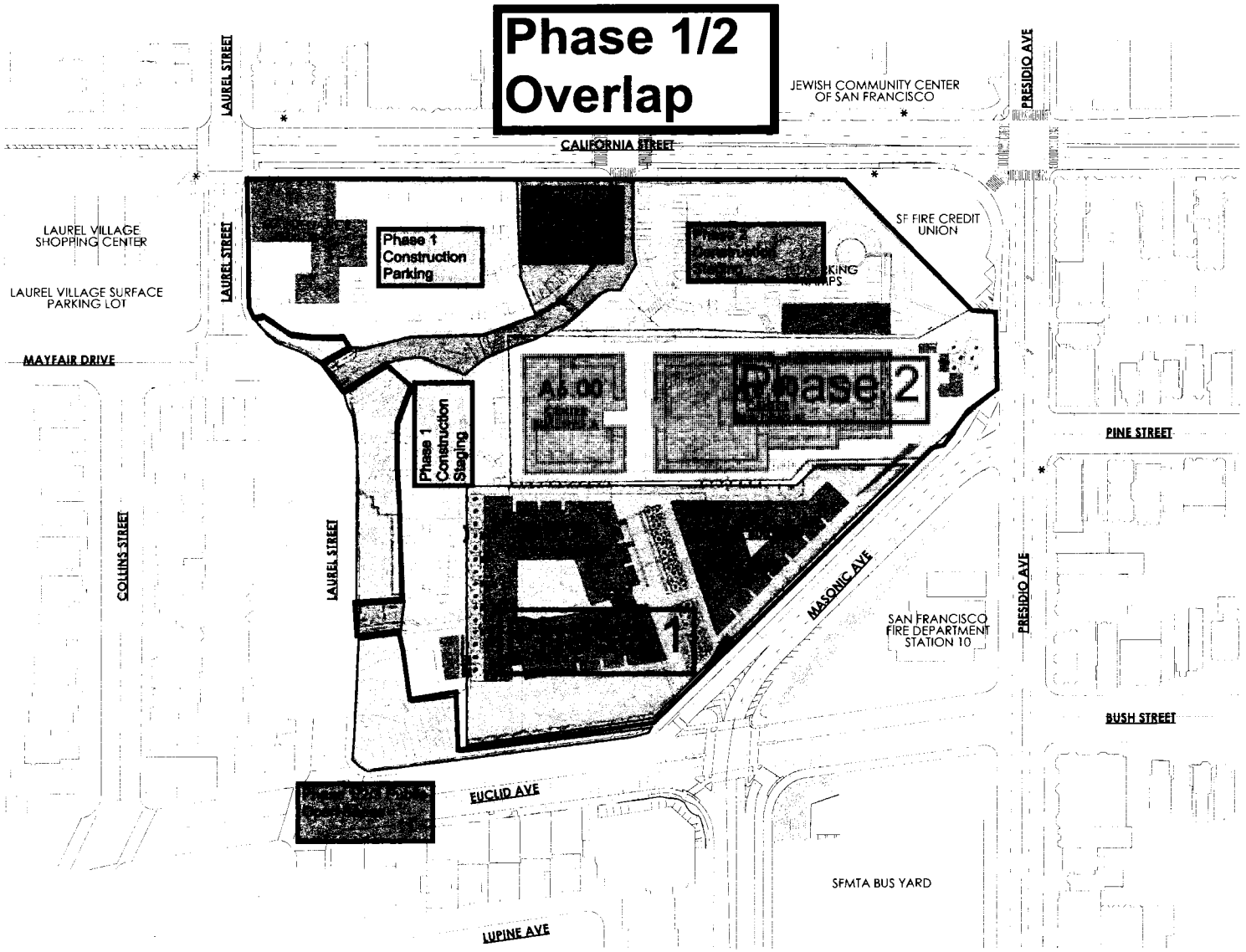
SKS | JAMES CORNER FIELD OPERATIONS | ARUP | BAR architects | JENSEN | SCB

03.06.2017
REVISED EEA SUBMITTAL

0 30' 60' 120' 180'

**G1.01**

I-FRISBIER2




**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

SITE PLAN - EXISTING

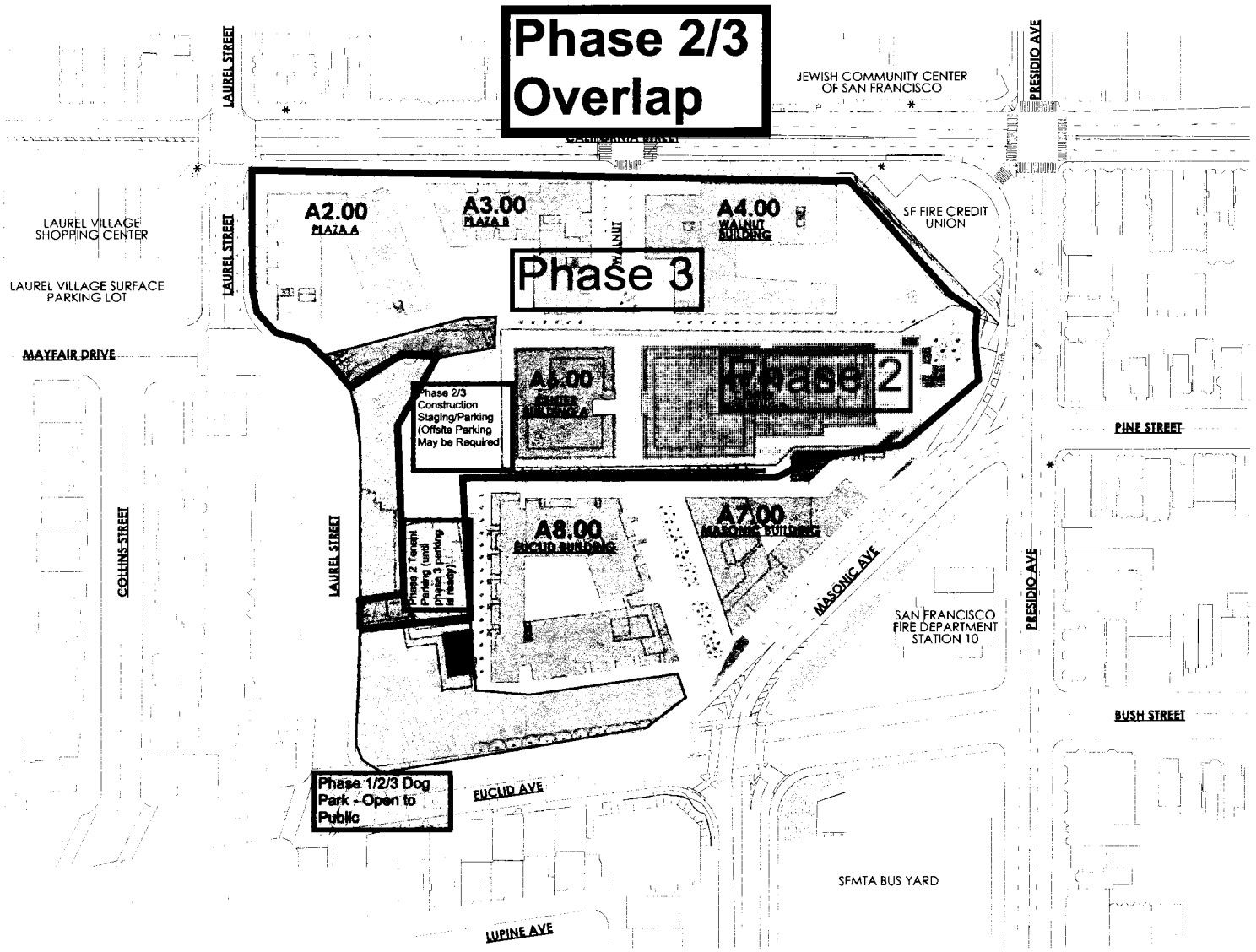
S+S | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

03.06.2017
REVISED EEA SUBMITTAL

0 30' 60' 120' 180'

**G1.01**

I-FRISBIER2




* DENOTES (E) BUS STOP

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

SITE PLAN - EXISTING

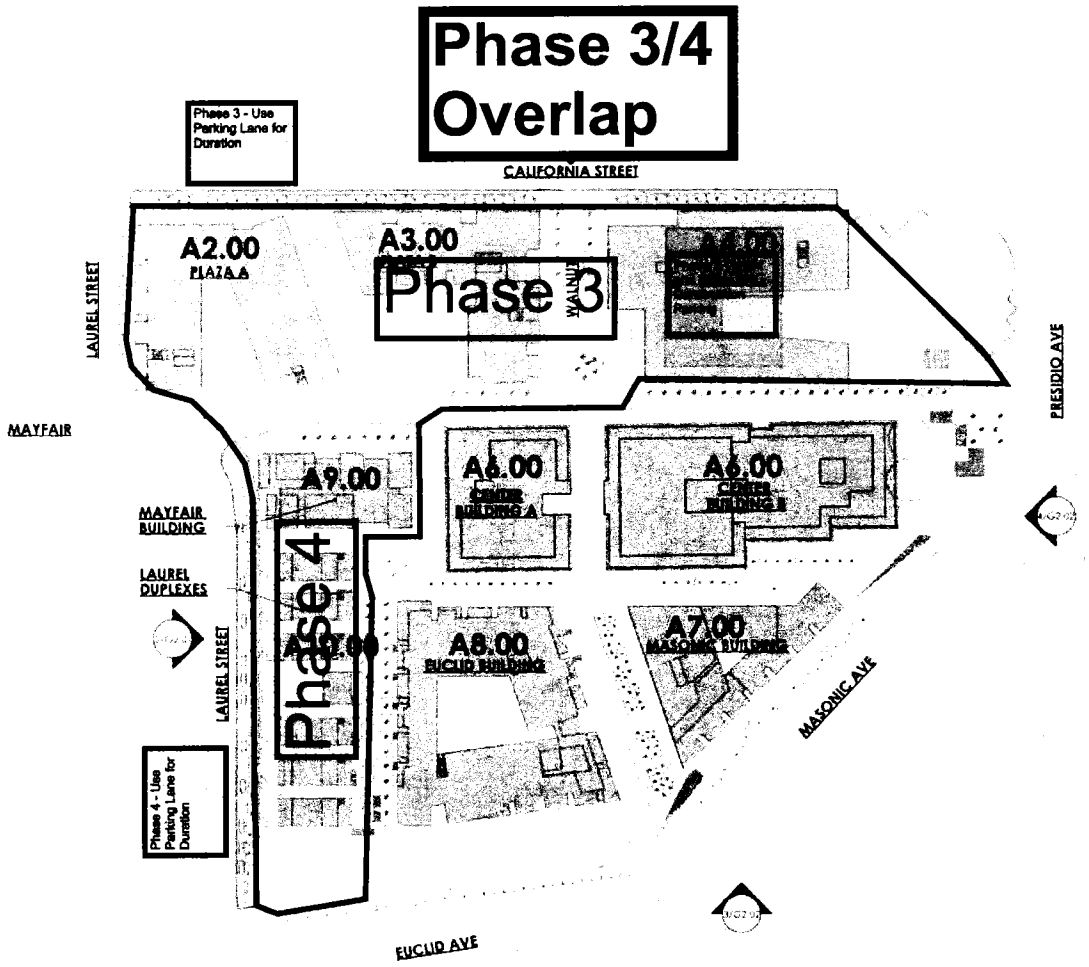
SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

03.06.2017
REVISED EEA SUBMITTAL

0 30' 60' 120' 180'

**G1.01**

I-FRISBIER2




"PRESIDIO BUILDING" REMOVED FROM PROJECT
A5 SERIES OMITTED

I-FRISBIER2

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

KEYING SITE PLAN - PROPOSED

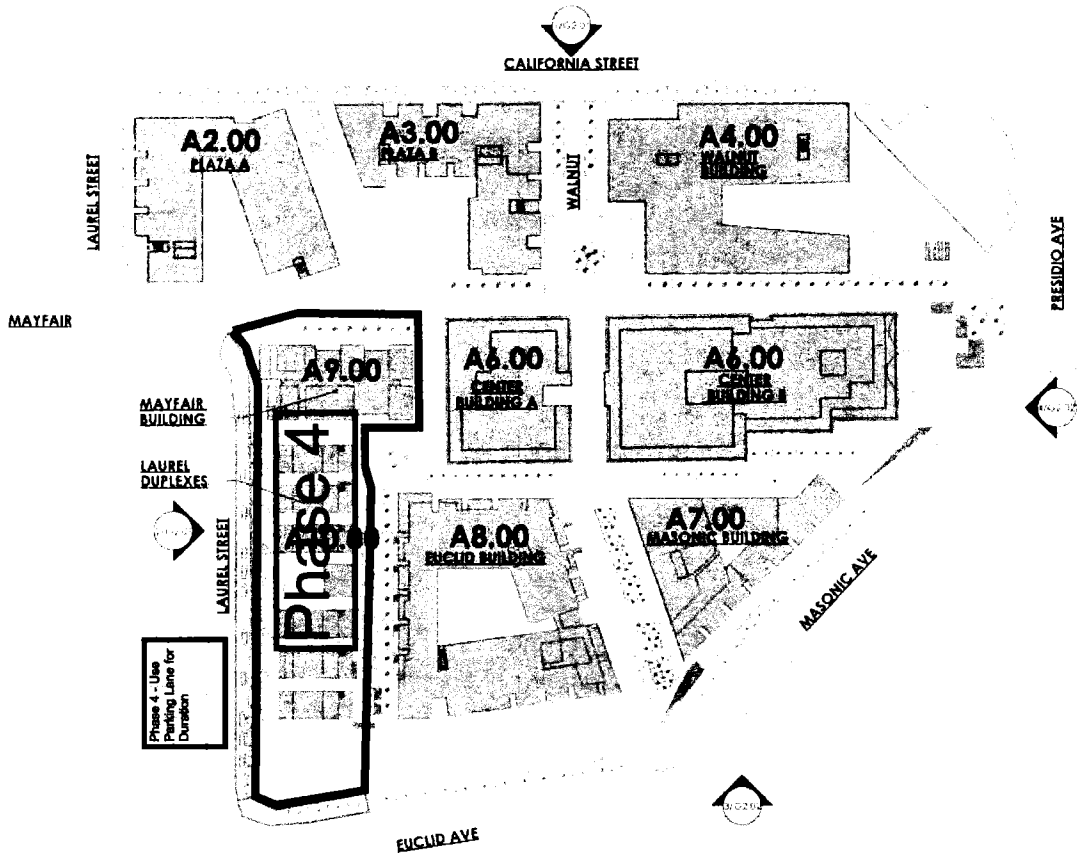
SHS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

03.06.2017
REVISED EEA SUBMITTAL

0 30' 60' 120' 180'

G1.02

# Phase 4




"PRESIDIO BUILDING" REMOVED FROM PROJECT - A5 SERIES OMITTED

I-FRISBIER2

**3333 CALIFORNIA STREET** SAN FRANCISCO, CA

KEYING SITE PLAN - PROPOSED

SKS | JAMES CORNER FIELD OPERATIONS | ARUP BAR architects | JENSEN | SCB

03.06.2017
REVISED EEA SUBMITTAL

0 30' 60' 120' 180'

**G1.02**

# **CO-2** Construction Equipment

I-FRISBIER2

| Equipment Type | Fuel | Number of Pieces | Days of Use | Hours/Day | Phase(s), if applicable |
|---|---|---|---|---|---|
| Aerial Lifts | Diesel | 2 | SKIN | 8 | ALL |
| Air Compressors | Diesel | 2 | DEMO | 5 | ALL |
| Cranes | Elec | 2 | TOWER | 8 | ALL |
| Crawler Tractors with Rippers | Diesel | 1 | EXCAVATION | 8 | ALL |
| Excavators | Diesel | 2 | EXCAVATION | 8 | ALL |
| Excavators with Hoe Ram | Diesel | 2 | EXCAVATION | 8 | ALL |
| Forklifts | Propane | 1 | EXTERIOR | 8 | All |
| Other General Industrial Equipment | Gasoline | X | | 8 | ALL |
| Pavers | Diesel | 1 | EXTERIOR | 8 | Street Paving |
| Paving Equipment | Diesel | 1 | EXTERIOR | 8 | Street Paving |
| Pumps | Diesel | 1 | STRUCTURE | 8 | Pour Days Only |
| Rollers | Diesel | 1 | 4 | 6 | Street Paving |
| Rough Terrain Forklifts | Diesel | 2 | Gradeall | 8 | ALL |
| Signal Boards | Elec | 2 | ALL | 24/7 | Phase 3/Phase 4 |
| Skid Steer Loaders (Bobcat) | Diesel | 1 | Demo | 8 | ALL |
| Sweepers/Scrubbers | Gasoline | 1 | Street Clean | 3 | ALL |
| Tractors/Loaders/Backhoes | Diesel | 2 | EXCAVATION | 8 | ALL |
| Welders | Elec | 2 | STRUCTURE | 8 | ALL |

I-FRISBIER2

- **CO-3:** *Construction workers for each construction stage.*
  - *Average number of workers by shift*
  - *Maximum number of workers by shift*
  - *Any information on mode of access of construction workers (e.g., car, transit, walking)*

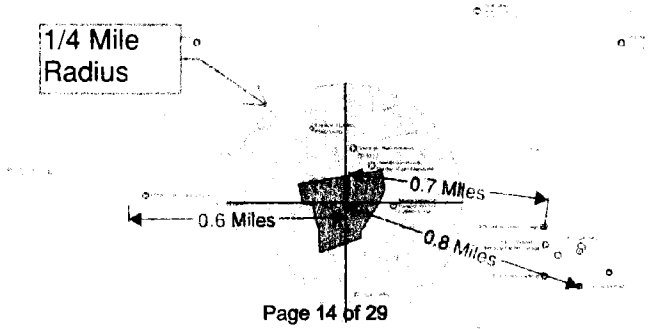
1. Project manpower requirements typically follow a bell curve with fewer workers at the beginning and end of a project. The maximum number of workers for each phase will be at their peak from the end of structure through exterior and will taper off at the end of interiors. These 'bell curves' will overlap for the phases as well. We expect half of the workforce to drive and the other half to take alternate means of transportation.

| Project Element/Phase | Work Days | Average Number of Workers | Maxiumum Number of Workers |
|---|---|---|---|
| Masonic/Euclid | 645 | 90 | 175 |
| Center Buildings A/B | 515 | 75 | 150 |
| Plaza A/Plaza B/Walnut | 773 | 90 | 175 |
| Mayfair/T-house/Euclid Park | 429 | 75 | 175 |

- **CO-4:** *Location of parking for construction workers for each construction stage.*
  - *Locations and number of spaces at each location*
  - *If offsite, will worker shuttles be provided? Describe.*

| Phase Overlap | | | |
|---|---|---|---|
| **Project Element/Phase** | **Method/Location** | **Shuttle Required** | **Approx # of Spaces Req** |
| Phase 1 | Onsite - Phase 3 | No | 100 |
| Phase 1/Phase 2 Overlap | Onsite - Phase 3 | No | 200 |
| Phase 2 | Onsite - Phase 3 | No | 100 |
| Phase 2/Phase 3 Overlap | Onsite - Phase 4 | No | 200 |
| Phase 3 | Onsite - Phase 4 | No | 100 |
| Phase 3/Phase 4 Overlap | Onsite - Phase 3 (new) | No | 200 |
| Phase 4 | Offsite | Yes | 100 |

1. See map below for the closest three parking garages to the project site. These parking garages will only be required for construction parking during the end of Phase 4. All other phases will utilize onsite parking.



- **CO-5:** *Construction truck trips for each construction stage.*
  - *Average number of trucks per shift and per day*
  - *Maximum number of trucks per shift and per day (typically during excavation)*
  - *For concrete pours, give separate truck information and description of activities.*

1. **See attached models showing the existing topography compared to the new topography.**

2. Excavation and demolition will be 1 shift per day with the below table showing the average number of truck trips per day and the possible maximum number of truck trips per day.

| Project Element/Phase | Duration of Demo/Excavation | Avg. Trips Per Day During Demo/Excavation | Maximum Trips Per Day | Total # of Trips |
|---|---|---|---|---|
| Masonic/Euclid | 7 months | 60 | 80 | 8,178 |
| Center Buildings A/B | 1 month | 10 | 10 | 121 |
| Plaza A/Plaza B/Walnut | 7 months | 60 | 80 | 8,157 |
| Mayfair/T-house/Euclid Park | 2 months | 60 | 80 | 1,566 |

Laurel Heights
Utilities Data

| FY1415 | GAS | ELECTRICITY | WATER |
|---|---|---|---|
| Month | Therms | KWH | CCF |
| Jul-14 | 11,350 | 342,443 | 1,110 |
| Aug-14 | 10,640 | 353,986 | 994 |
| Sep-14 | - | 361,968 | 593 |
| Total | 21,990 | 1,058,397 | 2,697 |

| FY1314 | GAS | ELECTRICITY | WATER |
|---|---|---|---|
| Month | Therms | KWH | CCF |
| Jul-13 | 9,850 | 355,705 | 1,168 |
| Aug-13 | 10,935 | 325,269 | 984 |
| Sep-13 | 11,317 | 357,431 | 1,271 |
| Oct-13 | 7,253 | 363,280 | 1,286 |
| Nov-13 | 10,004 | 339,480 | 508 |
| Dec-13 | 9,991 | 321,227 | 720 |
| Jan-14 | 12,616 | 324,316 | 770 |
| Feb-14 | 12,576 | 338,539 | 520 |
| Mar-14 | 11,690 | 355,557 | 608 |
| Apr-14 | 10,638 | 321,585 | 444 |
| May-14 | 10,855 | 350,958 | 668 |
| Jun-14 | 11,813 | 344,803 | 886 |
| Total | 129,538 | 4,098,150 | 9,833 |

| FY1213 | GAS | ELECTRICITY | WATER |
|---|---|---|---|
| Month | Therms | KWH | CCF |
| Jul-12 | 8,177 | 355,352 | 1,314 |
| Aug-12 | 8,129 | 336,804 | 977 |
| Sep-12 | 8,633 | 343,872 | 920 |
| Oct-12 | 8,618 | 342,295 | 748 |
| Nov-12 | 6,782 | 295,884 | 1,120 |
| Dec-12 | 11,532 | 331,613 | 734 |
| Jan-13 | 9,228 | 328,046 | 369 |
| Feb-13 | 12,308 | 333,171 | 378 |
| Mar-13 | 11,834 | 338,977 | 473 |
| Apr-13 | 10,551 | 332,124 | 722 |
| May-13 | 10,226 | 344,880 | 1,030 |
| Jun-13 | 9,638 | 330,840 | 1,075 |
| Total | 115,656 | 4,013,858 | 9,860 |

SWCA
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330 Townsend Street, Suite 216
San Francisco, California 94107
Tel 415.536.2883 Fax 415.536.3802
www.swca.com

July 23,2018

Julie Moore, Environmental Planner
San Francisco Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103

**Re: REVISED Final 3333 California Street Mixed-Use Project Energy Assessment / Case No. 2015-014028ENV**

Dear Ms. Moore:

SWCA Environmental Consultants updated minor errors in the April 12, 2018 energy assessment and calculations prepared for the proposed 3333 California Street Mixed-Use Project (proposed project) and project variant pursuant to Appendix F: Energy Conservation of the California Environmental Quality Act (CEQA) Guidelines.

Minor errors were identified by Ramboll during quantification of greenhouse gas emissions pursuant to AB900 requirements. The errors were related to an incorrect conversion factor "1 kBTU=3.412 kWh". In addition, one of the underlying formulas in the attached spreadsheets did not include all cell values.

The changes below are shown in double underline and strikethrough and are called out in the attached REVISED Final Energy Assessment dated July 23, 2018 using a "revision symbol" in the left hand margin of the page.

Last paragraph on p. A-2 in the Energy Assessment should read as follows:

> "Two tower cranes (179 kW) each would be used for the tower phase of construction over 1,054 days (8,432 hours), resulting in 3,018,656 kWh of electricity use. Including the additional electric construction equipment, the estimated total energy use during construction may increase to approximately ~~6,000,000~~ 7,170,000 kWh. Electricity use estimates are the same for the proposed project and project variant."

The note in Table 4. Operational Energy Use – Buildings on p. A-4 should read as follows:

> "1 ~~kBTU~~ kWh = 3.412 ~~kWh~~ kBTU

Second to last paragraph on p. A-10 should read as follows:

> "As shown on Table 10, the estimated renewable energy output is 4,485,641 kBTU/year (~~1,315,626~~ 1,314,666 kWh/year) for PV systems and 2,084,000 kBTU/year (610,786 kWh/year) for solar hot water heaters. The roof area allocated to solar equipment is consistent between the proposed project and the project variant; therefore, the estimated renewable energy production in the proposed case remains the same under the variant."

The calculations attached to the April 12, 2018 energy assessment have been updated. No other changes are needed for the revised energy assessment or calculations. This update replaces the April 12, 208 version in your Administrative Record files. All Initial Study Administrative Record CDs should be recycled.

The energy assessment provides the basis for the discussion in Section E.16 (Mineral and Energy Resources) of the Initial Study. The updated numbers are not substantially different from those in the original assessment thus conclusions regarding the effects of the construction and operation energy usage will not change. However, minor updates must be made to the Initial Study to update text and numbers (see p. 243 under "Construction" and footnote 318 and p. 244 – first full paragraph). These will be completed as part of staff-initiated text changes when the Response to Comments phase commences.

If there are any questions or concerns, please contact me.

Sincerely,

Peter Mye

Peter A. Mye
Senior Planner

Attachment

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330 Townsend Street, Suite 216
San Francisco, California 94107
Tel 415.536.2883 Fax 415.536.3802
www.swca.com

April 12, 2018

Julie Moore, Environmental Planner
San Francisco Planning
1650 Mission Street, Suite 400
San Francisco, CA 94103

**Re: 3333 California Street Mixed-Use Project Energy Assessment / Case No. 2015-014028ENV**

Dear Ms. Moore:

SWCA Environmental, with input from ARUP and Ramboll, conducted an energy assessment for the proposed 3333 California Street Mixed-Use Project (proposed project) and the Mixed Use Multi-Family Housing Variant (project variant). The energy assessment provides the basis for the discussion in Section E.16 (Mineral and Energy Resources) of the Initial Study and evaluates energy use associated with construction and operation of the proposed project and the project variant.

The analysis was prepared pursuant to Appendix F: Energy Conservation of the California Environmental Quality Act (CEQA) Guidelines. Appendix F of the CEQA Guidelines requires lead agencies to address the construction-related and operational energy impacts of a project, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy. Energy conservation is defined as a goal in Appendix F - the wise and efficient use of energy - and the means to achieving this goal are:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on natural gas and oil; and
- Increasing reliance on renewable energy sources.

Sincerely,

Amanda Tyrrell

Amanda Tyrrell
Senior Environmental Planner

Attachment

- **REVISED ATTACHMENT A. ENERGY ASSESSMENT**

## EXISTING REGIONAL ENERGY SUPPLY AND DEMAND

This section summarizes the existing energy supply mix from renewable and non-renewable sources and energy demand for the San Francisco Bay Area region.

Pacific Gas and Electric Company (PG&E) primarily supplies power to customers in San Francisco from a variety of renewable and non-renewable sources both within and outside of the State. In 2016, PG&E's resource mix was approximately 33 percent renewables, 24 percent nuclear, 17 percent natural gas, 14 percent unspecified sources, and 12 percent large hydroelectric.[1] The San Francisco Public Utilities Commission (SFPUC) provides clean energy to select local residential and business communities and for public transit. The SFPUC owns and operates the Hetch Hetchy Power System, a clean energy system that draws its power from hydroelectric, solar, and biomass/biowaste sources.

Electrical energy demand is measured by power flow, expressed in kilowatt-hours (kWh) and in gigawatt-hours when describing large-scale uses, such as a city. San Francisco uses about 6,000 gigawatt-hours of electricity per year, and this use is expected to grow at a rate of 1.3 percent per year to about 8,000 gigawatt-hours by 2030.[2]

Natural gas is measured in cubic feet of gas or by its heat content in British Thermal Units (BTU), or therms. PG&E supplies natural gas to San Francisco from sources in the western United States. Natural gas is commonly used to generate electricity and for heating in California, and compressed and liquefied natural gas is a viable alternative transportation fuel. Natural gas demand is projected to remain relatively flat as energy efficiency measures are expected to continue to reduce demand, but closure of nuclear generating facilities will require some replacement generation from natural gas in California.[3]

Petroleum-based fuels, including diesel and gasoline, are measured in gallons and consumed almost exclusively by the transportation sector in California. Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline being consumed by light-duty cars, pickup trucks, and sport utility vehicles.[4] Construction equipment typically uses diesel fuel.

## PROPOSED ENERGY DEMAND

This section describes the energy demand associated with construction and operation of the proposed project and the project variant.

### Construction Energy Demand

Energy use associated with phased construction of the proposed project or project variant would include electricity usage associated with water consumption for dust control and use of electric equipment, diesel fuel consumption from on-road hauling trips and off-road construction diesel equipment, and gasoline consumption from on-road worker commute and vendor trips. The methodology and estimated energy demands for each category are provided below.

---

[1] Pacific Gas & Electric Company (PG&E), "Clean Energy Solutions". Available at https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page?WT.mc_id=Vanity_cleanenergy. Accessed January 18, 2018.

[2] San Francisco Public Utilities Commission (SFPUC), "San Francisco's Updated Electricity Resource Plan". Available at http://sfwater.org/index.aspx?page=700. Accessed January 18, 2018.

[3] California Energy Commission (CEC). "2013 Natural Gas Issues, Trends, and Outlook". Available at http://www.energy.ca.gov/2014publications/CEC-200-2014-001/CEC-200-2014-001-SF.pdf. Accessed January 18, 2018.

[4] CEC. "California Gasoline Data, Facts, and Statistics". Available at http://www.energy.ca.gov/almanac/transportation_data/gasoline. Accessed January 18, 2018.

### *Electricity – Water for Construction Dust Control*

Electricity use associated with water for construction dust control is based on the total water consumption and energy intensity for supply, distribution, and treatment of water consumed for dust control over the phased construction. Total gallons of water consumed is based on the estimated acreage of ground disturbance during grading and site preparation.[5] The California Emissions Estimator Model (CalEEMod) provides the estimated energy intensity per gallon of water for San Francisco County shown in Table 1.

As shown in Table 1, electricity use for construction of the proposed project or the project variant are the same, approximately 1,226 kWh.

**Table 1. Construction Electricity Use – Water for Dust Control**

| | Proposed Project | Project Variant |
|---|---|---|
| Ground disturbance (acres per day)* | 0.21 | 0.21 |
| Water consumption rate per acre disturbed (gallons per acre per day) | 3,020 | 3,020 |
| Number of days | 354 | 354 |
| **Total water consumption (gallons)** | **226,500** | **226,500** |
| **Energy intensity per gallon of water (kWh)** | **0.005411** | **0.005411** |
| **Total electricity use (kWh)** | **1,226** | **1,226** |

*Acreage factors in multiple levels of grading at the site during the excavation phase of construction. To be conservative, a total of 75 acres of ground disturbance is assumed for construction of the proposed project and the project variant based on the CalEEMod defaults for the specified mix of land uses.

### *Electricity – Construction Equipment[6]*

Electricity demand from off-road construction equipment is estimated based on the size and type of the equipment and total hours of usage. Usage information of electric construction equipment was provided for tower cranes (179 kW each). Total hours is equal to the total number of days the tower cranes would be used (i.e., 1,054 days) multiplied by 8 work hours per day. Cutting and chopping saws, saw cutter, tile cutting saws, and dry wall stud impact guns may also be used (approximately 1 to 5 kW each), as well as welders and signal boards (approximately 18 to 20 kW each). Since equipment sizes were not provided except for tower cranes, available information was used to estimate energy use.[7,8,9]

Two tower cranes (179 kW) each would be used for the tower phase of construction over 1,054 days (8,432 hours), resulting in 3,018,656 kWh of electricity use. Including the additional electric construction equipment, the estimated total energy use during construction may increase to approximately
- ~~6,000,000~~ 7,170,000 kWh. Electricity use estimates are the same for the proposed project and project variant.

[5] The water application rate of 3,020 gallons per acre is from the Air & Waste Management Association's Air Pollution Engineering Manual (1992).
[6] Denney, Brad, Vice President, Webcor, e-mail correspondences with Peter Mye, SWCA, about details of preliminary construction phasing schedule and construction equipment, September and October 2017.
[7] Ramboll Environ. "Analysis of Energy Use Associated with the Proposed Golden State Warriors Project, San Francisco, California". October 19, 2015. Available at http://www.gsweventcenter.com/GSW_RTC_References/2015_1019_Ramboll_Environ.pdf. Accessed January 24, 2018.
[8] Miller Electric Mfg., LLC. "Welding Guide to Power Efficiency". Available at
[9] Young, Gregory. "The Basics of Digital Signage and Energy Consumption". Available at www.scenic.org/storage/documents/EXCERPT_The_Basics_of_Digital_Signage_and_Energy_Consumption.pdf. Accessed March 16, 2018.

### *Fuel – Off-road Construction Equipment*

Diesel fuel usage from off-road construction equipment is estimated based on equipment usages (total equipment horsepower-hours) and is calculated using a fuel usage rate for gallons of diesel per horsepower-hour.[10] Off-road construction equipment fueled by diesel includes aerial lifts, air compressors, excavators, pavers, pumps, rollers, forklifts, tractors, loaders, and backhoes.

Construction of the proposed project or project variant would both use approximately 431,158 gallons of diesel for off-road construction equipment, as shown in Table 2.

**Table 2. Construction Diesel Use – Off-road Equipment**

| | Proposed Project | Project Variant |
|---|---|---|
| Total diesel equipment use (horsepower-hours) | 8,623,158 | 8,623,158 |
| Gallons of diesel per horsepower-hour | 0.05 | 0.05 |
| Total diesel use (gallons) | 431,158 | 431,158 |

### *Fuel – On-road Construction Trips*

Energy demand associated with diesel fuel usage from on-road construction truck trips and fuel usage (such as gasoline or gasoline/hybrid) from worker commute trips is based on Vehicle Miles Traveled (VMT) and projected fuel efficiency in miles per gallon.[11,12] All vendor trucks are assumed to be medium-heavy duty, all concrete trucks are assumed to be heavy-heavy duty, and all hauling trucks are assumed to be heavy-heavy duty. Worker vehicles are assumed to be 50 percent light-duty auto, 25 percent light-duty auto type 1, and 25 percent light-duty auto type 2. In Table 3, concrete trucks are categorized in the heavy-heavy duty vendor row.

Approximately 149,829 gallons of diesel and 220,202 gallons of gasoline would be used for on-road trips during construction of the proposed project. The estimated fuel use would be the same for the project variant.

## Operational Energy Demand

Energy use associated with operation of the proposed project or project variant would include on-site usage associated with buildings; electricity for off-site water treatment and distribution; and fuel from mobile sources. The methodology and estimated energy demands for each category are provided below.

### *Natural Gas and Electricity – Buildings*

Per-building energy use estimates for the proposed project and project variant, including electricity associated with cooling, natural gas use associated with heating, and additional electricity use, were estimated using the proposed square footages and program-specific, California Code of Regulations

[10] The fuel usage rate of 0.05 gallons of diesel per horsepower-hour is based on the South Coast Air Quality Management District CEQA Air Quality Handbook, Table A9-3E.
[11] Fuel efficiency miles per gallon for construction is based on EMFAC2011.
[12] Bowie, Ted, Senior Managing Consultant, Ramboll Environ, e-mail correspondence with Amanda Tyrrell, SWCA, regarding vehicle miles traveled by vehicle type for construction of the proposed project and project variant, January 17, 2018.

Title 24 (referred to as "Title 24") 2013-compliant energy use intensities reported in the PG&E Zero Net Energy Feasibility Study.[13] The energy use intensities include site end uses, such as outdoor lighting.

As shown in Table 4, the total energy use for on-site buildings would be approximately 37,547,861 kBTU/year for the proposed project. The project variant would have a slightly higher energy use, approximately 40,039,142 kBTU/year.

**Table 3. Construction Fuel Use – On-road Trips**

| | | Proposed Project and Project Variant | |
|---|---|---|---|
| **Vehicle Type** | **Trip Type** | **Vehicle Miles Traveled** | **Miles Per Gallon** |
| Diesel, medium heavy-duty | Vendor | 65,100 | 8.4 |
| Diesel, heavy heavy-duty | Vendor | 96,600 | 5.5 |
| Diesel, heavy heavy-duty | Hauling | 684,836 | 5.5 |
| **Total diesel use (gallons)** | | | **149,329** |
| Gasoline, light-duty auto | Worker | 2,123,094 | 21.8 |
| Gasoline, light-duty truck type 1 | Worker | 1,061,547 | 18.8 |
| Gasoline, light-duty truck type 2 | Worker | 1,061,547 | 16.0 |
| **Total gasoline use (gallons)** | | | **220,202** |

- **Table 4. Operational Energy Use – Buildings**

| | Proposed Project | Project Variant |
|---|---|---|
| **Natural Gas** | | |
| Heating (kBTU/year) | 10,854,013 | 12,104,102 |
| **Electricity** | | |
| Cooling (kBTU/year)* | 1,084,440 | 1,217,713 |
| Additional Electricity Use (kBTU/year) | 25,609,409 | 26,717,327 |
| **Total energy use (kBTU/year)** | **37,547,861** | **40,039,142** |

- * 1 ~~kBTU~~ kWh = 3.412 ~~kWh~~ kBTU

Peak energy demand in California occurs on hot summer days when the cooling load is greatest; however, in the cool San Francisco Bay climate, peak demand may occur on a cold winter evening when the heating load is greatest (where electric heat is used). Peak energy demand was estimated for both the proposed project and the project variant. Peak energy demand was estimated using the proposed square footages and program- and climate-specific American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2013 compliant Department of Energy reference building energy models.

As shown in Table 5, the operational peak energy demand associated with building use for the proposed project is approximately 14.3 MMBTU/hour. The project variant would have a slightly higher operational peak energy demand, approximately 15.1 MMBTU/hour.

[13] PG&E, "The Technical Feasibility of Zero Net Energy Buildings in California". December 2012. Available at https://www.energydataweb.com/cpucfiles/pdadocs/904/california_zne_technical_feasibility_report_final.pdf. Accessed January 18, 2018.

**Table 5. Operational Peak Energy Use – Buildings**

| | Proposed Project | Project Variant |
|---|---|---|
| **Natural Gas** | | |
| Heating (MMBTU/hour) | 3.9 | 4.1 |
| **Electricity** | | |
| Cooling (MMBTU/hour)* | 6.3 | 6.6 |
| Additional Electricity Use (MMBTU/hour) | 4.1 | 4.4 |
| **Total peak energy use (MMBTU/hour)** | **14.3** | **15.1** |

* 1 MMBTU = 1 million BTU

## *Electricity – Water Treatment and Distribution*

Project water demand was estimated from square footages and projected occupancy, and code-compliant plumbing fixture types and irrigation levels using the SFPUC's preferred tool for project water use estimation, and is consistent with the Water Supply Assessment for the proposed project and project variant. Indoor and outdoor electricity intensity factors were obtained from the 2006 California Energy Commission (CEC) report, "*Refining Estimates of Water-Related Energy Use in California*".[14] These factors are reported in kWh per million gallons of water used and are specific to northern California. These intensity factors represent the electricity required to: (1) supply and convey water from source to site; (2) treat the water to usable standards; (3) distribute the water to individual users. The indoor intensity factor includes the electricity required to process resultant wastewater.[15]

The total electricity use associated with water supply, treatment, and distribution, is shown in Table 6. The proposed project would use approximately 111,430 kWh/year, and the project variant would use approximately 138,915 kWh/year.

**Table 6. Operational Electricity Use – Water**

| | Proposed Project | | Project Variant | |
|---|---|---|---|---|
| **Use Type** | **Water Demand (gallons/year)** | **Resultant Electricity Use (kWh/year)** | **Water Demand (gallons/year)** | **Resultant Electricity Use (kWh/year)** |
| Commercial Fixtures | 422,000 | 2,280 | 229,000 | 1,238 |
| Residential Fixtures | 17,125,000 | 92,663 | 22,398,000 | 121,194 |
| HVAC/Cooling | 1,995,000 | 10,795 | 1,995,000 | 10,795 |
| Landscape Irrigation | 1,626,000 | 5,689 | 1,626,000 | 5,689 |
| **Total electricity use** | | **111,430** | | **138,915** |

[14] CEC, "Refining Estimates of Water-Related Energy Use in California". December 2006, CEC-500-2006-118. Available at http://www.energy.ca.gov/pier/project_reports/CEC-500-2006-118.html. Accessed January 18, 2018.

[15] Energy intensity factors may be conservative because they may not fully account for the energy efficiency of San Francisco's water system, which primarily uses gravity flow to convey water from the Hetch Hetchy reservoir to treatment plants in the Bay Area.

### *Fuel and Electricity – Mobile Sources*

Energy use associated with travel demand for the proposed project or project variant includes vehicle trips generated by residents, employees, and visitors to the project site. It also includes energy use from delivery and service vehicle trips that would be generated by the proposed project or project variant. Gasoline, diesel, and natural gas usage from on-road mobile trips during operation is based on total VMT estimated using CalEEMod (used for the proposed project's and project variant's air quality analysis) and fuel efficiency projections.[16] The public transit system in San Francisco also includes electric-powered buses and trains.

All vendor trucks are assumed to be medium-heavy duty and all hauling trucks are assumed to be heavy-heavy duty. Vehicles are assumed to be a mix of light-duty auto, light-duty auto type 1, light-duty auto type 2, medium-duty vehicles, motorcycles, and motor homes. Urban, school, and other buses are assumed to be a mix of gas, diesel, and electric.

As shown in Table 7, mobile sources during operation of the proposed project would use approximately 73,660 gallons of diesel fuel and 416,115 gallons of gasoline per year, based on an estimate of 9,957,096 annual VMT. The project variant would have a slightly higher energy use based on an estimate of 10,133,358 annual VMT, approximately 74,964 gallons of diesel fuel and 423,481 gallons of gasoline per year.

## ENERGY CONSERVATION

This section discusses energy conservation features associated with the proposed project and project variant per Appendix F of the CEQA Guidelines. Applicable state and local laws, regulations, and policies that govern energy supply and use are summarized, including incentives that promote energy conservation above that which is required. On-site renewable energy output is also discussed, followed by a description of the energy savings estimates from the energy conservation measures.

### Regulatory Framework

At the state level, the Renewable Portfolio Standard (RPS) requires retail sellers of electricity to provide a percentage of their electricity supply from renewable sources by certain years. The CEC, California Public Utilities Commission (CPUC), and PG&E have extensive programs to implement the RPS and otherwise encourage renewable energy.

California Code of Regulations, Title 24 regulates energy efficiency and water efficiency in buildings. The CEC also regulates appliance efficiency and there are California Green Building Standards. The CPUC has required utilities to conduct energy efficiency programs for many years.

San Francisco also has a number of programs to promote energy conservation among residents and businesses. The City has adopted the Electricity Resource Plan and Green Building Code requirements, Stormwater Management and Water Conservation and Irrigation ordinances, and the Energy Conservation Ordinance, which promote energy and water use efficiency. The Environmental Protection Element of the San Francisco General Plan contains goals, objectives, and policies related to energy conservation.

[16] 3333 California Street Mixed-Use Project, Case No. 2015-014028ENV, Draft Environmental Impact Report, Appendix AQ, pdf pp. 54 and 121. Fuel efficiency data for operation is based on EMFAC2014.

**Table 7. Operational Energy – Mobile Sources**

| | | Proposed Project | | Project Variant | |
|---|---|---|---|---|---|
| Vehicle Type | Fleet Mix | Vehicle Miles Traveled (annual) | Miles Per Gallon | Vehicle Miles Traveled (annual) | Miles Per Gallon |
| Diesel, medium heavy-duty (MHD) | 3.3% | 330,874 | 7.9 | 336,731 | 7.9 |
| Diesel, heavy heavy-duty (HHD)* | 0.9% | 94,304 | 5.3 | 95,973 | 5.3 |
| Diesel, urban buses (UBUS) | 0.3% | 29,702 | 4.1 | 30,228 | 4.1 |
| Diesel, school buses (SBUS) | 0.1% | 9,519 | 7.2 | 9,687 | 7.2 |
| Diesel, other buses (OBUS) | 0.4% | 42,537 | 8.1 | 43,290 | 8.1 |
| **Total diesel use (gallons)** | | | **73,660** | | **74,964** |
| Gasoline, light-duty auto (LDA) | 60.3% | 6,008,918 | 26.8 | 6,115,289 | 26.8 |
| Gasoline, light-duty truck type 1 (LDAT1) | 3.7% | 368,044 | 22.7 | 374,559 | 22.7 |
| Gasoline, light-duty truck type 2 (LDAT2) | 19.3% | 1,921,739 | 20.2 | 1,955,758 | 20.2 |
| Gasoline, medium-duty vehicle (MDV) | 9.1% | 906,653 | 15.5 | 922,703 | 15.5 |
| Gasoline, light-heavy duty truck type 1 (LHD1) | 1.3% | 128,337 | 9.6 | 130,609 | 9.6 |
| Gasoline, light-heavy duty truck type 2 (LHD2) | 0.5% | 51,618 | 8.8 | 52,531 | 8.8 |
| Gasoline, motorcycle (MCY) | 0.6% | 59,265 | 33.0 | 60,314 | 33.0 |
| Gasoline, motor homes (MH) | 0.1% | 5,586 | 6.8 | 5,685 | 6.8 |
| **Total gasoline use (gallons per year)** | | | **416,419** | | **423,481** |

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The City's Commuter Benefits Program, Emergency Ride Home Program, transportation demand management programs, Transportation Sustainability Fee, Jobs-Housing Linkage Program, bicycle parking requirements, low-emission car parking requirements, and car sharing requirements reduce energy use by promoting the use of sustainable transportation modes.

To address waste, the City implemented the Recycling and Compositing Ordinance, the Construction and Demolition Debris Recovery Ordinance, and Green Building Code requirements. These regulations reduce the amount of materials sent to a landfill and promote reuse of materials to conserve embodied energy[17] and reduce the energy required to produce new materials.

A component of San Francisco's larger climate strategy as it relates to energy conservation is documented through the Greenhouse Gas Compliance Checklist, which identifies applicable local and state regulations for public and private projects intended to decrease emissions of greenhouse gases and reduce energy use. These components of the City's Greenhouse Gas Reduction Strategy are coordinated at the local level through the adoption and implementation of city agency-specific Climate Action Strategies and integrated with regional efforts in cooperation with the Bay Area Air Quality Management District. The Greenhouse Gas analysis for the proposed project and project variant is provided in Section E.7 of the Initial Study.

## Energy Efficiency

Construction of the proposed project and project variant would require the manufacture of new materials requiring the use of energy. The production of these materials would result in consumption of natural resources including fossil fuels. However, the reuse and recycling of existing materials after demolition of buildings would partially offset the energy needed to produce new materials. San Francisco's construction and demolition debris ordinance requires a minimum recovery rate of 65 percent of building waste. Other energy conservation strategies implemented during construction would be to use energy-efficient equipment that would connect to the existing electrical grid when feasible instead of using diesel generators, and to encourage worker carpooling and use of public transit.

During operation, residential and commercial buildings would use energy for cooling, lighting, water heating, and appliances and electronics. In an effort to decrease energy consumption of residential and commercial buildings, energy efficiency measures would be incorporated into the project design. For the proposed project and project variant, the potential energy savings from combinations of twenty different energy conservation measures were assessed using the Snapshot Efficiency tool. The Snapshot Efficiency Tool is a web-based tool for quickly understanding the potential impact of various efficiency measures.[18] The top five most effective energy conservation measures are identified for each space type in Table 8.

The percentage of energy saved after incorporation of the energy conservation measures into the project design is shown in Table 9. The proposed project would save approximately 26 percent of annual building energy use through energy conservation measures, and the project variant would save approximately 25 percent, compared to energy use without these conservation measures.

[17] Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

[18] Architecture at Zero, "Technical Resources, The Snapshot Efficiency Tool". Available at http://www.architectureatzero.com/technical-resources. Accessed April 9, 2018.

**Table 8. Operational Energy – Conservation Measures**

| Proposed Project and Project Variant Conservation Measures | |
|---|---|
| **Space Type** | **Identified Measures*** |
| Residential | Reduce domestic hot water consumption<br>Reduce equipment power density<br>Increase residential water heater efficiency<br>Increase lighting efficiency<br>Increase cooling efficiency |
| Office | Increase lighting efficiency<br>Increase commercial boiler efficiency<br>Reduce equipment power density<br>Reduce domestic hot water consumption<br>Reduce window solar heat gain coefficient |
| Retail | Increase lighting efficiency<br>Increase commercial boiler efficiency<br>Reduce equipment power density<br>Reduce domestic hot water consumption<br>Integrate natural ventilation strategies |
| Child Care | Increase lighting efficiency<br>Reduce equipment power density<br>Increase commercial boiler and residential water heater efficiency<br>Reduce window solar heat gain coefficient<br>Integrate natural ventilation strategies |
| Parking | Increase lighting efficiency |

* Energy conservation measures are ranked from most to least impactful for each space type

**Table 9. Operational Energy – Efficiency Savings**

| | Proposed Project | | | Project Variant | | |
|---|---|---|---|---|---|---|
| **Energy Use** | **Without Conservation Measures (kBTU/year)** | **Conservation Measures Included (kBTU/year)** | **Estimated Savings (%)** | **Without Conservation Measures (kBTU/year)** | **Conservation Measures Included (kBTU/year)** | **Estimated Savings (%)** |
| Natural Gas - Heating | 10,854,013 | 10,638,137 | 2 | 12,104,102 | 11,947,129 | 1 |
| Electricity - Cooling | 1,084,440 | 685,450 | 37 | 1,217,713 | 774,496 | 36 |
| Additional Electricity Use | 25,609,409 | 16,497,970 | 36 | 26,717,327 | 17,264,515 | 25 |
| **Total** | **37,547,861** | **27,821,558** | **26** | **40,039,142** | **29,986,139** | **25** |

## Renewable Energy

Solar photovoltaic (PV) cells convert sunlight to electricity. PV cells are assembled into a solar module or group of PV cells. Solar modules are placed in an area or added to a larger system to generate and supply electricity for homes and businesses. A system typically includes one or more solar modules (sometimes referred to as an array), equipment to convert direct current electricity to alternating current electricity (i.e., inverters), and connecting wiring.[19] Some systems are designed with batteries to store the generated electricity for later use and/or sun tracking devices to increase the amount of solar energy collected. PV systems can be located on rooftops or mounted on racks on the ground and have a typical life span of approximately 30 years.

Solar water heating systems use energy from the sun to heat water and can replace conventional energy-intensive water heating. Solar water heating systems consist of two main parts: a solar collector and a storage tank.[20] The solar collector absorbs the sunlight. Water flows from the storage tank into small metal tubes located in the collector and is warmed by the absorber plates. The heated water then flows back to the storage tank for use. Larger systems generally consist of an array of smaller heating units, connected in parallel, to provide the desired amount of hot water.

For the proposed project and project variant, approximately 35% of the roof area would be used for on-site renewable energy production from rooftop solar. The projected renewable energy output was estimated for both rooftop PV and rooftop solar hot water based on the proposed design. PV Watts[21] was used to calculate energy production from rooftop solar photovoltaics, assuming SUNPOWER[22] panels. The T*SOL[23] tool was used to calculate the solar hot water energy production from rooftop solar tubes, assuming Ritter tubes.[24]

As shown on Table 10, the estimated renewable energy output is 4,485,641 kBTU/year
● (~~1,315,626~~ 1,314,666 kWh/year) for PV systems and 2,084,000 kBTU/year (610,786 kWh/year) for solar hot water heaters. The roof area allocated to solar equipment is consistent between the proposed project and the project variant; therefore, the estimated renewable energy production in the proposed case remains the same under the variant.

On-site generation is not included in the building energy use estimates before or after energy conservation measures (see Tables 4 and 9 above). On-site renewable energy generation would further reduce regional energy demand associated with the proposed project or project variant. Table 11 shows that on-site PV renewable electricity generation would save about 17 percent of annual demand on the local electric grid for the proposed project, and 16 percent for the project variant. Solar water heaters would reduce annual natural gas demand by 19 percent for the proposed project and 17 percent for the project variant.

[19] DOE (U.S. Department of Energy), "Solar Photovoltaic Technology Basics." Available online at: https://energy.gov/eere/solar/articles/solar-photovoltaic-technology-basics. Accessed January 17, 2018.
[20] DOE (U.S. Department of Energy), "Solar Water Heaters." Available online at: https://energy.gov/energysaver/solar-water-heaters. Accessed January 17, 2018.
[21] National Renewable Energy Lab. PVWatts v5.3.8. pvwatts.nrel.org.
[22] SUNPOWER: SPR-E20-435-COM SPR-E19-410-COM. Efficiency: 19%. Module area: 21.5 $ft^2$.
[23] Valentin Software. T*SOL Dynamic Thermal Simulation Software v5.5. www.valentinsoftware.com.
[24] Ritter CPC 14 XL (gross surface area: 28.2 $ft^2$)

**Table 10. Operational Energy – Renewable Generation**

| | Proposed Project and Project Variant | | |
|---|---|---|---|
| Building | Proposed Total Solar Equipment Area (square feet) | Estimated PV Energy Output (kBTU/year) | Estimated Solar Hot Water Energy Output (kBTU/year) |
| Center Building A | 0 | 0 | 0 |
| Center Building B | 2,597 | 180,864 | 82,000 |
| Plaza A Building | 12,190 | 795,497 | 380,000 |
| Plaza B Building | 11,812 | 828,163 | 384,000 |
| Walnut Building | 19,771 | 1,397,159 | 635,000 |
| Masonic Building | 0 | 0 | 0 |
| Euclid Building | 9,036 | 638,342 | 289,000 |
| Laurel Duplexes | 6,384 | 394,514 | 207,000 |
| Mayfair Building | 3,550 | 251,107 | 107,000 |
| **Total** | **65,340** | **4,485,643** | **2,084,000** |

Overall, renewable generation would save about 17 percent of annual operational building energy demand for the proposed project and 16 percent for the project variant. Energy conservation measures would save an additional 26 percent of annual building energy use and the project variant would save approximately 25 percent. The building energy use estimates before conservation measures are assumed to be Title 24-2013 equivalent, and the energy use estimates after conservation represent savings compared to Title 24. With implementation of the energy conservation measures and on-site renewable energy generation, the proposed project and project variant would meet and improve upon the Title 24 Part 6 building energy efficiency standards.

**Table 11. Operational Energy – Renewable Generation Energy Savings**

| | Proposed Project | | | Project Variant | | |
|---|---|---|---|---|---|---|
| Energy Use | Without Energy Conservation Measures (kBTU/year) | Generation Included (kBTU/year) | Estimated Savings (%) | Without Energy Conservation Measures (kBTU/year) | Generation Included (kBTU/year) | Estimated Savings (%) |
| Natural Gas | 10,854,013 | 8,770,013 | 19% | 12,104,102 | 10,020,102 | 17% |
| Electricity | 26,693,849 | 22,208,208 | 17% | 27,935,040 | 23,449,399 | 16% |
| **Total** | **37,547,862** | **30,978,221** | **17%** | **40,039,142** | **33,469,501** | **16%** |

## CONCLUSION

Operation of the project would increase the intensity of existing energy use of the site by introducing new residential, retail/restaurant, office, and child care uses on the site, replacing the current office and child care uses. Under the project variant, there would be slightly more residential use and less retail/restaurant and child care uses and no office use. The proposed project or project variant would contribute to annual long-term increases in energy use as a result of increased vehicle trips (mobile sources) and residential, retail/restaurant, office, and child care operations. Construction activities would also result in temporary increases energy use.

Energy conservation design features to meet state and local goals for energy efficiency and renewable energy have been incorporated into the project design to reduce wasteful, inefficient, and unnecessary consumption of energy during construction and operation. The proposed project or project variant would be required to be built to Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND Gold Standard)[25] thus minimizing the amount of fuel, water, or energy used. Rooftops of the proposed new buildings and the adaptively reused office building would be developed with a mix of green roofs, solar photovoltaic systems, and/or roof-mounted solar hot water systems. The proposed project or project variant would also incorporate transportation demand management measures into its design such as car share parking, and bicycle parking and repair stations that would help to minimize the amount of transportation fuel consumed. Further, the project sponsor would be required to develop and/or reserve up to 8 percent of parking spaces for electric vehicles, which would also minimize the amount of transportation fuel consumed.

Based on compliance with the Title 24 conservation standards of the California Code of Regulations and the assessment of the projected demand for energy resources, operation of the proposed project or project variant would not have a measurable effect on regional energy supplies or on peak energy demand resulting in a need for additional capacity. Natural gas and electric service would be provided to meet the needs of the proposed project or project variant, as required by the CPUC, which obligates PG&E and the SFPUC to provide service to its existing and potential customers. PG&E and the SFPUC, as part of their future service projection planning, have incorporated the demand from the proposed project or project variant and other future development projects to determine the balance of regional energy supply and demand. Energy conservation and production measures in the proposed project would decrease overall energy consumption, decrease reliance on non-renewable energy sources, and increase reliance on renewable energy sources. The proposed project and project variant would also be consistent with San Francisco's greenhouse gas reduction strategy. Furthermore, construction energy consumption would be a temporary energy expenditure and would not occur in an inefficient or wasteful manner.

In summary, construction and operation of the proposed project or project variant would not use energy resources in an inefficient or wasteful manner. Therefore, the proposed project or project variant would have a less-than-significant impact on energy resources, and no mitigation measures are required.

[25] Leadership in Energy and Environmental Design (LEED) is a green building rating system that provides independent verification of a building or neighborhood's energy and environmental design features. LEED certification encourages energy and resource-efficient buildings, and savings from decreased utility costs. LEED for Neighborhood Development (LEED-ND) inspires and helps create better, more sustainable, well-connected neighborhoods. Certification is awarded at four levels, Certified, Silver, Gold, Platinum.

## Construction Energy

| Construction Electricity Use - Water for Dust Control | Proposed Project | Project Variant |
|---|---|---|
| Ground disturbance (acres per day)* | 0.21 | 0.21 |
| Water consumption rate per acre disturbed (gallons per acre per day) | 3,020 | 3,020 |
| Number of days | 354 | 354 |
| **Total water consumption (gallons)** | **226,500** | **226,500** |
| **Energy intensity per gallon of water (kWh)** | **0.005411** | **0.005411** |
| **Total electricity use (kWh)** | [illegible] | [illegible] |

*Acreage factors in multiple levels of grading at the site

| Construction Electricity Use - Off-road Equipment | Proposed Project | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|
| **Equipment*** | **kW** | **Quantity** | **Total Hours** | **kWh** | **kW** | **Quantity** | **Total Hours** | **kWh** |
| Cutting and chopping saws | 5 | 30 | 8,432 | 1,264,800 | 5 | 30 | 8,432 | 1,264,800 |
| Tile cutting saws | 5 | 25 | 8,432 | 1,054,000 | 5 | 25 | 8,432 | 1,054,000 |
| Saw cutter | 5 | 4 | 8,432 | 168,640 | 5 | 4 | 8,432 | 168,640 |
| Dry wall stud impact guns | 1 | 50 | 8,432 | 421,600 | 1 | 50 | 8,432 | 421,600 |
| Tower cranes | **179** | **2** | **8,432** | **3,018,656** | **179** | **2** | **8,432** | **3,018,656** |
| Signal boards | 19 | 2 | **28,824** | 1,072,253 | 19 | 2 | **28,824** | 1,072,253 |
| Welders | 20 | 2 | **4,240** | 169,600 | 20 | 2 | **4,240** | 169,600 |
| [illegible] | | | | | | | | |

*We received usage information for tower cranes, signal boards, and welders, but no other equipment. Data in red was estimated conservatively, and sources are cited in the energy assessment. Total hours is equal to the total days of use multiplied by work hours per day.

| Construction Diesel Use - Off-road Equipment | Proposed Project | Project Variant |
|---|---|---|
| Total diesel equipment use (horsepower-hours)* | 8,623,158 | 8,623,158 |
| Gallons of diesel per horsepower-hour | 0.05 | 0.05 |
| **Total diesel use (gallons)** | [illegible] | [illegible] |

* Refer to the air quality diesel equipment list spreadsheet for horsepower, quantity, and total hours for each type

| Construction Fuel Use - On-road Trips | | Proposed Project | | Project Variant | |
|---|---|---|---|---|---|
| **Vehicle Type** | **Trip Type*** | **Vehicle Miles Traveled** | **Miles Per Gallon** | **Vehicle Miles Traveled** | **Miles Per Gallon** |
| Diesel, medium heavy-duty | Vendor | 65,100 | 8.4 | 65,100 | 8.4 |
| Diesel, heavy heavy-duty | Vendor | 96,600 | 5.5 | 96,600 | 5.5 |
| Diesel, heavy heavy-duty | Hauling | 684,836 | 5.5 | 684,836 | 5.5 |
| **Total diesel use (gallons)** | | [illegible] | | [illegible] | |
| Gasoline, light-duty auto | Worker | 2,123,094 | 21.8 | 2,123,094 | 21.8 |
| Gasoline, light-duty truck type 1 | Worker | 1,061,547 | 18.8 | 1,061,547 | 18.8 |
| Gasoline, light-duty truck type 2 | Worker | 1,061,547 | 16.0 | 1,061,547 | 16.0 |
| **Total gasoline use (gallons)** | | [illegible] | | [illegible] | |

** Assumes all vendor trucks as MHDT, all concrete trucks as HHDT, and all hauling trucks as HHDT. Worker vehicles are assumed to be 50% LDA, 25% LDT1 and 25% LDT2. In the table

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## Operational Energy

| Operational Energy Use - Buildings | Proposed Project | Project Variant |
|---|---|---|
| **Natural Gas** | | |
| Heating (kBTU/year) | 10,854,013 | 12,104,102 |
| **Electricity** | | |
| Cooling (kBTU/year)* | 1,084,440 | 1,217,713 |
| Additional Electricity Use (kBTU/year) | 25,609,409 | 26,717,327 |
| Total energy use (kBTU/year) | [illegible] | [illegible] |

*1 kWh = 3.412 kBTU

| Operational Peak Energy Use - Buildings | Proposed Project | Project Variant |
|---|---|---|
| **Natural Gas** | | |
| Heating (MMBTU/hour) | 3.9 | 4.1 |
| **Electricity** | | |
| Cooling (MMBTU/hour)* | 6.3 | 6.6 |
| Additional Electricity Use (MMBTU/hour) | 4.1 | 4.4 |
| Total peak energy use (MMBTU/hour) | [illegible] | [illegible] |

*1 MMBTU = 1 million BTU

| Operational Electricity Use - Water | Proposed Project | | Project Variant | |
|---|---|---|---|---|
| **Use Type** | **Water Demand (gallons/year)** | **Resultant Electricity Use (kWh/year)** | **Water Demand (gallons/year)** | **Water Demand (gallons/year)** |
| Commercial Fixtures | 422,000 | 2,280 | 229,000 | 1,238 |
| Residential Fixtures | 17,125,000 | 92,663 | 22,398,000 | 121,194 |
| HVAC/Cooling | 1,995,000 | 10,795 | 1,995,000 | 10,795 |
| Landscape Irrigation | 1,626,000 | 5,689 | 1,626,000 | 5,689 |
| Total electricity use (kWh/year) | [illegible] | | [illegible] | |

| Operational Fuel Use - Mobile Trips | | Proposed Project | | Project Variant | |
|---|---|---|---|---|---|
| **Vehicle Type** | **Fleet Mix** | **Vehicle Miles Traveled (annual)** | **Miles Per Gallon** | **Vehicle Miles Traveled (annual)** | **Miles Per Gallon** |
| Diesel, medium heavy-duty (MHD) | 3.3% | 330,874 | 7.9 | 336,731 | 7.9 |
| Diesel, heavy heavy-duty (HHD)* | 0.9% | 94,304 | 5.3 | 95,973 | 5.3 |
| Diesel, urban buses (UBUS) | 0.3% | 29,702 | 4.1 | 30,228 | 4.1 |
| Diesel, school buses (SBUS) | 0.1% | 9,519 | 7.2 | 9,687 | 7.2 |
| Diesel, other buses (OBUS) | 0.4% | 42,537 | 8.1 | 43,290 | 8.1 |
| Total diesel use (gallons) | | [illegible] | | [illegible] | |
| Gasoline, light-duty auto (LDA) | 60.3% | 6,008,918 | 26.8 | 6,115,289 | 26.8 |
| Gasoline, light-duty truck type 1 (LDAT1) | 3.7% | 368,044 | 22.7 | 374,559 | 22.7 |
| Gasoline, light-duty truck type 2 (LDAT2) | 19.3% | 1,921,739 | 20.2 | 1,955,758 | 20.2 |
| Gasoline, medium-duty vehicle (MDV) | 9.1% | 906,653 | 15.5 | 922,703 | 15.5 |
| Gasoline, light-heavy duty truck type 1 (LHD1) | 1.3% | 128,337 | 9.6 | 130,609 | 9.6 |
| Gasoline, light-heavy duty truck type 2 (LHD2) | 0.5% | 51,618 | 8.8 | 52,531 | 8.8 |
| Gasoline, motorcycle (MCY) | 0.6% | 59,265 | 33.0 | 60,314 | 33.0 |
| Gasoline, motor homes (MH) | 0.1% | 5,586 | 6.8 | 5,685 | 6.8 |
| Total gasoline use (gallons) | | [illegible] | | [illegible] | |

*HHD was not separated between vendor and hauling in the operational emissions analysis. All HHD miles traveled are classified as vendor for calculation purposes

| Operational Energy - Conservation Measures | |
|---|---|
| **Space Type** | **Identified Measures*** |
| Residential | Reduce domestic hot water consumption<br>Reduce equipment power density<br>Increase residential water heater efficiency<br>Increase lighting efficiency<br>Increase cooling efficiency |
| Office | Increase lighting efficiency<br>Increase commercial boiler efficiency<br>Reduce equipment power density<br>Reduce domestic hot water consumption<br>Reduce window solar heat gain coefficient |
| Retail | Increase lighting efficiency<br>Increase commercial boiler efficiency<br>Reduce equipment power density<br>Reduce domestic hot water consumption<br>Integrate natural ventilation strategies |
| Child Care | Increase lighting efficiency<br>Reduce equipment power density<br>Increase commercial boiler and residential water heater efficiency<br>Reduce window solar heat gain coefficient<br>Integrate natural ventilation strategies |
| Parking | Increase lighting efficiency |

*Energy conservation measures are ranked from most to least impactful for each space type, and are the

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| Operational Energy - Efficiency Savings | Proposed Project | | | Project Variant | | |
|---|---|---|---|---|---|---|
| Energy Use | Measures Excluded (kBTU/year) | Measures Included (kBTU/year) | Estimated Savings (%) | Measures Excluded (kBTU/year) | Measures Included (kBTU/year) | Estimated Savings (%) |
| Natural Gas - Heating | 10,854,013 | 10,638,137 | 2 | 12,104,102 | 11,947,129 | 1 |
| Electricity - Cooling | 1,084,440 | 685,450 | 37 | 1,217,713 | 774,496 | 36 |
| Additional Electricity Use | 25,609,409 | 16,497,970 | 36 | 26,717,327 | 17,264,515 | 25 |
| Total | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |

| Operational Energy - Renewable Generation | Proposed Project and Project Variant | | | | | |
|---|---|---|---|---|---|---|
| Building | Proposed Total Solar Equipment Area (square feet) | Estimated PV Energy Output (kWh/year) | Estimated PV Energy Output (MMBTU/year)* | Estimated Solar Hot Water Energy Output (MMBTU/year) | Estimated PV Energy Output (kBTU/year)* | Estimated Solar Hot Water Energy Output (kBTU/year) |
| Center Building A | 0 | 0 | 0 | 0 | 0 | 0 |
| Center Building B | 2,597 | 53,047 | 181 | 82 | 180,864 | 82,000 |
| Plaza A Building | 12,190 | 233,317 | 795 | 380 | 795,497 | 380,000 |
| Plaza B Building | 11,812 | 242,898 | 828 | 384 | 828,163 | 384,000 |
| Walnut Building | 19,771 | 409,783 | 1,397 | 635 | 1,397,159 | 635,000 |
| Masonic Building | 0 | 0 | 0 | 0 | 0 | 0 |
| Euclid Building | 9,036 | 187,224 | 638 | 289 | 638,342 | 289,000 |
| Laurel Duplexes | 6,384 | 115,710 | 395 | 207 | 394,514 | 207,000 |
| Mayfair Building | 3,550 | 73,649 | 251 | 107 | 251,107 | 107,000 |
| Total | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |

*1 kWh = 0.003409510640514 5 MMBtu

| Operational Energy - Renewable Generation Savings | | Proposed Project | | | Project Variant | | |
|---|---|---|---|---|---|---|---|
| Energy Use | Renewable Generation (kBTU/year) | Energy Conservation Measures Excluded (kBTU/year) | Generation Included (kBTU/year) | Estimated Savings (%) | Energy Conservation Measures Excluded (kBTU/year) | Generation Included (kBTU/year) | Estimated Savings (%) |
| Natural Gas | 2,084,000 | 10,854,013 | 8,770,013 | 19% | 12,104,102 | 10,020,102 | 17% |
| Electricity | 4,485,641 | 26,693,849 | 22,208,208 | 17% | 27,935,040 | 23,449,399 | 16% |
| Total | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |

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# PSKS
# 3333 California St.
# CEQA Energy Calculations

Draft 2 | January 12, 2018

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 245654

**Arup North America Ltd**
560 Mission Street
Suite 700
San Francisco 94105
United States of America
www.arup.com

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# Document Verification

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| | | Name | Raphael Sperry, Sara Tepfer | Kirstin Weeks | |
| | | Signature | | | |
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| | | **Description** | | | |
| | | | Prepared by | Checked by | Approved by |
| | | Name | Sara Tepfer | Kirstin Weeks | Kirstin Weeks |
| | | Signature | | | |
| | | **Filename** | | | |
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| | | | Prepared by | Checked by | Approved by |
| | | Name | | | |
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# 1 Energy use estimate

Per-building energy usage, including both electricity and natural gas usage, was estimated using the proposed square footages and program-specific, Title 24 2013-compliant energy use intensities (EUIs) reported in the Pacific Gas and Electric Company Zero Net Energy Feasibility Study.[1] These EUIs include site end uses, such as outdoor lighting. Energy usage was calculated for both the proposed building and the project variant.

Table 1: Estimated energy use of proposed buildings on the project site

| Energy Use (kBtu/yr) | Center Bldg. A | Center Bldg. B | Plaza A Bldg. | Plaza B Bldg. | Walnut Bldg. | Masonic Bldg. | Euclid Bldg. | Laurel Duplex | Mayfair Bldg. | Sitewide Total |
|---|---|---|---|---|---|---|---|---|---|---|
| **Heating** | **1,007,732** | **2,629,271** | **1,033,594** | **1,043,977** | **985,511** | **1,001,435** | **2,084,838** | **609,505** | **485,151** | **10,854,013** |
| Residential | 1,007,732 | 2,629,271 | 745,112 | 813,484 | 0 | 1,001,435 | 1,997,610 | 609,505 | 485,151 | 9,928,299 |
| Office | 0 | 0 | 0 | 0 | 371,012 | 0 | 0 | 0 | 0 | 371,012 |
| Retail | 0 | 0 | 288,482 | 230,492 | 494,924 | 0 | 87,228 | 0 | 0 | 1,101,126 |
| Child Care | 0 | 0 | 0 | 0 | 92,576 | 0 | 0 | 0 | 0 | 92,576 |
| Parking | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Cooling** | **106,802** | **278,658** | **87,973** | **93,410** | **81,013** | **106,135** | **214,435** | **64,597** | **51,418** | **1,084,440** |
| Residential | 106,802 | 278,658 | 78,969 | 86,215 | 0 | 106,135 | 211,712 | 64,597 | 51,418 | 984,507 |
| Office | 0 | 0 | 0 | 0 | 46,917 | 0 | 0 | 0 | 0 | 46,917 |
| Retail | 0 | 0 | 9,004 | 7,194 | 15,448 | 0 | 2,723 | 0 | 0 | 34,368 |
| Child Care | 0 | 0 | 0 | 0 | 18,648 | 0 | 0 | 0 | 0 | 18,648 |
| Parking | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Electricity** | **1,381,540** | **3,965,525** | **3,116,795** | **2,986,061** | **6,246,774** | **2,047,392** | **3,980,797** | **924,212** | **960,314** | **25,609,409** |
| Residential | 1,381,540 | 3,604,573 | 1,021,504 | 1,115,238 | 0 | 1,372,907 | 2,738,603 | 835,595 | 1,201,681 | 12,735,073 |
| Office | 0 | 0 | 0 | 0 | 1,042,043 | 0 | 0 | 0 | 0 | 1,042,043 |
| Retail | 0 | 0 | 885,432 | 707,446 | 1,519,061 | 0 | 267,728 | 0 | 0 | 3,379,668 |
| Child Care | 0 | 0 | 0 | 0 | 416,146 | 0 | 0 | 0 | 0 | 416,146 |
| Parking | 0 | 360,952 | 1,209,859 | 1,163,376 | 3,269,524 | 674,484 | 974,466 | 88,617 | 295,202 | 8,036,479 |
| **Total** | **2,496,074** | **6,873,454** | **4,238,361** | **4,123,447** | **7,286,298** | **3,154,962** | **6,280,070** | **1,598,314** | **1,496,883** | **37,547,861** |
| Residential | 2,496,074 | 6,512,502 | 1,845,585 | 2,014,938 | 0 | 2,480,477 | 4,947,926 | 1,509,697 | 1,201,681 | 23,008,879 |
| Office | 0 | 0 | 0 | 0 | 1,459,971 | 0 | 0 | 0 | 0 | 1,459,971 |
| Retail | 0 | 0 | 1,182,918 | 945,133 | 2,029,432 | 0 | 357,679 | 0 | 0 | 4,515,162 |
| Child Care | 0 | 0 | 0 | 0 | 527,371 | 0 | 0 | 0 | 0 | 527,371 |
| Parking | 0 | 360,952 | 1,209,859 | 1,163,376 | 3,269,524 | 674,484 | 974,466 | 88,617 | 295,202 | 8,036,479 |

Estimated building energy uses include site end uses, such as outdoor lighting.

[1] Pacific Gas and Electric Co. (2012). *The Technical Feasibility of Zero Net Energy Buildings in California.* Retrieved from: http://www.energydataweb.com/cpucfiles/pdadocs/904/california_zne_technical_feasibility_report_final.pdf.

Table 2: Estimated energy use of proposed buildings on the project site under the project variant

| Energy Use (kBtu/yr) | Center Bldg. A | Center Bldg. B | Plaza A Bldg. | Plaza B Bldg. | Walnut Bldg. | Masonic Bldg. | Euclid Bldg. | Laurel Duplex | Mayfair Bldg. | Sitewide Totals |
|---|---|---|---|---|---|---|---|---|---|---|
| **Heating** | **1,007,732** | **2,629,271** | **1,033,594** | **1,043,977** | **2,208,601** | **1,001,435** | **2,084,838** | **609,505** | **485,151** | **12,104,102** |
| Residential | 1,007,732 | 2,629,271 | 745,112 | 813,484 | 1,733,751 | 1,001,435 | 1,997,610 | 609,505 | 485,151 | 11,023,050 |
| Retail | 0 | 0 | 288,482 | 230,492 | 382,526 | 0 | 87,228 | 0 | 0 | 988,728 |
| Child Care | 0 | 0 | 0 | 0 | 92,324 | 0 | 0 | 0 | 0 | 92,324 |
| Parking | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Cooling** | **106,802** | **278,658** | **87,973** | **93,410** | **214,285** | **106,135** | **214,435** | **64,597** | **51,418** | **1,217,713** |
| Residential | 106,802 | 278,658 | 78,969 | 86,215 | 183,748 | 106,135 | 211,712 | 64,597 | 51,418 | 1,168,255 |
| Retail | 0 | 0 | 9,004 | 7,194 | 11,939 | 0 | 2,723 | 0 | 0 | 30,860 |
| Child Care | 0 | 0 | 0 | 0 | 18,598 | 0 | 0 | 0 | 0 | 18,598 |
| Parking | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| **Electricity** | **1,381,540** | **3,965,525** | **3,116,795** | **2,986,061** | **7,394,692** | **2,047,392** | **3,980,797** | **924,212** | **960,314** | **26,717,327** |
| Residential | 1,381,540 | 3,604,573 | 1,021,504 | 1,115,238 | 2,376,869 | 1,372,907 | 2,738,603 | 835,595 | 1,201,681 | 15,111,942 |
| Retail | 0 | 0 | 885,432 | 707,446 | 1,174,081 | 0 | 267,728 | 0 | 0 | 3,034,688 |
| Child Care | 0 | 0 | 0 | 0 | 415,013 | 0 | 0 | 0 | 0 | 415,013 |
| Parking | 0 | 360,952 | 1,209,859 | 1,163,376 | 3,388,729 | 674,484 | 974,466 | 88,617 | 295,202 | 8,155,684 |
| **Total** | **2,496,074** | **6,873,454** | **4,238,361** | **4,123,447** | **9,777,578** | **3,154,962** | **6,280,070** | **1,598,314** | **1,496,883** | **40,039,142** |
| Residential | 2,496,074 | 6,512,502 | 1,845,585 | 2,014,938 | 4,294,368 | 2,480,477 | 4,947,926 | 1,509,697 | 1,201,681 | 27,303,247 |
| Retail | 0 | 0 | 1,182,918 | 945,133 | 1,568,547 | 0 | 357,679 | 0 | 0 | 525,935 |
| Child Care | 0 | 0 | 0 | 0 | 525,395 | 0 | 0 | 0 | 0 | 525,935 |
| Parking | 0 | 360,952 | 1,209,859 | 1,163,376 | 3,388,729 | 674,484 | 974,466 | 88,617 | 295,202 | 8,155,684 |

Estimated building energy uses include site end uses, such as outdoor lighting.

# 2 Peak energy demand estimate

Peak energy demand was estimated using the proposed square footages and program- and climate-specific ASHRAE 90.1-2013 compliant DOE reference building energy models. Peak energy use was estimated for both the proposed project and the project variant.

Table 3: Estimated peak energy demand

| Peak load (MMBtu/h) | Proposed project | Project variant |
|---|---|---|
| Heating | 3.9 | 4.1 |
| Cooling | 6.3 | 6.6 |
| Electric | 4.1 | 4.4 |
| **Total** | **14.3** | **15.1** |

# 3 Energy use from water

Project water demand was estimated from square footages and projected occupancy, and code-compliant plumbing fixture types and irrigation levels using the SFPUC's preferred tool for project water use estimation, and consistent with the Water Supply Assessment for this project. Indoor and outdoor electricity intensity factors were obtained from the 2006 CEC report, "Refining Estimates of Water-Related Energy Use in California"[2]. These factors are reported in the units of kWh per million gallons (MG) of water used and specific to northern California. These intensity factors represent the electricity required to: (1) supply and convey water from source to site; (2) treat the water to usable standards; (3) distribute the water to individual users. The indoor intensity factor includes the electricity required to process resultant wastewater.

Table 4: Estimated energy use from water

| **Use Type** | **Water demand (gal/yr)** | **Resultant electricity use (kWh/yr)** |
|---|---|---|
| Commercial fixtures | 422,000 | 2,280 |
| Residential fixtures | 17,125,000 | 92,663 |
| HVAC/Cooling | 1,995,000 | 10,795 |
| Landscape Irrigation | 1,626,000 | 5,689 |
| **Total** | **21,167,000** | **111,430** |

Table 5: Estimated energy use from water under project variant

| **Use Type** | **Water demand (gal/yr)** | **Resultant electricity use (kWh/yr)** |
|---|---|---|
| Commercial fixtures | 229,000 | 1,238 |
| Residential fixtures | 22,398,000 | 121,194 |
| HVAC/Cooling | 1,995,000 | 10,795 |
| Landscape Irrigation | 1,626,000 | 5,689 |

[2] "Refining Estimates of Water-Related Energy Use in California." California Energy Commission (CEC), 2006. CEC-500-2006-118. Retrieved from www.energy.ca.gov on 9 January, 2018.

| | | |
|---|---|---|
| **Total** | **26,247,000** | **138,915** |

# 4 Waste volume estimates

Residential waste volume was estimated based on the project unit counts, while commercial waste volume was estimated based on program square footages. Program-specific waste generation and diversion rates were then applied to estimate waste volumes. The environmental impacts associated with the project waste generation was estimated using factors consistent with the CalEEMod methodology.[3]

Table 6: Waste volume estimates - Proposed project

| Space type | Waste generated (cu. yds./day) | Total $CO_2$ (MT/yr) | $CH_4$ (MT/yr) | $N_2O$ (MT/yr) | $CO_2e$ (MT/yr) |
|---|---|---|---|---|---|
| Residential | 18.3 | 5.2 | 0.3 | 0 | 12.9 |
| Commercial | 34 | 9.7 | 0.6 | 0 | 23.9 |
| **Total** | **52.5** | **14.9** | **0.9** | **0** | **36.8** |

Table 7: Waste volume estimates – Project variant

| Space type | Waste generated (cu. yds./day) | Total CO2 (MT/yr) | CH4 (MT/yr) | N2O (MT/yr) | CO2e (MT/yr) |
|---|---|---|---|---|---|
| Residential | 19.8 | 5.6 | 0.3 | 0 | 13.9 |
| Commercial | 25.5 | 7.2 | 0.4 | 0 | 17.9 |
| **Total** | **45.3** | **12.8** | **0.7** | **0** | **31.8** |

[3] California Air Pollution Control Officers Association (2013). *Appendix A: Calculation Details for CalEEMod.* Retrieved from: http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixa.pdf.

# 5 Projected renewable energy output

The projected energy output was estimated for both rooftop solar photovoltaics and rooftop solar hot water based on the proposed design. PV Watts[4] was used to calculate energy production from rooftop solar photovoltaics, assuming SUNPOWER panels[5]. The T*SOL[6] tool was used to calculate the solar hot water energy production from rooftop solar tubes, assuming Ritter tubes.[7]

Table 8: Projected renewable energy production based on proposed design

| Building | Proposed total solar equipment area ($ft^2$) | Estimated PV energy output (kWh/yr) | Estimated solar hot water energy output (MMBtu/yr) |
|---|---|---|---|
| Center Bldg. A | 0 | 0 | 0 |
| Center Bldg. B | 2,597 | 53,047 | 82 |
| Plaza A Bldg. | 12,190 | 233,317 | 380 |
| Plaza B Bldg. | 11,812 | 242,898 | 384 |
| Walnut Bldg. | 19,771 | 409,783 | 635 |
| Masonic Bldg. | 0 | 0 | 0 |
| Euclid Bldg. | 9,036 | 187,224 | 289 |
| Laurel Dup. | 6,384 | 115,710 | 207 |
| Mayfair Bldg. | 3,550 | 73,649 | 107 |
| **Total** | 65,340 | 1,315,626 | 2,084 |
| The proposed solar area is roughly 35% of total roof area, with 30% of total roof area photovoltaic and 5% of total roof area solar hot water.<br>Potential renewable energy production under the project variant is the same as in the proposed project. | | | |

The roof area allocated to solar equipment is consistent between the proposed project and the project variant; therefore, the estimated renewable energy production in the proposed case remains the same under the variant.

[4] National Renewable Energy Lab. PVWatts v5.3.8. pvwatts.nrel.org.

[5] SUNPOWER: SPR-E20-435-COM SPR-E19-410-COM. Efficiency: 19%. Module area: 21.5 $ft^2$.

[6] Valentin Software. T*SOL Dynamic Thermal Simulation Software v5.5. www.valentin-software.com.

[7] Ritter CPC 14 XL (Gross surface area: 28.2 $ft^2$)

# 6 Energy savings estimates from energy efficiency

Beginning with the projected energy use estimated above, the Snapshot Efficiency tool was used to assess the potential savings from combinations of twenty different energy conservation measures (ECMs). The top five most impactful ECMs were identified for each space type, as well as the resulting percent energy saved. The percent savings were applied to each of the energy consumption values reported elsewhere in this report.

Table 9: Identified energy conservation measures by space type

| **Use type** | **Identified energy conservation measures** |
|---|---|
| Residential | Reduce Domestic Hot Water (DHW) consumption.<br>Reduce equipment power density.<br>Increase residential water heater efficiency.<br>Increase lighting efficacy.<br>Increase cooling efficiency. |
| Office | Increase lighting efficacy.<br>Increase commercial boiler efficiency.<br>Reduce equipment power density.<br>Reduce DHW consumption.<br>Reduce window SHGC. |
| Retail | Increase lighting efficacy.<br>Increase commercial boiler efficiency.<br>Reduce equipment power density.<br>Reduce DHW consumption.<br>Integrate natural ventilation strategies. |
| Child Care | Increase lighting efficacy.<br>Reduce equipment power density.<br>Increase commercial boiler and residential water heater efficiency.<br>Reduce window SHGC.<br>Integrate natural ventilation strategies. |
| Parking | Increase lighting efficacy. |
| ECMs are ranked from most to least impactful for each space type. | |

Table 10: Total estimated project site annual energy use

| Energy Conservation Measures Excluded | | Energy Conservation Measures Included | |
|---|---|---|---|
| **Energy Use** | **Site Total (kBtu/yr)** | **Site Total (kBtu/yr)** | **Estimated savings (%)** |
| **Heating** | **10,854,013** | **10,638,137** | **2** |
| Residential | 9,928,299 | 9,239,299 | 0 |
| Office | 371,012 | 330,377 | 11 |
| Retail | 1,101,126 | 922,059 | 16 |
| Child Care | 92,576 | 96,402 | -4 |
| Parking | 0 | 0 | 0 |
| **Cooling** | **1,084,440** | **685,450** | **37** |
| Residential | 984,507 | 619,287 | 37 |
| Office | 46,917 | 23,458 | 50 |
| Retail | 34,368 | 29,829 | 13 |
| Child Care | 18,648 | 12,876 | 31 |
| Parking | 0 | 0 | 0 |
| **Electricity** | **25,609,409** | **16,497,970** | **36** |
| Residential | 12,735,073 | 8,349,612 | 34 |
| Office | 1,042,043 | 684,671 | 46 |
| Retail | 3,379,668 | 1,823,699 | 36 |
| Child Care | 416,146 | 265,273 | 34 |
| Parking | 8,036,479 | 5,374,715 | 33 |
| **Total** | **37,547,861** | **27,821,558** | **26** |
| Residential | 23,008,879 | 18,258,197 | 21 |
| Office | 1,459,971 | 1,038,506 | 29 |
| Retail | 4,515,162 | 2,775,588 | 39 |
| Child Care | 527,371 | 374,551 | 29 |
| Parking | 8,036,479 | 5,374,715 | 33 |

Table 11: Total estimated project site energy annual use under Project variant

| Energy Conservation Measures Excluded | | ECMs Included | |
|---|---|---|---|
| **Energy Use** | **Site Total (kBtu/yr)** | **Site Total (kBtu/yr)** | **Estimated savings (%)** |
| **Heating** | **12,104,102** | **11,947,129** | **1** |
| Residential | 11,023,050 | 11,023,050 | 0 |
| Retail | 1,101,126 | 827,940 | 16 |
| Child Care | 92,324 | 96,139 | -4 |
| Parking | 0 | 0 | 0 |
| **Cooling** | **1,217,713** | **774,496** | **36** |
| Residential | 1,168,255 | 734,870 | 37 |
| Retail | 30,860 | 26,784 | 13 |
| Child Care | 18,598 | 12,841 | 31 |
| Parking | 0 | 0 | 0 |
| **Electricity** | **26,717,327** | **17,264,515** | **35** |
| Residential | 15,111,942 | 9,907,980 | 34 |
| Retail | 3,034,688 | 1,637,545 | 46 |
| Child Care | 415,013 | 264,551 | 34 |
| Parking | 8,155,684 | 5,454,439 | 33 |
| **Total** | **40,039,142** | **29,986,139** | **25** |
| Residential | 27,303,247 | 21,665,900 | 21 |
| Retail | 4,054,276 | 2,492,269 | 39 |
| Child Care | 525,935 | 373,532 | 29 |
| Parking | 8,155,684 | 5,454,439 | 33 |

# AGENDA ITEM
# Public Utilities Commission
***City and County of San Francisco***

DEPARTMENT Water Enterprise AGENDA NO. **11**

MEETING DATE June 13, 2017

**Approve Water Supply Assessment:** Regular Calendar
**Project Manager:** Paula Kehoe

**Approve Water Supply Assessment for the 3333 California Street Project**

| | |
|---|---|
| **Summary of Proposed Commission Action:** | **Approve** the Water Supply Assessment (WSA) for the proposed 3333 California Street Project, pursuant to the State of California Water Code Section 10910 *et seq.* and California Environmental Quality Act (CEQA) Section 21151.9 and CEQA Guidelines Section 15155. |
| | |
| **Background:** | Water Code Sections 10910-10915 provide a nexus between the regional land use planning process and the environmental review process. The law also reflects the growing awareness of the need to incorporate water supply and demand analysis at the earliest possible stage in the land use planning process. The core of this law is the requirement for a public water system to prepare a water supply assessment (WSA) of whether available water supplies are sufficient to serve the demand generated by projects of a specified size ("water demand projects"), as well as the reasonably foreseeable cumulative demand in the region over the next 20 years under a range of hydrologic conditions. The WSA is required within 90 days of the time the public water system receives a request for such assessment from the lead agency preparing an environmental impact report (EIR) or negative declaration under CEQA. The Planning Department, which carries out the City's lead agency responsibilities under CEQA, is preparing an EIR for the proposed project and has identified the proposed project as a water demand project.<br><br>The content of a WSA is specified by the Water Code and includes identification of any existing water supply entitlements or contracts, and detailed information about groundwater supplies. It assesses the adequacy of water supplies to serve the proposed project and cumulative demand.<br><br>The WSA must be completed by the public water supplier that would serve the project and be approved by its governing body at a public meeting. Approval of a WSA is not approval of the development |

**APPROVAL:** _____

COMMISSION SECRETARY Donna Hood

**Agreement:** Approve Water Supply Assessment for the 3333 California Street Project
**Commission Meeting Date:** June 13, 2017

| | |
|---|---|
| | project for which the WSA is prepared. A WSA is an informational document required to be prepared for use in the City's environmental review of a project under CEQA.<br><br>The attached WSA prepared by San Francisco Public Utilities Commission (SFPUC) staff analyzes the sufficiency of long-term water supplies to serve the proposed project and cumulative development and concludes that there are adequate short-term and long-term water supplies to provide water service to the Project in compliance with the State Water Code requirements. |
| | |
| **Result of Inaction:** | A delay in approving this agenda item will result in the inability of the San Francisco Planning Department to complete the environmental review for the proposed 3333 California Street Project. Under CEQA Guidelines Section 15155, the SFPUC may, within 90 days of the request for the WSA from Planning, request a reasonable extension of time to complete the WSA. |
| | |
| **Description of Action:** | Approve the WSA for the proposed 3333 California Street Project, pursuant to the State of California Water Code 10910. |
| | |
| **Environmental Review:** | Approval of the WSA is not a project under CEQA as the WSA is an informational document prepared for the CEQA process and is not an approval of the Project. |
| | |
| **Recommendation:** | SFPUC staff recommends that the Commission adopt the resolution. |
| | |
| **Attachment:** | 1. Water Supply Assessment for the 3333 California Street Project |

# PUBLIC UTILITIES COMMISSION

City and County of San Francisco

RESOLUTION NO. _____

WHEREAS, Under the California Environmental Quality Act (CEQA) and State Water Code (Section 10910(g)(1)), the San Francisco Public Utilities Commission (SFPUC) is required to prepare and approve a Water Supply Assessment (WSA) for the 3333 California Street Project's cumulative water demands; and

WHEREAS, A WSA is an informational document that assesses the adequacy of water supplies to serve a project and is required to be prepared as part of the CEQA environmental review process; and

WHEREAS, As an informational document, approval of the WSA is not a project under CEQA and is not an approval of the 3333 California Street Project; and

WHEREAS, A WSA must be approved at a public meeting by the governing body of the public water supplier that would serve the project; and

WHEREAS, The SFPUC staff prepared a WSA for the 3333 California Street Project, which concluded that the SFPUC has adequate water supplies to meet the Project's water demands through 2040; now, therefore, be it

RESOLVED, This Commission approves the Water Supply Assessment for the 3333 California Street Project, pursuant to the State of California Water Code 10910(g).

*I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of June 13, 2017.*

_____

*Secretary, Public Utilities Commission*

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
F 415.554.3161
TTY 415.554.3488

May 17, 2017

TO: Commissioner Anson Moran, President
Commissioner Ike Kwon, Vice President
Commissioner Ann Moller Caen
Commissioner Francesca Vietor
Commissioner Vince Courtney

THROUGH: Harlan L. Kelly, Jr., General Manager

FROM: Steven R. Ritchie, Assistant General Manager, Water

RE: Water Supply Assessment for the 3333 California Street Project

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# 1.0 Summary

## *1.1 Introduction*

Under the Water Supply Assessment law (Sections 10910 through 10915 of the California Water Code), urban water suppliers like the San Francisco Public Utilities Commission (SFPUC) must furnish a Water Supply Assessment (WSA) to the city or county that has jurisdiction to approve the environmental documentation for certain qualifying projects (as defined in Water Code Section 10912 (a)) subject to the California Environmental Quality Act (CEQA). The WSA process typically relies on information contained in a water supplier's Urban Water Management Plan (UWMP), and involves answering specific questions related to the estimated water demand of the proposed project. This memo serves as the WSA for the proposed 3333 California Street Project ("proposed project"), for use in the preparation of an environmental impact report by the City and County of San Francisco Planning Department (case no. 2015.014028ENV, San Francisco Planning Department).

### 1.1.1 2015 Urban Water Management Plan

The SFPUC's most current UWMP is the UWMP update for 2015, which was adopted in June 2016. The water demand projections in the UWMP incorporated 2012 Land Use Allocation (LUA 2012) housing and employment growth projections from the San Francisco Planning Department.

The WSA for a qualifying project within the SFPUC's retail service area may use information from the UWMP. Therefore, ***the 2015 UWMP is incorporated via references throughout this WSA shown in bold, italicized text.*** The UWMP may be accessed at www.sfwater.org/uwmp.

### 1.1.2 Basis for Requiring a WSA for the Proposed Project

The proposed project has not been the subject of a previous WSA, nor has it been part of a larger project for which a WSA was completed. The proposed project qualifies for preparation of a WSA under Water Code Section 10912(a) because it is a mixed-use residential development that includes more than 500 dwelling units. The proposed project is characterized further in Section 1.2.

Edwin M. Lee
Mayor
Anson Moran
President
Ike Kwon
Vice President
Ann Moller Caen
Commissioner
Francesca Vietor
Commissioner
Vince Courtney
Commissioner
Harlan L. Kelly, Jr.
General Manager

### 1.1.3 Conclusion of this WSA

In this WSA, the SFPUC concludes that there are adequate water supplies to serve the proposed project and cumulative retail water demands during normal years, single dry years, and multiple dry years over a 20-year planning horizon from 2020 through 2040. Additional information on supply sufficiency is provided in Section 4.2, Findings.

## *1.2 Proposed Project Description*

The Prado Group, Inc. and SKS Partners, LLC are proposing to redevelop the 10.25-acre parcel at 3333 California Street in the northwest portion of San Francisco from an office and parking use to a mix of residential, retail, commercial office, child care, and parking uses. It is currently used as the University of California San Francisco (UCSF) Laurel Heights Campus and is developed with two structures, three surface parking lots, two circular garage ramp structures, internal roadways and landscaping or landscaped open space.

Overall, the proposed project would entail the removal of approximately 376,000 gross square feet (gsf) of office uses with approximately 49,999 gsf relocated to the proposed Walnut Building. The proposed project would include 558 dwelling units within 818,247 gsf of residential floor area. The proposed project would provide 49,999 gsf of commercial office floor area; 54,967 gsf of retail floor area; and a 14,620-gsf child care center use. Up to 898 vehicle parking spaces, including ten car share spaces, would be provided in multiple garages with up to three subterranean levels totaling approximately 435,767 gsf. Additionally, the proposed project would develop approximately 53 percent of the overall lot area (approximately 236,900 square feet – excluding green roofs) with a combination of public and private open spaces including: Euclid Park, Cypress Square, Mayfair Walk, and Walnut Walk.

The project sponsor is considering a variant to the proposed project, referred to as the Mixed-Use Senior Housing Variant. This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. The approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. Overall, approximately 1,473,001 gsf of new and rehabilitated space, comprising approximately 972,167 gsf of residential floor area; approximately 47,407 gsf of ground floor retail spaces; and approximately 14,620 gsf of childcare center space would be developed under the variant. Up to 871 vehicle parking spaces, including ten car share spaces would be provided in multiple garages with up to three subterranean levels totaling approximately 438,807 gsf. Approximately 236,900 square feet of publicly accessible and private open space would be provided throughout the site. Under this variant, the footprints of the other proposed new buildings would not change.

Construction of the proposed project, or its variant, would be phased. The preliminary construction plan would include four overlapping construction phases and is subject to change. Project construction would commence in 2020 and would occur within a maximum development period of 10 years.

Further details on both the proposed project and the Mixed-Use Senior Housing Variant are provided in Attachment B. However, for the purpose of the WSA, only the Mixed-Use Senior Housing Variant is assessed for water supply as it would result in the most conservative water demand estimate and would encompass the demands estimated for the proposed project.

# 2.0 Water Supply

This section reviews San Francisco's existing and planned water supplies.

## *2.1 Regional Water System*

See ***Section 3.1 of the UWMP*** for descriptions of the Regional Water System (RWS) and ***Section 6.1 of the UWMP*** for water rights held by City and County of San Francisco and the SFPUC Water System Improvement Program (WSIP).

## *2.2 Existing Retail Supplies*

Retail water supplies from the RWS are described in ***Section 6.1 of the UWMP***.

Local groundwater supplies, including the Westside Groundwater Basin, Central Groundwater Sub Basin, and Sunol Filter Gallery Subsurface Diversions, are described in ***Section 6.2.1 of the UWMP***.

Local recycled water supplies, including the Harding Park Recycled Water Project and Pacifica Recycled Water Project, are described in ***Section 6.2.1 of the UWMP***.

## *2.3 Planned Retail Water Supply Sources*

The San Francisco Groundwater Supply Project is described in ***Section 6.2.2 of the UWMP***.

The proposed Westside and Eastside Recycled Water Projects, as well as non-potable water supplies associated with onsite water systems implemented in compliance with San Francisco's Non-potable Water Ordinance (Health Code Chapter 12C), are also described in ***Section 6.2.2 of the UWMP***.

## *2.4 Summary of Current and Future Retail Water Supplies*

A breakdown of water supply sources for meeting SFPUC retail water demand through 2040 in normal years is provided in ***Section 6.2.5 of the UWMP***.

## *2.5 Dry-Year Water Supplies*

A description of dry-year supplies developed under WSIP is provided in ***Section 7.2 of the UWMP***. Other water supply reliability projects and efforts that are currently underway or completed are described in ***Section 7.4 of the UWMP***. A breakdown of water supply sources for meeting SFPUC retail water demand through 2040 in multiple dry years are provided in ***Section 7.5 of the UWMP***. For a single dry year, the retail RWS allocation and, thus, the breakdown of water supply sources would be the same as those in a normal year.

# 3.0 Water Demand

This section reviews the climatic and demographic factors that may affect San Francisco's water use, projected retail water demands, and the demand associated with the proposed project.

## *3.1 Climate*

San Francisco has a Mediterranean climate. Summers are cool and winters are mild with infrequent rainfall. Temperatures in the San Francisco area average 57 degrees Fahrenheit annually, ranging from the mid-40s in winter to the upper 60s in late summer. Strong onshore flow of wind in summer keeps the air cool, generating fog through September. The warmest temperatures generally occur in September and October. Rainfall in the San Francisco area averages about 22 inches per year and is generally confined to the "wet" season from late October to early May. Except for

occasional light drizzles from thick marine stratus clouds, summers are nearly completely dry. A summary of the temperature and rainfall data for the City of San Francisco is included in Table 1.

**Table 1: San Francisco Climate Summary**

| Month | Average Maximum Temperature (°F) | Average Minimum Temperature (°F) | Average Monthly Rainfall (inches) |
|---|---|---|---|
| January | 58.0 | 45.7 | 4.36 |
| February | 60.3 | 47.3 | 4.41 |
| March | 61.4 | 48.1 | 2.98 |
| April | 62.3 | 49.1 | 1.38 |
| May | 63.2 | 50.9 | 0.68 |
| June | 64.8 | 52.7 | 0.18 |
| July | 65.6 | 54.3 | 0.02 |
| August | 66.6 | 55.3 | 0.06 |
| September | 68.1 | 55.0 | 0.19 |
| October | 67.8 | 53.3 | 1.04 |
| November | 61.2 | 48.1 | 2.85 |
| December | 58.3 | 45.9 | 4.33 |
| **Annual Average** | **63.3** | **50.6** | **22.45** |

Source: Western Regional Climate Center (www.wrcc.dri.edu), 1981-2010 data from two San Francisco monitoring stations (Mission Dolores/SF#047772 and Richmond/SF#047767).

### *3.2 Projected Growth*

Projections of population growth in the retail service area through 2040 are presented in ***Section 3.2.2 of the UWMP***. The corresponding LUA 2012 projections for housing and employment in San Francisco, which are incorporated into the projected retail water demands, are provided in ***Appendix E of the UWMP***.

### *3.3 Projected Retail Water Demands*

For the 2015 UWMP, the SFPUC developed a new set of models that incorporate socioeconomic factors to project retail demands through 2040. These models incorporate the latest housing and employment projections from LUA 2012. ***See Section 4.1 of the UWMP*** for tabulated retail water demand projections through 2040 and a description of the model methodology.

### *3.4 Proposed Project Water Demand*

Prado Group, Inc. and SKS Partners, LLC provided a memo describing the methods and assumptions used to estimate the water demand of the proposed project, along with the resulting demand (Attachment B). The SFPUC reviewed the memo to ensure that the methodology is appropriate for the types of proposed water uses, the assumptions are valid and thoroughly documented along with verifiable data sources, and a professional standard of care was used. The SFPUC concluded that the demand estimates are reasonable. Water demand associated with the proposed project over the 20-year planning horizon is shown in the following table.

**Table 2: Water Demand Based on Project Phasing**

| Demand of Proposed Project (mgd) | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Potable Demand | – | 0.050 | 0.053 | 0.053 | 0.053 |
| Non-potable Demand | – | 0.019 | 0.020 | 0.020 | 0.020 |
| Total Demand | – | 0.069 | 0.073 | 0.073 | 0.073 |

mgd = million gallons per day

Notes:
Construction would occur over four overlapping phases commencing in 2020 (subject to change). Phases 1 is estimated to be completed in 2022, Phase 2 in 2023, Phase 3 in 2025, and Phase 4 in 2027.

The estimates above reflect the Mixed-Use Senior Housing Variant. Water demand estimates for the proposed project are slightly lower and are provided in Attachment B.

The San Francisco Planning Department has determined that the proposed project is encompassed within the projections presented in LUA 2012 as indicated in the letter from the Planning Department to the SFPUC (Attachment A). Therefore, the demand of the proposed project is also encompassed within the San Francisco retail water demands that are presented in ***Section 4.1 of the UWMP***, which considers retail water demand based on the LUA 2012 projections. The following table shows the demand of the proposed project relative to total retail demand.

**Table 3: Proposed Project Demand Relative to Total Retail Demand**

| | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Total Retail Demand (mgd)[1] | 77.5 | 79.0 | 82.3 | 85.9 | 89.9 |
| Total Demand of Proposed Project (mgd) | – | 0.069 | 0.073 | 0.073 | 0.073 |
| Portion of Total Retail Demand[2] | – | 0.09% | 0.09% | 0.08% | 0.08% |

Notes:
1. Retail water demands per ***Table 4-1 of the UWMP***.
2. The proposed project is accounted for in the LUA 2012 projections and subsequent retail water demand projections.

# 4.0 Conclusion

## *4.1 Comparison of Projected Supply and Demand*

***Section 7.5 of the UWMP*** compares the SFPUC's retail water supplies and demands through 2040 during normal year, single dry-, and multiple dry-year periods. See Table 4, below, which is adapted from the UWMP (Table 7-4). As explained previously in Section 3.4, water demands associated with the proposed project are already captured in the retail demand projections presented in the UWMP. The proposed project is expected to represent up to 0.09 percent of the total retail water demand.

**Table 4: Projected Supply and Demand Comparison (mgd)**

| | | Normal Year | Single Dry Year[1] | Multiple Dry Years | | |
|---|---|---|---|---|---|---|
| | | | | Year 1[1] | Year 2[2] | Year 3[2] |
| 2020 | Total Retail Demand[3] | 77.5 | 77.5 | 77.5 | 77.5 | 77.5 |
| | Total Retail Supply[4] | 77.5 | 77.5 | 77.5 | 77.5 | 77.5 |
| | Surplus/(Deficit) | 0 | 0 | 0 | 0 | 0 |
| 2025 | Total Retail Demand[3] | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 |
| | Total Retail Supply[4] | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 |
| | Surplus/(Deficit) | 0 | 0 | 0 | 0 | 0 |
| 2030 | Total Retail Demand[3] | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 |
| | Total Retail Supply[4] | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 |
| | Surplus/(Deficit) | 0 | 0 | 0 | 0 | 0 |
| 2035 | Total Retail Demand[3] | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 |
| | Total Retail Supply[4] | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 |
| | Surplus/(Deficit) | 0 | 0 | 0 | 0 | 0 |
| 2040 | Total Retail Demand[3] | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 |
| | Total Retail Supply[4] | 89.9 | 89.9 | 89.9 | 88.8 | 88.8 |
| | Surplus/(Deficit) | 0 | 0 | 0 | (1.1) | (1.1) |

Notes:
1. During a single dry year and multiple dry year 1, a system-wide shortage of 10% is in effect. Under the Water Shortage Allocation Plan (WSAP), the retail supply allocation at this stage of shortage is 36.0% of available RWS supply, or 85.9 mgd. However, due to the Phased WSIP Variant, only 81 mgd of RWS supply can be delivered. RWS supply is capped at this amount.
2. During multiple dry years 2 and 3, a system-wide shortage of 20% is in effect. Under the WSAP, the retail supply allocation at this stage of shortage is 37.5% of available RWS supply, or 79.5 mgd. RWS supply is capped at this amount.
3. Total retail demands correspond to those in ***Table 4-1 of the UWMP***, and reflect both passive and active conservation, as well as water loss.
4. Total retail supplies correspond to those in ***Table 6-7 of the UWMP***. Procedures for RWS allocations and the WSAP are described in ***Section 8.3 of the UWMP***. Groundwater and recycled water are assumed to be used before RWS supplies to meet retail demand. However, if groundwater and recycled water supplies are not available, up to 81 mgd, or the corresponding capped amount in dry years, of RWS supply could be used.

The LUA 2012 projections result in a retail demand in 2035 of 85.9 mgd, which represents a 5.0 mgd, or 6 percent, increase over the 2035 demand projected in the 2010 UWMP. The ability to meet the demand of the retail customers is in large part due to development of 10 mgd of local WSIP supplies, including conservation, groundwater, and recycled water. These supplies are anticipated to be fully implemented over the next 10 to 15 years.

If planned future water supply projects (i.e., San Francisco Groundwater Supply Project, Westside Recycled Water Project, Eastside Recycled Water Project, and onsite non-potable supplies) are not implemented, normal-year supplies may not be enough to meet projected retail demands. To balance any water supply deficits during normal years, the SFPUC may import additional water from the RWS beyond the retail allocation of 81 mgd, with mitigation implemented by the SFPUC and potential environmental surcharges if RWS deliveries exceed the 265 mgd interim supply limitation.

If dry-year supply projects (i.e., Calaveras Dam Replacement Project, Lower Crystal Springs Dam Improvements Project, Alameda Creek Recapture, Regional

Groundwater Storage and Recovery Project, and water transfers) are not implemented, existing dry year supplies may not be enough to meet projected retail demands. To balance any water supply deficits during dry years, the SFPUC may reduce system deliveries and impose customer rationing.

The SFPUC remains committed to meeting the level of service goals and objectives outlined under WSIP. In addition, the SFPUC continues to explore other future supplies, including:

- Development of additional conservation and recycling.
- Development of additional groundwater supplies.
- Securing of additional water transfer volumes.
- Increasing Tuolumne River supply.

### *4.2 Findings*

Regarding the availability of water supplies to serve the proposed project beginning in 2022, the SFPUC finds, based on the entire record before it, as follows:

- During normal years, single dry years, and multiple dry years, the SFPUC has sufficient water supplies to serve the proposed project.
- With the addition of planned retail supplies, the SFPUC has sufficient water supplies available to serve its retail customers, including the demands of the proposed project, existing customers, and foreseeable future development.

Approval of this WSA by the Commission is not equivalent to approval of the development project for which the WSA is prepared. A WSA is an informational document required to be prepared for use in the City's environmental review of a project under CEQA. It assesses the adequacy of water supplies to serve the proposed project and cumulative demand.

Furthermore, this WSA is not a "will serve" letter and does not verify the adequacy of existing distribution system capacity to serve the proposed project. A "will serve" letter and/or hydraulic analysis must be requested separately from the SFPUC City Distribution Division to verify hydraulic capacity.

If there are any questions or concerns, please contact Steve Ritchie at (415) 934-5736 or SRitchie@sfwater.org.

# Attachment A –

## Communications from San Francisco Planning Department

SAN FRANCISCO
**PLANNING DEPARTMENT**

**MEMO**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

**DATE:** June 13, 2013

**TO:** SF Planning EP Planners & SFPUC Planners

**FROM:** Scott T. Edmondson, AICP; Aksel Olsen

**RE:** Project Types Represented in the Land Use Allocation

This Memorandum explains the Planning Department's Land Use Allocation (LUA) and the types of projects included in the LUA. The 2012 LUA is the most recent update and uses the Association of Bay Area Governments' (ABAG) May 2012 Jobs-Housing Connection Scenario. As this memorandum explains, the Planning Department expects that the LUA will encompass the vast majority of development proposals that project sponsors will present to the Planning Department. This memorandum also identifies possible unusual circumstances under which EP Planners and the SF PUC Planners may want to consult further with the Planning Department's Information and Analysis Group to determine whether a project is encompassed within the LUA.

**ABAG's Projections of San Francisco's Economic Growth and the LUA**

The LUA takes ABAG's 30-year projections of citywide household and job growth and allocates them to smaller geographic units, in this case, the traffic analysis zones of the SF Transportation Authority's Countywide Transportation Model. Thus, the LUA does not project growth but simply allocates ABAG's growth projections to subarea locations within the city. The current 2012 LUA uses ABAG's Jobs-Housing Connection Scenario projections for San Francisco and covers the period from 2010 to 2040; these projections were released in May 2012 and are represented in five-year increments.

ABAG derives its demographic and economic growth projections from assumptions about long-term demographic and economic growth.[1] ABAG maintains its own set of regional models and develops each forecast with its in-house experts and private economic consultants.[2] The forecasting is informed by the best information and assumptions available through federal and State agencies, such as the State Department of Finance, and private sources. However, ABAG develops its forecast based on local knowledge from over 50 years of forecasting and develops the forecast to reflect local conditions in contrast to more general forecasting assumptions of State or federal sources. ABAG's estimate of total citywide growth for the 30-year period is expected to best represent actual growth at the end of the 30-year period. However, projected growth for any portion of the projection period, such as growth in a one-year or a five-year period, would be expected to vary from actual growth in such periods. Within the 30-year growth projection period, higher than average growth periods could be followed by lower than average growth periods such that growth over the period would ultimately equal the projected 30-year

total. All projection methodologies make assumptions based on the best available information at the time. To minimize the effects of imprecision intrinsic to any projections methodology when used in for planning decisions, ABAG follows professional best practices and updates its projections every two years. Accordingly, the Planning Department updates its LUA every two years. The planning practice of frequently updating projections and plans allows the incorporation of new information over time to provide for the most up-to-date projections.

The SFPUC updates its Urban Water Management Plan (UWMP) every five years. The UWMP typically relies on LUA projections or similar information. But, because the LUA is updated every two years, the SFPUC may want to review the LUA issued within SFPUC's 5-year UWMP cycle; and if it varies in a significant way from the SFPUC's projections used in its UWMP, discuss with Planning whether it should make any changes in its own water supply needs assessment during an UWMP cycle.

**Types of Projects Included in the LUA**

The LUA translates ABAG's projected household and job growth into total expected development in San Francisco over a 30-year period. The LUA translates ABAG's household growth into residential housing units and ABAG's job growth into commercial space.[3] Thus, the LUA projections of housing units and commercial space include all project types expected from San Francisco growth, such as housing, office, retail, production-distribution-repair (PDR), visitor, and cultural-institutional-educational (CIE). The LUA does not exclude any project type or potential growth. As such, the LUA and the ABAG economic projections upon which it is based contain the best estimates available of reasonably foreseeable growth and development in San Francisco over a 30-year period.

**Unusual Circumstances**

The LUA can be considered to include all reasonably expected growth and development and it is frequently updated to correct for expected variations. Nevertheless, there are possible unusual circumstances under which the EP Planners or SFPUC Planners may want to request further Planning Department consultation with the Information and Analysis Group to determine if a particular project falls within the LUA. ABAG's projections and the Department's LUA take into account urban economic trends and based on that information capture all reasonably foreseeable growth in San Francisco. Limited capital and aggregate demand of any urban economy constrains growth. However, occasionally the reality or perception may arise that a project lies outside the normal growth constraints of the San Francisco economy for some reason, and therefore lies outside ABAG's projection's and the Department's current spatial allocation in its LUA.

One can envision the rare case of a project arising outside the City's economy (demand and capital) from an organization not located in San Francisco using nonprofit foundation funds or private donations to construct a large institutional project in San Francisco, such as a major hospital, a university, or an office complex. These projects would represent spending and demand beyond that normally active in the San Francisco economy, and therefore represent net additions to projected growth beyond that captured by ABAG's projections and reflected in the Department's LUA. Indicative characteristics of such projects

would include those with non-local sponsors, of large size, and for an institutional land use. Alternatively, very large project proposals from local project sponsors active in the SF economy involving a large site, land assembly, a planned unit development (PUDs), master plans, or area plan and rezoning proposals may warrant individual assessment for a range of reasons even though they are likely captured in ABAG's projections and the LUA. Such projects would be similar to recent projects such as Hunters Point/Candlestick, Park Merced, Treasure Island, Pier 70 Master Plan, Eastern Neighborhoods, or the Transit Center District Plan.

The bi-annual update of ABAG's projections and the LUA would be able to capture development associated with such projects. However, should such a project be proposed between updates, the EP Planners and SFPUC could treat its appearance as sufficient cause to request the Planning Department's assistance in determining whether to consider the project outside the latest LUA projections.

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[1] Please see ABAG's summary of its research and forecasting on its website: http://www.abag.ca.gov/planning/research/index.html

[2] ABAG describes its current Jobs-Housing Scenario policy-based forecast here: http://onebayarea.org/pdf/JHCS/May_2012_Jobs_Housing_Connection_Strategy_Appendices_Low_Res.pdf.

[3] The LUA citywide totals only differ slightly, up to within one percent of ABAG totals (+/-). The difference is produced by LUA's complex method of translating ABAG projections into development (residential units and commercial space) and allocating total citywide growth to subarea locations. The minor difference between the LUA and ABAG citywide totals is real in absolute terms, but not in the sense that they are different projections. The one percent difference does not constitute a difference of projections. ABAG and MTC consider variation of one percent in citywide totals, plus or minus, as sufficiently representing ABAG's projections for consistency with the MTC regional projections and modeling purposes (congestion management, etc.). Even if a few versions of the LUA must be done to make minor subarea spatial allocation corrections, as long as the LUA's citywide totals are within one percent of ABAG's projections, and ABAG's projections have not changed, the LUA citywide totals have not effectively changed either. Any of those LUA versions' citywide totals fully represent the same unchanged ABAG projection totals.

# Attachment B –

## 3333 California Street Project Demand Memo

# SAN FRANCISCO
# PLANNING DEPARTMENT

**MEMO**

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

Reception:
**415.558.6378**

Fax:
**415.558.6409**

Planning
Information:
**415.558.6377**

**DATE:** May 2, 2017

**TO:** Fan Lau, SFPUC

**FROM:** Chris Thomas, Environmental Planning

**CC:** Deborah Dwyer, Environmental Planning

**RE:** 3333 California Street Project Water Supply Assessment Request (Planning Department Case No. 2015-014028ENV)

The purpose of this memorandum is to request that the San Francisco Public Utilities Commission (SFPUC) prepare a Water Supply Assessment (WSA) for the proposed 3333 California Street mixed-use residential project, in compliance with CEQA Guidelines Section 15155 and Sections 10910 through 10915 of the California Water Code. As indicated in the attached request for a Water Supply Assessment, two projects are currently under consideration: the proposed project which includes 558 dwelling units and the Senior Housing Variant which includes a total of 744 dwelling units. As indicated, both developments would also include commercial office, retail, day care and open space components.

The project sponsor has provided project information intended to meet the requirements outlined in the SFPUC guidance memo dated September 6, 2016. The project is proposed to be constructed in four phases over a 10 year period. A summary of the project description, proposed average daily water demands, and supporting tables prepared by the project sponsor's consultant (based on the SFPUC Non-Potable Water Calculator Version 5.3), are attached. Non-Potable Water Calculator spreadsheets for both the proposed project and the Senior Housing Variant are also attached.

Should you have questions or need additional information from the Planning Department or the project sponsor, please contact me at 415-575-9036 or christopher.thomas@sfgov.org.

Updated April 28, 2017

Chris Thomas
SFPUC: Water Resources Division
Non-Potable Program
525 Golden Gate Ave, 10th Floor
San Francisco, CA 94102
christopher.thomas@sfgov.org
Phone: 415-575-9036

*Via Email*

Re: 3333 California Street
**Case File No. 2015.014028ENV**

Water Supply Assessment

Dear Mr. Thomas,

The proposed redevelopment project at 3333 California Street (Block 1032 and Lot 003) is currently undergoing Environmental Review (Environmental Planner Debra Dwyer). We appreciate your review of the attached submission to ensure that the SFPUC has the necessary supporting documentation for the WSA, and it is in the proper format. We have revised the information herein based on Fan Lau's initial comments.

## PROJECT DESCRIPTION

The Proposed Project would redevelop the 10.25-acre parcel at 3333 California Street in the northwest portion of San Francisco from an office and parking use to a mix of residential, retail, commercial office, child care, and parking uses. It is currently used as the University of California San Francisco (UCSF) Laurel Heights Campus and is developed with two structures, three surface parking lots, two circular garage ramp structures, internal roadways and landscaping or landscaped open space.

The Proposed Project would entail the demolition of the existing one-story annex building at the corner of California and Laurel Streets (northwest corner of the site), the demolition of the existing surface parking lots and circular garage ramp structures, and the partial demolition (approximately 49 percent) of the existing office building located at the center of the project site. The remaining portion of the existing office building would be divided into two separate residential buildings, Center Building A and Center Building B, with a two-story addition atop Center Building A and a two- to three-story addition above Center Building

B. The Proposed Project would also include the construction of 13 new buildings along the California Street, Masonic Avenue, Euclid Avenue, and Laurel Street edges:

- Two (2) four- to five-story mixed use residential buildings with ground floor retail along California Street between Laurel and Walnut Streets (the Plaza A and Plaza B Buildings);
- One (1) three-story mixed use (ground floor retail and child care) with commercial office building along California Street east of Walnut Street (the Walnut Building);
- Two (2) four- to six-story mixed use buildings along Masonic and Euclid Avenues (the Masonic and Euclid Buildings);
- Seven (7) three- to four-story townhomes along Laurel Street (the Laurel Duplexes); and
- One (1) four-story residential building near the Laurel Street and Mayfair Drive intersection (the Mayfair Building).

Overall, the Proposed Project would entail the removal of approximately 376,000 gross square feet of office uses with approximately 49,999 gsf relocated to the proposed Walnut Building. Table 1 provides a summary of the proposed changes.[1] As noted below, the Proposed Project would include 558 dwelling units within 818,247 gross square feet of residential floor area. The Proposed Project would provide 49,999 gross square feet of commercial office floor area; 54,967 gross square feet of retail floor area; and a 14,620-gross-square-foot child care center use. Up to 898 vehicle parking spaces, including ten car share spaces, would be provided in multiple garages with up to three subterranean levels totaling approximately 435,767 gsf. Estimated occupancy totals for the proposed uses were calculated using the occupant density defaults from the SFPUC Nonpotable Calculator Spreadsheet, with the exception of Phase 1 and 2 residential, which was estimated at 2.25 people/unit rather than the default value of 2.01 people/unit based on unit type mix. The total estimated occupancy counts are shown in Table 3. Additionally, the Proposed Project would develop approximately 53 percent of the overall lot area (approximately 236,900 square feet – excluding green roofs) with a combination of public and private open spaces including: Euclid Park, Cypress Square, Mayfair Walk, and Walnut Walk. The Proposed Project would also widen the adjacent sidewalks to meet the requirements of the *Better Streets Plan* and include other improvements as part of a series of proposed streetscape changes.

**Table 1: Project Summary**

| Project Features | Existing | Existing to Be Retained | New Construction | Proposed Totals |
|---|---|---|---|---|
| Dwelling Units | -- | -- | 558 | **558** |
| Number of Buildings | 2 | 1 | 13 | **14** |
| Open Space | Yes | -- | 236,900 square feet | **236,900 square feet** |
| Parking Spaces | 543 [a] | 543 | 355 | **898** |
| Loading Spaces | 5 | -- | 6 | **6** |
| Bicycle Spaces | 15 | -- | 659 | **659** |

[1] Square footages presented are approximate.

| Existing Use | Existing Gross Square Footage | Existing Uses to Be Retained (gsf) | New Construction / Additions (gsf) | Proposed Project Totals (gsf) |
|---|---|---|---|---|
| Office | | | | |
| Office to Residential | 376,000 [b] | 205,356 [c] | 612,891 [d] | **818,247** |
| Office to Office | | -- | 49,999 [e] | **49,999** |
| Retail | -- | -- | 54,967 [f] | **54,967** |
| Child Care | -- | -- | 14,620 [g] | **14,620** |
| Structured Parking [h] | 93,000 | 93,000 | 342,767 | **435,767** |
| ***Total gsf*** | ***469,000*** | ***298,356*** | ***1,075,244*** | ***1,373,600*** |

*Notes*:

[a] Surface (331) and garage (212) parking spaces.

[b] Total includes 349,500 gsf of office uses in the existing office building (Floors 1 through 4 and Basement Level 1), 12,500 gsf of non-office uses (storage areas) on Basement Levels 1 through 3 of the existing office building, and the 14,000-gsf annex building.

[c] Existing office building would be retained and adaptively reused as two separate residential buildings, and the annex building would be demolished.

[d] Includes the additions to the adaptively reused office building and new residential uses along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street.

[e] Existing office uses would be relocated to the proposed Walnut Building.

[f] New retail uses would be developed at the ground floor of the proposed Plaza A, Plaza B, Walnut, and Euclid Buildings.

[g] New child care uses would be developed in the proposed Walnut Building.

[h] The existing three-level, partially below-grade parking garage under the eastern portion of the existing office building would be reconstructed as part of the proposed California Street Garage under the proposed Plaza A, Plaza B, and Walnut Buildings as well as the adaptively-reused Center Building B. New below-grade parking would be developed under the proposed Masonic and Euclid Buildings, the proposed Laurel Duplexes, and the proposed Mayfair Building.

**Table 2: Project Unit Types**

| PROJECT TOTALS | Building | JR | 1-BED | 2-BED | 3-BED | 4-BED or PH | TOTAL |
|---|---|---|---|---|---|---|---|
| | Plaza A | 18 | 22 | 23 | 4 | 0 | 67 |
| | Plaza B | 9 | 21 | 25 | 6 | 0 | 61 |
| | Walnut | 0 | 0 | 0 | 0 | 0 | 0 |
| | Center Bldg A | 0 | 24 | 11 | 10 | 6 | 51 |
| | Center Bldg B | 0 | 49 | 51 | 30 | 9 | 139 |
| | Masonic | 0 | 27 | 24 | 10 | 0 | 61 |
| | Euclid | 0 | 50 | 52 | 33 | 0 | 135 |
| | Laurel Duplexes | 0 | 0 | 2 | 0 | 12 | 14 |
| | Mayfair | 0 | 13 | 8 | 9 | 0 | 30 |
| | **Total** | **27** | **206** | **196** | **102** | **27** | **558** |
| | | *5%* | *37%* | *35%* | *18%* | *5%* | *100%* |

**Table 3: Proposed Project Estimated Occupancies**

| | Estimated Residents | Estimated Nonresidential FTE Occupancy (including visitors) | Total |
|---|---|---|---|
| **Phase 1 (est 2022)** | 441 | 41 | 482 |
| **Phase 2 (est 2023)** | 428 | 0 | 428 |
| **Phase 3 (est 2025)** | 257 | 878 | 1,135 |
| **Phase 4 (est 2027)** | 88 | 0 | 88 |
| **Full Buildout** | 1,214 | 918 | 2,133 |

## PROJECT DESCRIPTION: MIXED USE SENIOR HOUSING VARIANT

The project sponsor is considering a variant to the Proposed Project, referred to as the Mixed-Use Senior Housing Variant ("variant"). This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the Proposed Project. Under this variant, the approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. In this variant, the Walnut Building would be comprised of 153,920 gsf of residential use, 18,800 gsf of retail use, 180,800 gsf of below grade garage and retain the 14,620 gsf of childcare use. The total Walnut Building in the variant would be 368,140 gsf.

Overall, approximately 1,473,001 gsf of new and rehabilitated space, comprising approximately 972,167 gsf of residential floor area; approximately 47,407 gsf of ground floor retail spaces; and approximately 14,620 gsf of childcare center space would be developed under the Mixed-Use Senior Housing Variant. Up to 871 vehicle parking spaces, including ten car share spaces would be provided in multiple garages with up to three subterranean levels totaling approximately 438,807 gsf. Approximately 236,900 square feet of publicly accessible and private open space would be provided throughout the site. Under this variant the footprints of the other proposed new buildings would not change.

**Table 4: Variant Project Summary**

| VARIANT AREAS | Bldg | Residential Gross SF | Retail Gross SF | Commercial Gross SF | Childcare Gross SF | Garage Gross SF | TOTAL GSF |
|---|---|---|---|---|---|---|---|
| | Plaza A | 66,025 | 12,470 | 0 | 0 | 60,060 | 138,555 |
| | Plaza B | 72,220 | 11,850 | 0 | 0 | 67,820 | 151,890 |
| | Walnut | 153,920 | 18,800 | 0 | 14,620 | 180,800 | 368,140 |
| | Center Bldg A | 89,465 | 0 | 0 | 0 | 0 | 89,465 |
| | Center Bldg B | 230,928 | 0 | 0 | 0 | 23,227 | 254,155 |
| | Masonic | 87,168 | 0 | 0 | 0 | 35,986 | 123,154 |
| | Euclid | 178,847 | 4,287 | 0 | 0 | 51,991 | 235,125 |
| | Laurel Duplexes | 49,974 | 0 | 0 | 0 | 3,720 | 53,694 |
| | Mayfair | 43,620 | 0 | 0 | 0 | 15,203 | 58,823 |
| | **Total** | **972,167** | **47,407** | **0** | **14,620** | **438,807** | **1,473,001** |

**Table 5: Variant Project Unit Types**

| VARIANT UNITS | | | | | | |
|---|---|---|---|---|---|---|
| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED | TOTAL |
| Plaza A | 18 | 22 | 23 | 4 | 0 | 67 |
| Plaza B | 9 | 21 | 25 | 6 | 0 | 61 |
| Walnut | 0 | 185 | 1 | 0 | 0 | 186 |
| Center Bldg A | 0 | 24 | 11 | 10 | 6 | 51 |
| Center Bldg B | 0 | 49 | 51 | 30 | 9 | 139 |
| Masonic | 0 | 27 | 24 | 10 | 0 | 61 |
| Euclid | 0 | 50 | 52 | 33 | 0 | 135 |
| Laurel Duplexes | 0 | 0 | 2 | 0 | 12 | 14 |
| Mayfair | 0 | 13 | 8 | 9 | 0 | 30 |
| **Total** | **27** | **391** | **197** | **102** | **27** | **744** |

**Table 6: Variant Estimated Occupancies**

| | Estimated Residents | Estimated Nonresidential FTE Occupancy (including visitors) | Total |
|---|---|---|---|
| **Phase 1 (est 2022)** | 441 | 41 | 482 |
| **Phase 2 (est 2023)** | 428 | 0 | 428 |
| **Phase 3 (est 2025)** | 631 | 599 | 1230 |
| **Phase 4 (est 2027)** | 88 | 0 | 88 |
| **Full Buildout** | 1,588 | 640 | 2228 |

## PROPOSED INTEGRATED WATER MANAGEMENT APPROACH

The proposed water management approach would be applicable to both the Proposed Project and its variant and is briefly described below. The Proposed Project and its variant would comply with the requirements of City and County of San Francisco ordinances related to water conservation and resources, as applicable, including the San Francisco Green Building Ordinance, the Stormwater Management Ordinance, and the Alternate Water Supplies/Reuse Ordinance, as well as the Water Efficient Irrigation, Residential Water Conservation, and Commercial Water Conservation Ordinances.

*Water Conservation*

The project site is served by San Francisco's water supply system. To reduce the use of potable water on a per-unit basis, the Proposed Project would provide high-efficiency fixtures and appliances in new and existing buildings. Water wise landscaping will be employed. Nonpotable demands are intended to be met by collected rainwater and greywater treated onsite. The garage is assumed to be washed down quarterly with water-efficient waterbrooms or equivalent. The site is projected to use about 1/3 less water than a comparable development that meets the stringent CALGreen Code.

*Stormwater and Wastewater*

The project site is served by San Francisco's combined sewer system and is subject to the City's stormwater management requirements. The Proposed Project would reduce loading on the neighborhood stormwater infrastructure by collecting rainwater for reuse. These strategies combined with a site plan targeting over 50 percent planted area, including living roofs, should result in stormwater runoff reductions beyond the 25 percent required by the Stormwater Management Ordinance. No new or enlarged off-site wastewater collection facilities are proposed.

*Water + Ecology*

A site of this size has the potential to enhance the ecological assets of the neighborhood and city. The Proposed Project would preserve several major trees and greatly increase the total number of trees on the project site and the adjacent sidewalks (replacing over 200 trees including 17 street trees). The proposed landscaping plans would choose native and adapted trees and plants that reduce irrigation demands while managing stormwater.

## PROPOSED CONSTRUCTION SCHEDULING AND PHASING

It is the intent of the project sponsor to phase the construction of the Proposed Project or its variant. The preliminary construction plan would include four overlapping construction phases and is subject to change. Project construction would commence in 2020 and would occur within a maximum development period of 10 years as follows:

Phase 1: Masonic and Euclid Buildings

- Duration: 30 month
- Phase would include the demolition of the existing annex building and the construction of 266,015 gsf of residential uses (196 units), 4,287 gsf of retail uses, and 87,977 gsf of garage space totaling 358,279 gsf of new construction.
- Includes Walnut Walk South and eastern portion of Euclid Park (private) and related adjacent public right of way improvements.

Phase 2: Center Buildings A and B (existing office building)

- Duration: 24 months; anticipated to commence on Month 20 of Phase 1
- Phase would include the partial demolition of the existing office building and the construction of 320,393 gsf of residential uses (190 units) and 23,227 gsf of garage space totaling 343,620 gsf of construction.
- Parking for these buildings would be programmed below Center Building B, and in the Masonic/Euclid and California Street Garages. Project sponsor plans to use valet strategies within the constructed garages or within available area on the site should the California Street Garage parking not be available at the time of occupancy.

Phase 3: California Street Buildings (Plaza A, Plaza B, and Walnut Buildings)

- Duration: 36 months; anticipated to commence on Month 15 of Phase 2

- Phase would include the construction of 138,245 gsf of residential uses (128 units), 50,680 gsf of retail uses, 49,999 gsf of office uses, 14,620 gsf of childcare space, and 305,640 gsf of garage space totaling 559,184 gsf of new construction.
- Includes Walnut Walk North, Mayfair Walk, Presidio Overlook, Pine Plaza and related adjacent public right of way improvements.

Phase 4: Mayfair Building and Laurel Duplexes

- Duration: 20 months; anticipated to commence on Month 30 of Phase 3
- Phase would include the construction of 93,594 gsf of residential uses (44 units) and 18,923 gsf of garage space totaling 112,517 gsf of new construction.
- Includes western part of Euclid Park (public) and related adjacent public right of way improvements.

The preliminary construction phasing plan would also be applicable to the variant with the exception of Phase 3. Under the variant, Phase 3 would include the development of 153,920 gsf of residential uses (186 units of senior housing), substituting for 49,999 gsf of commercial office space in the Walnut Building and 7,560 gsf of retail space in the Plaza A, Plaza B, and Walnut Buildings. Under the variant, Phase 3 garage space would increase by 3,040 gsf (from 305,640 gsf for the Proposed Project to 308,680 gsf).

## WATER USE ESTIMATES

The following tables summarize the potable and nonpotable water demand estimates for the Proposed Project and the Mixed-Use Senior Housing Variant and are based off the proposed uses and the preliminary construction phasing program. These estimates are preliminary and may be refined at a later time as project designs progress. The estimates include better than code average fixture flowrates (though are conservative in that they do not take the very lowest flowrate available in all cases), and include the maximum potential living roof area contemplated as a conservative case from a water supply perspective (more irrigation, less capturable rainwater). Targeted rainwater and greywater reuse would offset about 30% of the projected use according to the SFPUC calculator tool (see Attachment A for the Proposed Project and Attachment B for the Variant). The portion of nonpotable demands anticipated to be met onsite are broken out separately from potable demand in the below estimates. Estimated water demands for the garage are not large enough to alter the significant figures in the mgd totals below.

Dry year estimates assume that irrigation and hand-watering demands increase, and do not account for additional dry year conservation by residents, though that would most likely occur (and be encouraged). Estimates by year follow calculator estimates for phases complete at the end of each shown calendar year, so the 2025 estimate includes Phases 1-3, and the 2030 and later estimates include full buildout.

### *Existing Usage*

Site water use data provided to the project team from 2012-2014 indicate that existing usage tends to average about 20,000 gpd (0.02 mgd), with peak months averaging around 26,000 gpd (0.026 mgd). It is possible that this data set does not include 100% of the current site water demands, but we believe it does.

*Proposed Project*

**Table 7: Proposed Project Estimated Total Water Demand Based on Water Year Type**

| | Normal | Single dry | Multiple 2 | Multiple 3 | Multiple 4 |
|---|---|---|---|---|---|
| Total to be met with potable water (mgd) | 0.0413 | 0.0415 | 0.0417 | 0.0417 | 0.0417 |
| Total to be met with onsite non-potable water (mgd) | 0.0183 | 0.0195 | 0.0203 | 0.0204 | 0.0204 |
| Total estimated demand of proposed project (mgd) | 0.0596 | 0.0610 | 0.0619 | 0.0621 | 0.0621 |

**Table 8: Proposed Project Estimated Total Water Demand Based on Project Phasing**

| Usage at End of Year | 2015 | 2020 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|
| Total to be met with potable water (mgd) | 0 | 0 | 0.0385 | 0.0413 | 0.0413 |
| Total to be met with onsite non-potable water (mgd) | 0 | 0 | 0.0178 | 0.0183 | 0.0183 |
| Total estimated demand of proposed project (mgd) | 0 | 0 | 0.0562 | 0.0596 | 0.0596 |

*Mixed Use Senior Housing Variant*

**Table 9: Variant Estimated Total Water Demand Based on Water Year Type**

| | Normal | Single dry | Multiple 2 | Multiple 3 | Multiple 4 |
|---|---|---|---|---|---|
| Total to be met with potable water (mgd) | 0.0531 | 0.0533 | 0.0535 | 0.0535 | 0.0535 |
| Total to be met with onsite non-potable water (mgd) | 0.0199 | 0.0211 | 0.0218 | 0.0219 | 0.0219 |
| Total estimated demand of Variant (mgd) | 0.0729 | 0.0744 | 0.0753 | 0.0755 | 0.0755 |

**Table 10: Variant Estimated Total Water Demand Based on Project Phasing**

| Usage at End of Year | 2015 | 2020 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|
| Total to be met with potable water (mgd) | 0 | 0 | 0.0502 | 0.0531 | 0.0531 |
| Total to be met with onsite non-potable water (mgd) | 0 | 0 | 0.0193 | 0.0199 | 0.0199 |
| Total estimated demand of Variant (mgd) | 0 | 0 | 0.0695 | 0.0729 | 0.0729 |

If you have any questions, please feel free to reach out directly to me at 415-857-9324 or dbragg@pradogroup.com.

Best Regards,

Don Bragg
Development Director, Prado Group Inc.

Attachments: Alternate Water Supply Project Compliance: Project (3 pgs.)
Alternate Water Supply Project Compliance: Variant (3 pgs.)

cc: Debra Dwyer and Jessica Range, SF Planning Department
Peter Mye, SWCA

# NON-POTABLE WATER CALCULATOR

## Project Summary Sheet

**Project Contact:** Don Bragg
415.395.0880
dbragg@pradogroup.com

Estimated Site/Building Permit Issuance Date: 12/31/2019

**Total Gross Square Footage:** 937,833

### 1. Demands and Supplies Summary

| | | |
|---|---|---|
| **Demands Met by Non-Potable Supply for Project (gpy):** | **6,675,500** | Project is 250,000 square feet in size or greater and is not elegible for a grant |
| **Demands Met by Non-Potable Supply for Project *:** | **31%** | Achieving estimated offset may require storage to store excess monthly supplies. |
| **Project Total Annual Water Demand (gpy) *:** | **21,763,290** | |
| **If Grant Offset Criteria Met, Occurs in Year:** | **2027** | |

*Note: Estimates based on Tab 6 - Building Potential Summary total water demand values. Manually entered non-potable demands that exceed auto-calculated non-potable demands from Tab 6 may result in Total Annual Water demands greater than the value used in this analysis

### 2. Building Information Summary

| | Main Project Site 1 | Site 2 | Site 3 |
|---|---|---|---|
| **Project / Building Name:** | **3333 California** | **3333 California Phase 2** | **3333 California Phases 3+4** |
| **Project Address:** | 3333 California St, SanFrancisco, CA | 3333 California St, SanFrancisco, CA | 3333 California St, SanFrancisco, CA |
| **Assessor's Block & Lot No. / APN:** | 1032/003 | 1032/003 | 1032/003 |
| **Year Online:** | 2027 | 2027 | 2027 |
| **Building Type:** | Mixres | Resident | Mixres |
| **Total Building Size (gross square footage or GSF):** | 270,302 | 320,393 | 347,138 |
| **Total Lot Size ($ft^2$):** | 178,587 | 89,294 | 178,588 |
| **Number of Residential Units:** | 196 | 190 | 172 |
| **Impervious Surface Above Grade ($ft^2$):** | 13,000 | 22,500 | 30,688 |
| **Impervious Surface Below Grade ($ft^2$):** | 59,225 | 35,535 | 142,140 |
| **Landscaped Area ($ft^2$):** | 64,175 | 20,545 | 118,092 |
| **Site Location (Zone):** | Eastern SF | Eastern SF | Eastern SF |

### 3. Summary of Nonpotable Demands and Supplies for the Project

Non-Potable Water Supply Estimates

| On-site Alternate Water Source Supplies | Annual Supply (gpy) | Annual Supply (gpy) | Annual Supply (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Rainwater:** | 155,119 | 208,329 | 268,584 | **632,032** |
| **Stormwater:** | 0 | 0 | 0 | **0** |
| **Graywater:** | 2,658,821 | 2,576,117 | 2,119,487 | **7,354,425** |
| **Blackwater:** | 0 | 0 | 0 | **0** |
| **Foundation Drainage** | 0 | 0 | 0 | **0** |
| **Cooling & Other Supplies** | 0 | 0 | 0 | **0** |
| **TOTAL:** | **2,813,940** | **2,784,445** | **2,388,071** | **7,986,456** |

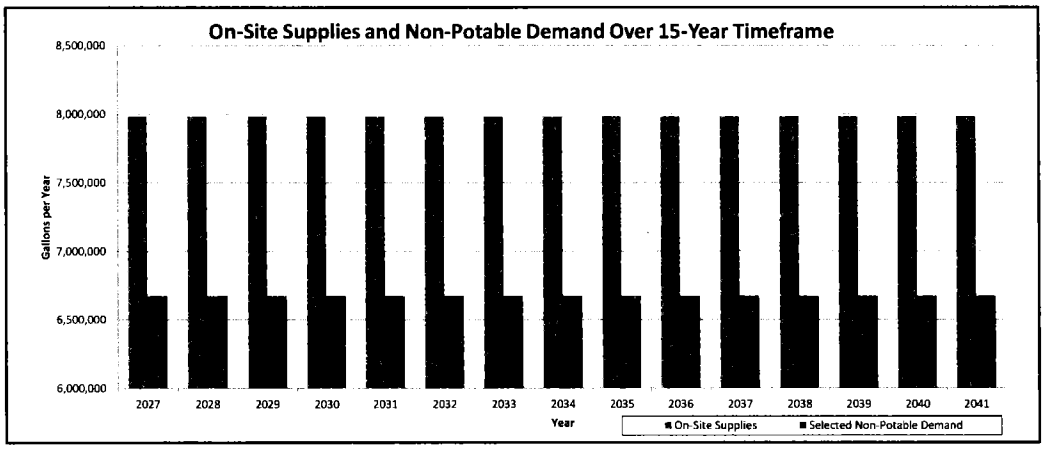
Non-Potable Applications Estimates

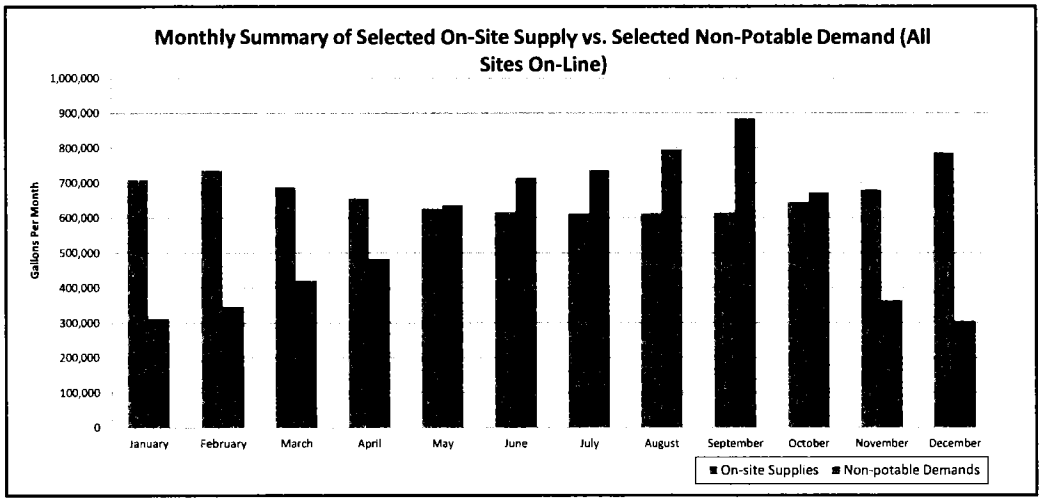
| Project Specific Non-Potable Application Demands | Annual Demand (gpy) | Annual Demand (gpy) | Annual Demand (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Toilets/Urinals:** | 993,131 | 948,708 | 1,113,115 | **3,054,954** |
| **Irrigation:** | 527,048 | 165,008 | 933,479 | **1,625,535** |
| **Toilets/Urinals + Irrigation:** | 1,520,179 | 1,113,716 | 2,046,594 | **4,680,489** |
| **Cooling Tower:** | 498,750 | 698,250 | 798,000 | **1,995,000** |
| **Commercial Laundry & Other** | 0 | 0 | 0 | **0** |
| **Total:** | **2,018,929** | **1,811,966** | **2,844,594** | **6,675,489** |

***4. Project Phasing***

| 15-Year Timeframe | SITE 1: 3333 California – 3333 California St, SanFrancisco, CA | | SITE 2: 3333 California Phase 2 – 3333 California St, SanFrancisco, CA | | SITE 3: 3333 California Phases 3+4 – 3333 California St, SanFrancisco, CA | | |
|---|---|---|---|---|---|---|---|
| | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | Re-Used Non-Potable Supplies (gpy) |
| 2027 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2028 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2029 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2030 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2031 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2032 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2033 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2034 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2035 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2036 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2037 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2038 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2039 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2040 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |
| 2041 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 2,388,071 | 2,844,594 | 6,675,489 |

This offset analysis assumes the full year of supplies is available to offset non-potable demands. Some scenarios may require storage to store excess supplies from one month in order to use those supplies in another month with unmet demands.



# NON-POTABLE WATER CALCULATOR

## Project Summary Sheet

**Project Contact:** Don Bragg
415 395 0880
dbragg@pradogroup.com

Estimated Site/Building Permit Issuance Date: 12/31/2019

**Total Gross Square Footage:** 1,034,194

### 1. Demands and Supplies Summary

| | | |
|---|---|---|
| **Demands Met by Non-Potable Supply for Project (gpy):** | 7,249,500 | Project is 250,000 square feet in size or greater and is not elegible for a grant |
| **Demands Met by Non-Potable Supply for Project*:** | 27% | Achieving estimated offset may require storage to store excess monthly supplies. |
| **Project Total Annual Water Demand (gpy)*:** | 26,617,083 | |
| **If Grant Offset Criteria Met, Occurs in Year:** | 2027 | |

*Note: Estimates based on Tab 6 - Building Potential Summary total water demand values. Manually entered non-potable demands that exceed auto-calculated non-potable demands from Tab 6 may result in Total Annual Water demands greater than the value used in this analysis

### 2. Building Information Summary

| | Main Project Site 1 | Site 2 | Site 3 |
|---|---|---|---|
| **Project / Building Name:** | 3333 California | 3333 California Phase 2 | 3333 California Phases 3+4 |
| **Project Address:** | 3333 California St, SanFrancisco, CA | 3333 California St, SanFrancisco, CA | 3333 California St, SanFrancisco, CA |
| **Assessor's Block & Lot No. / APN:** | 1032/003 | 1032/003 | 1032/003 |
| **Year Online:** | 2027 | 2027 | 2027 |
| **Building Type:** | Mixres | Resident | Mixres |
| **Total Building Size (gross square footage or GSF):** | 270,302 | 320,393 | 443,499 |
| **Total Lot Size ($ft^2$):** | 178,587 | 89,294 | 178,588 |
| **Number of Residential Units:** | 196 | 190 | 358 |
| **Impervious Surface Above Grade ($ft^2$):** | 13,000 | 22,500 | 30,688 |
| **Impervious Surface Below Grade ($ft^2$):** | 59,225 | 35,535 | 142,140 |
| **Landscaped Area ($ft^2$):** | 64,175 | 20,545 | 118,092 |
| **Site Location (Zone):** | Eastern SF | Eastern SF | Eastern SF |

### 3. Summary of Nonpotable Demands and Supplies for the Project

Non-Potable Water Supply Estimates

| On-site Alternate Water Source Supplies | Annual Supply (gpy) | Annual Supply (gpy) | Annual Supply (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Rainwater:** | 155,119 | 208,329 | 303,836 | **667,284** |
| **Stormwater:** | 0 | 0 | 0 | **0** |
| **Graywater:** | 2,658,821 | 2,576,117 | 4,353,731 | **9,588,669** |
| **Blackwater:** | 0 | 0 | 0 | **0** |
| **Foundation Drainage** | 0 | 0 | 0 | **0** |
| **Cooling & Other Supplies** | 0 | 0 | 0 | **0** |
| **TOTAL:** | **2,813,940** | **2,784,445** | **4,657,567** | **10,255,953** |

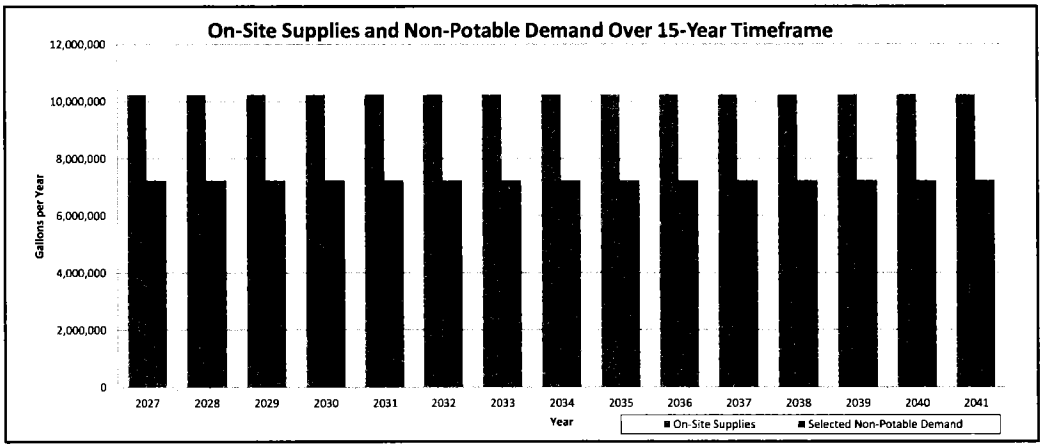
Non-Potable Applications Estimates

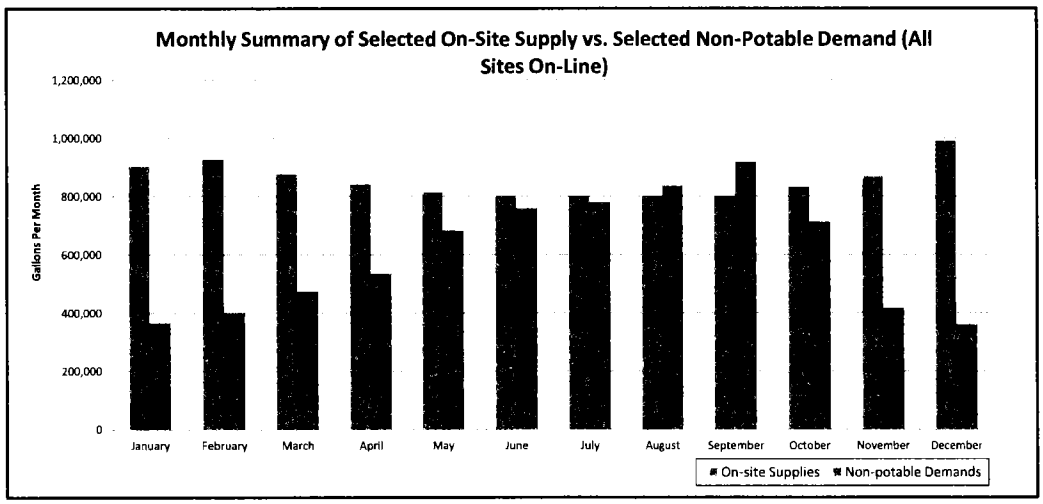
| Project Specific Non-Potable Application Demands | Annual Demand (gpy) | Annual Demand (gpy) | Annual Demand (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Toilets/Urinals:** | 993,131 | 948,708 | 1,786,795 | **3,728,634** |
| **Irrigation:** | 527,048 | 165,008 | 933,479 | **1,625,535** |
| **Toilets/Urinals + Irrigation:** | 1,520,179 | 1,113,716 | 2,720,274 | **5,354,169** |
| **Cooling Tower:** | 498,750 | 698,250 | 698,250 | **1,895,250** |
| **Commercial Laundry & Other** | 0 | 0 | 0 | **0** |
| **Total:** | **2,018,929** | **1,811,966** | **3,418,524** | **7,249,419** |

***4. Project Phasing***

| 15-Year Timeframe | SITE 1: 3333 California – 3333 California St, SanFrancisco, CA | | SITE 2: 3333 California Phase 2 – 3333 California St, SanFrancisco, CA | | SITE 3: 3333 California Phases 3+4 – 3333 California St, SanFrancisco, CA | | |
|---|---|---|---|---|---|---|---|
| | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | Re-Used Non-Potable Supplies (gpy) |
| 2027 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2028 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2029 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2030 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2031 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2032 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2033 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2034 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2035 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2036 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2037 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2038 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2039 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2040 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |
| 2041 | 2,813,940 | 2,018,929 | 2,784,445 | 1,811,966 | 4,657,567 | 3,418,524 | 7,249,419 |

This offset analysis assumes the full year of supplies is available to offset non-potable demands. Some scenarios may require storage to store excess supplies from one month in order to use those supplies in another month with unmet demands.



# APPENDIX 1
# RAMBOLL SUPPORTING TABLES

**Table Con-1. Construction Phase Duration by Year**
**3333 California St AB900**
**San Francisco, CA**

| Phase | Phase Name | Start Date | End Date | Total number of work days | Construction phase duration by year[1,2] | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | Masonic/Euclid | 3/2/2020 | 8/19/2022 | 645 | 34% | 41% | 26% | -- | -- | -- | -- | -- |
| 2 | Center Building A/B | 9/10/2021 | 8/31/2023 | 515 | -- | 16% | 51% | 34% | -- | -- | -- | -- |
| 3 | Plaza A/Plaza B/ Walnut | 12/4/2022 | 11/18/2025 | 773 | -- | -- | 3% | 34% | 34% | 30% | -- | -- |
| 4 | Mayfair/Townhouse/Euclid Park | 5/22/2025 | 1/12/2027 | 429 | -- | -- | -- | -- | -- | 37% | 61% | 2% |
| | | | **TOTAL** | **2,362** | | | | | | | | |

**Notes:**

[1] Construction duration per year is calculated as construction duration of phase in a year/total construction duration.

[2] Total percentages in the table may not add up to 100% due to rounding.

I-FRISBIER2

Ramboll

**Table Con-2. Project Off-Road Diesel Construction Equipment List**
**3333 California Street**
**San Francisco, California**

| Subphase[1] | Equipment Type | Number | Hours/day | Horsepower | Load Factor | Phase |
|---|---|---|---|---|---|---|
| Exterior | Aerial Lifts | 2 | 8 | 63 | 0.31 | All |
| Demolition | Air Compressors | 2 | 5 | 78 | 0.48 | All |
| Excavation | Crawler Tractors with Rippers | 1 | 8 | 208 | 0.43 | All |
| Excavation | Excavators | 2 | 8 | 163 | 0.38 | All |
| Excavation | Excavators with Hoe Ram | 2 | 8 | 163 | 0.38 | All |
| Exterior | Forklifts | 1 | 8 | 89 | 0.20 | All |
| Exterior | Pavers | 1 | 8 | 126 | 0.42 | Street Paving[1] |
| Exterior | Paving Equipment | 1 | 8 | 131 | 0.36 | Street Paving[1] |
| Structure | Pumps | 1 | 8 | 84 | 0.74 | Pouring Days[2] |
| Exterior | Rollers | 1 | 6 | 81 | 0.38 | Street Paving[1] |
| All | Rough Terrain Forklifts | 2 | 8 | 100 | 0.40 | All |
| Demolition | Skid Steer Loaders (Bobcat) | 1 | 8 | 65 | 0.37 | All |
| All | Sweepers/Scrubbers | 1 | 3 | 64 | 0.46 | All |
| Excavation | Tractors/Loaders/Backhoes | 2 | 8 | 98 | 0.37 | All |

**Notes:**

1. Street paving occurs for one day at the completion of each construction phase.
2. There will be approximately 50 pouring days during Phase 1, 15 pouring days during Phase 2, 70 pouring days during Phase 3, and 12 pouring days during Phase 4.

I-FRISBIER2

**Table Con-3. Construction Offroad and Onroad GHG Emissions**
**3333 California St AB900**
**San Francisco, CA**

| Emission Source | Phase | Total $CO_2e$ Emissions (MT) | $CO_2e$ Emissions by Year[1] | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| Offroad Diesel Equipment[2] | 1 | 512 | 173 | 207 | 131 | -- | -- | -- | -- | -- |
| | 2 | 259 | -- | 41 | 131 | 87 | -- | -- | -- | -- |
| | 3 | 573 | -- | -- | 15 | 194 | 194 | 170 | -- | -- |
| | 4 | 122 | -- | -- | -- | -- | -- | 46 | 74 | 2 |
| Onroad Trucks and Vehicles[3] | 1 | 763 | 259 | 309 | 195 | -- | -- | -- | -- | -- |
| | 2 | 58 | -- | 9 | 29 | 19 | -- | -- | -- | -- |
| | 3 | 745 | -- | -- | 19 | 252 | 252 | 221 | -- | -- |
| | 4 | 152 | -- | -- | -- | -- | -- | 57 | 92 | 3 |
| **Total** | All | 3,182 | 432 | 567 | 520 | 552 | 447 | 494 | 167 | 5 |

**Notes:**

[1] Yearly emissions split by fraction of phase in each year.

[2] Emissions are calculated based on default CalEEMod® off-road construction equipment tiers for each piece of equipment in the emissions year modeled. A construction equipment list and hours of operation for each piece of equipment for each phase were provided by the Project Sponsor.

[3] Total number of hauling, concrete, and delivery trips and trip distances are discussed in Table Con-5.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric ton

**Table Con-4. Electricity Usage and Emissions from Construction Electric Equipment**
**3333 California St AB900**
**San Francisco, California**

**Electricity Usage[1]**

| | | |
|---|---|---|
| Total Electricity Usage | 7,169,549 | kWh |

| Phase | Number of Days | Electric Equipment Usage (kWh) | Usage by Year[2] (kWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 645 | 1,957,815 | 663,482 | 794,003 | 500,331 | -- | -- | -- | -- | -- |
| 2 | 515 | 1,563,217 | -- | 245,338 | 792,464 | 525,414 | -- | -- | -- | -- |
| 3 | 773 | 2,346,343 | -- | -- | 60,831 | 792,977 | 795,149 | 697,385 | -- | -- |
| 4 | 429 | 1,302,175 | -- | -- | -- | -- | -- | 486,145 | 792,156 | 23,873 |
| Total | 2,362 | 7,169,549 | 663,482 | 1,039,341 | 1,353,626 | 1,318,391 | 795,149 | 1,183,530 | 792,156 | 23,873 |

| Phase | $CO_2e$ Intensity Factor by Year[3] (lb $CO_2e$/MWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| All | 363 | 354 | 345 | 335 | 326 | 317 | 308 | 299 |

| Phase | $CO_2e$ Emissions by Year (MT/yr) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 109 | 127 | 78 | -- | -- | -- | -- | -- |
| 2 | -- | 39 | 124 | 80 | -- | -- | -- | -- |
| 3 | -- | -- | 9.5 | 121 | 118 | 100 | -- | -- |
| 4 | -- | -- | -- | -- | -- | 70 | 111 | 3.2 |
| Total | 109 | 167 | 212 | 201 | 118 | 170 | 111 | 3.2 |

**Notes:**

[1] Total electricity usage from SWCA's Energy Assessment report (July 2018).

[2] Yearly electricity usage split by fraction of phase in each year. Electricity usage and GHG emissions are same for both Project and Project Variant.

[3] See Table Ops-5 for $CO_2e$ intensity factor calculations.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
kWh - kilowatt hour
lb - pound
MT - metric ton
MWh - megawatt hour
yr - year

**Table Con-5. Project Construction Trip Assumptions**
**3333 California Street**
**San Francisco, California**

| Phase | Trip Category | Total Trips[1] | Total Trip Length[2] (miles) |
|---|---|---|---|
| 1 | Worker | 58,050 | 21 |
| 2 | | 38,625 | |
| 3 | | 69,570 | |
| 4 | | 32,175 | |
| 1 | Non-hauling | 2,500 | 14 |
| 2 | | 500 | |
| 3 | | 3,500 | |
| 4 | | 400 | |
| 1 | Vendor | 1,300 | 14 |
| 2 | | 1,000 | |
| 3 | | 1,500 | |
| 4 | | 850 | |
| 1 | Hauling (Hazardous Waste) | 1,636 | 60 |
| 2 | | 24 | |
| 3 | | 1,631 | |
| 4 | | 313 | |
| 1 | Hauling (Non-Hazardous Waste) | 3,271 | 17 |
| 2 | | 48 | |
| 3 | | 3,263 | |
| 4 | | 626 | |
| 1 | | 3,271 | 48 |
| 2 | | 48 | |
| 3 | | 3,263 | |
| 4 | | 626 | |

**Notes:**

1. Trips were provided by the Project Sponsor.
2. Worker, non-hauling, and vendor trip lengths assume CalEEMod® default values. Hauling trip lengths were provided by the Project Sponsor.

**Abbreviations:**

CalEEMod® - California Emissions Estimator MODel

**Table Con-6. Water Usage and Emissions from Construction Dust Control**
**3333 California St AB900**
**San Francisco, California**

**Usage Information[1]**

| | | |
|---|---|---|
| Total water consumption | 226,500 | gallons |
| Energy intensity | 0.005411 | kWh/gallon |
| Total electricity use | 1,226 | kWh |

| Phase | Number of Days | Total Electricity (kWh) | Electricity by Year[2] (kWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 147 | 509 | 172 | 206 | 130 | -- | -- | -- | -- | -- |
| 2 | 20 | 69 | -- | 11 | 35 | 23 | -- | -- | -- | -- |
| 3 | 147 | 509 | -- | -- | 13 | 172 | 172 | 151 | -- | -- |
| 4 | 40 | 138 | -- | -- | -- | -- | -- | 52 | 84 | 2.5 |
| Total | 354 | 1,226 | 172 | 217 | 178 | 195 | 172 | 203 | 84 | 2.5 |

| Phase | $CO_2e$ Intensity Factor by Year[3] (lb $CO_2e$/MWh) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| All | 363 | 354 | 345 | 335 | 326 | 317 | 308 | 299 |

| Phase | $CO_2e$ Emissions by Year (MT/yr) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 | 2026 | 2027 |
| 1 | 0.028 | 0.033 | 0.020 | -- | -- | -- | -- | -- |
| 2 | -- | 0.002 | 0.005 | 0.004 | -- | -- | -- | -- |
| 3 | -- | -- | 0.002 | 0.026 | 0.026 | 0.022 | -- | -- |
| 4 | -- | -- | -- | -- | -- | 0.007 | 0.012 | 0.0003 |
| Total | 0.028 | 0.035 | 0.028 | 0.030 | 0.026 | 0.029 | 0.012 | 0.0003 |

**Notes:**
[1] Total water consumption and energy intensity from San Francisco Water Power Sewer's Water Supply Assessment and SWCA's Energy Assessment report.
[2] Yearly electricity usage split by fraction of phase in each year.
[3] See Table Ops-5 for $CO_2e$ intensity factor calculations.

**Abbreviations:**
$CO_2e$ - carbon dioxide equivalents
kWh - kilowatt hour
lb - pound
MT - metric ton
MWh - megawatt hour
yr - year

**Table Ops-1a. Trip Rates - Existing Conditions**
**3333 California St AB900**
**San Francisco, California**

| Land Use Data | | CalEEMod Defaults[1] | | | | | | Driveway Count[2] | | | | ITE Trips[2] | | Calculated Rates[3] | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use Sub-Type | Size | Weekday Trip Rate | Saturday Trip Rate | Sunday Trip Rate | Weekday Trips | Saturday Trips | Sunday Trips | AM Peak Hour | PM Peak Hour | Scaled AM Peak Hour Trips | Scaled PM Peak Hour Trips | % of Daily Trips in AM Count | % of Daily Trips in PM Count | Weekday Trip Counts | Weekday Trip Rate | Saturday Trip Rate | Sunday Trip Rate |
| | ksf | trips/ksf/day | | | trips/day | | | trips/hr | trips/hr | trips | trips | % | % | trips/day | trips/ksf/day | | |
| General Office Building | 352 | 11.03 | 2.46 | 1.05 | 3,883 | 866 | 370 | 266 | 296 | 218 | 243 | 8.2% | 8.5% | 2,758 | 7.84 | 1.75 | 0.75 |
| Day-care Center | 11.5 | 74.06 | 6.21 | 5.83 | 852 | 71 | 67 | | | 48 | 53 | 17.6% | 18% | 284 | 24.68 | 2.07 | 1.94 |

**Notes:**

[1] CalEEMod version 2016.3.2 default trip rates for San Francisco County, urban setting.

[2] AM and PM peak hour driveway counts and percent of daily trips in AM and PM count from Project Travel Demand Memorandum (Kittelson & Associates, March 2018). Scaled by land use using CalEEMod default trips.

[3] Weekday trip counts estimated by dividing AM and PM peak hour trips by ITE percent of daily trips in AM and PM trips and taking the average of the two values. Weekend trip rates estimated using ratio of CalEEMod default weekday to weekend rates.

**Abbreviations:**

hr - hour

ksf - thousand square feet

ITE - Institute of Transportation Engineers

**Table Ops-1b. Trip Rates - Project and Project Variant**
**3333 California St AB900**
**San Francisco, California**

**Project**[1]

| Land Use Sub-Type | Size Metric | Size | Person-Trips | Adjusted Person-Trips | Vehicle Trips | Trip Rate |
|---|---|---|---|---|---|---|
| | | | (trips/day) | (trips/day) | (trips/day) | (trip/size/day) |
| Apartments Mid Rise | Dwelling Unit | 558 | 5,002 | 2,498 | 1,431 | 2.56 |
| Open Space | Acre | 5.42 | 0 | 0 | 0 | 0 |
| Day-Care Center | 1000sqft | 14.69 | 984 | 491 | 281 | 19.16 |
| Enclosed Parking Structure | Spaces | 895 | 0 | 0 | 0 | 0 |
| General Office Building | 1000sqft | 49.999 | 905 | 452 | 259 | 5.18 |
| Parking Lot | 1000sqft | 10.836 | 0 | 0 | 0 | 0 |
| Strip Mall | 1000sqft | 54.117 | 12,753 | 6,370 | 3,648 | 67.41 |

**Variant**[1]

| Land Use Sub-Type | Size Metric | Size | Person-Trips | Adjusted Person-Trips | Vehicle Trips | Trip Rate |
|---|---|---|---|---|---|---|
| | | | (trips/day) | (trips/day) | (trips/day) | (trip/size/day) |
| Apartments Mid Rise | Dwelling Unit | 744 | 6,670 | 3,274 | 1,917 | 2.58 |
| Open Space | Acre | 5.42 | 0 | 0 | 0 | 0 |
| Day-Care Center | 1000sqft | 14.65 | 984 | 483 | 283 | 19.30 |
| Enclosed Parking Structure | Spaces | 971 | 0 | 0 | 0 | 0 |
| General Office Building | 1000sqft | 0 | 0 | 0 | 0 | 0 |
| Parking Lot | 1000sqft | 10.836 | 0 | 0 | 0 | 0 |
| Strip Mall | 1000sqft | 48.593 | 11,925 | 5,854 | 3,427 | 70.52 |

**Notes:**

[1] Project and Variant trip rates from the traffic memorandum (Kittelson & Associates, March 2018). Strip mall is assumed to include "General Retail", "Sit-Down", and "Composite" land uses. Daily person-trips are adjusted to remove double-counted internal trips, non-auto trips, and double-counted carpool trips. For emissions purposes, daily trips are assumed constant for weekdays and weekends. These factors are shown below.

| Variable | Project | Variant |
|---|---|---|
| Total Vehicle-Trips/ Total Person-Trips | 0.57 | 0.59 |
| % internal, average | 18.25 | 19.10 |
| % external auto, average | 61.10 | 60.68 |

**Abbreviations:**

1000sqft - thousand square feet

**Table Ops-2. Existing Conditions Energy Emissions**
**3333 California St AB900**
**San Francisco, California**

| Energy Sector | Average Monthly Data[1] | Average Annual Usage | Usage Units | Emission Factor | Emissions Factor Units | $CO_2e$ Emissions (MT/year) |
|---|---|---|---|---|---|---|
| Electricity | 340 | 4,076 | MWh | 363 | lbs $CO_2e$/MWh delivered | 671 |
| Natural Gas | 1,028 | 12,332 | MMBtu | 117.77 | lb $CO_2e$/MMBtu | 659 |
| | | | | | **Total** | 1,330 |

**Notes:**

[1] Average monthly usage from PG&E bills July 2012 - September 2014. Data provided by Project Sponsor.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
lb - pound
MMBTU - million British Thermal Units
MT - metric ton
MWh - megawatt-hour
PG&E - Pacific Gas and Electric

**Table Ops-3. Electricity Intensity Factor Derivations**
**3333 California St AB900**
**San Francisco, California**

| | 2014[1,2] | 2015[1,3] | 2016[1,4] | Average[5] | Units |
|---|---|---|---|---|---|
| $CO_2$ Intensity Factor per Total Energy Delivered | 434.92 | 404.51 | 293.7 | 377.7 | lbs $CO_2$/MWh delivered |
| % of Total Energy From Renewables | 27% | 29.5% | 32.8% | 29.8% | |
| $CO_2$ Intensity Factor per Total Non-Renewable Energy[6] | 595.78 | 573.77 | 437 | 537.8 | lbs $CO_2$/MWh delivered |
| | | | | | |
| **Estimated Intensity Factor for Total Energy Delivered[7,8]** | | | | | |
| 2020 RPS (33%) | 399.2 | 384.4 | 292.8 | 360.3 | lbs $CO_2$/MWh delivered |
| | 401.7 | 387.0 | 295.4 | 362.9 | lbs $CO_2$e/MWh delivered |
| 2030 RPS (50%)[9] | 297.9 | 286.9 | 218.5 | 268.9 | lbs $CO_2$/MWh delivered |
| | 300.5 | 289.5 | 221.1 | 271.453 | lbs $CO_2$e/MWh delivered |
| 2050 RPS (80%)[10] | 119.2 | 114.8 | 87.4 | 107.6 | lbs $CO_2$/MWh delivered |
| | 121.7 | 117.3 | 90.0 | 110.1 | lbs $CO_2$e/MWh delivered |

**Notes:**

[1] Total $CO_2$ emission factor from The Climate Registry. Available at: https://www.theclimateregistry.org/our-members/cris-public-reports/. Accessed: June 2018.

[2] Percent of total energy from eligible renewables is from the PGE 2015 Corporate Responsibility Report. Available at: http://www.pgecorp.com/corp_responsibility/reports/2015/PGE_CRSR_2015.pdf.

[3] Percent of total energy from eligible renewables is from the PGE 2016 Corporate Responsibility Report. Available at: http://www.pgecorp.com/corp_responsibility/reports/2016/PGE_CRSR_Environment.pdf.

[4] Percent of total energy from eligible renewables is from the PGE 2017 Corporate Responsibility Report. Available at: http://www.pgecorp.com/corp_responsibility/reports/2017/assets/PGE_CRSR_2017_Environment.pdf.

[5] This average uses the most recent three years of data.

[6] The emissions metric presented here is calculated based on the total $CO_2$ intensity factor divided by the percent of energy delivered from non-renewable sources.

[7] The intensity factor for total energy delivered is estimated by multiplying the percentage of energy delivered from non-renewable energy by the $CO_2$ emissions per total non-renewable energy metric calculated above. The estimate provided here and the energy reports issued by PGE assume that renewable energy sources do not result in any $CO_2$ emissions.

[8] Global Warming Potentials (GWP) are based on the IPCC Fourth Assessment Report. $CH_4$ and $N_2O$ emission factors are from the CalEEMod version 2016.3.2 defaults for PGE, and are conservatively assumed not to change from these estimates. As more renewable energy is integrated into the electricity grid, these intensity factors will also decrease.

[9] Emission factor presented here is 50% projected RPS for 2030 consistent with SB 32 and SB 350. Available at: http://www.energy.ca.gov/sb350/.

[10] The projected 2050 RPS target is based on 80% RPS in 2050, consistent with the CARB Final 2017 Scoping Plan, Appendix D PATHWAYS, pg 12 (November, 2017). Available at: https://www.arb.ca.gov/cc/scopingplan/2030sp_appd_pathways_final.pdf

**Abbreviations:**

CARB - California Air Resources Board
$CO_2$ - carbon dioxide
GHG - greenhouse gases
IPCC - Intergovernmental Panel on Climate Change
lbs - pounds
MWh - megawatt-hour
RPS - Renewable Portfolio Standards
PGE - Pacific Gas & Electric
SB - Senate Bill

**Table Ops-4. Stationary Source Emissions**
**3333 California St AB900**
**San Francisco, California**

| Stationary Source | Engine Tier | HP | Fuel Type | Operation[1] | $CO_2e$ Emission Factor[2] | $CO_2e$ Emissions |
|---|---|---|---|---|---|---|
| | | | | hrs/yr | g/bhp-hr | MT/yr |
| Existing Generator | None | 380 | Diesel | 20 | 523.5 | 4.0 |
| Proposed Generator | Tier 2 | 1,073 | Diesel | 50 | 523.5 | 28.1 |

**Notes:**

[1] Operation of existing generator is 20 hours, based on the existing BAAQMD Permit. Operation of proposed generator is assumed to be 50 hours per year for routine maintenance and testing. This is consistent with the Maximum Allowed Testing Time from the Airborne Toxics Control Measure for Stationary Compression Ignition Engines (17 CCR 93115) for a Tier 2 engine.

[2] Generator emission factors are from CalEEMod and do not depend on engine tier.

**Abbreviations:**

BAAQMD - Bay Area Air Quality Management District
bhp - brake-horsepower
CO2e - carbon dioxide equivalents
g - grams
hrs - hours
MT - metric tons
yr - year

**Table Ops-5. Electricity and Mobile Emission Factors**
**3333 California St AB900**
**San Francisco, California**

| Year | CO2e Intensity Factor | Fleet CO2e EF | Change in carbon intensity from previous year | Change in Fleet EF from previous year |
|---|---|---|---|---|
| | lb CO2e/MWh | metric ton/mi | % | % |
| 2020 | 363 | 4.00E-04 | -- | -- |
| 2021 | 354 | 3.90E-04 | -3% | -2% |
| 2022 | 345 | 3.80E-04 | -3% | -3% |
| 2023 | 335 | 3.69E-04 | -3% | -3% |
| 2024 | 326 | 3.59E-04 | -3% | -3% |
| 2025 | 317 | 3.49E-04 | -3% | -3% |
| 2026 | 308 | 3.40E-04 | -3% | -3% |
| 2027 | 299 | 3.32E-04 | -3% | -2% |
| 2028 | 290 | 3.25E-04 | -3% | -2% |
| 2029 | 281 | 3.18E-04 | -3% | -2% |
| 2030 | 271 | 3.12E-04 | -3% | -2% |
| 2031 | 263 | 3.07E-04 | -3% | -2% |
| 2032 | 255 | 3.03E-04 | -3% | -1% |
| 2033 | 247 | 2.99E-04 | -3% | -1% |
| 2034 | 239 | 2.96E-04 | -3% | -1% |
| 2035 | 231 | 2.93E-04 | -3% | -1% |
| 2036 | 223 | 2.90E-04 | -3% | -1% |
| 2037 | 215 | 2.88E-04 | -4% | -1% |
| 2038 | 207 | 2.86E-04 | -4% | -1% |
| 2039 | 199 | 2.85E-04 | -4% | -1% |
| 2040 | 191 | 2.83E-04 | -4% | 0% |
| 2041 | 183 | 2.82E-04 | -4% | 0% |
| 2042 | 175 | 2.81E-04 | -4% | 0% |
| 2043 | 167 | 2.81E-04 | -5% | 0% |
| 2044 | 159 | 2.80E-04 | -5% | 0% |
| 2045 | 150 | 2.80E-04 | -5% | 0% |
| 2046 | 142 | 2.79E-04 | -5% | 0% |
| 2047 | 134 | 2.79E-04 | -6% | 0% |
| 2048 | 126 | 2.78E-04 | -6% | 0% |
| 2049 | 118 | 2.78E-04 | -6% | 0% |
| 2050 | 110 | 2.78E-04 | -7% | 0% |
| 2051 | 110 | 2.78E-04 | 0% | 0% |
| 2052 | 110 | 2.78E-04 | 0% | 0% |
| 2053 | 110 | 2.78E-04 | 0% | 0% |
| 2054 | 110 | 2.78E-04 | 0% | 0% |
| 2055 | 110 | 2.78E-04 | 0% | 0% |

| Year | CO2e Intensity Factor | Fleet CO2e EF | Change in carbon intensity from previous year | Change in Fleet EF from previous year |
|---|---|---|---|---|
| | lb CO2e/MWh | metric ton/mi | % | % |
| 2056 | 110 | 2.78E-04 | 0% | 0% |
| 2057 | 110 | 2.78E-04 | 0% | 0% |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Approximation of the decrease in vehicle emission factors over time, based on San Francisco fleet-average emission factors from 2020-2050. Assumes no change after 2050, since EMFAC2017 does not project past 2050.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

EF - emission factor

lb - pound

mi - mile

MWh - megawatt-hour

**Table Ops-6. Project Operational $CO_2e$ Emissions by Year**
**3333 California St AB900**
**San Francisco, California**

| Year | $CO_2e$ (MT/yr)[3] | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Area | Energy | | Mobile[2] | Waste | Water | | Stationary Source[4] | Construction | Solar Reductions | Vegetation Reduction | Total |
| | | Electricity[1] | Natural Gas | | | Treatment | Transportation | | | | | |
| **2020** | -- | -- | -- | -- | -- | -- | -- | -- | 541 | 0 | 0 | 541 |
| 2021 | -- | -- | -- | -- | -- | -- | -- | -- | 733 | 0 | 0 | 733 |
| 2022 | 4 | 74 | 65 | 233 | 2 | 4 | 2 | -- | 732 | -45 | 0 | 1,071 |
| 2023 | 14 | 245 | 235 | 761 | 7 | 13 | 8 | 9 | 752 | -56 | 0 | 1,988 |
| 2024 | 20 | 334 | 347 | 1,019 | 10 | 19 | 11 | 28 | 564 | -55 | 0 | 2,297 |
| 2025 | 21 | 367 | 369 | 1,286 | 13 | 20 | 11 | 28 | 664 | -256 | 0 | 2,522 |
| 2026 | 27 | 664 | 529 | 3,408 | 36 | 27 | 14 | 28 | 277 | -252 | 0 | 4,759 |
| 2027 | 29 | 681 | 567 | 3,412 | 37 | 29 | 15 | 28 | 8 | -290 | -13 | 4,504 |
| 2028 | 29 | 662 | 568 | 3,339 | 37 | 29 | 15 | 28 | -- | -284 | -13 | 4,410 |
| 2029 | 29 | 641 | 568 | 3,271 | 37 | 29 | 14 | 28 | -- | -279 | -13 | 4,326 |
| **2030** | 29 | 620 | 568 | 3,211 | 37 | 29 | 14 | 28 | -- | -273 | -13 | 4,251 |
| 2031 | 29 | 602 | 568 | 3,159 | 37 | 29 | 13 | 28 | -- | -268 | -13 | 4,184 |
| 2032 | 29 | 583 | 568 | 3,112 | 37 | 29 | 13 | 28 | -- | -264 | -13 | 4,123 |
| 2033 | 29 | 565 | 568 | 3,072 | 37 | 29 | 12 | 28 | -- | -259 | -13 | 4,069 |
| 2034 | 29 | 546 | 568 | 3,037 | 37 | 29 | 12 | 28 | -- | -254 | -13 | 4,021 |
| 2035 | 29 | 528 | 568 | 3,008 | 37 | 29 | 12 | 28 | -- | -249 | -13 | 3,977 |
| 2036 | 29 | 510 | 568 | 2,982 | 37 | 29 | 11 | 28 | -- | -244 | -13 | 3,937 |
| 2037 | 29 | 491 | 568 | 2,960 | 37 | 29 | 11 | 28 | -- | -240 | -13 | 3,901 |
| 2038 | 29 | 473 | 568 | 2,941 | 37 | 29 | 10 | 28 | -- | -235 | -13 | 3,868 |
| 2039 | 29 | 454 | 568 | 2,926 | 37 | 29 | 10 | 28 | -- | -230 | -13 | 3,839 |
| 2040 | 29 | 436 | 568 | 2,913 | 37 | 29 | 10 | 28 | -- | -225 | -13 | 3,812 |
| 2041 | 29 | 417 | 568 | 2,902 | 37 | 29 | 9 | 28 | -- | -220 | -13 | 3,787 |
| 2042 | 29 | 399 | 568 | 2,893 | 37 | 29 | 9 | 28 | -- | -215 | -13 | 3,764 |
| 2043 | 29 | 381 | 568 | 2,885 | 37 | 29 | 8 | 28 | -- | -211 | -13 | 3,742 |
| 2044 | 29 | 362 | 568 | 2,879 | 37 | 29 | 8 | 28 | -- | -206 | -13 | 3,722 |
| 2045 | 29 | 344 | 568 | 2,874 | 37 | 29 | 8 | 28 | -- | -201 | -13 | 3,702 |
| 2046 | 29 | 325 | 568 | 2,868 | 37 | 29 | 7 | 28 | -- | -196 | -13 | 3,683 |
| 2047 | 29 | 307 | 568 | 2,863 | 37 | 29 | 7 | 28 | -- | -191 | 0 | 3,677 |
| 2048 | 29 | 288 | 568 | 2,859 | 37 | 29 | 6 | 28 | -- | -187 | 0 | 3,658 |
| 2049 | 29 | 270 | 568 | 2,855 | 37 | 29 | 6 | 28 | -- | -182 | 0 | 3,641 |
| 2050 | 29 | 252 | 568 | 2,853 | 37 | 29 | 6 | 28 | -- | -177 | 0 | 3,625 |
| 2051 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2052 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2053 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2054 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2055 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2056 | 29 | *252* | *568* | 2,853 | *37* | *29* | *6* | *28* | -- | -177 | 0 | 3,625 |
| 2057 | 29 | 252 | 568 | 2,853 | 37 | 29 | 6 | 28 | -- | -177 | 0 | 3,625 |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Approximation of the decrease in vehicle emission factors over time, based on San Francisco fleet-average emission factors from 2020-2050. Assumes no change after 2050, since EMFAC2017 does not project past 2050.

[3] Assume all buildings become operational as soon as phase is constructed, based on percent of operational land uses by Phase as shown in Table Ops-16. The only changes in emissions are due to transportation and electricity becoming cleaner.

[4] Assumes generator operational with phase 2

**Abbreviations:**

AB - Assembly Bill
CARB - California Air Resources Board
$CO_2e$ - carbon dioxide equivalent
EMFAC - CARB Emissions Factor model
g - gram
lb - pound
mi - mile
MWh - megawatt-hour
MT - metric ton
RPS - Renewables Portfolio Standard

**Table Ops-7. Project Variant Operational $CO_2e$ Emissions by Year**
**3333 California St AB900**
**San Francisco, California**

| Year | $CO_2e$ (MT/yr)[3] | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Area | Energy | | Mobile[2] | Waste | Water | | Stationary Source | Construction | Solar Reductions | Vegetation Reduction | Total |
| | | Electricity[1] | Natural Gas | | | Treatment | Transportation | | | | | |
| **2020** | -- | -- | -- | -- | -- | -- | -- | -- | 541 | 0 | 0 | 541 |
| 2021 | -- | -- | -- | -- | -- | -- | -- | -- | 733 | 0 | 0 | 733 |
| 2022 | 3.8 | 68 | 58 | 238 | 2 | 3.5 | 2.1 | -- | 732 | -45 | 0 | 1,063 |
| 2023 | 14 | 225 | 209 | 774 | 6 | 12 | 7 | 9 | 752 | -56 | 0 | 1,953 |
| 2024 | 20 | 304 | 309 | 1,033 | 8 | 18 | 11 | 28 | 564 | -55 | 0 | 2,242 |
| 2025 | 22 | 346 | 344 | 1,305 | 11 | 20 | 11 | 28 | 664 | -256 | 0 | 2,496 |
| 2026 | 37 | 702 | 603 | 3,467 | 31 | 34 | 18 | 28 | 277 | -252 | 0 | 4,946 |
| 2027 | 39 | 716 | 637 | 3,470 | 32 | 36 | 19 | 28 | 8 | -290 | -13 | 4,682 |
| 2028 | 39 | 695 | 638 | 3,396 | 32 | 36 | 18 | 28 | -- | -284 | -13 | 4,585 |
| 2029 | 39 | 673 | 638 | 3,326 | 32 | 36 | 18 | 28 | -- | -279 | -13 | 4,498 |
| 2030 | 39 | 651 | 638 | 3,266 | 32 | 36 | 17 | 28 | -- | -273 | -13 | 4,421 |
| 2031 | 39 | 632 | 638 | 3,212 | 32 | 36 | 17 | 28 | -- | -268 | -13 | 4,352 |
| 2032 | 39 | 612 | 638 | 3,165 | 32 | 36 | 16 | 28 | -- | -264 | -13 | 4,290 |
| 2033 | 39 | 593 | 638 | 3,125 | 32 | 36 | 16 | 28 | -- | -259 | -13 | 4,235 |
| 2034 | 39 | 574 | 638 | 3,089 | 32 | 36 | 15 | 28 | -- | -254 | -13 | 4,184 |
| 2035 | 39 | 554 | 638 | 3,059 | 32 | 36 | 15 | 28 | -- | -249 | -13 | 4,139 |
| 2036 | 39 | 535 | 638 | 3,033 | 32 | 36 | 14 | 28 | -- | -244 | -13 | 4,098 |
| 2037 | 39 | 516 | 638 | 3,010 | 32 | 36 | 14 | 28 | -- | -240 | -13 | 4,060 |
| 2038 | 39 | 496 | 638 | 2,991 | 32 | 36 | 13 | 28 | -- | -235 | -13 | 4,026 |
| 2039 | 39 | 477 | 638 | 2,975 | 32 | 36 | 13 | 28 | -- | -230 | -13 | 3,995 |
| 2040 | 39 | 458 | 638 | 2,962 | 32 | 36 | 12 | 28 | -- | -225 | -13 | 3,967 |
| 2041 | 39 | 438 | 638 | 2,951 | 32 | 36 | 12 | 28 | -- | -220 | -13 | 3,941 |
| 2042 | 39 | 419 | 638 | 2,942 | 32 | 36 | 11 | 28 | -- | -215 | -13 | 3,917 |
| 2043 | 39 | 399 | 638 | 2,934 | 32 | 36 | 10 | 28 | -- | -211 | -13 | 3,894 |
| 2044 | 39 | 380 | 638 | 2,928 | 32 | 36 | 10 | 28 | -- | -206 | -13 | 3,872 |
| 2045 | 39 | 361 | 638 | 2,923 | 32 | 36 | 9 | 28 | -- | -201 | -13 | 3,852 |
| 2046 | 39 | 341 | 638 | 2,917 | 32 | 36 | 9 | 28 | -- | -196 | -13 | 3,832 |
| 2047 | 39 | 322 | 638 | 2,912 | 32 | 36 | 8 | 28 | -- | -191 | 0 | 3,824 |
| 2048 | 39 | 303 | 638 | 2,907 | 32 | 36 | 8 | 28 | -- | -187 | 0 | 3,805 |
| 2049 | 39 | 283 | 638 | 2,904 | 32 | 36 | 7 | 28 | -- | -182 | 0 | 3,786 |
| 2050 | 39 | 264 | 638 | 2,902 | 32 | 36 | 7 | 28 | -- | -177 | 0 | 3,769 |
| 2051 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2052 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2053 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2054 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2055 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2056 | 39 | *264* | *638* | 2,902 | *32* | *36* | *7* | *28* | -- | -177 | 0 | 3,769 |
| 2057 | 39 | 264 | 638 | 2,902 | 32 | 36 | 7 | 28 | -- | -177 | 0 | 3,769 |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Approximation of the decrease in vehicle emission factors over time, based on San Francisco fleet-average emission factors from 2020-2050. Assumes no change after 2050, since EMFAC2017 does not project past 2050.

[3] Assume all buildings become operational as soon phase is constructed, based on percent of operational land uses by Phase as shown in Table Ops-16.. The only changes in emissions are due to transportation and electricity becoming cleaner.

[4] Assumes generator operational with phase 2.

**Abbreviations:**

AB - Assembly Bill
CARB - California Air Resources Board
$CO_2e$ - carbon dioxide equivalent
EMFAC - CARB Emissions Factor model
g - gram
lb - pound
mi - mile
MWh - megawatt-hour
MT - metric ton
RPS - Renewables Portfolio Standard

**Table Ops-8. Energy and Water Use Values**
**3333 California St AB900**
**San Francisco, California**

**Scaled Building Energy Use (kBTU/year)[1]**

| Building Type | Project Case | | Project Variant | |
|---|---|---|---|---|
| | Natural Gas | Electricity | Natural Gas | Electricity |
| Apartments | 9,289,299 | 8,968,899 | 11,023,050 | 10,642,850 |
| Day-Care Center | 96,402 | 278,149 | 96,139 | 277,392 |
| Parking Structure | 0 | 5,374,715 | 0 | 5,454,439 |
| General Office Building | 330,377 | 708,129 | 0 | 0 |
| Parking Lot | 0 | 0 | 0 | 0 |
| Strip Mall | 922,059 | 1,853,528 | 827,940 | 1,664,329 |
| **Total (kBTU/yr)** | **10,638,137** | **17,183,420** | **11,947,129** | **18,039,010** |

**Water Use and Electricity for Water Use[2]**

| Type | Water | | | | Electricity to Supply, Treat, and Distribute Water | | | |
|---|---|---|---|---|---|---|---|---|
| | Project Case | | Project Variant | | Project | | Project Variant | |
| | Indoor (gal) | Outdoor (gal) | Indoor (gal) | Outdoor (gal) | kWh/year | Kwh/gal | kWh/year | Kwh/gal |
| Commercial | 422,000 | 0 | 229,000 | 0 | 2,280 | 0.0054 | 1,238 | 0.0054 |
| Residential | 17,125,000 | 0 | 22,398,000 | 0 | 92,663 | 0.0054 | 121,194 | 0.0054 |
| HVAC/Cooling | 1,995,000 | 0 | 1,995,000 | 0 | 10,795 | 0.0054 | 10,795 | 0.0054 |
| Landscape/Irrigation | 0 | 1,626,000 | 0 | 1,626,000 | 5,689 | 0.0035 | 5,689 | 0.0035 |
| **Total** | **19,542,000** | **1,626,000** | **24,622,000** | **1,626,000** | **111,427** | **-** | **138,916** | **-** |

**Distributing Water Use for CalEEMod Land Uses[3]**

| Land Use Sub-Type | CalEEMod Default Indoor Water Use | Project Case | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|---|
| | (gal/land use size/year) | Land Use | Land Use (sq ft) | Indoor (gal/year) | Outdoor (gal/year) | Land Use | Land Use (sq ft) | Indoor (gal/year) | Outdoor (gal/year) |
| Apartments (DU) | 65,154 | 558 | 824,691 | 18,868,788 | 0 | 744 | 978,611 | 24,271,899 | 0 |
| Open Space (Acres) | 0 | 5.42 | 236,000 | 0 | 1,626,000 | 5.42 | 236,000 | - | 1,626,000 |
| Day-Care Center (ksf) | 42,890 | 14.69 | 14,690 | 50,720 | 0 | 14.65 | 14,650 | 62,087 | |
| General Office Building (ksf) | 177,734 | 49.999 | 49,999 | 382,990 | 0 | 0 | 0 | 0 | 0 |
| Strip Mall (ksf) | 74,073 | 54.117 | 54,117 | 239,502 | 0 | 48.593 | 48,593 | 288,014 | 0 |
| **Total** | - | - | - | **19,542,000** | **1,626,000** | **-** | **-** | **24,622,000** | **1,626,000** |

**Notes:**

[1] From 3333 California CEQA Energy Inputs, Arup (January 2018), Tables 10 and 11, including energy conservation measures. CEQA Energy Inputs is supporting information for the Energy Assessment.

[2] From 3333 California CEQA Energy Inputs, Arup (January 2018), Tables 4 and 5. CEQA Energy Inputs is supporting information for the Energy Assessment.

[3] Water use is distributed among land uses on a square footage basis for CalEEMod purposes. The total water use is from San Francisco Water Power Sewer's Water Supply Assessment (June 2017) which is summarized in the Energy Assessment.

**Abbreviations:**

DU - dwelling units
gal - gallon
kBTU - thousand British Thermal Units
sq ft - square feet

**Table Ops-9. GHG Emissions Reductions from Solar Energy**
**3333 California St AB900**
**San Francisco, California**

**Energy Assessment Solar Data by Building and Phase[1]**

| Building | Proposed Total Solar Equipment Area (sqft) | Estimated PV Energy Output (kBTU/year) | Estimated Solar Hot Water Energy Output (kBTU/year) | Construction Phase |
|---|---|---|---|---|
| Center Building A | 0 | 0 | 0 | 2 |
| Center Building B | 2,597 | 180,864 | 82,000 | 2 |
| Plaza A Building | 12,190 | 795,497 | 380,000 | 3 |
| Plaza B Building | 11,812 | 828,163 | 384,000 | 3 |
| Walnut Building | 19,771 | 1,397,159 | 635,000 | 3 |
| Masonic Building | 0 | 0 | 0 | 1 |
| Euclid Building | 9,036 | 638,342 | 289,000 | 1 |
| Laurel Duplexes | 6,384 | 394,514 | 207,000 | 4 |
| Mayfair Building | 3,550 | 251,107 | 107,000 | 4 |
| **Total** | **65,340** | **4,485,646** | **2,084,000** | |

**Year-By-Year Reductions due to Solar**

| Year | $CO_2e$ Intensity Factor (lb $CO_2e$/MWh)[2] | Solar PV Reductions (MT) | $CO_2e$ Intensity Factor NG (lb $CO_2e$/kBTU)[3] | Solar Heating Reductions (MT) | Latest completed Phase[4] |
|---|---|---|---|---|---|
| 2020 | 363 | 0 | 0.118 | 0 | - |
| 2021 | 354 | 0 | 0.118 | 0 | - |
| 2022 | 345 | -29 | 0.118 | -15 | 1 |
| 2023 | 335 | -37 | 0.118 | -20 | 2 |
| 2024 | 326 | -36 | 0.118 | -20 | 2 |
| 2025 | 317 | -162 | 0.118 | -95 | 3 |
| 2026 | 308 | -157 | 0.118 | -95 | 3 |
| 2027 | 299 | -178 | 0.118 | -111 | 4 |
| 2028 | 290 | -173 | 0.118 | -111 | 4 |
| 2029 | 281 | -167 | 0.118 | -111 | 4 |
| 2030 | 271 | -162 | 0.118 | -111 | 4 |
| 2031 | 263 | -157 | 0.118 | -111 | 4 |
| 2032 | 255 | -152 | 0.118 | -111 | 4 |
| 2033 | 247 | -147 | 0.118 | -111 | 4 |
| 2034 | 239 | -143 | 0.118 | -111 | 4 |
| 2035 | 231 | -138 | 0.118 | -111 | 4 |
| 2036 | 223 | -133 | 0.118 | -111 | 4 |
| 2037 | 215 | -128 | 0.118 | -111 | 4 |
| 2038 | 207 | -123 | 0.118 | -111 | 4 |
| 2039 | 199 | -119 | 0.118 | -111 | 4 |
| 2040 | 191 | -114 | 0.118 | -111 | 4 |
| 2041 | 183 | -109 | 0.118 | -111 | 4 |
| 2042 | 175 | -104 | 0.118 | -111 | 4 |
| 2043 | 167 | -99 | 0.118 | -111 | 4 |
| 2044 | 159 | -95 | 0.118 | -111 | 4 |
| 2045 | 150 | -90 | 0.118 | -111 | 4 |
| 2046 | 142 | -85 | 0.118 | -111 | 4 |
| 2047 | 134 | -80 | 0.118 | -111 | 4 |
| 2048 | 126 | -75 | 0.118 | -111 | 4 |
| 2049 | 118 | -70 | 0.118 | -111 | 4 |

| Year | $CO_2e$ Intensity Factor (lb $CO_2e$/MWh)[2] | Solar PV Reductions (MT) | $CO_2e$ Intensity Factor NG (lb $CO_2e$/kBTU)[3] | Solar Heating Reductions (MT) | Latest completed Phase[4] |
|---|---|---|---|---|---|
| 2050 | 110 | -66 | 0.118 | -111 | 4 |
| 2051 | 110 | -66 | 0.118 | -111 | 4 |
| 2052 | 110 | -66 | 0.118 | -111 | 4 |
| 2053 | 110 | -66 | 0.118 | -111 | 4 |
| 2054 | 110 | -66 | 0.118 | -111 | 4 |
| 2055 | 110 | -66 | 0.118 | -111 | 4 |
| 2056 | 110 | -66 | 0.118 | -111 | 4 |
| 2057 | 110 | -66 | 0.118 | -111 | 4 |

**Notes:**

[1] From SWCA's Energy Assessment (July 2018), Table 10.

[2] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[3] $CO_2e$ intensity factor for natural gas is from CalEEMod Appendix D.

[4] The solar for each building is assumed to become active when the relevant Phase is complete.

**Abbreviations:**

CalEEMod - California Emissions Estimator Model
$CO_2e$ - carbon dioxide equivalents
kBTU - thousand British Thermal Units
lb - pound
MT - metric ton
MWh - megawatt-hour
sqft - square feet

**Table Ops-10. Energy Emissions Year-by-Year**
**3333 California St AB900**
**San Francisco, California**

| Year | CO2e Intensity Factor[1] | | Project Case[2] | | | | Project Variant[2] | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Electricity | Natural Gas | Electricity Use[3] | Natural Gas Use[3] | Electricity Emissions | Natural Gas Emissions | Electricity Use[3] | Natural Gas Use[3] | Electricity Emissions | Natural Gas Emissions |
| | lb CO2e/MWh | lb CO2e/kBTU | MWh | kBTU | MT CO2e/year | | MWh | kBTU | MT CO2e/year | |
| 2020 | 363 | 0.118 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2021 | 354 | 0.118 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2022 | 345 | 0.118 | 473 | 1,224,705 | 74 | 65 | 436 | 1,092,913 | 68 | 58 |
| 2023 | 335 | 0.118 | 1,612 | 4,393,180 | 245 | 235 | 1,478 | 3,917,878 | 225 | 209 |
| 2024 | 326 | 0.118 | 2,255 | 6,498,974 | 334 | 347 | 2,055 | 5,791,991 | 304 | 309 |
| 2025 | 317 | 0.118 | 2,550 | 6,900,308 | 367 | 369 | 2,405 | 6,440,318 | 346 | 344 |
| 2026 | 308 | 0.118 | 4,754 | 9,905,647 | 664 | 529 | 5,027 | 11,295,228 | 702 | 603 |
| 2027 | 299 | 0.118 | 5,027 | 10,614,055 | 681 | 567 | 5,278 | 11,925,697 | 716 | 637 |
| 2028 | 290 | 0.118 | 5,036 | 10,638,137 | 662 | 568 | 5,287 | 11,947,129 | 695 | 638 |
| 2029 | 281 | 0.118 | 5,036 | 10,638,137 | 641 | 568 | 5,287 | 11,947,129 | 673 | 638 |
| 2030 | 271 | 0.118 | 5,036 | 10,638,137 | 620 | 568 | 5,287 | 11,947,129 | 651 | 638 |
| 2031 | 263 | 0.118 | 5,036 | 10,638,137 | 602 | 568 | 5,287 | 11,947,129 | 632 | 638 |
| 2032 | 255 | 0.118 | 5,036 | 10,638,137 | 583 | 568 | 5,287 | 11,947,129 | 612 | 638 |
| 2033 | 247 | 0.118 | 5,036 | 10,638,137 | 565 | 568 | 5,287 | 11,947,129 | 593 | 638 |
| 2034 | 239 | 0.118 | 5,036 | 10,638,137 | 546 | 568 | 5,287 | 11,947,129 | 574 | 638 |
| 2035 | 231 | 0.118 | 5,036 | 10,638,137 | 528 | 568 | 5,287 | 11,947,129 | 554 | 638 |
| 2036 | 223 | 0.118 | 5,036 | 10,638,137 | 510 | 568 | 5,287 | 11,947,129 | 535 | 638 |
| 2037 | 215 | 0.118 | 5,036 | 10,638,137 | 491 | 568 | 5,287 | 11,947,129 | 516 | 638 |
| 2038 | 207 | 0.118 | 5,036 | 10,638,137 | 473 | 568 | 5,287 | 11,947,129 | 496 | 638 |
| 2039 | 199 | 0.118 | 5,036 | 10,638,137 | 454 | 568 | 5,287 | 11,947,129 | 477 | 638 |
| 2040 | 191 | 0.118 | 5,036 | 10,638,137 | 436 | 568 | 5,287 | 11,947,129 | 458 | 638 |
| 2041 | 183 | 0.118 | 5,036 | 10,638,137 | 417 | 568 | 5,287 | 11,947,129 | 438 | 638 |
| 2042 | 175 | 0.118 | 5,036 | 10,638,137 | 399 | 568 | 5,287 | 11,947,129 | 419 | 638 |
| 2043 | 167 | 0.118 | 5,036 | 10,638,137 | 381 | 568 | 5,287 | 11,947,129 | 399 | 638 |
| 2044 | 159 | 0.118 | 5,036 | 10,638,137 | 362 | 568 | 5,287 | 11,947,129 | 380 | 638 |
| 2045 | 150 | 0.118 | 5,036 | 10,638,137 | 344 | 568 | 5,287 | 11,947,129 | 361 | 638 |
| 2046 | 142 | 0.118 | 5,036 | 10,638,137 | 325 | 568 | 5,287 | 11,947,129 | 341 | 638 |
| 2047 | 134 | 0.118 | 5,036 | 10,638,137 | 307 | 568 | 5,287 | 11,947,129 | 322 | 638 |
| 2048 | 126 | 0.118 | 5,036 | 10,638,137 | 288 | 568 | 5,287 | 11,947,129 | 303 | 638 |
| 2049 | 118 | 0.118 | 5,036 | 10,638,137 | 270 | 568 | 5,287 | 11,947,129 | 283 | 638 |
| 2050 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2051 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2052 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2053 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2054 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2055 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2056 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |
| 2057 | 110 | 0.118 | 5,036 | 10,638,137 | 252 | 568 | 5,287 | 11,947,129 | 264 | 638 |

**Notes:**

[1] Uses a linear interpretation between the electricity intensity factors derived in Table Ops-3.

[2] Does not include the benefits of solar photovoltaics or solar water heating. These are shown in Table Ops-9.

[3] While construction is underway, energy use is based on the percent of operational land uses by Phase as shown in Table Ops-16.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
EF - emission factor
lb - pound
kBTU - thousand British Thermal Units
MT - metric ton
MWh - megawatt-hour

**Table Ops-11. Wastewater Treatment Types and Electricity Intensity**
**3333 California St AB900**
**San Francisco, California**

**Wastewater Electricity Intensity**

| County | Electricity to Treat Wastewater (kWh/million gal)[1] |
|---|---|
| San Francisco | 1,911 |

**Wastewater Treatment Types[2]**

| County | Septic Tank | Aerobic | Anaerobic, Facultative Lagoons | Anaerobic, Combustion of Gas | Anaerobic, Cogeneration of Gas |
|---|---|---|---|---|---|
| San Francisco | 10.33% | 87.46% | 2.21% | 100% | 0% |

**Wastewater Treatment Direct Emission Factors[3]**

| Wastewater Treatment Type | $CO_2$ Biogenic, ton/gal | $CO_2$ Non-Biogenic, ton/gal | $CH_4$, ton/gal | $N_2O$, ton/gal |
|---|---|---|---|---|
| Septic | 0 | 0 | 2.50E-07 | 8.48E-10 |
| Aerobic | 3.90E-07 | 0 | 1.34E-09 | 8.48E-10 |
| Anaerobic Facultative | 3.90E-07 | 0 | 4.02E-07 | 8.48E-10 |
| Digester Burn | 0 | 0 | 0 | 0 |
| Digester Cogen | 0 | 0 | 0 | 0 |

**Notes:**

[1] Water Electricity Intensity from Table 9.2 of Appendix D of the CalEEMod User's Guide.

[2] Water Treatment Types from Table 9.3 of Appendix D of the CalEEMod User's Guide.

[3] Wastewater Treatment Direct Emission Factors from Table 9.4 of Appendix D of the CalEEMod User's Guide.

**Abbreviations:**

CalEEMod - California Emissions Estimator Model
$CH_4$ - methane
$CO_2$ - carbon dioxide
gal - gallon
kWh - kilowatt-hours
$N_2O$ - nitrogen oxides

**Table Ops-12. Water Treatment Emissions**
**3333 California St AB900**
**San Francisco, California**

| Land Use | Project Case | | | | Project Variant | | | |
|---|---|---|---|---|---|---|---|---|
| | Septic Tank Direct Emissions | Aerobic Direct Emissions | Facultative Lagoon Direct Emissions | Total Treatment Emissions | Septic Tank Direct Emissions | Aerobic Direct Emissions | Facultative Lagoon Direct Emissions | Total Treatment Emissions |
| | MT CO2e/year | | | | | | | |
| Apartments (DU) | 11.51 | 10.12 | 4.04 | 25.68 | 14.81 | 13.02 | 5.20 | 33.04 |
| Day-Care Center (ksf) | 0.03 | 0.03 | 0.01 | 0.07 | 0.04 | 0.03 | 0.01 | 0.08 |
| Parking Structure | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| General Office Building (ksf) | 0.23 | 0.21 | 0.08 | 0.52 | 0.00 | 0.00 | 0.00 | 0.00 |
| Strip Mall (ksf) | 0.15 | 0.13 | 0.05 | 0.33 | 0.18 | 0.15 | 0.06 | 0.39 |
| Parking Lot | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Open Space (Acres) | 0.99 | 0.87 | 0.35 | 2.21 | 0.99 | 0.87 | 0.35 | 2.21 |
| **Total** | **12.92** | **11.36** | **4.54** | **28.81** | **16.02** | **14.08** | **5.63** | **35.73** |

**Notes:**

[1] Treatment factors are shown in Table Ops-11.

[2] Water usage is shown in Table Ops-8.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

DU - dwelling units

ksf - thousand square feet

MT - metric tons

**Table Ops-13. Water Emissions Year-by-Year**
**3333 California St AB900**
**San Francisco, California**

| Year | CO2e Intensity Factor | Project Case | | | Variant | | |
|---|---|---|---|---|---|---|---|
| | | Electricity Consumption[1] | Distribution Emissions | Treatment Emissions[2] | Electricity Consumption[1] | Distribution Emissions | Treatment Emissions[2] |
| | lb $CO_2e$/MWh | MWh | MT $CO_2e$ | | MWh | MT $CO_2e$ | |
| 2020 | 363 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2021 | 354 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2022 | 345 | 14 | 2.2 | 3.6 | 13 | 2.1 | 3.5 |
| 2023 | 335 | 50 | 7.6 | 13 | 48 | 7.4 | 12 |
| 2024 | 326 | 74 | 11 | 19 | 72 | 11 | 18 |
| 2025 | 317 | 78 | 11 | 20 | 79 | 11 | 20 |
| 2026 | 308 | 103 | 14 | 27 | 131 | 18 | 34 |
| 2027 | 299 | 111 | 15 | 29 | 139 | 19 | 36 |
| 2028 | 290 | 111 | 15 | 29 | 139 | 18 | 36 |
| 2029 | 281 | 111 | 14 | 29 | 139 | 18 | 36 |
| 2030 | 271 | 111 | 14 | 29 | 139 | 17 | 36 |
| 2031 | 263 | 111 | 13 | 29 | 139 | 17 | 36 |
| 2032 | 255 | 111 | 13 | 29 | 139 | 16 | 36 |
| 2033 | 247 | 111 | 12 | 29 | 139 | 16 | 36 |
| 2034 | 239 | 111 | 12 | 29 | 139 | 15 | 36 |
| 2035 | 231 | 111 | 12 | 29 | 139 | 15 | 36 |
| 2036 | 223 | 111 | 11 | 29 | 139 | 14 | 36 |
| 2037 | 215 | 111 | 11 | 29 | 139 | 14 | 36 |
| 2038 | 207 | 111 | 10 | 29 | 139 | 13 | 36 |
| 2039 | 199 | 111 | 10 | 29 | 139 | 13 | 36 |
| 2040 | 191 | 111 | 10 | 29 | 139 | 12 | 36 |
| 2041 | 183 | 111 | 9.2 | 29 | 139 | 12 | 36 |
| 2042 | 175 | 111 | 8.8 | 29 | 139 | 11 | 36 |
| 2043 | 167 | 111 | 8.4 | 29 | 139 | 10 | 36 |
| 2044 | 159 | 111 | 8.0 | 29 | 139 | 10 | 36 |
| 2045 | 150 | 111 | 7.6 | 29 | 139 | 9.5 | 36 |
| 2046 | 142 | 111 | 7.2 | 29 | 139 | 9.0 | 36 |
| 2047 | 134 | 111 | 6.8 | 29 | 139 | 8.5 | 36 |
| 2048 | 126 | 111 | 6.4 | 29 | 139 | 8.0 | 36 |
| 2049 | 118 | 111 | 6.0 | 29 | 139 | 7.4 | 36 |
| 2050 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2051 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2052 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2053 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2054 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2055 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2056 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |
| 2057 | 110 | 111 | 5.6 | 29 | 139 | 6.9 | 36 |

**Notes:**

[1] Electricity use is calculated based on phased water use and usage factors from the Energy Assessment (SWCA, July 2018) and supporting Water Supply Assessment (San Francisco Water Power Sewer, June 2017) and CEQA Energy Inputs (Arup, 2018). While construction is underway, water use is based on the percent of operational land uses by Phase as shown in Table Ops-16. Electricity Usage Factors taken from the Energy Assessment are shown below.

| Indoor (kwh/gal) | Outdoor (kwh/gal) |
|---|---|
| 0.0054 | 0.0035 |

[2] Emissions from wastewater treatment are calculated in Table Ops-12.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents
lb - pounds
MT - metric tons
MWh - megawatt-hour

**Table Ops-14. Waste Generation and Emissions**
**3333 California St AB900**
**San Francisco, California**

| Space Type | Project | | Variant | |
|---|---|---|---|---|
| | Waste Generated | $CO_2e$ Emissions[1] | Waste Generated | $CO_2e$ Emissions[1] |
| | Cubic yards/day | MT/yr | Cubic yards/day | MT/yr |
| Residential | 18.3 | 12.9 | 19.8 | 13.9 |
| Commercial | 34 | 23.9 | 25.5 | 17.9 |
| **Total** | **52.5** | **36.8** | **45.3** | **31.8** |

| Land Use[2] | Total $CO_2e$ (MT/yr) | |
|---|---|---|
| | Project | Variant |
| Apartments | 13 | 14 |
| Day-Care Center | 3.0 | 4.1 |
| Parking Structure | 0 | 0 |
| General Office Building | 10 | 0 |
| Parking Lot | 0 | 0 |
| Retail | 11 | 14 |

| Year | Total $CO_2e$ (MT/yr)[3] | |
|---|---|---|
| | Project | Variant |
| 2022 | 2.0 | 1.8 |
| 2023 | 6.9 | 6.1 |
| 2024 | 9.8 | 8.4 |
| 2025 | 13 | 11 |
| 2026 | 36 | 31 |
| 2027 | 37 | 32 |
| 2028 | 37 | 32 |

**Notes:**

[1] Total waste emissions are from CEQA Energy Inputs (ARUP, January 2018).

[2] Commercial waste generation was split by total land uses among daycare, office, and retail based on square footage.

[3] While construction is underway, waste is based on the percent of operational land uses by Phase as shown in Table Ops-16.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric tons

yr - year

**Table Ops-15. GHG Emissions Sequestration from Vegetation**
**3333 California St AB900**
**San Francisco, California**

| Number of Net New Trees[1] | Units | Broad Species Class | Annual $CO_2$ accumulation per tree (MT $CO_2$/tree/year)[2] | Project GHG Sequestration (MT $CO_2e$) |
|---|---|---|---|---|
| 162 | Trees | Miscellaneous | -0.0354 | -115 |
| **Number of Net New Acres[1]** | **Units** | **Vegetation Land Use Subtype** | **Annual $CO_2$ accumulation per acre (MT $CO_2$/acre/year)[2]** | **Project GHG Sequestration (MT $CO_2e$)** |
| 1.63 | Acres | Grassland | -4.31 | -140 |
| | | | **Total, Trees and Acres Covered** | -255 |

**Notes:**

1. Number of net new trees from Project Description. Total number of trees - number of existing trees
2. From CalEEMod User's Guide Appendix A.
3. All vegetation types are assumed to have a growing period of 20 years.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric tones

**Table Ops-16. Phased Land Use**
**3333 California St AB900**
**San Francisco, California**

| Land Use | Size Metric | Phase[1] | | | | | % Total in Phase[2] | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | Phase 1 | Phase 2 | Phase 3 | Phase 4 | All | Phase 1 | Phase 2 | Phase 3 | Phase 4 |
| **Project Case** | | | | | | | | | | |
| Apartments | DU | 196 | 190 | 128 | 44 | 558 | 35% | 34% | 23% | 8% |
| Day-Care Center | ksf | 0 | 0 | 14.69 | 0.00 | 14.69 | 0% | 0% | 100% | 0% |
| Parking Structure | ksf | 87.98 | 19.26 | 301.06 | 20.48 | 428.77 | 21% | 4% | 70% | 5% |
| General Office Building | ksf | 0 | 0 | 50.00 | 0.00 | 50 | 0% | 0% | 100% | 0% |
| Parking Lot | ksf | 3.936 | 2.51 | 3.82 | 0.58 | 10.84 | 36% | 23% | 35% | 5% |
| Retail | ksf | 4.287 | 0 | 49.83 | 0 | 54.12 | 8% | 0% | 92% | 0% |
| Open Space | acre | 1.42 | 1.35 | 2.19 | 0.46 | 5.42 | 26% | 25% | 40% | 9% |
| **Project Variant** | | | | | | | | | | |
| Apartments | DU | 196 | 190 | 314 | 44 | 744 | 26% | 26% | 42% | 6% |
| Day-Care Center | ksf | 0 | 0 | 14.65 | 0.00 | 14.65 | 0% | 0% | 100% | 0% |
| Parking Structure | ksf | 87.98 | 19.26 | 307.42 | 20.48 | 435.13 | 20% | 4% | 71% | 5% |
| General Office Building | ksf | 0 | 0 | - | 0.00 | 0 | - | - | - | - |
| Parking Lot | ksf | 3.94 | 2.51 | 6.18 | 0.58 | 13.2 | 30% | 19% | 47% | 4% |
| Retail | ksf | 4.29 | 0 | 44.31 | 0 | 48.59 | 9% | 0% | 91% | 0% |
| Open Space | acre | 1.42 | 1.35 | 2.19 | 0.46 | 5.42 | 26% | 25% | 40% | 9% |

**Notes:**

[1] Land use totals and Phase descriptions provided by Project sponsor.

[2] Percent of total in Phase is used to quantify emissions at buildout of each Phase. Phases 1, 2, 3, and 4 are assumed to be operational in 2022, 2023, 2025, and 2027, respectively.

**Abbreviations:**

DU - dwelling units

ksf - thousand square feet

**Table Ops-17. Area and Mobile Emissions by Phase**
**3333 California St AB900**
**San Francisco, California**

| Phase[1] | Operational Year | % Change in Mobile Emissions Factor[2] | Project | | Variant | |
|---|---|---|---|---|---|---|
| | | | Area | Mobile | Area | Mobile |
| | | | $CO_2e$ (MT/yr)[3] | | | |
| 1 | 2022 | -- | 3.8 | 233 | 3.8 | 238 |
| 1 | 2023 | -2.81% | 10 | 618 | 10 | 630 |
| 1 | 2024 | -2.67% | 10 | 602 | 10 | 613 |
| 1 | 2025 | -2.82% | 10 | 585 | 10 | 596 |
| 1 | 2026 | -2.54% | 10 | 570 | 10 | 580 |
| 1 | 2027 | -2.39% | 10 | 556 | 10 | 567 |
| 1 | 2028 | -2.23% | 10 | 544 | 10 | 554 |
| 2 | 2022 | -- | 0 | 0 | 0 | 0 |
| 2 | 2023 | -2.81% | 3.3 | 143 | 3.3 | 144 |
| 2 | 2024 | -2.67% | 10 | 417 | 10 | 421 |
| 2 | 2025 | -2.82% | 10 | 406 | 10 | 409 |
| 2 | 2026 | -2.54% | 10 | 395 | 10 | 398 |
| 2 | 2027 | -2.39% | 10 | 386 | 10 | 389 |
| 2 | 2028 | -2.23% | 10 | 377 | 10 | 380 |
| 3 | 2022 | -- | 0 | 0 | 0 | 0 |
| 3 | 2023 | -2.81% | 0 | 0 | 0 | 0 |
| 3 | 2024 | -2.67% | 0 | 0 | 0 | 0 |
| 3 | 2025 | -2.82% | 0.8 | 295 | 1.9 | 301 |
| 3 | 2026 | -2.54% | 6.7 | 2,443 | 17 | 2,488 |
| 3 | 2027 | -2.39% | 6.7 | 2,384 | 17 | 2,428 |
| 3 | 2028 | -2.23% | 6.7 | 2,331 | 17 | 2,374 |
| 4 | 2022 | -- | 0 | 0 | 0 | 0 |
| 4 | 2023 | -2.81% | 0 | 0 | 0 | 0 |
| 4 | 2024 | -2.67% | 0 | 0 | 0 | 0 |
| 4 | 2025 | -2.82% | 0 | 0 | 0 | 0 |
| 4 | 2026 | -2.54% | 0 | 0 | 0 | 0 |
| 4 | 2027 | -2.39% | 2.2 | 85 | 2.2 | 86 |
| 4 | 2028 | -2.23% | 2.3 | 86 | 2.3 | 87 |

**Notes:**

[1] Operational year and fraction of operation in Table Ops-16.

[2] Mobile emissions change is shown in Table Ops-5.

[3] Area and mobile emissions from buildout year for each Phase are from CalEEMod outputs. Emissions from energy, water, waste, stationary sources, and reductions from solar and vegetation are shown in Tables Ops-7 and Ops-8.

**Abbreviations:**

$CO_2e$ - carbon dioxide equivalents

MT - metric ton

yr - year

**From:** Holly Galbrecht
**To:** Zushi, Kei (CPC)
**Subject:** Catherine.Stefani@sfgov.org; frfbeagle@gmail.com; richhillissf@gmail.com; myrna.melgar@sfgov.org; planning@rodneyfong.com; milicent.johnson@sfgovorg; joel.koppel@sfgov.org; kathrin.moore@sfgov.org; dennis.richards@sfgov.org; commissions.secretary@sfgov...
**Date:** Wednesday, January 02, 2019 1:11:57 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Kei Sushi, Senior Environmental Planner,
Here are my comments on the Draft EIR for the proposed development at 3333 California Street.

**I fully support the Community Full Preservation Residential Alternative for 3333 California.** 1 (AL-2)

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.
- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 8,000 retail auto trips per day.
- It does not generate approximately 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It matches the surrounding neighborhoods for character, style, scale and bulk.

I strongly oppose the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333 California; it threatens the quality of life; it poses threats to pedestrian safety; and it contributes to climate change. 2 (ME-1 )

The Community Full Preservation Alternative will generate zero retail auto trips to 3333 California as opposed to the 8,000 retail auto trips caused by the Developers Destructive Proposal. The Community Full Preservation Alternative will protect the small, family owned businesses
in Laurel Village, Sacramento St. and Presidio Avenue. A quick walk around these neighborhoods
will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses.The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St., etc.
We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal calls for. 3 (AL-2) 4 (ME-1)

Thank you for your consideration.

Sincerely,

Holly Galbrecht
560 Presidio Avenue, Apt. 1
San Francisco, CA 94115
hgalbrecht@gmail.com
415-409-1335

# I-GIAMPAOLI

**From:** Ron Giampaoli
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); Richard Frisbie; richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); CPC-Commissions Secretary
**Subject:** 3333California Street
**Date:** Tuesday, January 08, 2019 2:26:39 PM

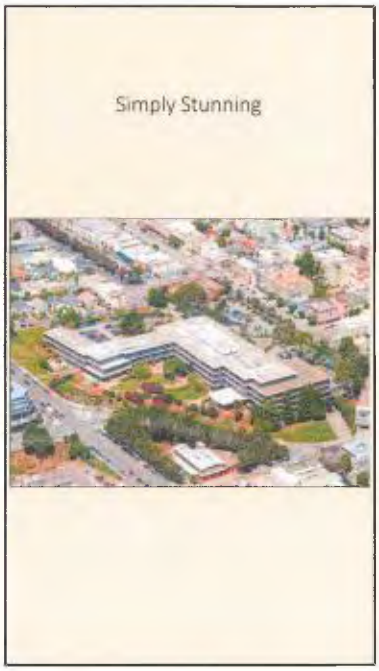
This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear planning commission my father and his partners started Cal Mart Supermarket in 1952 so I think I know the neighborhood very well .⌈i support the full preservation alternative for the project as preserving the historic site will be good for the neighborhood as it will provide housing units which we all need in San Francisco .⌈I don't like the idea of adding extra retail as we have enough already in Laurel village and nearby sacramento Street and trader joes and target nearby .⌈There is another project in the making as Children's Hospital will be closing down and there will a large project of just housing being built and they say it will be much faster compilation compared to this project then the 15 years at 3333 California St. I think this timeline of 10 to 15 years is not the way to go it should be must faster .⌈We have fought the rezoning and gathered many signatures so hope that works out for the neighborhood . Laurel village is really a special gem of the city and I hate to see it disrespected with no concern for the neighborhood .⌈Cal Mart is taking care of a lot of third generations of neighborhood customers and we want that to continue.

Thank you for taking time to read my comments Ronald Giampaoli President Cal Mart Supermarket

1 (AL-2)
2 (ME-1)
3 (PD-1)
4 (ME-1)

Received at CPC Hearing 12/13/18
K. Zushi




Good afternoon Commissioners.
I'm Linda Glick, a resident of Laurel Street.
I'd like to explain the history of the restrictions placed on the site by the Planning Commission and the community use of the green space as a park.

The same developer who built the Laurel Heights residential tract and Anza Vista was going to build a residential tract on this site, but he died.

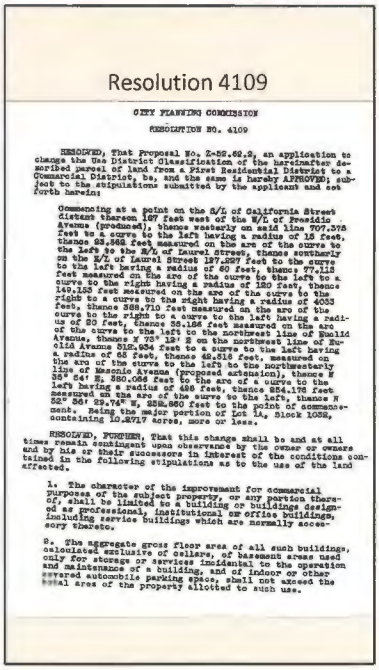
7
(PP-1)




The School District acquired the property for a possible site for Lowell High School but decided to locate that elsewhere and sell this site. The District could get 50% more money from the sale if it could rezone it from First Residential to Commercial.

The District withdrew its first attempt at rezoning due to community opposition.

7
(PP-1)
cont'd



Resolution 4109

CITY PLANNING COMMISSION

RESOLUTION NO. 4109

RESOLVED, That Proposal No. Z-52.62.2, an application to change the Use District Classification of the hereinafter described parcel of land from a First Residential District to a Commercial District, be, and the same is hereby APPROVED; subject to the stipulations submitted by the applicant and set forth herein:

Commencing at a point on the S/L of California Street distant thereon 167 feet west of the W/L of Presidio Avenue (produced), thence westerly on said line 707.576 feet to a curve to the left having a radius of 15 feet, thence 23.562 feet measured on the arc of the curve to the left to the E/L of Laurel Street, thence southerly on the E/L of Laurel Street 187.257 feet to the curve to the left having a radius of 60 feet, thence 77.115 feet measured on the arc of the curve to the left to a curve to the right having a radius of 180 feet, thence 149.153 feet measured on the arc of the curve to the right to a curve to the right having a radius of 4033 feet, thence 368.710 feet measured on the arc of the curve to the right to a curve to the left having a radius of 20 feet, thence 36.186 feet measured on the arc of the curve to the left to the northwest line of Euclid Avenue, thence N 73° 12' E on the northwest line of Euclid Avenue 812.434 feet to a curve to the left having a radius of 66 feet, thence 46.516 feet, measured on the arc of the curve to the left to the northwesterly line of Masonic Avenue (proposed extension), thence N 35° 54' W, 380.066 feet to the arc of a curve to the left having a radius of 466 feet, thence 854.176 feet measured on the arc of the curve to the left, thence N 52° 56' 29.74" W, 252.860 feet to the point of commencement. Being the major portion of Lot 14, Block 1052, containing 10.2717 acres, more or less.

RESOLVED, FURTHER, That this change shall be and at all times remain contingent upon observance by the owner or owners and by his or their successors in interest of the conditions contained in the following stipulations as to the use of the land affected.

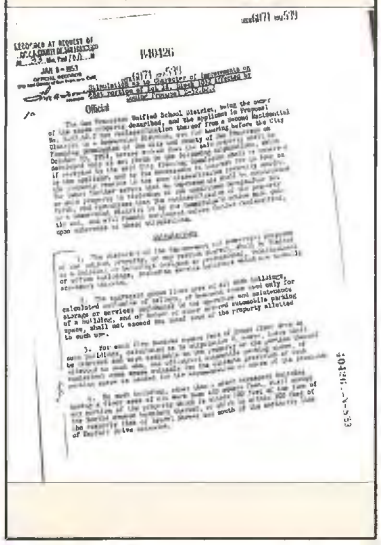
1. The character of the improvement for commercial purposes of the subject property, or any portion thereof, shall be limited to a building or buildings designed as professional, institutional or office buildings, including service buildings which are normally accessory thereto.

2. The aggregate gross floor area of all such buildings, calculated exclusive of cellars, of basement areas used only for storage or services incidental to the operation and maintenance of a building, and of indoor or other covered automobile parking space, shall not exceed the total area of the property allotted to such use.

Finally a deal was struck with the community that resulted in the restrictions stated in Resolution 4109 that include 100-foot landscaped setbacks along Laurel and Euclid streets and a ban on retail uses of the site.

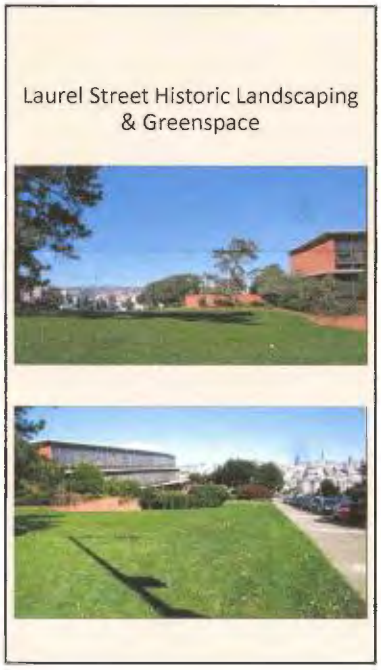
7 (PP-1) cont'd

Stipulation of Character of Improvements.....



Under Planning Code section 174, such Stipulations as to Character of Improvements become provisions of the Planning Code and can only be changed by the Board of Supervisors.

7
(PP-1)
cont'd

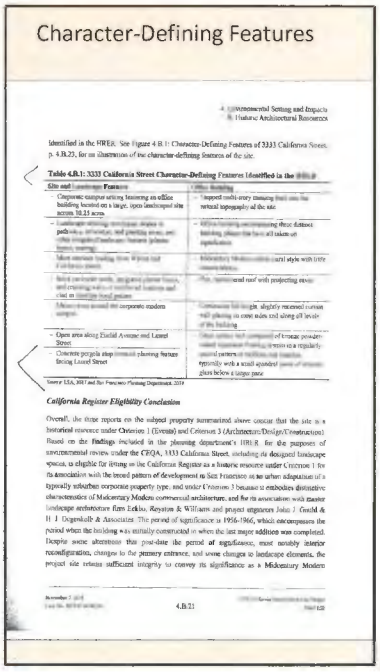



Through the years, the community has used the green landscaped spaces for recreational purposes and a lawyer has stated that the public has acquired permanent recreational rights on the green spaces. 8 (PD-5)

There is a lot of talk about preserving neighborhood character.

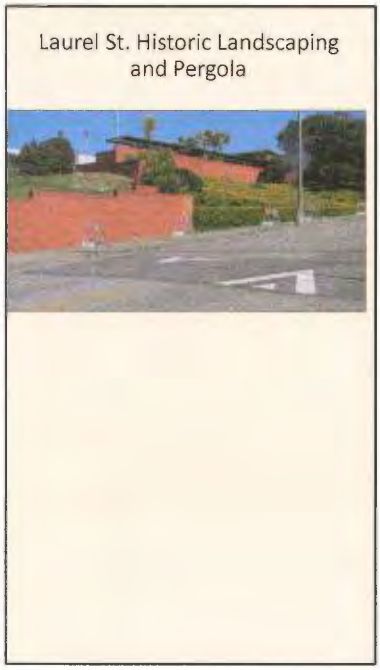
Laurel Hill has always been a place where neighbors gather; children learn sports from their parents; and a Community is formed.

These Community bonds will not be formed along meandering concrete paths. 9 (PD-3)




The EIR identifies the concrete pergola atop terraced planting feature facing Laurel Street as a character defining feature of the resource. [DEIR p. 4.B.21]

10
(CR-1)




The EIR explains that as a characteristic of Midcentury Modern design, the use of patios, pergolas and interior courtyards created welcoming, transition areas where the inside and outside merged. [DEIR p. 4.B.12]

10
(CR-1)
cont'd

I, and the entire Community strongly supports our Full Preservation Alternative that protects these cherished Historic features of this important and iconic site.

11
(AL-2)

THANK YOU

**Comments to the Draft Environmental Impact Report for 3333 California St. Mixed Use project**

**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**

1
(PD-1)

**I fully support the Community Full Preservation Residential Alternative for 3333.**

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.
- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 13,000+ retail auto trips per day.
- It does not generate approx. 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It matches the surrounding neighborhoods for character, style, scale and bulk.

2
(AL-2)

**I strongly oppose the Developers Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333. It threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change.**

3
(ME-1)

While there are many impact areas of the Draft Environmental Impact Report that should be challenged as the assumptions used are suspect, I will focus on one:

4
(TR-8)

- **Cumulative Pedestrian Conditions (4.c.112)**

As an avid walker in San Francisco, I appreciate the effort to improve sidewalks and intersections. However improvements that are proposed will do nothing to enhance the pedestrian environment. For example the addition of a crosswalk at the eastern Mayfair/Laurel intersection will not fix today's problem that will only be worsened with the post project increased traffic. Today the crosswalk that runs north /south across the west side of Mayfair at Laurel is a death trap as people using Collins as a pass through routinely fail to stop at the intersection. Increased traffic volume will result in more injuries. The only reason that this crosswalk did not come up as dangerous is that today's residents know to pay attention. Who will warn the new residents of 3333 California?

Also the Euclid Avenue traffic circles have made pedestrian life a nightmare. Drivers cannot see across the traffic circle and are so busy trying to figure out how to navigate that pedestrians are ignored. Again, the assumption that the traffic calming will help with the increased traffic volume is fallacious.

The new bulb out on the NE corner of Euclid and Laurel has not made the intersection any safer. Drivers routinely turn right onto Laurel without coming to a full stop. The addition of one on the NW corner will not change the driving behavior. Again the increased traffic will not be mitigated by these bulb-outs.

From: David Goldbrenner <goldbren@gmail.com>
Sent: Tuesday, December 18, 2018 1:31 PM
To: PIC, PLN (CPC)
Cc: Jane Fridlyand
Subject: 3333 California Project

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Department,

I am writing to express my concern over the 3333 California project. I recently heard about the project and attended last week's Planning Commission meeting at city hall.

I live about 6 blocks from the site with my wife and daughter, and I am deeply concerned about the size and scale of the project. It looks like the creation of a mini-city in our neighborhood. 1 (GC-1)

The developer has asked for a 7-15 year time frame. I cannot imagine having this important area and intersection under construction for this amount of time. We use the JCC frequently and we transit down California and Presidio streets constantly as well. I have a 5-year-old daughter--will she really be 20 by the time this project is finished? That is mind-boggling to me. 2 (PD-1)

We are not opposed to development of htis site but request a smaller project with a shorter construction timeframe.

We do not see how the currently proposed project, with its duration, size, traffic impact, etc can possibly be in the best interest of the neighborhood. The city's housing shortage needs to be addressed, but it shouldn't be solved by opportunistically adding unreasonable density wherever there is an available site--that is not fair or just. Increases in density need to be distributed fairly amongst the various city neighborhoods. 3 (ME-1)

Again, we are not opposed to developing this site, but the project as it stands is not reasonable and we strongly oppose it and urge you to work with the developer on a version that scales down the number of units, the retail, and the construction timeframe to 3-5 years at most. 4 (AL-3)

Thank you very much.

Sincerely,

David and Zhenya

David Goldbrenner
2947 Jackson St.
SF CA 94115

**Subject:** Comments on 3333 Project
**Date:** Friday, January 4, 2019 at 8:15:22 PM Pacific Standard Time
**From:** David Goldbrenner
**To:** Zushi, Kei (CPC), richhillissf@gmail.com, Melgar, Myrna (CPC), planning@rodneyfong.com, Johnson, Milicent (CPC), Koppel, Joel (CPC), Moore, Kathrin (CPC), Richards, Dennis (CPC), CPC-Commissions Secretary
**CC:** Jane Fridlyand, Stefani, Catherine (BOS), Richard Frisbie, LaurelHeights2016@gmail.com

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi and Commissioners,

I am writing to express my deep concerns over the current proposal for 3333 California, and to express support for the Community Alternative. (1 (GC-1), 2 (AL-1))

I have lived in Pacific Heights for 7 years, the last three at my current address, along with my wife and daughter. We live on Jackson between Baker and Broderick, about six blocks from the corner of California and Presidio, one of the major intersections that would be affected by the project.

We use the JCC frequently, and are constantly using both California, Presidio, Masonic and other streets around the site to get to our destinations, both by car and bus (1, 3 and 43). We also shop at Laurel Village, Trader Joe's and other local destinations.

We are concerned that the proposed project would affect us in numerous ways, the most important of which I outline below: (3 (PD-1))

- The proposed 7-15 year time frame for the project is mind-boggling to us. Will our five year old daughter really be 20 when this is finished? Dealing with construction delays, noise, dust, traffic congestion, diesel smoke, torn up road, and other hindrances for up to 15 years as we visit the JCC, take the 1 bus from California and Presidio, etc, is deeply troubling.
- The long timeframe makes it more likely that in the case of an economic downturn, such as in 2008, the project could halt indefinitely.
- The truck traffic and other construction traffic is a threat to pedestrian safety. The congestion will force cars onto nearby side streets, affecting the whole area. (4 (TR-8))
- The size and scope of the project will have major environmental impact in terms of the amount of GHG released. (5 (GHG-3))

Instead, I strongly support the Community Alternative, which will produce the same amount of much-needed housing. It will increase the density of housing in the area, but will not have the excessive and unneeded retail, office and commercial space. It also can be completed in a reasonable timeframe, thus balancing the needs of the neighborhood and the city as a whole. (6 (AL-1))

I understand that the city needs more housing, but letting developers build small cities on any available site is not a fair or equitable way to solve the problem. I urge the commission to work with the developer to be responsive to community concerns by scaling down the proposal. (7 (ME-1))

Thank you very much for your consideration.

Sincerely,

David Goldbrenner

Zhenya Fridlyand
2947 Jackson Street
San Francisco, CA 94115
415-225-8963

**From:** Theodore Gordon
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Subject:** Support Housing at 3333 California
**Date:** Monday, December 10, 2018 5:43:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commissioners, Planner, and Sup. Stefani,

My name is Theo Gordon and I am a resident and voter of San Francisco. I live ten minutes from 3333 California.

I moved to San Francisco because, as so many people before me, I saw an opportunity to further myself. It has become harder and harder for people to seek opportunity in San Francisco because of the dire housing shortage. For every 8 jobs we create in the Bay Area, we build 1 unit of housing. This is why we are in a crisis. We must build more housing so that our neighbors can afford to live and work in this city and so that we are not pushing out vulnerable communities. We have to stop making excuses and we have to build housing now. 1 (ME-1)

The project at 3333 California is a chance to build 700 new units of housing. That's 700 more families and individuals who get the opportunity to live in a great neighborhood in a fantastic city. That's 700 more families and individuals who have access to good schools. 700 more families and individuals who can take the bus to work instead of destroying our environment, driving into the city from far out in the East Bay.

As you know, a small but well connected group of wealthy neighbors are trying to label an office building as historic. No such claim had ever been made about this building until the possibility of new housing came up. Let's call this what it is, a perversion of historic building protections to enrich a few, already very well off, people. It is another example in a shameful history of downzoning and redlining that was used to keep newcomers and diversity out of the northern and western parts of the city. This is NIMBYism at its worst. 2 (CR-1)

Sup. Stefani, I know that you consider yourself a progressive. Please choose the progressive option that will help bring diversity to our schools and neighborhoods, get people out of their cars, and give 700 neighbors the opportunity to call San Francisco home. 3 (ME-1)

Thank you,
Theo Gordon

**From:** M.E. Gwynn
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); laurelheights2016@gmail.com; richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary
**Subject:** 3333 California St. DEIR
**Date:** Monday, January 07, 2019 10:37:54 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

**Dear Mr. Zuchi,**

As a long time resident and homeowner who lives on the 3300 block of California Street, I wanted to express my opinion on the DEIR done for the 3333 California development**.**

**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an upzoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.** 1 (PD-1)

**The DEIR does not address the impact on the neighborhood of a 15 year construction project and all the resulting affects on the surrounding neighborhoods and thus it is incomplete and inaccurate.** 2 (GC-1)

**I fully support the Community Full Preservation Residential Alternative for 3333** 3 (AL-2)

It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 13,000+ retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It matches the surrounding neighborhoods for character, style, scale and bulk.

**I strongly oppose** the Developers Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 4 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the Developers Proposal. 5 (AL-2)

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses. The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more. We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Proposal calls for. One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense. 6 (ME-1)

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. **Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents?**

6 (ME-1) cont'd

Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading.

At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact. The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. Studies also show that TNCs increase passenger trips by almost 10%. There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.

Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 13,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." In much the same way as they calculated on the "direct" GHG and totally ignored the "indirect" even though required to do so by their own criteria.

Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is a very suspect number as it is based on questionable assumptions, such as " The SF Guidelines **do not provide a specific methodology to** assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…." Rather amazing that these "refinements" all work in the Developers favor. Nowhere in these "refinements" have THCs been taken into account! **All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.

Planning's mitigation measure is a stone age solution to a digital age problem. How will many people respond to a perceived lack of parking? They'll simply call a TNC and go anyway. **Eliminating parking won't eliminate auto trips it will actually increase auto trips.**

7 (TR-2)

The Developers Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs.

8 (TR-10)

I hope that you will take my comments into account when assessing the impact of the 3333 California development as currently proposed. It is unfortunate that after so much efforts at outreach that a) the community's imput has been ignored and b) that the developers have presented a proposal with last minute significant and meaningful changes ( 15 year construction period, street loading zones etc) , which were not shared with the community.

9 (ME-1)

Regards,

Mary E. Gwynn

3328 California St. apt. 4

From: Anne Harvey <annetharvey@hotmail.com>
Sent: Thursday, December 13, 2018 9:54 AM
To: richhillissf@gmail.com; Melgar, Myrna (CPC) <Myrna.Melgar@sfgov.org>; planning@rodneyfong.com; Johnson, Milicent (CPC) <Milicent.Johnson@sfgov.org>; Koppel, Joel (CPC) <Joel.Koppel@sfgov.org>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; Richards, Dennis (CPC) <dennis.richards@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Cc: Richard Frisbie <frfbeagle@gmail.com>
Subject: 3333 California Street-URGENT

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am Anne Harvey and I am writing to you on behalf of my husband, a professor emeritus at the University of San Francisco, and our two sons, physician and an economist to strongly urge the Planning Commission to grant a 15-day extension of the Due Date for comments on the DEIR for 3333 California.
It is a lengthy and complex document. And for some unknown reason, the Planning Department has refused to extend the time limit for written comments. As to stands now the deadline for written response to the Draft EIR is December 24, Christmas Eve.This is ridiculous, Christmas ia a time for family and friends.
People should not be rushing around to meet en arbitrary deadline. 1 (GC-3)

We fully support the Community Full Preservation Residential Alternative for 3333 California.and if you examine the matter closely, I think you will too. In any event please let the public have additional time to have input on this matter. 2 (AL-2)

**From:** Anne Harvey
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC.3333CaliforniaEIR
**Cc:** Richard Frisbie
**Subject:** 3333 California Street EIR Insufficiency and Comments
**Date:** Tuesday, January 08, 2019 5:09:35 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners,

I am writing to you to strongly urge you to reject the draft EIR as being insufficient. It fails to consider the proposal the community put forward. The community put forward a full preservation residential alternative for 3333 California Street. I strongly believe that the community proposal should be adopted. 1 (AL-2)

My family and I support all the points submitted by Richard Frisbee. My husband and two sons and I have lived in San Francisco since 1978. In fact, my younger son was born today in the hospital just down the street from this project on todays date in 1983. At the time we lived in the Western Addition and since then both of our sons have gone to school here in San Francisco and grew up here and are both young professionals. We are in full support of more housing at 3333 California. But we are aware of the incredible deficiencies of what the developer is proposing. 2 (ME-1)

Please do not rezone this area. Please adopt the neighborhood proposal as it is much better than what the developer is doing. My husband is a retired professor at the University of San Francisco and I was self employed. One of my sons is a doctor and the other is a young professional. They agree with my position. 3 (AL-2)

Anne Harvey
415-931-5678

Minutes Received at CPC Hearing 12/13/18 (*)
K. Zushi

I urge -- 12/24 DEIR deadline be extended 15 days.
On 12/5, HPC had remaining questions on neighborhood alternative. I-HILLSON1

Over 4 decades ago, *The Chronicle* described site as having:
"pleasant green lawns and plantings that enhance the handsome low lines of the simple building designed by Edward B. Page."

DEIR doesn't mention that the cultural resource of remnant large mature trees from Laurel Hill Cemetery that were incorporated into the Firemen's Fund Building site as historic character-defining features are workhorses in mitigating GHG emissions. Planting small trees over a span of 15 years as if that would provide equivalent or reduced GHGs from thousands of VMTs associated with *NEW* retail uses to negatively impact everyone's HEALTH is concerning. 5 (GHG-1)

Historically site was designed to have commercial on California only. 6 (ME-1)

The Jordan Park Improvement Association Board opposes retail on Euclid side.

Rose H.

MR. IONIN:
I will send this to you electronically.
R

January 8, 2019

Planning Department
Attn: Kei Zushi, Senior Planner
1650 Mission St., Suite 400
San Francisco, CA 94103

Case No. 2015-014028ENV, State Clearinghouse No. 2107092053, 3333 Calif. St. DEIR Comments

Thank you for the opportunity to comment and ask questions on the DEIR.

Volume 1:
Page S.2: In order to develop 558 "dwelling" units under the proposed project or 744 "residential" units on the 10.25-acre site, "…the existing annex building, surface parking lots, and circular garage ramp structures would be demolished." Why would there need to be 13 new structures to be erected with either proposal? 1 (PD-3)

In the 896 parking spaces that are to be provided in "four below-grade parking garages and in 2-car parking garages serving the duplexes on Laurel, would there be 60 public parking spaces for the "60 existing public parking spaces" that are going to be removed? If not, what would be the total number of public parking spaces on the site at each phase of the development and at full completion? 1 (PD-3)

Page S.6, S.7, S.8: "CR-1: The proposed project or project variant would cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5 of the CEQA Guidelines." 2 (CR-4)

In re the mitigation measures stated – Documentation of Historic Resource; Measured Drawings; Historic American Buildings/Historic American Landscape Survey-Level Photographs; HABS/HALS Historical Report; Video Recordation; Softcover Book; & Interpretation of the Historical Resource: While members of the public may appreciate the above products to document the tangible items on the property, how will this be done if the project is supposedly to take 5-7 years or even up to 15 years ("…the proposed project or project variant may be developed over a 15-year timeframe" <Page 4.C.45>)? When would the historic resource materials be available considering the multiple phasing of the project? How would the public know when these become available? Who will be responsible party to get these products to the public? 2 (CR-4)

As part of the "interpretative program," would there be a new plaque for the listing on the CA Register to be placed on the property? If so where? If not, why not? Would the old plaque that marked Landmark #760 be part of the documentation (even though the landmark standards changed since then & maybe that's why the plaque was removed?)? 2 (CR-4)

For future generations, it would be nice to capture this well-known history of San Francisco's Laurel Hill Cemetery where the city's pioneers were once buried along with being one of the "Big Four" cemeteries with Calvary, Masonic and Odd Fellows cemeteries. 2 (CR-4)

If and when any of the larger remnant trees reach the end of their lifespan or are killed by the development, it would be a good gesture to the community to have parts of it available for sale and to earmark the funds to go into the urban forestry fund so that tree plantings in this area where such large trees are removed will be increased for the benefit of the community since there are not many large mature trees and to combat future added pollution in this area where traffic is getting worse and as more pollution causing activity increases. 3 (BR-1)

Also, it may be prudent to have not only other parts of the larger remnant trees donated to scientific study as the trunk of the larger trees will tell a story of the environment in the area since the Laurel Hill Cemetery days and the trunk slice at the largest diameter can be saved as a display somewhere. It would help with botanical genome study, too. This would be better than to just dump the remnants and mulch it with no scientific findings for the future. For the environmental study students, would this not be a great project? 3 (BR-1)

It is especially important to plant and keep large mature trees where there is space in light of the fact that "open space" does not mean *ON THE GROUND* but rather includes green rooftops, walls, and sidewalks where large mature trees could not thrive. Information from these older growth trees would give scientists a lot of information about climate change and other things as they occurred in this area. Rather than toss out tree cuttings as mulch only, would that the mitigation measures also provide for people to obtain samples for future historic purposes and/or scientific studies? One may not know what they have and rather than do harm first, it may be prudent to study such matters as is done under the "Precautionary Principle." 4 (PD-3) 5 (BR-1)

In addition, since the Laurel Hill Cemetery contained various rare shrubs like manzanitas, it could be that the area still contains some dormant seeds which may be good to collect for biological study. The range of these rare manzanitas and the conditions could be studied by school children. These seeds accumulate in "seed banks" and would be good to preserve for scientific research.

Page S.10: "TR-2: The proposed project or project variant would cause substantial additional VMT and/or substantially induce automobile travel." ("SIGNIFICANT") 6 (TR-5)

While it is appreciated that Mitigation Measure M-TR-2 proposes to *REDUCE* the retail parking supply as though that would reduce the number of VMTs, any added retail generally, and restaurants in particular, according to prior DEIRs for other development sites, show that retail attracts vehicles to the site such that elimination of a handful of parking spaces will not solve the inundation of vehicles – whether personally owned or for hire (car sharing) – in this area for at least ¾-mile in all directions. The retail use attracts vehicle trips. And with rideshares, there does not have to be parking to have them add to the vehicle trip count.

What formula model does Planning Department use to calculate VMTs? Does it include commercial vehicle miles travelled? What road types are included or excluded from calculations? What about VMTs from carshares? Would one-way carshare trip miles travelled be included in the calculations vs. 2-way carshare trips? Would certain passenger vehicle miles traveled be excluded from calculations? What other models were used besides the one used by Planning? Were the outcomes the same? Was the VMT calculation model used in this DEIR used for all other DEIRs in the last 3 years? If not, why not; and if so, what were the mitigation measures for those DEIRs that could be applied to this site? 7 (TR-2)

The DEIR does *NOT* account for the post-2008/2009 phenomena of TNCs / rideshares causing substantial VMTs in the area. Carshare drivers stop in the middle of the street to load and unload passengers. They drive in from across the bridge to "work" in SF. When they get a customer, they pick up the customer and drive off to another area that could be miles away – especially when the driver drives into the city from outside, the total mileage he has to drive is not included in the VMTs which starts and stops only upon the rider's total ride rather than the miles the TNC driver has racked up. The same customer may want the same driver to drive him/her back so the driver drives back in from miles away potentially to pick up this initial customer at 3333 California who only needs a ride 3 blocks away. The mitigation measure to reduce the VMTs generated by this project would be to eliminate all or much of the *retail* use which in many Planning Department DEIRs show is what generates the most VMTs. In addition, different retail uses generate more VMTs than others. Retail 8 (TR-5) 9 (TR-1)

and especially ***restaurant type use*** generates ***a lot more traffic*** because they stay open later than another use that is open only 9AM-5PM. Neighbors in this area drive or call a rideshare to get a cup of coffee even if only 2 blocks away. 9 (TR-1) cont'd

Also, documentation from University of California, Davis, and other sources, indicate that San Francisco is 92% dependent now on carshare mode (e.g. Uber, Lyft, etc.) as opposed to Muni buses. The documentation states that had these carshare modes not existed, they would walk, bike or take Muni or a taxi. The documentation also shows that there are millions of VMTs travelled by these rideshares in SF based on the total amount of fares collected by these companies. 10 (TR-2)

Here is a sample article of the impact from rideshares and VMT count:

https://www.washingtonpost.com/local/trafficandcommuting/as-ride-hailing-booms-in-dc-its-not-just-eating-into-the-taxi-market--its-increasing-vehicle-trips/2018/04/23/d1990fde-4707-11e8-827e-190efaf1f1ee_story.html?utm_term=.1f054949bc7e&noredirect=on

Moreover, here is an additional document about the impact of rideshares on VMTs. There is a statement that VMTs would be 83.5% more miles than had rideshares not existed or used. Here is the link to the September 2018 text by Henao and Marshall:
https://link.springer.com/article/10.1007%2Fs11116-018-9923-2
This is the abstract for their work:
"Ride-haling such as Uber and Lyft are changing the ways people travel. Despite widespread claims that these services help reduce driving, there is little research on this topic. This research paper uses a quasi-natural experiment in the Denver, Colorado, region to analyze basic impacts of ride-hailing on transportation efficiency in terms of deadheading, vehicle occupancy, mode replacement, and vehicle miles traveled (VMT). Realizing the difficulty in obtaining data directly from Uber and Lyft, we designed a quasi-natural experiment—by one of the authors driving for both companies—to collect primary data. This experiment uses an ethnographic and survey-based approach that allows the authors to gain access to exclusive data and real-time passenger feedback. The dataset includes actual travel attributes from 416 ride-hailing rides—Lyft, UberX, LyftLine, and UberPool—and travel behavior and socio-demographics from 311 passenger surveys. For this study, the conservative (lower end) percentage of deadheading miles from ride-hailing is 40.8%. The average vehicle occupancy is 1.4 passengers per ride, while the distance weighted vehicle occupancy is 1.3 without accounting for deadheading and 0.8 when accounting deadheading. When accounting for mode replacement and issues such as driver deadheading, we estimate that ride-hailing leads to approximately 83.5% more VMT than would have been driven had ride-hailing not existed. Although our data collection focused on the Denver region, these results provide insight into the impacts of ride-hailing."

The rideshares are stated to also impact the ridership of existing Muni buses because they cannot move when the rideshares add to the congestion and automobile delay on the streets. If the retail use was curbed, there would not be as many vehicles in the area to cause the Muni delays as well.

Part of the mitigation measure should be to curb increased vehicle counts on the residential arterial (side) streets within ½-mile of the project that are already taking on the bulk of the traffic. What are the vehicle counts projected for Laurel, Manzanita, Iris, Heather, Spruce, Parker, Commonwealth, Jordan, Palm, Euclid, Geary, and California St. from 2018 each year until the fully built out project? It is hard to say the total number of years the development is projected to take – ranges from 5-7 years (see Table AQ-1 shown later herein & from DEIR) to 15 years so what are the counts based on the time projections? 11 (TR-5) 12 (TR-14)

Page S.10: "TR-3: The proposed project or project variant would not cause major traffic hazards." ("LESS THAN SIGNIFICANT" (LTS)) 13 (TR-7)

Improvement Measure I-TR-3 says there will be parking garage attendants or other queue abatement actions but there will be bad actors who will "only for a minute" park in neighbors' driveways as they wait for parking in the garage. These queued up drivers will compete now with the rideshares that generally are in the neighborhood parked and waiting or sleeping in their vehicles for their next client. Neighbors will no longer have any street space to park because all the "temporary" parkers are taking up practically every foot of curb space. 13 (TR-7) cont'd

If double-parkers occurred at the intersection of Euclid and Laurel or farther east, there could be major collisions from being not only blinded by the sun but due to the trifurcation of Pine into Euclid, Presidio, and Masonic. This area is like an accident waiting to happen. I cross there as a pedestrian on the tiny little refuge islands and can get the breeze from cars "flying" by. The time for the signal for pedestrians to cross on a fresh green is very short there. Vehicles do not see the signals well so they continue on their turns even on a red. 14 (TR-8)

There could be major traffic hazards with a new retail on the Euclid corner which may take out people on the pedestrian islands or on the sidewalk. The retail on Euclid side should be taken out because people will spill out onto the dangerous part of the parcel putting them at risk for their safety. Rideshares will be taking up road space and on-street parking for pick-ups and drop-offs so there will be a lot of automobile delay especially with the heavy traffic from Pine (one-way westbound, Masonic (left turn westbound onto Euclid & right turn onto Euclid) and Euclid (from other cross-streets) are combined. Although the report shows the impact at "LESS THAN SIGNIFICANT" ("LTS"), the cumulative traffic issue with Trader Joe's traffic already bogging down Masonic southbound should not overburden the adjacent neighborhoods with cut-through traffic through Laurel Heights and Jordan Park. In addition, the delivery trucks travel within ½-mile of Laurel Heights to the Laurel Village Shopping Center, to the existing CPMC cafeteria and hospital to add to the overburdening of the street. 15 (TR-12)

When new businesses get to inhabit the City Center at Masonic and Geary, those traffic counts and VMTs will add to the area VMTs which should be much more than it is today. If a grocery store or another restaurant or more is inserted in the City Center, how will the traffic from that impact the Laurel Heights/Jordan Park, Geary and California St. areas? Has this been studied in the DEIR?

This point cannot possibly be considered "LTS". See **C-TR-1** (Pages S.15-S.16) "Construction of the proposed project or project variant, in combination with reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to cumulative construction-related transportation impacts." ("LTS," "None required" for mitigation)

A number of projects including the Lucky Penny, CPMC rebuild into new housing, a Presidio Avenue project, the GearyBRT closing off lanes for construction that will be coming during the same time span as 3333 California Project, the introduction of a potential Whole Foods at City Center at Masonic, the 3300-mid-block demolition-to-housing project on Geary, the new builds and other increases of unit counts on surrounding "nearby streets" are not taken into account.

Page S.11: TR-3 (continued)
Why would the owner/operator of the garage be held accountable for a situation caused by the developer's design of the project? If the project is going to attract that much vehicular traffic and problems for the garage, then the uses that attract the most vehicles that would use the garage would need to be eliminated from the project. 16 (TR-7)

Page S.12: Unsure that a new Muni line would mitigate much of the traffic or loading demand on buses when many use the rideshares. Muni ridership has declined. Perhaps more people in this area take rideshare. This means more VMTs in the area than other areas where more ridership exists on Muni. There are many lines that go by the 3333 California site but do not stop there (e.g. 38BX, 38AX, 17 (TR-9)

NX, etc.). These existing lines use Masonic to get to Bush to get downtown. Again, with other transportation modes available such as scooters, bikes, rideshares such as Uber, Lyft, Chariot, not sure how this will mitigate the impact of ridership on Muni. Will there be a 43-Masonic line ridership survey to see where they are all going first? Also, if there is less ridership on Muni overall, why not find out where the ride-hailing companies are taking their passengers and from what point to what point before putting in things that may not make any difference? Will such data be analyzed and shared with the public? 17 (TR-9) cont'd

This S.12 mitigation proposal appears to be conflict with C-TR-10 on Page S.17 that says the "project will not contribute…passenger loading impact." If there is no loading impact, again, it does not make sense to run more buses or run a new Muni line. Also, without knowing if all the future residents and users of the site will be taking Muni or using alternate forms of transportation which are now in use since 2009 when the study was done, not clear why this is also labeled "Not required" and "N/A" just like C-CR-1 (above). And if all the future visitors and residents to the site will be taking rideshare or driving – as the statistics for automobile use in the city is still fairly high with Muni ridership declining, it makes less sense to add to the 43-Masonic line or increase the frequency. Just because there are more buses being run on a line does not mean that is the basis to say the demand is there. There is already the 2-Clement line, the 1-California line and the 43-Masonic at the location. The 38-Geary is only up to 2 blocks away. Anybody west of these locations generally takes the 33-Stanyan, 44-O'shaugnessy, 28-19th Avenue or 29-Sunset lines to go in the north-south direction.

Page S.12 (***see also TR-4*** comments): The "fair share" contribution is listed not to exceed these amounts:

"Proposed Project – $182,227
Project Variant – $218,390"

However, due to the project taking at minimum 5-7 years to be completely built out or as described from the DEIR up to 15 years, these figures would be too low as the cost in future of the Muni operation and purchases increase. There should be a clause in the developer agreement to ensure that the project pays for ***future increases in cost*** to mitigate the traffic impacts to the value of the cost of the bus with projected cost of a bus in the future. The ***$182,000-$218,000 is low to mitigate impacts*** of the transit ridership by full development of this project.

TR-4 (***see also S-12*** comments): "The proposed project or project variant would result in an adverse transit capacity utilization impact for Muni route 43 Masonic during the weekday a.m. peak hour under baseline conditions."

**"**Mitigation Measure M-TR-4: Monitor and Provide Fair-Share Contribution to Improve 43 Masonic Capacity Based on an evaluation of the transit ridership generated by the proposed project or project variant, monitoring of transit capacity utilization for the 43 Masonic line shall be initiated when the first phase of development has been completed and occupied."

Where are the extra 3 people mentioned in the DEIR triggering the need to purchase another bus at today's cost of $940,000+ coming and going to? Why not find out where most of the 43-Masonic line riders are going to and from? Why is there not an estimation of the need for any 43 Masonic buses for the entire development completion with the purchase price of the bus being paid for those as well including estimated bus purchase cost at end of the development? Otherwise, the taxpayers end up paying for supporting Muni via more ridership fare increases and such. A developer who works in partnership with the city should pay for the additional infrastructure costs into the future if his/her development is going to be delayed for many years. Otherwise, it's cheaper to put the entire development in at the current costs of infrastructure or it will cost a lot more to the taxpayers and Muni riders in the form of fare increases. If the Muni fare increases are equivalent to the rideshare modes,

there will be even more VMTs as San Francisco is more and more dependent on rideshares especially as fares increase for the municipal bus system (Muni) and travel times increase as more vehicles clog the streets to increase travel time causing major delays so all modes get bogged down and people sit in vehicles and pollute at lower RPMs. The stopping and starting of vehicles as they cannot get around town and as signal timing is contributing to the automobile delay will increase air pollution on many streets around this project for at least ½-mile radius. One can see the automobile increase just from watching and this does not take any $100,000 "traffic study" to figure out. 17 (TR-9) cont'd 18 (AQ-3)

This point about increase in vehicular travel in this area with nobody really going anywhere efficiently should also be a point under "AIR QUALITY" (***Chapter 4E & AQ***).

Air Quality Table AQ-1 (shown below): It shows the project being done from 2020-2027. With this timeline, I think the GHGs will not be remedied with the current trees of unknown species being planted even if in greater quantities than the existing number of mature trees. The mature trees are the ones that do the heavy cleaning of the air. There should be some consideration of tree species that also will not cause harm to the existing mature trees in the area to be retained and are in good condition. 19 (GHG-1)

**Table AQ-1**
**Project Construction Phasing**
**3333 California Street**
**San Francisco, California**

| Phase | Phase Name | Start Date | End Date | # of Work Days |
|---|---|---|---|---|
| 1 | Masonic/Euclid | 3/2/2020 | 8/19/2022 | 645 |
| 2 | Center Building A/B | 9/10/2021 | 8/31/2023 | 515 |
| 3 | Plaza A/Plaza B/Walnut | 12/4/2022 | 11/18/2025 | 773 |
| 4 | Mayfair/Townhouse/ Euclid Park | 5/22/2025 | 1/12/2027 | 429 |

**Notes:**

[1] Project construction schedule provided by the Project Sponsor.



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There's a comment (Page 523) that states in ***today's*** dollar value:
"Cost of a 40-foot electric bus is $967,132"

20
(TR-9)

The fair-share contribution to even add one bus is not going to be covered per the amounts shown on Page S.12 above because in the future, the bus would cost more. How was this figure calculated? If the project takes years to complete, there should be a figure that would purchase however number of buses to mitigate the impact of not having sufficient number of buses as a result of this project due to the impact to the community in the surrounding area, no?

The trigger for the needed 43-Masonic line is explained as being due to the 3 additional riders on that line. Where are these people on this line going to that it is so heavily skewed to the *northbound* 43-Masonic trips in the AM Peak Hour?

Page 248 shows 43-Masonic ridership NORTHbound & Southbound as below:

Directional Muni Line Analysis

| Route by Direction | Existing Conditions | | | | | | | | Project Trips | | Existing plus Project Conditions | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Weekday AM Peak Hour | | | | Weekday PM Peak Hour | | | | | | AM | | PM | |
| | Ridership | Capacity | Utilization | MLP | Ridership | Capacity | Utilization | MLP | AM | PM | Ridership | Utilization | Ridership | Utilization |
| Northbound | | | | | | | | | | | | | | |
| 43-Masonic | 318 | 378 | 84% | Geneva/Mission | 140 | 315 | 44% | Masonic/Fulton | 15 | 32 | 333 | 88% | 172 | 55% |
| *Subtotal* | *318* | *378* | *84%* | — | *140* | *315* | *44%* | — | *15* | *32* | *333* | *88%* | *172* | *55%* |
| Southbound | | | | | | | | | | | | | | |
| 43-Masonic | 246 | 378 | 65% | guna Honda Blvd/Clarend | 215 | 315 | 68% | Masonic Ave/Golden Gave Av | 37 | 14 | 283 | 75% | 229 | 73% |
| *Subtotal* | *246* | *378* | *65%* | — | *215* | *315* | *68%* | — | *37* | *14* | *283* | *75%* | *229* | *73%* |

Is the same model used for transportation VMTs used for calculating impact or needs for Muni? What is the margin of error to calculate the need for Muni considering the focus is on the 43-Masonic line which is at the boundary of the Census Block or Transportation Analysis Zone (TAZ)? Has any analysis been made as to whether the riders using the 43-Masonic are going across town or milling about just to travel a few blocks to the City Center on Masonic for a cup of coffee? Would it not be more accurate to find out where the riders are going? What about the impacts to the 1-California or the 2-Clement? 20 (TR-9) cont'd

Page S.13: "TR-6: The proposed project or project variant would not cause significant impacts on regional transit." ("LTS" & the mitigation = "None required")

When the streets in the area get jammed with more vehicles in the area along with potential new bus line or more Muni buses as stated in this DEIR, more road space is taken up and everybody will be waiting, including the Golden Gate Transit buses on Geary that go to Marin County. How is this analyzed in the DEIR?

S.14: "TR-9: The proposed project's or project variant's freight loading demand would be met during the peak loading hour." ("LTS") 21 (TR-10)

One of the mitigation measures states:
"Requiring deliveries to the retail and restaurant components of the proposed project or project variant to occur during early morning or late evening hours."
If any more trucks are going to weave through the Laurel Heights & Jordan Park neighborhoods during the wee morning hours or late evening, the community will not be able to get quiet enjoyment of their properties.

"Delivery to the retail and restaurant components" of the project is unclear as to when these would occur. Please clarify. Restaurants usually are open late. They would already have deliveries late. Most deliveries should be done on OFF-PEAK, *NON*-WEE-HOURS to not create a nuisance to the neighborhoods.

The DEIR mentions:
"Installing delivery supportive amenities such as lock boxes and unassisted delivery systems to allow delivery personnel access and enable off-peak hour deliveries"

If this is going to create *"Amazon-like" lockers* (package delivery lockers for mail orders) to be accessed 24/7, there will be a huge impact to more VMTs and other CEQA impacts to the neighborhood that would not ordinarily exist if restricted to when any retail is open for business. Also, should such locations ("Delivery Supportive Amenities," Page 246, "TDM") be identified on the site, they should be kept on the commercial corridor rather than on the Euclid side which is residential in nature.

Page S-15 (TR-10): "…passenger loading demand would be met during the peak loading hour and would not create hazardous conditions or significant delays for transit, bicycles or pedestrians. / "LTS" 22 (TR-9)

Based on the 12,000+ VMT for the project and with all the retail and office space being proposed, there is likely to be delays for transit as more conflicts at the intersections would arise by cutting new streets through the historic property site. There will be automobile delay to the point of gridlock in some areas. Putting retail in the Euclid building and at the corner plaza where the Muni Express buses and commuters travel at a good clip around the Euclid-Masonic intersection at all hours but especially during the AM and PM peak hours with 3-lanes of one-way traffic from Pine heading westbound is compromising safety for everybody. I do not think this should be considered "LTS" if any sort of use 23 (TR-8)

allows people to linger about this area and on the corner of this steep hill area. Also, as more projects will not have parking allowed with units on Presidio Avenue and practically every other street in the city, the rideshares will, along with all the road-dieting, bulb-outs for pedestrian safety, lane marking changes and traffic control devices cause a lot of automobile delay and could be dangerous to get *emergency access and support* into and out of the area for not only this site but for the rest of the nearby community inhabitants. 24 (TR-13)

Related to this above matter about emergency access, see Page S.15, ***TR-11*****:** "The proposed project or project variant would not result in significant impacts on emergency access to the project site or adjacent locations." ("LTS," "None required" for mitigation measures)

This also applies to S.13 ***TR-7 & TR-8*** -- bike lane on Euclid at Masonic heading westbound & to downtown. This is not safe due to slope with multiple vehicular feeders in the area. 25 (TR-8)

Page S.15: The mitigation measure to initiate early morning and late evening deliveries would seem like they would increase noise levels during these hours which are very low per your data (in the 40dBAs). When one adds large commercial truck deliveries during these very early or very late hours, the impact would be greater even if at 75db because everything else around it is so quiet. 26 (NO-3)

Page S.16 (C-TR-2): "The proposed project's or project variant's incremental effects on regional VMT would be significant, when viewed in combination with past, present, and reasonably foreseeable future projects. / S" 27 (TR-5)

The "Mitigation Measure M-TR-2: Reduce Retail Parking Supply" will make things worse and more impactful because as stated earlier, even if there is *no* parking anywhere, more rideshares, etc. will use the streets and bicycle lanes to clog up the street so that the automobile delay will be greatly increased up to at least ¾-mile of the area in all directions.

The statements in this part seem as if they should be in the freight-loading section of the study -- C-TR-9, Page S.17 – as well. If one looks at it, it also says, "Not required" and "N/A." 28 (TR-10)

S.18-S.22: Re noise issues…

The Noise Control Plan should be reviewed and approved by BOTH Planning Department *and* the Department of Building Inspection (DBI) before permit issuance that will show that the daytime and nighttime noise from the project or any variant will not be greater than 10dBA$L_{eq}$. 29 (NO-1)

This 3333 California DEIR does not have specifics as to how or where the construction-related equipment and vehicles will be handled in the neighborhood. Noise should be attenuated at the closest receptor as part of the mitigation of this "S" Significant Impact category. Developer and contractor may use field-erected temporary noise barriers. Other mitigation measures to employ might be noise control blankets on the buildings as they are worked on, wall off stationary equipment that are noise-makers such as compressors, generators, concrete pumps.

Not only to mitigate noise but also to reduce GHGs in the area, turn off idling vehicles such as dump trucks, delivery trucks, etc.

Staging of concrete pump trucks (they have their concrete spinning while waiting for their turn and thus have a continuous noise) should be determined as to what street and how that will work with the TR (transportation and traffic) category of impact. Who might be responsible would likely be the developer and the construction contractor(s) with notice to Planning and DBI.

Concrete pumping trucks used at night should not increase interior noise levels to surrounding sensitive receptor sites above 45 dBA from 7PM-7AM. Shift noise-making activities to daytime prior to 7PM whenever possible. 29 (NO-1)

If HVAC equipment mitigation is not reached, the Certificate of Occupancy should not be issued for parts of the development where any part of the Noise Ordinance is not met. 30 (NO-3)

The noise-monitoring report should be made available online with a link for the public to access the data to be done daily (every 15 min. or what the neighbors request) rather than on a "weekly basis" (Page S.20). 31 (NO-1)

The hotline number should be posted on a publicly accessible webpage specifically for this construction project as contractors change quickly depending on the phase and change of plans. The hotline number complaints should be handled within 24 hours. Investigational steps should be taken to determine the source of the noise, reduce or abate the noise due to the sound path. Block significant noise makers with non-noise-producing vehicles and equipment so long as they do not create additional hazards for pedestrians, bicyclists and other traffic in the area.

The routes taken (under TR), causes more noise on these residential streets. The routes should be only where large trucks not over 3 tons are allowed. Many streets in the Laurel Heights / Jordan Park area are off-limits for trucks over 3 tons and have many speed humps that would create more vibrations and banging noises when larger vehicles use them. The construction vehicles should not take the restricted streets and stick to commercial streets.

Also, shifting all the noise makers to the early morning or late evening hours will make the noise more discernable since even 70db is heard better during these hours than during the day when other noise is present to "mask" it somewhat.

See also S.15 comments and other areas where noise was brought up as an issue in this document.

Page S.33-S.34: "CR-2: Construction activities of the proposed project or project variant could cause a substantial adverse change in the significance of an archaeological resource." ("SIGNIFICANT," "Mitigation Measure M-CR-2a: Archaeological Testing, Monitoring, Data Recovery and Reporting") 32 (CR-4)

The Mitigation Measure states:
"Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA Department of Parks and Recreation [DPR] 523 series) and/or documentation for nomination to the National Register of Historic Places (National register)/California Register of Historical Resources (California register). In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above."

Would the public be able to obtain a copy of the CD or access a link to the FARR, etc. as described above? Please advise.

Page S.34: Mitigation states:
"The project sponsor shall implement an approved program for interpretation of significant archaeological resources. The project sponsor shall retain the services of a qualified archaeological

consultant from the rotational qualified archaeological consultant list maintained by the Planning Department archaeologist having expertise in California urban historical and prehistoric archaeology. The archaeological consultant shall develop a feasible, resource-specific program for post-recovery interpretation of resources. The particular program for interpretation of artifacts that are encountered within the project site will depend upon the results of the data recovery program and will be the subject of continued discussion between the ERO, consulting archaeologist, and the project sponsor. Such a program may include, but is not limited to, any of the following (as outlined in the Archaeological Research Design and Treatment Plan): lectures, exhibits, websites, video documentaries, and preservation and display of archaeological materials. To the extent feasible, the interpretive program shall be part of a larger, coordinated public interpretation strategy for the project area."

32 (CR-4) cont'd

How will the public be informed as to the availability of this program and what would be the timeline?

Page 2.8: Text in Table 2.1 "Project Summary" shows:
"Retail / None / Not Applicable / 54,117 gsf Plaza A, Plaza B, Walnut, and Euclid buildings (new construction)"

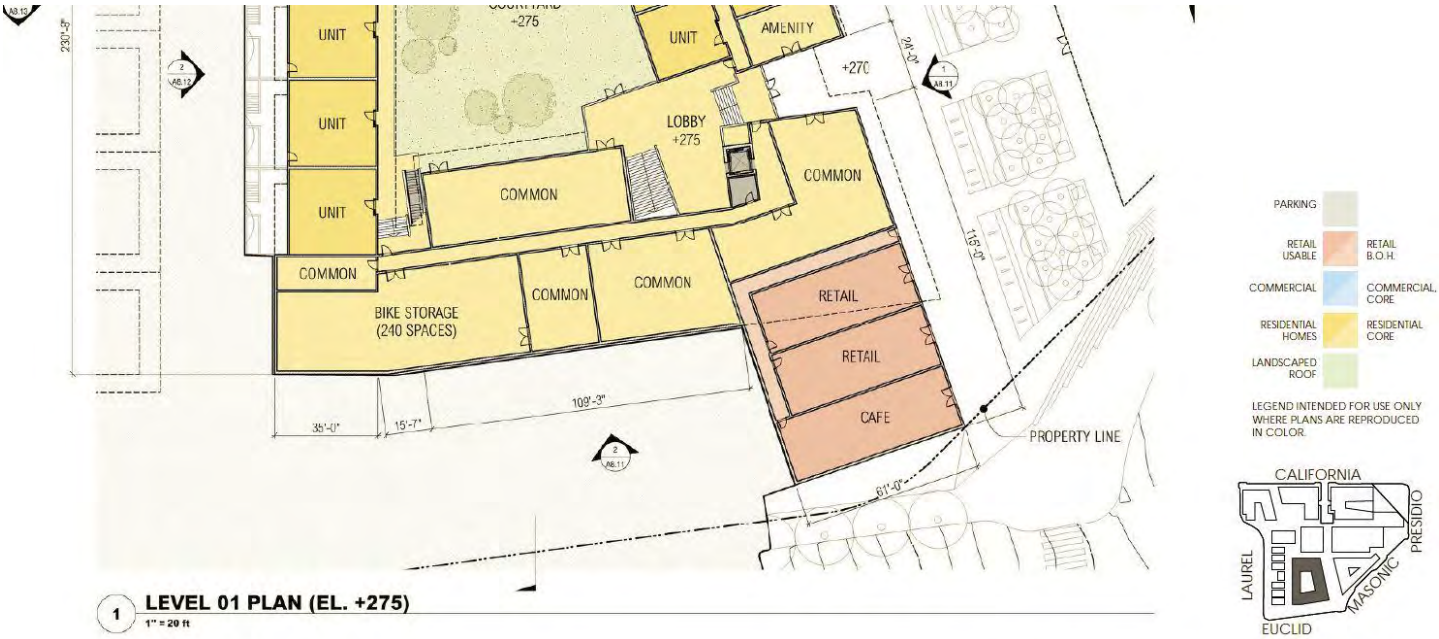
33 (ME-1)

It was stated in one meeting at the Jordan Park Improvement Association Board meeting that there would be no retail on Euclid side near Masonic Avenue but the DEIR still shows it in the plans as on Page 2.82:




The red circle says "RETAIL AT GRADE BELOW"

Also, in the Appendix, there is this picture that also still has pink-shaded RETAIL proposed on EUCLID AVE side. This retail use should be eliminated for the traffic issues & safety issues mentioned earlier. The Jordan Park Improvement Association Board opposes the retail on the Euclid Avenue side:




33 (ME-1) cont'd

In addition, on Page 2.94, the retail use shows up in Table 2.5 as part of Phase I to start in 2020 per another table that shows the phasing dates (alluded to in my comments document elsewhere):

**Table 2.5: Preliminary Construction Phasing Program**

| Phase | Building(s) | Proposed Construction | | | | | |
|---|---|---|---|---|---|---|---|
| | | Residential (gsf / units) | Retail (gsf) | Office (gsf) | Child Care (gsf) | Parking (gsf) | Total (gsf) |
| Phase 1 (2020-2022) | Masonic and Euclid | 266,251 / 196 | 4,287 | -- | -- | 87,977 | 358,515 |
| Phase 2 (2021-2023) | Center A and Center B | 322,888 / 190 | -- | -- | -- | 19,258 | 342,146 |
| Phase 3 (2022-2025) | Plaza A, Plaza B, Walnut | 138,370 / 128 | 49,830 | 49,999 | 14,690 | 301,060 | 553,949 |
| Phase 4 (2025-2027) | Mayfair and Laurel Duplexes | 97,182 / 44 | -- | -- | -- | 20,478 | 117,660 |
| | *TOTAL* | *824,691 / 558* | *54,117* | *49,999* | *14,690* | *428,773* | *1,372,270* |

*Source:* Laurel Heights Partners, LLC and Webcor, September 2017

As an overall comment, the 49,830 square feet of retail will be a magnet for increased VMTs as indicated in past EIRs in many projects throughout the city with retail and office uses totaling 54,117 sq. ft. of retail and almost 50,000 sq. ft. of office. The city is looking for housing people and not demanding office nor retail. Retail currently exists on Geary, California, Sacramento and parts of Masonic near Geary. Retail is not lacking in this area but quality housing for all income levels may be what the city needs more today. Office "space" can be virtual via technology.

Page 4.C.7: "The project site comprises most of the area in TAZ 709, which is the area generally between Laurel / California streets, Presidio Avenue / California Street, Presidio / Euclid avenues and Laurel Street / Euclid Avenue. The project site is located close to major transit services and facilities, bicycle and pedestrian networks and facilities, and a diversity and density of land uses. A project

34 (TR-4)

located in TAZ 709 would have substantially reduced vehicle trips and shorter vehicle distance, and thus reduced VMT, compared to other areas of the region."

While the Transportation Analysis Zone (TAZ) 709 is based on census data, it *ignores the other nearby TAZs* which are not functioning in a vacuum. There should be impacts that go at least ¾- to 1-mile away based on the ***land use types*** being proposed at the site for potential workers count & resident counts. The larger TAZ 709 area being compared to a larger geographic area for VMT does not make sense except to make it so that the TAZ 709 is going to be smaller than the larger "Bay Area VMT" and make the result *not* be impactful to a significant level. Where in the DEIR does it state the margin of error for these counts? What is it? If the margin of error were incorporated, how would the results change? 34 (TR-4) cont'd

Page 4.C.77: With the conclusion from Page 4.C.7 that the project will not affect TAZ 709 in any way, it is illogical to throw in Table 4.C.19 that takes into account "other nearby TAZs (within three-quarters of a mile based on walking distance)" for the analysis when in all the other tables, *NO* "other nearby TAZs" are reflected in that data. How can one way of analysis be applied to one but not in other categories of impact?

**Table 4.C.19: Parking Rate Summary**

| Scenario/Land Use | Size | Vehicle Parking Spaces | Existing Neighborhood Parking Rate | Proposed Parking Rate | Change from Existing |
|---|---|---|---|---|---|
| **Proposed Project** | | | | | |
| Residential | 558 units | 558 | 0.9 | 1 | 11% |
| Retail | 54,117 gsf | 198 | 1.55 | 3.66 | 136% |
| Other Non-residential (Office & Daycare) | 64,689 gsf | 129 | 1.44 | 1.99 | 38% |
| **Project Variant** | | | | | |
| Residential | 744 units | 744 | 0.9 | 1 | 11% |
| Retail | 48,593 gsf | 188 | 1.55 | 3.87 | 150% |
| Other Non-residential (Daycare) | 14,650 gsf | 29 | 1.44 | 1.98 | 37% |

*Note:* The existing parking rate for residential uses reflects data for TAZ 709 and other nearby TAZs (within three-quarters of a mile based on walking distance). The existing parking rate for retail and other non-residential uses reflects data from California and Sacramento streets, as provided by the planning department. The retail land use category for the proposed project and project variant includes the proposed 60 public parking (commercial) spaces on the project site. Car-share spaces are not included in the parking rate calculation as these would be publicly accessible spaces and would not be dedicated to residents or tenants of the proposed project or project variant.

*Source:* Kittelson and Associates, Inc. 2018; San Francisco Planning Department, 2018

The proposed ***parking rate for the Retail Use to increase to 136%*** or **150%** depending on which alternative is chosen compared to the existing parking rate is severely out of character for this area. It is the RETAIL USE that will *drive* all the vehicles into the area (pun intended). When the parking rate increases by these percentages and there is no parking on the street nor the lots, people will crowd the vehicular lanes to entangle the neighborhood with delayed traffic to push more GHGs in the neighborhood. Also, as more people cannot park, those spaces become more expensive due to "demand" parking pricing. The winners will be the SFMTA (parking meters/parking stickers revenue) and the garage owners to increase their pricing. This will lead to unaffordable pricing in this area except for the well-heeled. Having a 136% - 150% increase in parking rate would almost keep traffic

going to and from this area all day. This cannot be truly environmentally sound and sustainable but with all the parking demand, the price of parking would soar and there could be socio-economic red-lining of the area such that only the well-to-do would be able to park or the TNC count would explode in this area. 34 (TR-4) cont'd

As none of the "other nearby TAZs" is enumerated, ***there needs to be an accurate count of all traffic on all streets*** -- within at least 1-mile of this project -- as more units and various uses get settled in the area during the development phase. What are the traffic counts for all the streets between California and Geary from Arguello Blvd on the west to Fillmore on the east side? All of these streets are part of the "other nearby TAZs" not incorporated into the study. If nothing else, there should be counts for Palm to Presidio between and including Geary and California and none of this appears in the DEIR to come to the conclusion that there's little impact to the Laurel Heights, Jordan Park, Presidio Heights areas. Without study of the "other nearby TAZs" to see the impact on each TAZ, one particular area could be overwhelmed with more VMTs and vehicle trips. Perhaps if the data for the other streets were presented, this project would reveal an immense impact beyond "significant"? The Final EIR should provide all this data that is missing from the "other nearby TAZs" and all streets in each TAZ. It is missing and thus the DEIR is not complete nor the analysis conclusion accurate without this data. Will it be provided?

Page 4.C.102: The DEIR then decides not to mention the "other nearby TAZs" in Table 4.C.32 below and decides to show only *regional* VMTs for certain uses. What this means is that in future, TAZ 709 will start to creep to the "Bay Area VMT" of double digits (12.4-17.1) because there is no chaining of miles in the analysis nor a separate "other TAZs" analysis done. Here is the table:

**Table 4.C.23: Projected 2040 Average Daily Vehicle Miles Traveled – Cumulative Conditions**

| Land Use | Bay Area VMT | | TAZ 709 |
|---|---|---|---|
| | Regional Average | Regional Average minus 15% | |
| Households (Residential) | 16.1 | 13.7 | 6.6 |
| Employment (Office) | 17.1 | 14.5 | 8.9 |
| Visitors (Retail) | 14.6 | 12.4 | 7.8 |

*Source:* San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Under other DEIR transportation or traffic analysis, the city used *NOT* the "Bay Area VMT." Why in this one? Why not do an analysis of the TAZs (I suspect about a dozen of them being impacted by this project) to see in greater detail impacts to those TAZs and calculation of VMTs. Would this be provided?

A major flaw in the DEIR for VMTs and traffic counts and parking needs is the separate unbundling of any data in regards to workers who get to the project site who live outside of San Francisco. It is not only the residents of this city who may be visiting this site. Perhaps an analysis of VMTs, parking, and other analysis to nearby TAZs should be included (only TAZ 709 analyzed in this DEIR).

Also, the traffic analysis does not take into account the time of day impacts. While most heavy traffic is in AM- and PM-peak commute hours, there are other hours of concern such as when school lets out. These periods have more traffic on the road. Where is the hourly traffic volumes for the nearby streets (Arguello to Presidio / Fillmore between California & Geary)? Using only TAZ 709 from the 2000 Census appears to show rather low VMT numbers. I think since 2000, there is higher VMT with TNCs. I also think more of the nearby TAZs should be included in the analysis to see a more accurate picture 35 (TR-1)

of what would impact the "other nearby TAZs" rather than using only TAZ 709 (now called TAZ 100521 (Laurel to Lyon Between California & Sacramento). Traffic flows over a distance and the DEIR admits at least to ¾-mile from the site. There needs to be included the "other nearby TAZs" into the calculations for impacts due to changes since appearance of TNCs, other uses, more people. 35 (TR-1) cont'd

Here are the "other nearby TAZs" located from 3333 California. All the streets in these TAZs are not studied for impacts alone with only 3333 California Project *NOR* with the "reasonably foreseeable"** projects the DEIR lists. See also the map below of the TAZs (corresponding TAZ numbers differ but area of TAZs are same): 36 (TR-12)

**TAZ 100524 = Parker to Laurel between California & Euclid *(*NOT* included in the DEIR)***
**TAZ 100521 = Laurel to Baker between California & Euclid/Bush *(TAZ 709 in the DEIR)***
**TAZ 100513 = Laurel to Lyon between California & Sacramento *(*NOT* included in the DEIR)***
**TAZ 100523 = Parker to Presidio between Euclid/Bush to Geary *(*NOT* included in the DEIR)***
**TAZ 100517 = Maple to Laurel between California & Sacramento *(*NOT* included in the DEIR)***
**TAZ 100525 = Arguello to Parker between California & Geary *(*NOT* included in the DEIR)***

The above TAZs include projects that are reasonably known to happen, has happened or has projects that will happen (e.g. new uses at Target City Center, new buildings on Geary, Presidio Ave, **surrounding "nearby" streets that are *NOT* analyzed for traffic impacts**. ***CEQA categories such as AIR QUALITY, VIBRATIONS, NOISE are also not analyzed for these other "nearby" streets with known projects, upcoming projects as additive to 3333 California. The data does not exist in the DEIR. It is missing***.

Why was only TAZ 709 used and none of the "other nearby TAZs" analyzed for impacts from the proposed project? Look below at *** for the list of ***"Projects for cumulative analysis"*** & there are many projects that can have impact with this development in "other nearby TAZs" than only TAZ 709. This is not accounted for in this DEIR.

Again, refer to the map of TAZs below that shows ***at least 12-13 TAZs that are within ¾-mile*** from the proposed development. The streets should all be analyzed for CEQA impacts including traffic or VMTs on these streets. If the **DEIR mentions the known other projects in the area**, every one of those will produce some impact, especially in regards to vehicle travel why are not the streets around them studied in relation to this project?

Not ***all counts of vehicles and VMTs be done to the above TAZs listed*** are included in the DEIR. Why?

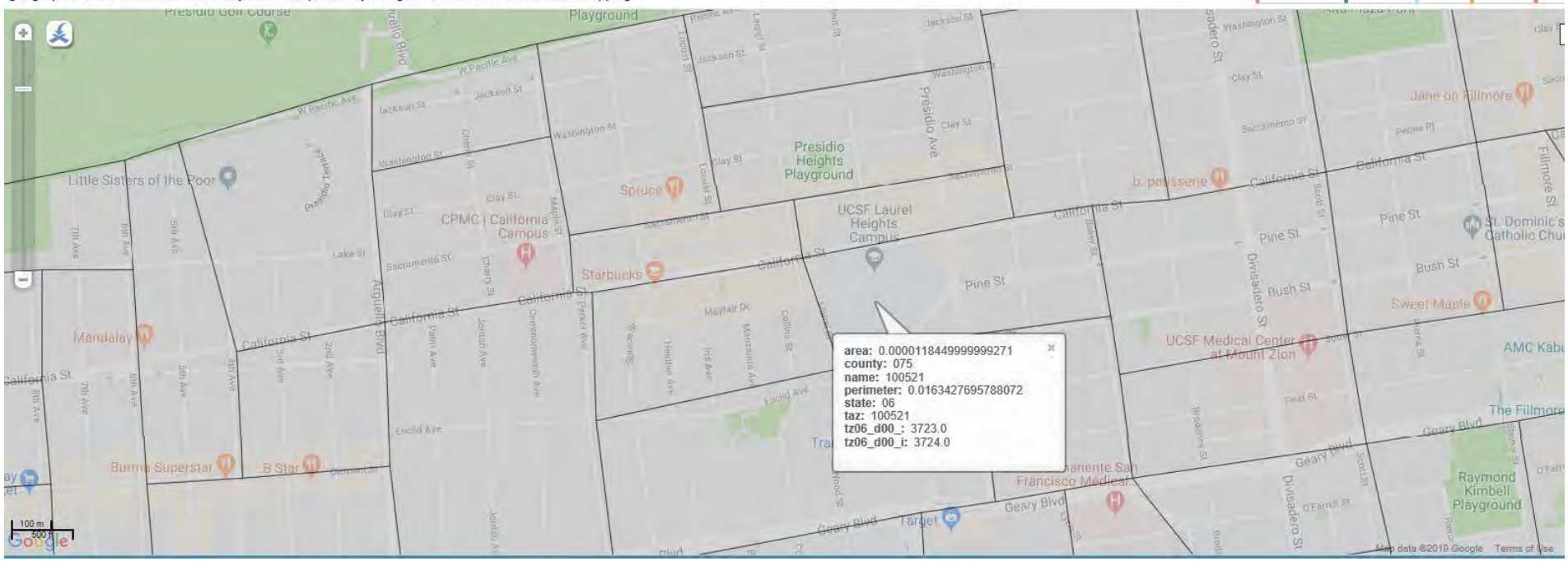
## Traffic Analysis Zones

Based on Traffic Analysis Zones

A traffic analysis zone (TAZ) is the unit of geography most commonly used in conventional transportation planning models. The size of a zone varies, but for a typical metropolitan planning software, a zone of under 3000 people is common. The cartographic boundary files are simplified representations of selected geographic areas from the Census Bureau's MAF/TIGER geographic database. These boundary files are specifically designed for small scale thematic mapping.

Find in this Dataset

More Views | Visualize | Export | Discuss | Em



Do the developers of these other up-and-coming nearby projects want their locations to be impacted by any oversights from the 3333 California Project? Streets nearby known and upcoming projects need to be studied for cumulative impacts and it is missing from this DEIR.

Look below at Table 4.C.1 which lists *ONLY* the closest streets in the analysis. When one has a 10+ acre project, the impact with vehicles goes up along with the other projects and the streets surrounding them. NO ANALYSES has been done on the other streets.

The DEIR fails to take into consideration that the listed and other recent foreseeable projects** (and those now completed) and new projects such as that at 2675 Geary or the 3300-block of Geary Project, the new uses going into Masonic City Center, all of which can impact the residential streets "nearby" in the Laurel Heights, Jordan Park and Presidio Heights areas. Only intersections for one "Transportation Analysis Zone" (TAZ) -- No. 709 – has a vehicle count. Traffic flows to and from "other nearby TAZ" streets listed due to the "reasonably foreseeable" projects the DEIR lists and without the analysis for these other streets in the Laurel Heights, Jordan Park & Presidio Heights neighborhoods, this DEIR is not complete and thorough nor does it give an accurate VMT picture by 2040.

36 (TR-12) cont'd

**Table 4.C.1 Study Intersections**

| Number | Intersection | Existing Traffic Control |
|---|---|---|
| 1 | Sacramento Street / Walnut Street | All Way Stop Control |
| 2 | Sacramento Street / Presidio Avenue | Signal |
| 3 | California Street / Spruce Street | Signal |
| 4 | California Street / Laurel Street | Signal |
| 5 | California Street / Walnut Street | Signal |
| 6 | California Street / Presidio Avenue | Signal |
| 7 | Mayfair Drive / Laurel Street | All Way Stop Control |
| 8 | Presidio Avenue / Masonic Avenue / Pine Street | Signal |
| 9 | Euclid Avenue / Laurel Street | All Way Stop Control |
| 10 | Masonic Avenue / Euclid Avenue | Signal |
| 11 | Presidio Avenue / Euclid Avenue / Bush Street | Signal |
| 12 | Geary Boulevard / Masonic Avenue | Signal |
| 13 | Geary Boulevard / Presidio Avenue | Signal |

*Source:* Kittelson & Associates, Inc. 2017

Is the TAZ "bar" set to "Bay Area VMT" such that the REGIONAL bar is now the metric rather than anything at the neighborhood level? If so, would that not create a situation such that any and almost all development in future will not have and "Significant" level impacts, especially in the low-density neighborhoods?

37 (TR-4)

NOTE: In Table 4.C.1 above, Number 10 states that the "Existing Traffic Control" is only a "Signal." This is *NOT* true. There is also an uncontrolled traffic lane going eastbound on Euclid to southbound on Masonic. Pedestrians can get killed here as many vehicles turn that corner near the traffic islands.

38 (TR-8)

Take a look at the below 2 tables – one for 3333 California & the other for 1 South Van Ness:

39 (TR-4)

Table 4.C.23 shows the Average Daily VMTs for *ONLY* TAZ 709 (3333 California site & very close streets):

39 (TR-4) cont'd

**Table 4.C.23: Projected 2040 Average Daily Vehicle Miles Traveled – Cumulative Conditions**

| Land Use | Bay Area VMT | | TAZ 709 |
|---|---|---|---|
| | Regional Average | Regional Average minus 15% | |
| Households (Residential) | 16.1 | 13.7 | 6.6 |
| Employment (Office) | 17.1 | 14.5 | 8.9 |
| Visitors (Retail) | 14.6 | 12.4 | 7.8 |

*Source:* San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Table 4.2.10 shows the Average Daily VMTs for *ONLY* TAZ 578 (10 S. Van Ness Project & close streets):

**Table 4.2.10: Average Daily Vehicle Miles Traveled per Capita—2040 Cumulative Conditions**

| Land Use | Average Daily VMT per Capita | | |
|---|---|---|---|
| | San Francisco Bay Area | | |
| | Regional Average | Regional Average minus 15% | TAZ 578 |
| Residential (per resident) | 16.1 | 13.7 | 3.1 |
| Retail (per employee) | 14.6 | 12.4 | 9.0 |

Notes: TAZ = transportation analysis zone; VMT = vehicle miles traveled
Source: CHS Consulting Group, *10 South Van Ness Avenue Mixed-Use Residential Project Final Transportation Impact Study*, Case No. 2015-004568ENV, December 2017.

Comparing these 2 tables, it shows that SF has, in these last couple of *recent* DEIRs, decided to use a *REGIONAL* number rather than do street-level or neighborhood district level analyses for CEQA traffic analysis to determine level of impact. Would not using a *REGIONAL* figure in most all cases result in minor or no impacts in less populated (whether residents or visitors (retail) or employee counts) areas?

What the above 2 tables compared indicates is that the 3333 California Project and the 10 South Van Ness Project would have the same resulting impact to the neighbors because they *BOTH* fall under the *REGIONAL" average. Is this what this means? Please clarify.

Now, let us consider the 3333 California Project "VMT per capita" in Table 4.C.3 below:

**Table 4.C.3: Existing Daily Vehicle Miles Traveled per Capita**

| Land Use | Bay Area Regional Average | Citywide Average | TAZ 709 |
|---|---|---|---|
| Households (Residential) | 17.2 | 7.9 | 7.3 |
| Employment (Office) | 19.1 | 8.8 | 10.1 |
| Visitors (Retail) | 14.9 | 5.4 | 8.3 |

*Source:* San Francisco Planning Department Transportation Information Map, accessed May 25, 2018

Compare Table 4.C.3 to the 10 South Van Ness Project "VMT per capita" in Table 4.2.7 below:

39 (TR-4) cont'd

**Table 4.2.7: Average Daily Vehicle Miles Traveled per Capita—Existing Conditions**

| | Average Daily VMT per Capita | | |
|---|---|---|---|
| | San Francisco Bay Area | | |
| Land Use | Regional Average | Regional Average minus 15% | TAZ 578 |
| Residential (per resident) | 17.2 | 14.6 | 3.7 |
| Retail (per employee) | 14.9 | 12.6 | 8.9 |

Notes: TAZ = transportation analysis zone; VMT = vehicle miles traveled

Source: CHS Consulting Group. *10 South Van Ness Avenue Mixed-Use Residential Project Final Transportation Impact Study*, December 2017. Case No 2015-004568ENV.

While 10 South Van Ness is in a highly dense and commercialized area unlike 3333 California, it appears from the counts shown in their respective TAZs (709 for 3333 California & 578 for 10 S. Van Ness), that *BOTH* projects have no impact since their numbers are below the *REGIONAL* numbers. Using TAZ would take projects and their VMTs to be analyzed on a *REGIONAL* level rather than a local neighborhood level as it was done in the past for many other DEIRs. Who decides which method to use? Why? In what cases? Are the decisions of whether Planning applies TAZ to determine VMTs arbitrary? What would the results for the VMTs be under the older traffic analysis without using TAZ? Would the impact conclusions be different? If so, in what way? If not, why not? Please clarify.

I think using TAZs and saying any particular one TAZ as being less than the "REGIONAL" number is only going to allow for future DEIRs to have "NO IMPACT" in terms of VMTs; but the evidence on the street is that there are many more vehicles milling about and the numbers appear to be lowballed. The additional VMTs not captured outside of any one TAZ could impact "other nearby streets" in every neighborhood district with potentially bad consequences for its residents in terms of AIR QUALITY (more people, more garbage truck trips, more GHGs, more NOISE & VIBRATIONS, and SAFETY.

Now, let us look at another DEIR that was released not too long ago, ***Case No. 2013.1543E (State Clearinghouse No. 2015012059), 1979 Mission Street Mixed-Use Project, published May 4, 2016***: In this 1979 Mission DEIR, there is ****NOT**** ONE MENTION OF TAZ.

Although the DEIRs for 1979 Mission, 3333 California, 10 South Van Ness cover *varied* site particulars, the conclusion of all three is that they are ***identical*** as to having no VMT impact because of the application of a "REGIONAL" threshold. Doing so skews the impact at the neighborhood level.

The city may want to take into account again the "Precautionary Principle" that while one can create a situation that would pass muster due to having to meet a high "REGIONAL" number for VMTs before a project would be deemed having a "SIGNIFICANT" impact in re VMTs. Each project may well be contributing a lot more impacts to the environment in some or all of the CEQA categories than meets the eye. If the city continues on this path, it may be found out by 2040 that there is much more impact than what was written in these DEIRs today. Not only the community near the developments would be negatively impacted, but so might the entire city.

TAZs have been used for some decades already. If some DEIRs use TAZs but others do not, the process of choosing which to use is not transparent to the public nor would the results necessarily to come to some of the conclusions in the DEIRs.

Had the 1979 Mission Street Project DEIR (Sarah Jones, ERO) used TAZ, would the VMT numbers have changed? If so, to what? If they do change, how much of an impact would they be?

The greater number of vehicles and with ***TNCs coming in from *OUTSIDE* the city***, along with other building uses and more units having been completed in the area, there are more vehicles and people than what is being used in this DEIR for TAZ 709 from the 2000 Census as things change over 18-19 years. Why would the other TAZs not be included for each DEIR alternative and perhaps for the neighborhood community alternative in order to have an accurate, thorough and complete DEIR? 39 (TR-4) cont'd

Even with TAZs, why has Planning not used in in recent past DEIRs? Seems like not using the same method for all projects so the impacts can be manipulated. For instance, there exists DEIR Case No. 2013.1543E published on May 4, 2016 for 1979 Mission Street. It does not use TAZ. New metrics for TAZs are not going to be in place until later in 2019 wherein larger zones will be created to minimize concentration of VMT issues in a smaller area not disaggregated from the TAZ being analyzed. Why did Planning decide to use TAZ for the last couple DEIRs and not prior DEIRs? Why is there not a consistent basis of analysis for all projects?

There is also **DEIR Case No. 2015-004568ENV (State Clearinghouse No. 2017072018) published October 17, 2018 for 10 South Van Ness**. The DEIR for this project uses TAZ. It gives a "2040 Average Daily Household VMT per Capita" calculation.

In re school end times, there will be more kids and parents (pedestrians) out so what is the change to pedestrian volume around this area? Has this been factored in to VMTs, GHGs from automobile delay (idling & driving at low RPMs and stop-and-go pollution)? 40 (GHG-1)

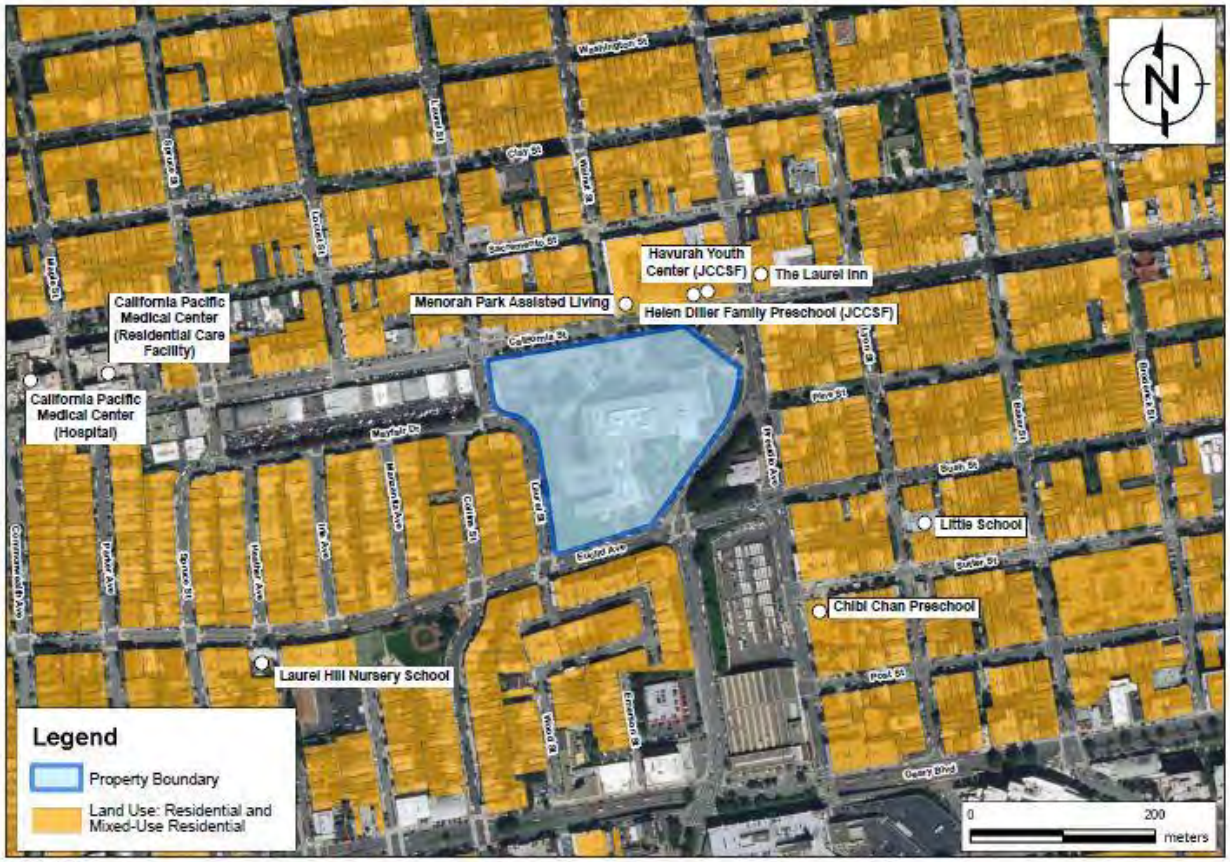
With streets clogged with more vehicles, with more pedestrians in the area, the delays can start to impact emergency services. How has the emergency response times changed? Where is the analysis for safety personnel (e.g. ambulance, fire trucks) for the development per phase and at the end of completion? 41 (TR-13)

Page 4.E.17: Under the AIR QUALITY part of the DEIR is this statement: "…The closest non-residential sensitive receptors include Laurel Hill Nursery School, San Francisco University High School – South Campus, Little School, Havurah Youth Center, the Helen Diller Family Preschool at the Jewish Community Center of San Francisco, the Menorah Park Assisted Living Senior Housing Complex, and the Chibi Chan Preschool at the Booker T. Washington Community Center…." What are the comments from these groups on this project? 42 (GC-4)

Page 4.E.30: The map of the Sensitive Receptors has the legend covering up the 150 Parker School that is just as distant as the CPMC sensitive receptor yet it is not shown on the map nor mentioned in the list of sensitive receptors on Page 4.E.17. 43 (AQ-4)

The area that is occupied by the California Pacific Medical Center (Hospital & Residential Care Facility) buildings (where the new residential replacement project is planned) is shown but not the 150 Parker School. The location of this school is covered by the white legend box.

The young children attending this pre-school would appear to be sensitive receptors. Why is the 150 Parker Avenue School not shown on the map (Page 4.E.30) below?




3333 CALIFORNIA STREET MIXED-USE PROJECT
2015-014028ENV

FIGURE 4.E.2: SENSITIVE RECEPTOR PARCELS IN THE IMMEDIATE VICINITY OF THE PROJECT SITE



Page 4.E.59: According to Fig. 4.E.8, a partial shown below, there are specific cancer risks shown. Why is there only one location denoted by the yellow square on Laurel St. to be determined to be "Offsite Resident Cancer Rick, PM2.5"? How was the information obtained to designate this parcel as such?

44 (AQ-2)




3333 CALIFORNIA STREET MIXED-USE PROJECT
2015-014028ENV

FIGURE 4.E.8: MAXIMALLY EXPOSED INDIVIDUAL SENSITIVE RECEPTOR LOCATIONS

"The cancer risks were estimated using the equation specified in Tables AQ-18 and AQ-20 in EIR Appendix F" – what other parcels were studied using this equation? Please list or provide a map showing the parcels. 44 (AQ-2) cont'd

Volume 2C: Page 267 on the sheet/Page 283 in "read mode" pdf: From the 5/11/2018 "BkF Letter" on a meeting with SFFD on 3333 California St. project. 45 (PS-1)
How would the SFFD fight a fire at the building as it stands today for the main building where the access is and the division in half of the building is proposed for this project? Why would the change be needed if the fire can be extinguished with the whole building as is?

Below is a portion of text from the "BkF Letter" for the Euclid building portion. For whatever reason, there is a hand-written comment. Are these the final specs?

- **EUCLID (Type IIIA)**
  - Address shall be off of Euclid Street
  - Aerial ladder access staging area provided along Walnut walkway between Euclid and Masonic Buildings.
  - A 26 ft. wide, 100-200 ft. long staging area is required at the Lobby
  - If the building is Construction Type I or IIIA, then a variance request may be granted to reduce aerial ladder access along the north side.
  - Install bollards (specifications to be approved by SFFD) at the end of Walnut Walk and Euclid.
  - (Note: Easement via the Laurel duplexes may be required to maintain access to the rear egress windows)
    - Fire access Through Walnut to Euclid Avenue shall be provided.

Captain Mike Patt

Table NO-8, Page 12 by RAMBOLL should say "Bush Street" rather than "Bust (sic) Street." Please correct. 46 (GC-4)

Volume 2A: 47 (TR-4)
(See also under Volume 2C.)
➔ ***DEIR LIST OF OTHER FORESEEABLE PROJECTS** (Pages 94-99)***:
3700 California Street (2017-003559ENV)
726 Presidio Avenue (2014-001576ENV) – add 4 units, remove 1 on-street parking
2670 Geary Blvd. (2014-002181ENV)
2675 Geary Blvd. (2015-007917ENV)
California Laurel Village Improvement Project
Laurel Heights/Jordan Park Traffic Calming Project
Masonic Ave. Streetscape Project
Geary Bus Rapid Transit Project

With the above cumulative projects listed in this Volume 2A of this DEIR -- of which more than one is now complete -- and with Planning Code allowing new buildings and alterations to occur with no minimum parking requirements especially along California St. and Geary Blvd. and other streets where transit or bike lanes exist, the residents in these newer buildings with more units and fewer or no parking, may be forced to add to VMTs to park their vehicles farther out into neighboring areas and add to VMT calculations. Also, they may resort to ride-sharing. These ride-share drivers are also increasing the VMT calculations as they are often trolling the neighborhoods with no passengers waiting for a call on their app for their next customer or taking up residents' on-street parking. Without

on-street parking for residents currently existing in their units, how are they to get to work or take care of personal business especially when the affordability factor gets thrown into the equation? 47 (TR-4) cont'd

Retail and office components trigger the most traffic as seen in many DEIRs. It might be best to leave the retail out of this residential area on the Euclid side. Retail is already on California, Sacramento and at the Target City Center at Geary and Masonic only a couple of blocks away. This only adds to VMTs.

With 13,500+ additional vehicle trips from the retail and offices (and some from the residential) use of the proposed project, the increase in automobile delay in the area would be a major impact not only adjacent to the site but even 6 blocks away into Presidio Heights, Jordan Park, Lone Mountain areas. Traffic will eventually reach gridlock as was written in the GearyBRT EIR – and *that* EIR did *not* even have this project in its write-up so any additional heavy traffic such as in the proposal is just going to be BEYOND GRIDLOCK and it is not safe for people to not be able to get to emergencies. 48 (TR-12)

The DEIR states that the proposed project will be designated as a Special Use District (SUD). As one knows, the City has passed ordinance to have no minimum parking requirements for any units. What people fail to recognize is that parking spaces, while they attract vehicles since that is what parking is for, even if removed, with rideshare vehicles in play today as opposed to 2008/2009 when this project was known and TNCs did not exist, that does not mean that less traffic will be in this area of new retail (over 41,000 sq. ft.) and offices (49,999 sq. ft.) proposed. Retail generates significant vehicle traffic whether for deliveries or for visits. If retail is being proposed, it should all be located on California St. With the advent of the rideshares, people will double-park to drop off the visitors and more and more traffic will go through the area regardless of whether retail parking is there or if removed. The automobile delay in this area and the neighborhoods surrounding it will eventually become worse. People may as well walk, but not everybody is going to. In the areas of greater socio-economic status, most drive. This has been documented in the newspapers. 49 (TR-2)

The comparative data should be in this DEIR from 2009-2017 but the DEIR seems to put the base line for analysis at 2020 – possibly because the project is not expected to start until then. Doing so does not make a comparable to what existed from earlier years when the higher number of vehicles did not exist. Using the figures based on the vehicles today when their numbers have *already* increased makes the results of the additional vehicles negligible because the factors for comparison is based on a false comparison of what existed before (no rideshares, e.g.). If the date for the modeling does not use data from when no alternative transportation modes like rideshare existed, then one cannot make an accurate comparison as to the impact of traffic volume on the neighborhood. If one compared the 2009 and earlier years when rideshares (TNCs) did not exist to what is projected for this development, it may indeed become not an insignificant impact but a SIGNIFICANT impact. Why not use the prior years? 50 (TR-14)

Under Prop M, Priority Policy #7 (preservation of landmarks and historic buildings) and the DEIR stating various Standards for historic preservation would not be in conformance (Standards 1, 2, 5, 6, 9 & 10) such that the proposed project and variant would materially alter the historical significance of the building and site. 51 (CR-2)

As a reminder, here are the 10 standards with areas of non-conformance bolded:

> **1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.**
> **2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.**

51
(CR-2)

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
**5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.**
**6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
**9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**
**10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.**

It seems that many of the above standards would be violated with the project proposal. Would there be some way this state-registered historic resource not lose its "character-defining" features that made it so? Out of all the changes proposed to the existing buildings, the one that cuts the main building in half is the most egregious in my humble opinion.

The historic use of the property after the cemetery bodies were moved and when Mayfair Heights (old name of Laurel Heights) was proposed was for residential except for commercial on California Street when Mayfair Heights was being built. The commercial was never on the tract where UCSF building is. There was no commercial on Euclid Avenue historically and it would seem that historic use should be honored and retained to prevent the additional impacts to the neighborhood from putting retail on Euclid which is the residential side of the property. A Chronicle article states that the residential area be "a high class residential district of homes, flats and apartments." It says a group comprised of "Rusalem, Bennion, Gummere, Goldman and Goldman, Lang Realty Company, Joseph and Jones" will "develop the business district…along California street." Here is the article:



**CEMETERY EVACUATED**

The cemetery was evacuated more than two years ago.

The purchasing syndicate will develop Laurel Hill after the war into a high class residential district of homes, flats and apartments. A second syndicate will develop the business district for 1000 feet along California street.

The second syndicate comprises Rusalem, Reunion, Gummere, Goldman and Goldman, Lang Realty Company, Joseph and Jones.

**54-ACRE TRACT**

The 54-acre tract, bounded by Presidio avenue, California street, Parker avenue and extending irregularly nearly to Geary street on the south, is to be developed as a unit.

The new district will be known as Mayfair Heights. The American Trust Company has been named as the principal financing agency.

51 (CR-2) cont'd

Unfortunately, since the new finished materials and details have not yet been told to the public, and since they are lacking in the DEIR, we cannot comment on them as affecting any of the CEQA categories. 52 (CEQA-3)

Volume 2B:

Page 546 of 776 (pdf page count – would help if the document had page numbers *on* the document) has a DBI violations letter dated 6/19/62 to Edwin & Joanna Roberts, 1149 Dolores St., for the location 3515-1/2 – 3519 24th St. but I do not see the connection to 3333 California St. in this DEIR. I do not understand why it is included. This should have been and be stricken from the DEIR as being irrelevant to 3333 California. 53 (GC-4)

Appendix I, Page 658 of 776 says California Historical Landmark plaque on Northeastern Corner Perimeter Wall is missing. It would be part of the history (even if not a "landmark" under present CEQA law) and may be re-created and hung up somewhere where it will not be so easily removed like when it was removed. Images of it are available on the internet. 54 (CR-4)

Volume 2C:

(See also under Volume 2A.)

The Kittelson & Associates (KIA)'s letter on Page 6 under "Task 4" says the VMT for the project will be the same as what exists today: 55 (TR-4)

**"Vehicle Miles Traveled**: For purposes of the VMT analysis, KIA assumes the baseline (Year 2020)

conditions VMT for the region and the Project's transportation analysis zone for each of the uses proposed by the Project and Variant will be the same as Existing."

Do not believe a true impact can be told "assuming" the baseline year of 2020. I think it skews the impact as less impactful because rideshares and *alternative modes such as rideshares were not present in 2008/9 and earlier years vs. 2020*. The years prior to rideshares is not included in the DEIR so it skews the data and conclusions. Please provide data for vehicles in the area from earlier years starting at 2008 to present in this project area streets. It will likely show that compared to today, there are many more vehicles in this area (Arguello to Laurel, between Geary & California).

Rideshare is everywhere today so it is not like cars have disappeared just because the parking is minimized or removed. It is the type of uses for a project that attract certain number of cars. Again, not clear why the baseline year of 2020 – the year the development is supposedly to start -- is being used as the starting year for the analysis. Why is that?

55 (TR-4) cont'd

Today, the 3333 California site is offices with no residential units so there is hardly any use of the site beyond UCSF's use after 5PM. As more projects surrounding the building are built with uses that go beyond 5PM or early evening, there will be increased base level noise on all the streets in the neighborhood where it has not existed before or to a greater extent than it will once such uses get put on the site.

56 (NO-3)

In the November 15, 2018 article at the link below, it states that vehicle mode is still prevalent at over 50%, especially for those in the higher income brackets. The area of the proposed project has a large population of higher income residents and visitors and thus one would reasonably expect more cars in the area.

57 (TR-4)

http://www.sfexaminer.com/survey-private-auto-use-sf-lower-except-among-wealthier-residents/

The SF Examiner article references the SFMTA's "Travel Decision Survey" of 2017. This is anecdotal evidence that wealthier areas drive or take rideshare more so the mitigation measure to remove some parking spaces will not necessarily negate the traffic, automobile delay or VMTs and increased GHGs. There must be other mitigation measures, and that may be reduction or removal of non-residential use especially on the residential side of the parcel.

The DEIR states that the VMT will be no different at complete build-out compared to 2009 or any year through 2018. Since 2009, there were new transportation alternatives – e.g. rideshare, shared scooters (Bird, Lime, etc.) and other modes. The analyses in the DEIR is *incomplete* without this new data incorporated. The new rideshares impact all streets in the neighborhood in all directions and are mostly used in retail trips besides commuting to offices/work places. Many of my neighbors use them for these purposes but then hop into their personal automobiles for longer out-of-city trips.

On Page 21 of their letter, it states the vehicle trips estimates for the 3 different scenarios and all three are over 2,236 person-trips per day. If the restaurants were only on the California street side where there are already commercial businesses, there should be less disruption of cars in the residential areas as they can take the Muni bus or alternative modes. Also, in the DEIR, it states there will be ***13,500+ automobile trips generated per day from the site***. If every project in the city keeps adding to the overall trips made, the GHGs will increase. Each electric vehicle creates pollution to make and to make the batteries that go in them. Having electric cars replacing gasoline-powered cars does not mean that pollution is going down when the factories making the items that go into making the electric cars and enabling them to run cause pollution. This is not a sustainable practice. How many batteries are needed to keep the cars going for the number of trips that are projected to go to and from this site upon completion? How many tons of pollution come from manufacturing them? Having more cars

58 (GHG-1)

59 (TR-8)

circulating in the area would also increase the chances also for pedestrian safety to be compromised. All of the traffic does not necessarily have to be directed into and around this project site if certain uses are curtailed. 59 (TR-8) cont'd

How much analysis has been done to see how this project be impacted by the cumulative trips from the new project at CPMC, from the new uses to come to the City Center at Masonic, from increases in TNC (rideshares) in the area as new uses and buildings and more units are created in this ½-mile area near this 3333 California site? Where is this data? 60 (TR-12)

Anecdotally, below are a couple of links to tell you about jammed SF streets and traffic increase – many due to people deciding to use vehicles not available before since the introduction of "Transportation Network Companies (TNCs), aka "rideshares". 61 (TR-4)

Article re jamming SF's streets:
https://sf.streetsblog.org/2018/10/17/data-confirms-uber-and-lyft-jam-up-san-francisco/

Article re traffic increase:
https://sf.curbed.com/2018/10/16/17984366/tnc-ride-hailing-uber-lyft-sfcta-report

On Page 27 of the "KIA Letter", in Table 10, it shows clearly that people in the area are at 60%+ using automobile mode. I do not see this changing any time soon so the VMTs should be more especially with the retail restaurant sit-downs at 63.9%. For whatever reason, there is still a high percentage of automobile use – whether rideshares or privately-owned vehicles. With on-street parking diminishing and off-street parking being eliminated in many zoning districts, vehicles will still be around to circle the area to add to pollution, wear and tear on the roads, need to fix or re-pave roads and features. Even if in Volume 1 above, a new Muni line is proposed for relief of "congestion" in the area or of a bus line, there are still many who continue to drive. Even with "self-driving" cars, the VMTs do not go away.

Ramboll Environ's pollution counts show emissions based on what kind of equipment? Would not the equipment being used dictate how much pollution is put out? Are all the measurements based on equipment from the 1960s? To be more environmentally friendly, why would not other forms of construction equipment be used to mitigate the emissions? Sadly, the document states that the cancer risks will be essentially the same without and with all the construction equipment emissions coming from this project. It does not make sense as even the fire pollution wafting in from Butte County (the November 2018 "Camp Fire") incident urges everybody including non-sensitive groups to wear N-95 or better rated masks. Laurel Heights and surrounding area is one with a large population of families with small children in the neighborhood. They will be affected the most. It may be important as this cancer risk has to be mitigated. 62 (AQ-1)

General Comments:
Being that the site was the former location of the Laurel Hill Cemetery, and not all bodies were moved to Colma, would the discoveries be GPS-tagged and located on a map of the development site so that the person's remains can be identified in case there is a living relative who would like the human remains? This area also has a potential to yield new information depending on what is found so there should be somebody to catalog the findings to match it to the burial maps of the extant cemetery. Even when the bodies were removed the first run through and all were thought to be accounted for, the laborers found 189 more just after combing through the site right after all were accounted for. There are likely more because of the way the bodies were put into some of the plots. 63 (CR-4)

While the DEIR states that since any burials were done years ago, there would not be any concern over communicable diseases. However, the DEIR does *not* mention the potential of noxious odors 64 (AQ-1)

under CULTURAL RESOURCES nor under AIR QUALITY (odors). No mention of mitigation measure to deal with such odors in the DEIR. 64 (AQ-1) cont'd

Although the bodies were dead for a long time under the ground, the odors were still present even up to 70 years later when exhumed around 1937+, according to the 1950 City Planner's Report at this website http://www.sfgenealogy.org/sf/history/hcmcpr.htm :

> "Condition of remains disinterred varied from "dust" to almost perfectly embalmed bodies, the latter resulting from filling of cast-iron caskets with groundwater acting as a preservative. The superintendent of the disinterment proceedings told the author that his was an interesting job, but that in some cases it was not "pretty". The smell of death was often present, even though the remains had been laid to rest from thirty to seventy years previously."

The DEIR needs a mitigation measure for this because strong winds in this area may carry the unpleasant odors to affect a substantial number of people in the area.

Also, for HYDROLOGY/WATER, the DEIR does not have any mitigation measure for the potential groundwater contamination from disruption of found bodies which in past were embalmed in toxic chemicals toxic. What would be done if it gets into the aquifer or small underground stream that supposedly fed the Laurel Hill Cemetery and provided very clean drinkable water? It would be good for the city to ensure their "Precautionary Principle" is supported by not having anybody take action to contaminate potential clean drinking water sources for the residents of this city. 65 (HZ-1)

Recent studies and peer-reviewed publications state that certain mafic and ultramafic rocks, like serpentinite and peridotite formations would sequester $CO_2$ via magnesium (Mg) oxides and silicates. Air quality with increased pollution should be one of the highest priorities for the residents of the city. The property may contain certain geologic formations that sequester carbon in the Franciscan type band formation that runs from the NW to the SE of the city. The findings of such geologic formations would be a rare chance for scientists to study this peculiar formation in a large quantity as it exists in the city vs. elsewhere. The ground under the site may well be a jewel in sequestering carbon in considerable quantity. On the "Pre-cautionary Principle," perhaps some geologists should study the site as it may well prove to be a natural carbon-sequestration supersite; and rather than do more harm than good to the environment, perhaps this should be studied well in advance of construction to sort out exactly what rock formations exist under all parts of the site and in what quantities. This would be a great educational discovery to be shared with the community. The DEIR does not state such rocks are present on this property but parcels in this area have these rocks. 66 (GHG-3)

Also, the sand in this area may already contain this ultramafic soil that might be useful for propagating plants that thrive on it rather than be dumped into landfill.

Links to articles on geologic formations and their carbon-sequestration potentials:

https://www.osti.gov/biblio/900485 (This is from the federal ***Department of Energy***.)
https://www.nps.gov/goga/learn/education/geology-resources.htm (This is from the ***National Park Service***.)

***HISTORIC RESOURCES*** portion of DEIR: 67 (CR-1)
Page 4.B.40:
"The proposed project would also retain ten mature existing trees, if viable:
two mature Coast Live Oak trees at the western entrance to the proposed Mayfair Walk;
two Cypress trees at the proposed Cypress Square; three mature Coast Redwood trees
at the eastern end of the proposed Mayfair Walk; one mature Monterey Pine tree
at the west end of the proposed Euclid Green; and two mature Coast Live Oak trees

mid-block on Laurel Street between Mayfair Drive and Euclid Avenue."

67
(CR-1)
cont'd.

Page 4.B.42:
"Overall, the proposed project or project variant would result in substantial changes to the massing and materiality of the office building such that the project site would no longer convey its historic and architectural significance as a Midcentury Modern corporate campus."

Page 4.B.44:
"For these reasons, including the removal of elements that convey the project site's history as a corporate campus, the construction of new buildings on formerly open and/or landscaped space at the project site, and the changes to the massing and materiality of the office building, the proposed project and project variant would not be in conformance with Standards 1, 2, 5, 6, 9, and 10, and would materially alter the physical characteristics of 3333 California Street that convey its historic significance and that justify its inclusion in the California Register. As such, the proposed project or project variant would cause a substantial adverse impact on 3333 California Street, a historical resource, and would be considered a significant impact under CEQA."

Under ***AESTHETICS*** category of CEQA:
From the above "Page 4.B.44" text, it is evident that the proposed project and its variant would be significant impacts to the California historic site. The site has existing mature trees that lend an aesthetic suburban quality to the neighborhood that is a respite from the highly urbanized downtown core. Though the site was built as a form of corporate campus, there is a park-like feel to this location.

Speaking of parks, this is a report from the Department of City Planning by the City Planner in 1950:
"In 1939 and 1940, considerable momentum gathered behind the idea of preserving one-tenth of Laurel Hill Cemetery as a Memorial Pioneers Park, as allowed by the removal ordinances. This was spearheaded by the historical Monuments Committee of the National Recreation Association, and backed by the California Pioneers Society and the Native Sons of the Golden West."

Back in the late 1930s, newspaper articles appeared as to the new "Memorial Park" use of the cemetery lands. Here is one headline:



**Order to Evacuate Cemetery Approved**

**Proposal Made to Turn Laurel Hill Into Memorial Park**

And the text explaining the idea of using a portion as a memorial park to the pioneers that once were buried there:

**MEMORIAL PARK PROPOSED**

Proposals that Laurel Hill, or a portion of it, be transformed into a memorial park will be considered later separately from the evacuation ordinance, F. P. Deering, representing the Laurel Hill Cemetery Association, was promised.

67 (CR-1) cont'd

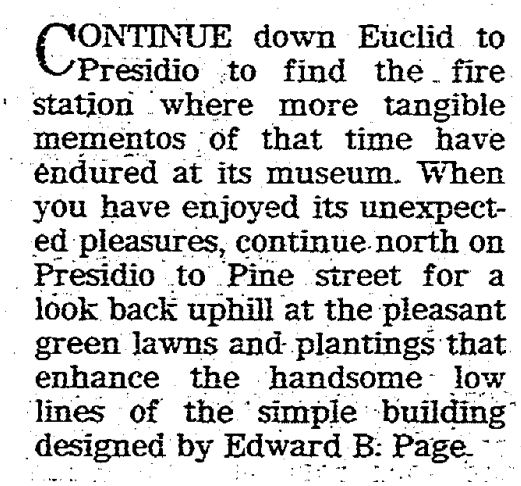
While no memorial park was created, the neighborhood residents and visitors today use this area of mature trees and open grassy areas as a park for recreation and to take in the views of the more urbanized downtown area to the east. This publicly used open space contributes to the health and well-being of the neighbors and the visitors in this area and is a healthful retreat from the pressures of urban life without having to trek farther to the Presidio National Recreation area nor to travel much farther to the next available designated park.

Small privately-owned-public-open-space (POPOs) behind walls and on rooftops are no substitute for grass on the ground, especially to dog owners who bring their pets there. The community sees this as an asset to their lifestyle in this area. 68 (PD-3)

Many mature trees are not only HISTORIC RESOURCES. They are also part of the AESTHETICS of the site – the building structures *and* the landscaping go hand-in-glove. The trees are rated in the arborist report as poor, fair or good for relocation. Yet, some of the good condition trees are potentially slated for removal. A couple of the trees were from the original Laurel Hill Cemetery and were incorporated into the Firemen's Fund Building landscaping that went with the building structure. The original trees are large and are the workhorses for carbon sequestration and GHG remediation. When large trees are cut down, they release the carbon back into the environment. The smaller tree replacements, though in more quantity than the existing count of trees, would not be sufficient to provide an equivalent environmental benefit in re carbon or GHG sequestration. Smaller trees also do not turn into the lush, mature park-like environment of this site overnight. 69 (CEQA-3) 70 (GHG-3)

It would be good to retain and enhance the health of the large Monterey Cypress that is a remnant from the days of the Laurel Hill Cemetery. Different species of trees sequester GHGs differently. The large workhorses do more carbon sequestration than a bunch of smaller trees. The DEIR goes not state what species will be planted but perhaps those that sequester more GHGs can be considered. The Presidio of San Francisco is planting clones of the largest trees from California – the redwoods. They are the giant workhorses to combat climate change. The project sponsors and the city would be sending the wrong message to its inhabitants about the value of such large trees if we keep chopping them down. Chopping down large trees also releases all the carbon back into the environment to pollute. What analyses has been done to calculate the carbon that will be released from those trees planned to be removed?

The Firemen's Fund Building is aesthetically pleasing due to its lines that appear to hug the hill. In fact, over four decades ago in The Chronicle, the reason the building is not so jarring on the slope may have to do with its "low lines": 71 (CR-1)



CONTINUE down Euclid to Presidio to find the fire station where more tangible mementos of that time have endured at its museum. When you have enjoyed its unexpected pleasures, continue north on Presidio to Pine street for a look back uphill at the pleasant green lawns and plantings that enhance the handsome low lines of the simple building designed by Edward B. Page.

71 (CR-1) cont'd

Heard about a neighborhood alternative that can give equal number of units as proposed or even as the project variant proposed. However, the neighborhood version has not been made public. Not sure if this neighborhood version would build where the original Monterey Cypress from Laurel Hill Cemetery stands or other larger trees historic to the site are located. Perhaps Planning can review it, have the Historic Preservation Commission review it, and then have the Planning Commission review it. It was not available at the December 5, 2018 Historic Preservation meeting. The alternative may meet the goals and not have such adverse impacts to the historic resource which includes not only the building but also the landscaping as that was the corporate campus use but today is used for public recreation. Today, it is used as a recreational area and childcare and office use with no retail. The retail use will change the ambiance of the existing historical neighborhood open space and non-commercial public use in a quiet residential area.

72 (AL-2)

In regards to a DEVELOPMENT AGREEMENT being entered into for this project, it seems the public cannot find out what are going into these agreements and if the mitigation and community benefits are not included in the publicly accessible DEIR/FEIR documents, then there could be problems down the road for the neighborhood.

73 (PP-1)

While the text on the website states that it exists to "strengthen the public planning process," it is unclear if the agreements really help the residents with impacts. What was the criteria used to determine what projects and this one in particular to have a development agreement?

Development Agreements – Frequently Asked Questions

**What is a Development Agreement and why does the City have them?**
Development agreements are contracts approved by the Planning Commission and Board of Supervisors entered into by the City and a developer to expressly define a development project's rules, regulations, commitments, and policies for a specific period of time. The purpose is to strengthen the public planning process by encouraging private participation in the achievement of comprehensive planning goals and reducing the economic costs of development. A development agreement reduces the risks associated with development, thereby enhancing the City's ability to obtain public benefits beyond those achievable through existing ordinances and regulations.

Due to the dissolution of the City's Redevelopment Agency, each agreement is now negotiated on a case-by-case basis by the Office of Economic and Workforce Development and the City Attorney's Office.

**How are Development Agreements monitored by the City?**
The Planning Department and OEWD are working closely with the Controller's Office City Performance Unit and other City Departments to centralize development agreement requirements and mitigations into a comprehensive system that will encourage proactive monitoring and tracking of developer and City responsibilities. Prior to this project, there was no centralized system that housed all development agreements and their requirements. In addition to this webpage, this project will produce a database that the City will use to track and monitor payments, community commitments, and other important data within the development agreements.

73 (PP-1) cont'd

**Are there different types of Development Agreements?**
California Government Code Section 65864-65869.5 and Chapter 56 of the San Francisco City and County Administrative Code sets forth the procedures by which a development agreement is processed and approved. There are four common categories of agreements:

1. Development Agreements - Voluntary contractual agreements between a landowner and the City concerning provisions of infrastructure, public spaces, and amenities.
2. Disposition and Development Agreements - A contract between a developer and the City that involves the sale of City-owned land to the developer.
3. Lease Disposition and Development Agreements - A contract between a developer and the City that involves the lease of City-owned land or property to the developer.
4. Owner Participation Agreements - A contract between a property owner/developer and the City to allow for development of property owned by an entity other than the City, generally the owner/developer.

This information is here:
https://oewd.org/development-agreements-%E2%80%93-frequently-asked-questions

It is best to get some of the mitigation measures lined up in the DEIR which is a *FULLY* public document rather than in "Development Agreements".

74 (TR-7)

In regards to traffic queues that arise from the garage use, why would the onus be put on the operator of the garage when in other DEIRs such as for 1979 Mission, it "shall be the responsibility of the Project Sponsor/property owner to ensure that recurring vehicle queues do not occur…"? The vehicles would be considered to be making a queue if more than one vehicle were lined up to enter the garage or exist the garage in a traffic jam. The queue should also not occur in the public right of way whether private vehicles or carshares for any longer than 3 minutes or the time it takes for the passenger to enter and exit the vehicle, whichever is less. Where the garage becomes full, there should be active management with "Lot Full" signs installed with parking occupancy sensors that show how many spaces are still left. If any queuing occurs, neighbors should contact the Planning Department to notify the property owner of the queuing issues to be abated through support from the developer's agreement to annually contribute to queue abatement costs as this will impact the neighborhood. If this is not done, the supervisor of the district will have a long line of complainers at her or his door due to the foreseeable situation that would arise with a development built to attract people in vehicles and not accommodating them so as not to jam up the streets or create queuing.

75 (TR-6)

As this project does not seem to be in a hurry to build out fully for possibly as long as 15 years, the construction traffic should be limited during AM and PM rush hours.

76 (TR-7)

In re the light and glare from the proposed windows and their impact to vehicles going and coming to the area would be a safety issue, I have not heard anything as to the remedy.

77 (PD-3)

Although non-reflective glass might be used, the current glass is reflective of the open space and greenery of its surroundings so the building blends in almost in a semi-camouflage manner. is expensive and is unknown as to its appropriateness to the existing historic building. The current building is slung low and hugs the topography but if the building gets too tall, the reflection may become too much. The current windows reflect the skyline of the city and has an effect such that the reflections of the surrounding trees and other landscape elements almost camouflage the building.

78 (WS-1)

In re ***WINDS*** (DEIR Page 1.9 <Pages 151-162 in Topic E.8 in Initial Study; EIR Appendix B)…
The wind report by RWDI (Rowan, Williams, Davies & Irwin, Inc., 600 Southgate Drive, Guelph, ON NIG 4P6, Canada) contains only general statements about how winds along Euclid and California may be such that a pedestrian would be "chilled" or that the winds would be "noticeable" but no specific speeds noted for any of the immediately surrounding or "nearby streets."

Page 4.E.2: "Wind measurements recorded on the San Francisco mainland indicate a prevailing wind direction from the west and an average annual wind speed of 10.1 miles per hour.[3]" (Footnote #3: Western Regional Climate Center, website query, Prevailing Wind Direction and Average Monthly Wind Speed (2001-2011), https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_dir_avg and https://wrcc.dri.edu/Climate/comp_table_show.php?stype=wind_speed_avg.2001-2011, accessed May 25, 2018.)

While the "average" wind speed of 10.1 miles is quoted for the prevailing wind on the "mainland," when buildings are erected, they channel the wind through openings between them in all directions.
In fact, in RWDI's analysis report, it states:
"Winds can also accelerate between two closely spaced buildings and through a passage underneath a building or bridge. If these building/wind combinations occur for prevailing wind directions, there is a greater potential for increased winds."

Also, when the wind is blocked by a large plane that blocks the wind from going east-west, the air ekes outward onto the avenues running north-south. Further wind studies may be necessary. Just historically, this site was given up as a cemetery not only because of the developers in the 1940s and 1950s wanted to build on it but also because the wind was so fierce that the sand was blowing away and the underlying lids to the caskets got blown open – an unpleasant sight.

In addition, the speed of the wind on balconies on the buildings, the street level – public areas – should not be made so that people have a comfortable experience. I believe there is a speed that is generally acceptable as comfortable and that could be around 17 mph. Where is the data to show that the winds will be at "LESS THAN SIGNIFICANT" ("LTS") when the Initial Study and the DEIR does not have any data to back this up?

The consequence of categorizing the WIND IMPACT at "LTS" as stated in the Planning Department Memo that prefaces the DEIR Document, would be that any recommendations under "LTS" categories do not have to have measures that are actionable to remedy unlike "S" (Significant) level impacts. Thus, having the wind portion with no data to back up the claim for potential damaging effects to the neighborhood should be further studied with data for all the "nearby streets" during each phase and at the completion of all phases for the project and any variants. Inclusion of one statement about the wind conditions with reference only to a *citywide* average to say that this and any other project has no wind impact is just a guess without data. One should try to visit this site where historically it has been one of the windiest parts of the city next to Geary and Masonic. If people have a hard time standing in fair weather, this may be unsafe for the pedestrians during inclement weather. Try standing around this site from 3PM on while the "citywide" average wind speed is 10MPH. Again, this is near "regionalization" of a metric that should be local for true impact analysis.

Page 6.57 "Wind":
The statements that since a building is "upwind north" or how wind in certain areas will be "somewhat reduced" does not give specific data on wind speeds. These general statements are not backed by scientific measurements and have no modeling of any sort in the DEIR. Yet, with no scientific data to back up any of the generalized wind statements, the DEIR states that the "Wind" impact category is "LESS THAN SIGNIFICANT" ("LTS"). The consultant's (RDWI's) report also has no scientific data measurements provided) so that this part of the DEIR is not only INCOMPLETE but flawed and the conclusion of the wind impact as being "LTS" INACCURATE. Please provide data for wind analysis. Please provide mitigation measures for the areas where, per RDWI's report, the pedestrians will be "chilled" or have the winds be "noticeable" and include the specific MPH ratings for all streets adjacent and the other nearby streets within at least 1/8-mile of the site. If you had the specific scientific data from when RWDI performed the wind report please provide; also provide for current winter season wind speeds.

The wind issue is important also due to the Child Care Facility. When the children are out on the play area the wind speeds and circulation may make the area unpleasant to take part in activities. It is not only the public areas but also on the site grounds where the children who will be playing.

A November 27, 2018 *Chronicle* article talks about the sustained 40-50MPH winds from the ocean. Once the westward winds hit the hills of Laurel Heights on the upslope of Jordan Park to its west, they pick up speed:
**"*Wind gusts over 60 mph forecast for San Francisco Bay Area"***
<picture deleted>
"People check out the Golden Gate Bridge during a storm on Monday, Feb. 20, 2017, in San Francisco, Calif. The National Weather Service announced flood, snow and wind advisories throughout the upper half of California. Photo: Santiago Mejia, **The Chronicle**

After a storm drizzling rain over the San Francisco Bay Area Tuesday moves out of the region, a second system is forecast to sweep in Wednesday night, delivering more rain and breezy conditions. The winds are expected to kick up late Wednesday and will gradually steer more west to northwest into Thursday.

The National Weather Service issued an advisory warning sustained winds could blow between 40 and 50 mph and isolated gusts could reach in excess of 60 mph.
"These west to northwest winds have the potential to be locally strong and damaging, particularly along the coast on Thursday afternoon and evening," the NWS warns."

What is the San Francisco's wind hazard criterion set at today? Last I heard, it was 26MPH. As Planning Code Sec. 148 for wind speed in certain SUDs (Special Use Districts) do not currently apply to this parcel, given that a SUD is being proposed, perhaps the wind criteria needs to be introduced as being applicable to this site. As taller and more buildings get established nearby, this Code Section 148 may need to be made applicable prior to the establishment of this SUD which is being sought by the developer.

People in public seating areas and in areas where they may frequent shops along California Street would not necessarily be pleased to encounter uncomfortable wind speeds whether sustained or as gusts. In order to minimize the unpleasantry of "uncomfortable" wind speeds there might be a similar adoption of comfortable wind scenarios for the site as is in the CPMC Long-range Development Plan EIR, Case No. 2005.0555E, Page 4.9-15, e.g., wherein several SUDs are mentioned for having Planning Code Sections applicable (e.g. C-3 Downtown Commercial Districts, Van Ness Avenue SUD <Sec. 243(c)(9)>, Folsom-Main Residential/Commercial SUD <Sec. 249.1>, and Downtown Residential District <Sec. 825>). Planning Code Section 148 allows for "comfort levels" such that the wind speeds do not exceed 7MPH for "public seating areas," and 11MPH for "substantial pedestrian use." Would this be something to entertain for the 3333 California site – potential SUD?

The project area is very windy not just **sustained wind** but also **gusts** due to the ocean breezes rising up slope as the wind travels eastward from the ocean. Winds should not be so fierce as to create a pedestrian to not be able to walk comfortably on California Street and Euclid Avenue. The DEIR does not have a comprehensive data in the main DEIR nor in the Appendices for the wind measurements on the streets surrounding the site with current conditions at different times of the year such as summer, winter, spring, autumn. Wind speeds per second increase considerably during the stormy season and people may not be able to stand erect without difficulty, especially for the elderly and disabled and children in the area.
When will the data for the above be available for the public?

Thank you again for the opportunity to comment on this DEIR. I look forward to the "Responses to the Comments" document. Please let me know when it is available. Thank you for your time.

Sincerely,
/s
Rose Hillson

** See → ***DEIR LIST OF OTHER FORESEEABLE PROJECTS** (Pages 94-99)***

**From:** William Holleran
**To:** Rich Hillis; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Subject:** Crucial Housing Opportunity for Families at 3333 California
**Date:** Monday, December 10, 2018 3:13:25 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Supervisor Stefani and SF Planning Commissioners,
I want to express my excitement for the potential for 500+ new units of housing at 3333 California. I am a SF Native and live/own property in the Richmond District. I strongly support this project because I'm devastated by the fact that our community is so expensive and exclusive! This is a prime example of how SF can help ease the housing crisis and do so with a minimal impact on an existing community. Excessive parking in unnecessary at this location. Many people would be happy to live in such a community and use public transit, bicycles, ride share and their own feet to get around our great city. We have no need to preserve 300 parking spaces and the existing building.

1 (ME-1)

2 (TR-11)

Thank you,
William Holleran SF Resident/Pro-Housing Advocate

**From:** corey johnson
**To:** Zushi, Kei (CPC)
**Subject:** 3333 California
**Date:** Monday, December 10, 2018 3:21:51 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi!

I'm writing about the 700+ housing units for 3333 California. This part of the city desperately needs more housing. I live close to this site (on the other side of Geary) and was very excited when I heard it was going to be replaced with housing. As someone who got lucky and bought a home in 2011 I'm protected from this housing crisis, but my friends have not been so lucky. As they start families my friends start moving away, the high cost of housing and the uncertainty of housing is the main reason they are leaving. While this new housing wouldn't solve this problem it would be a great step in the right direction. Also, because it is so close to so much retail and transportation this site is a perfect place for more housing.

1
(ME-1)

Thank You,
Corey Johnson
1825 Turk St.

**From:** jack kue
**To:** Zushi, Kei (CPC)
**Subject:** 3333 California Street
**Date:** Thursday, January 03, 2019 12:45:39 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission,

I am writing you to express my opposition to the current development proposal for 3333 California Street, the former Fireman's Fund / UCSF Laurel Campus. I have lived in Presidio and Pacific Heights since 1990. I am a fifth generation resident of San Francisco. I believe that this plan is not consistent with the neighborhood and will have a negative impact on the surrounding area and its residents. 1 (ME-1)

I concur with the following points raised by groups trying to limit the scale of this project:

The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years. 2 (PD-1) 3 (AL-2)

I fully support the Community Full Preservation Residential Alternative for 3333
It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
It does not create 13,000+ retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It matches the surrounding neighborhoods for character, style, scale and bulk.

I strongly oppose the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety. 4 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333, as opposed to the 12,000-15,000 retail caused the Developers Destructive Proposal. 5 (AL-2)

In short, I ask that any development of this site be consistent with the existing use and scope of the property, and not expanded as proposed by the current developer, which with have a highly negative impact on the surrounding neighborhoods. Such a project is inappropriate for this location. 6 (ME-1)

Sincerely,

Henry N. Kuechler IV

jkspambox@yahoo.com

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you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.  If you have received this communication in error, please immediately notify us by telephone and return the original message to us at the above address by email. Thank you.

**From:** Tina Kwok <kwoktina@me.com>
**Sent:** Tuesday, December 04, 2018 10:34 PM
**To:** andrew@tefarch.com; aaron.hyland.hpc@gmail.com; Black, Kate (CPC) <kate.black@sfgov.org>; RSEJohns@yahoo.com; ellen.hpc@ellenjohnckconsulting.com; dianematsuda@hotmail.com; jonathan.pearlman.hpc@gmail.com; CPC-Commissions Secretary <commissions.secretary@sfgov.org> **Cc:** LaurelHeights2016@gmail.com
**Subject:** 3333 California StreetProject

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners of the Historic Preservation Commission,

My name is Tina Kwok and I have been a resident in the Laurel Heights/Jordan Park and nearby neighborhoods since 1985. I currently live on Laurel Street, directly across from the 3333 California project site.

With it's "Midcentury Modern" architecture appeal, this area stands out as one of the best kept neighborhoods in San Francisco.

I am in favor of progress and the betterment of neighborhoods. I support the Neighborhood Full Preservation Alternative for the 3333 California Street project for the following reasons: 1 (AL-2)

1. It offers the same number of residential units as the developer's proposal (558 with a 744 variant).

2. It preserves the character-defining features of the historically significant landscaping as well as much of the architecture of the original design. It maintains the majority of the 185 mature trees of various significant and rare species that would continue to absorb greenhouse gases. People from the neighborhood and elsewhere regularly use this green space for recreational purposes and is very important to the community.

3. The Alternative would not have retail that would compete with the merchants at Laurel Village (and also on Sacramento Street). By using all the space for housing, some units would be large enough for middle-income families.

4. It would be built in approximately 3 years instead of the 7-15 years the project applicant wants. I am not sure if there are any neighborhoods in SF that would agree to such a long and drawn out construction timeline. Imagine the noise, pollution, traffic, quality of life for the people not only the immediate neighborhood but those who must travel through this area daily to get to wherever they have to go to.

5. I understand that the new Draft EIR Full Preservation Residential Alternative has 24 less residential units than the project. However, if some of the 44,306 sq ft of retail in this Alternative is used for 24 residential units, the Alternative would offer the same number of residential units as the proposed project. There will be retail along California Street under the Alternative and NO

retail along Euclid. The location of retail shops along Euclid is most unattractive - it is windy, hilly and steep. It is NOT a pleasant strolling area for shoppers.

1 (AL-2) cont'd

6. The project also proposes to replace the windows and there is new proposed rooftop addition. I am concerned regarding the designs of the windows and rooftops and whether they will become distinguished from the significant Midcentury Modern architectural design of the original building. The proposed buildings appear to be an unattractive mass of glass and concrete crammed into the property in order to maximize highly valued square footage.

2 (ME-1)

7. I am concerned about safety of the residents in the project and the residents and visitors to the area as there are many proposed open spaces inside the project with public access.

3 (PS-1)

Thank you for your attention.

Respectfully,

Tina Kwok

535 Laurel Street
San Francisco, CA 94118

May the long time sun shine upon you,
All love surround you,
And the light within you guide your way.

**From:** Tina Kwok
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); Dick Frisbie
**Subject:** Response to DEIR 3333 California Street
**Date:** Tuesday, January 08, 2019 4:40:54 PM
**Attachments:** 3333 California DEIR Response to PD - COMMUNITY COMMENTS, CHALLENGES, DEFICIENCIES FOR THE DEIR Rev 3.pages

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Dear Mr. Zushi

I am a resident of Laurel Heights. I reside at 535 Laurel Street. Below is my response to the DEIR of 3333 California Street project. The response is actually written by Mr. Dick Frisbie and I agree with all of his findings and comments.

Please let it be noted that we are pro increase in housing in SF. The need is now, and not in 7-15 years from now. Our community has supported the Copper Penny and CPMC project, and with the 3333 California project, will be increasing housing by 1000 units in the neighborhood. Some of my concerns, as examples and not comprehensive list, is as follows:

- The amount of excavation of earth, generating air, noise pollution is unimaginable for this long period of construction. 1 (GC-1)
- The lengthy construction period 2 (PD-1)
- The traffic during peak hours from the Inner Richmond to the Financial District and back using California Street as the main route (the Express buses will definitely be affected) 3 (TR-3)
- There is a concern in the community about excavation and the water table under the land - the water table survey was done during one the of the driest periods of SF and may not reflect the true measurement 4 (GEO-1)
- Destruction of historical site, virtually with nothing preserved (by cutting through the main building) 5 (CR-2)
- Office space allocation does not really conform to the character of the neighborhood
- Additional retail competes with the already challenged retail situation on Sacramento Street. Euclid side is windy and hilly and not conducive to a pleasant shopping experience. The retailers would be set up to fail… 6 (ME-1)

These are just some of my concerns. Mr Dick Frisbie's comments are attached below and I firmly support them.

Thank you for your attention.

With Best Regards,

Tina

Tina Kwok

# I-KWOK3

kwoktina@me.com

May the long time sun shine upon you,
All love surround you,
And the light within you guide your way.

**From:** Tina Kwok
**To:** Zushi, Kei (CPC)
**Cc:** ECN, 3333CalCompliance (ECN)
**Subject:** Re: Response to DEIR 3333 California Street
**Date:** Wednesday, January 09, 2019 11:30:01 AM
**Attachments:** 3333 California DEIR Response to PD - COMMUNITY COMMENTS, CHALLENGES, DEFICIENCIES FOR THE DEIR Rev 3.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr Zushi,

Attached is the document in PDF format for your view. Thank you so much for reaching out. It is my sincere hope and wish, along with the community of Laurel Heights, that we reach a "win-win" situation for the developers, the city of SF, and the residents of the neighborhood. I just cannot imagine going through 7-15 years of construction (a toddler today would be going to college 15 years from now).
There's also the possibility of the current developer using the approved plans to "sell" to other developers in the future in order to get out of the high cost of construction in the market place now. And the site can be morphed into an unforeseeable development then. 1 (PD-1)

Thank you again for your attention.

With Regards,

Tina Kwok
kwoktina@me.com

May the long time sun shine upon
you, All love surround you,
And the light within you guide your way.

---

**From:** Tina Kwok <kwoktina@me.com>
**Sent:** Tuesday, January 08, 2019 4:41 PM
**To:** Zushi, Kei (CPC) <kei.zushi@sfgov.org>
**Cc:** Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; Dick Frisbie <frfbeagle@gmail.com>
**Subject:** Response to DEIR 3333 California Street

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi

I am a resident of Laurel Heights. I reside at 535 Laurel Street. Below is my response to the DEIR of 3333 California Street project. The response is actually written by Mr. Dick Frisbie and I agree with all of his findings and comments.

Please let it be noted that we are pro increase in housing in SF. The need is now, and not in 7-15 years from now. Our community has supported the Copper Penny and CPMC project, and with the 3333 California project, will be increasing housing by 1000 units in the neighborhood. Some of my concerns, as examples and not comprehensive list, is as follows:

- The amount of excavation of earth, generating air, noise pollution is unimaginable for this long period of construction. 2 (GC-1)
- The lengthy construction period 3 (PD-1)
- The traffic during peak hours from the Inner Richmond to the Financial District and back using California Street as the main route (the Express buses will definitely be affected) 4 (TR-3)
- There is a concern in the community about excavation and the water table under the land - the water table survey was done during one the of the driest periods of SF and may not reflect the true measurement 5 (GEO-1)
- Destruction of historical site, virtually with nothing preserved (by cutting through the main building) 6 (CR-2)
- Office space allocation does not really conform to the character of the neighborhood
- Additional retail competes with the already challenged retail situation on Sacramento Street. Euclid side is windy and hilly and not conducive to a pleasant shopping experience. The retailers would be set up to fail… 7 (ME-1)

These are just some of my concerns. Mr Dick Frisbie's comments are attached below and I firmly support them.

Thank you for your attention.

With Best Regards,

Tina

Tina Kwok
kwoktina@me.com

May the long time sun shine upon you,
All love surround you,
And the light within you guide your way.

I-KWOK4

# SUMMARY of DEFICIENCIES/INACCURACIES for the 3333 California DEIR

"Incorrect, Incomplete, Inaccurate"

The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years. 8 (PD-1)

I fully support the Community Full Preservation Residential Alternative for 3333 9 (AL-2)

It preserves the Historic Characteristics of this wonderful historic site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/ Office/Commercial Complex that the Developer continues to insist upon.

It does not create 8,000 retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It is compatible with the surrounding neighborhoods for character, style, scale and bulk.

I strongly oppose the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 10 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 8,000 retail caused the Developers Destructive Proposal. 11 (AL-2)

## The Community Full Preservation Alternative Preserves and Protects Small and Family Owned Businesses

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses.

The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more.

We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal calls for.

One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense.

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents?

## The Community Unanimously Opposed the Developers' Massive Retail, Office, Commercial (ROC) Complex.

In a recent Petition Drive at Laurel Village over 800 residents signed the Petition opposing the Developers Full Destruction and Massive ROC plan and supporting the Community's residential Alternative. Three people opposed it the Petition. These signatures were gathered in less than 8 hours.

In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods. 12 (PP-1)

"A deal is a deal "was how everyone felt.

The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted.

These signatures are in the hands of the District 2 Supervisor.

13 (GHG-2)

## The Developers Destructive Proposal Generates Excessive Levels of Greenhouse Gases and Even More Destructive Climate Gases.

Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG) and the many associated and far more destructive climate changing gases that accompany the primary Carbon Dioxide gas.
The Community's Full Preservation Alternative will, by comparison, generate approx. 4,100 tons of GHG.
The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.
The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required.
The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required.
Could there be something they want to conceal from the public?
Much like they concealed the Historic nature of 3333 for over 4 years?

Planning ignores the GHG generated by the construction materials despite the requirement to address "indirect" GHG. Planning requires the GHG generated in dispensing water to control dust, etc, to be calculated but not the GHG generated in manufacturing the materials used in the construction!
Example: The GHG generated by the diesel fuel burned to deliver a load of concrete is calculated to the decimal point but the GHG generated by the concrete itself is ignored. What do the numbers show?
Assume a 30 mile round trip: the truck burns approx. 10 gallons of diesel and generates 225 lbs. of CO2. The concrete in the truck generated over 5,000 lbs. of CO2 during manufacture. So, Planning recognizes the 225bs. but claims the 5,000lbs. is irrelevant essentially ignoring 95% of the real GHG!
And using this logic throughout the Initial Study Planning concludes that GHG are "Less than Significant" and therefore need not be addressed!
Folks, you can't make this stuff up as its beyond one's imagination.
The steel, glass, etc. are all treated similarly.
Apparently if you can't see the GHG actually being emitted into the air it doesn't actually exist sothere is no need to consider it. So much for a responsible approach to Climate Change.

As noted above the Community Full Preservation Alternative generates less than one third the GHG, however Planning chooses to calculate them.
NOTE: Over 95% of the cement/concrete used in the Bay Area is totally

manufactured in the Bay Area beginning with the mining process so these GHG are being injected into our air.

13 (GHG-2) cont'd

## The Community Alternative is Superior, Sooner and Safer

14 (AL-2)

We pollute less and protect the environment: the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative:
We destroy less: we preserve the historic site.
We build less: 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building.
One single level underground parking garage for 450 spaces versus a complex of parking garages, some of three levels, for 896 spaces;
We excavate less: 90,000cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads);
We preserve and protect our local businesses and shops: no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business;
We better protect the health and well being of everyone: no 13,000+ auto trips to pollute the air, generate the noise, put pedestrians at risk, unload trucks on the streets, etc.

The Community's Full Preservation Alternative solution will always be three times More Climate Friendly; Far Less Disruptive; Far More Family Friendly; Far Safer for Pedestrians; Far Healthier Air Quality-wise; and Provide Critical Housing at Least Three Times Faster than Developers' solution.

## We fully support housing

15 (ME-1)

The Community has supported the Lucky Penny (95 units), CPMC (270 units) and now 3333 (558) units. It was the Community that spearheaded the effort that led to the approval of the Lucky Penny Project.
Over 1,000 units in a half mile radius.
So please don't offend me and misrepresent the Community's position.
We support housing and history; we oppose unneeded, unwanted and unnecessary Retail and mindless destruction of a historic site.
AND we provide housing in as much as 12 years sooner than the Developers Full Destructive Plan does.

The YIMBYs should be 100% in favor of the Community's Full Preservation plan and if they're not then they are being grossly hypocritical.

## The Community Full Preservation Alternative Prevents Excessive Traffic from the Massive ROC Complex, Uber & Lyft. Etc. from Overrunning our Neighborhoods.

16 (TR-2)

Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading. At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/ Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact.
The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude. Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 8,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is an entirely bogus number based on questionable assumptions, such as "The SF Guidelines do not provide a specific methodology to assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…."
Rather amazing that these "refinements" all work in the Developers favor. Nowhere in these "refinements" have TNCs been taken into account!

Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!

Seawall Lot 337 & Pier 48 summary:
Project type Mixed-use, open space, residential, commercial
Project area Approx. 28 acres
Proposed building area 1.3 – 1.7 million sf commercial; 750,000 - 1.5 million sf residential; 150,000 – 200,000 sf retail, 850,000 sf structured parking



Seawall Lot 337 & Pier 48

16
(TR-2)
cont'd

Pier 70 summary: "The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable? Simply bogus.
The DEIR consistently attempts to misrepresent and mislead the public.
It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.

Under their previous, Level of Service, methodology they would have calculated 8,000 retail trips alone.
I I think it safe to say that the numbers presented by Planning are simply "Developer friendly!". Their VMT methodology with "refinements" will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 35% less trips!
This entire section is suspect and Planning must explain this profound discrepancy.
As noted above, nowhere are the TNCs incorporated into the calculations.

All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact.
This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs have.
Planning's mitigation measure is a stone age solution to a digital age problem.
How will many people respond to a perceived lack of parking?
They'll simply call a TNC and go anyway.
Eliminating parking won't eliminate auto trips it will actually increase auto trips.

A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past – by any mode of transport. 16 (TR-2) cont'd

The VMT methodology used by the Planning Department fails to account for the impact of TNCs.

And, the use of TNCs makes the GHG situation worse. 17 (GHG-1)

Let's assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles.

Data shows that many people will now use a TNC rather than drive their own cars.

This will be even more pronounced if Parking is reduced!

So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles.

When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip!

So, not only do we have 8,000 retail auto trips, excluding the effect of TNCs (not addressed) to deal with we have many of them generating significant more GHG per trip!

Planning needs to do a comprehensive analysis using credible data and a credible methodology so that the public knows the extent of the GHG generated.

We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly.

In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR.

## The Community Full Preservation Alternative Protects the Historic Site, Protects the Greenspaces, Maintains the Existing RM-1 Zoning and Resolution 4109, Maintains the Public's Permanent Right-of-Use of the Greenspaces . 18 (AL-2)

The Developers Destructive Proposal first demolishes and destroys the Historic Characteristics and nature of 3333. 19 (CR-2)

Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft. 20 (GEO-3)

The only area that isn't excavated is under a portion of the existing building!

Not sure how they missed that opportunity!

Removal of the demolition debris and the excavated soils will require approx. 28,000 dump truck loads, all of which have to pass though and pollute our neighborhoods. 21 (AQ-1)

By contrast, the Community Full Preservation Alternative generates approx. 9,000 dump truck loads, one quarter as many!
After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings.
How many large truck loads, concrete truck loads, etc. will this require?
The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads. 22 (AL-2)

A quick look at the turning radii of the trucks, ie. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution. 23 (TR-7)

In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate.

The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4. 24 (AL-2)

## The Community Full Preservation Alternative Keeps the Loading and Unloading Traffic Within the Site as Opposed to External to the Site 25 (TR-10)

The Developers Destructive Proposal surrounds 3333 with five major Loading/ unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs. A perfect storm!

**From:** gary laufman
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); laurelheights2016@gmail.com; Richard Frisbie; richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary
**Subject:** 3333 California St.
**Date:** Tuesday, January 08, 2019 9:35:36 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am in Support for the Community Alternatives. 1 (AL-2)

I am in Opposition to the Developers' Destructive Proposal. 2 (ME-1)

I am saddened by the decline of the quality of living in San Francisco.

***If you're not planning to protect or improve the quality of living in SF then why do it ?***

Gary Laufman

San Francisco resident for 30+ years

3251 Washington St. #301

# I-LAWLOR

**From:** Ian Lawlor
**To:** CPC.3333CaliforniaEIR
**Subject:** Written Comments - Proposed Project @ 3333 California St - Case #2015-014028ENV
**Date:** Thursday, December 13, 2018 12:55:17 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Department:

In connection with Laurel Heights Partners, LLC's proposed development at 3333 California St., and based on the Draft Environmental Impact Report, please consider continuing to use the site for higher education, such as an annex for the University of San Francisco. Under a scenario where the building is used for higher education, the historically significant building and its beautiful landscaping would be preserved. Architects, preservationists and developers could update the glass curtain façade and interior to serve students for the 21st century. No changes would be required to the surrounding landscape or the perfectly suitable existing surface parking lots and garage ramp structures. Most importantly, the multitude of concerns raised by nearby residents and citizens set forth in the Draft Environmental Impact Report and listed again below for the Planning Department's reference would be adequately addressed. It appears there are far too many concerns for the Planning Department to proceed with the proposed project. Therefore, please consider continuing to use the site for higher education, such as an annex for the University of San Francisco. 1 (AL-1)

Two concerned nearby residents.

Summary of several concerns raised by nearby residents and citizens of San Francisco:

1. Archaeological concerns from the excavation and other site grading activities under the project and their effect on the topography of Laurel Hill 2 (CR-3)
2. Effects of construction of the project, including excavation of contaminated soils containing petroleum, polychlorinated biphenyls, and other contaminants; excavation and effects of undiscovered human remains and contaminated soils on public health 3 (HZ-1)
3. Potential for airborne contamination from office building demolition 4 (HZ-1)
4. Effect of ground settlement on adjacent buildings 5 (GEO-1)
5. Potential for contamination from leaking underground storage tanks and the use of chemicals for water treatment, 6 (HZ-1)
6. Increased population on the project site and effects on infrastructure 7 (PH-2)
7. Construction truck traffic and safety concerns, as well as cumulative construction transportation impacts 8 (TR-6)

8. Pedestrian safety due to increased traffic — 9 (TR-8)
9. Effects of projected growth on transit infrastructure — 10 (TR-9)
10. Loss of on-street parking spaces — 11 (TR-11)
11. Issues related to traffic circulation impacts from increased congestion on streets adjacent to the project site, — 12 (TR-3)
12. Length of the construction period and overlapping construction phases and the resulting air quality impacts on nearby residents — 13 (AQ-1)
13. Wind and shadow impacts on public streets and sidewalks and on existing private open space and recreational facilities — 14 (WS-1/WS-2)
14. Lack of recreational open space in the neighborhood and how the loss of the grass lawns along Euclid Avenue and along Masonic Avenue near Presidio Avenue would contribute to demand on public parks and recreational facilities — 15 (RE-1)
15. Concerns relating to the loss of mature onsite trees, the loss of landscaped space on the project site, and the potential loss of areas that could contain rare or endangered plant seeds or rare or endangered plants relevant to the historical significance of the site — 16 (BR-1)
16. Demand on regional water supply and the potential for adverse effects on storm drain capacity or flow — 17 (UT-1)
17. Project's effects on police and fire department services — 18 (PS-1)
18. Concerns about the project's demand on energy supplies and potential effects on utility service in the project vicinity. — 19 (EN-1)

I-LEE

**From:** Abe Lee
**To:** CPC.3333CaliforniaEIR
**Subject:** Laurel height development project
**Date:** Thursday, December 13, 2018 5:14:48 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear City Hall Planning Commission,
I am a resident of Laurel Heights and only heard about the 3333 California development yesterday through concerned neighbors on Nextdoor.com (https://nextdoor.com/post/98516472?init_source=copy_link_share)

I have serious reservations about the develop as it stands.
While more residential housing is needed, I believe it must be done without straining current public neighborhood resources. Increasing dwellings by 744 units as proposed could DOUBLE our neighborhood population and the run on public parks, libraries, and other spaces can be overwhelmed. Currently, we do not even have a public meeting hall or a workable recreation center. The one in Laural Heights park is a small shack - an unusable space for neighborhood and community meetings or deliberations.

If the developers will build that many residential buildings, it must be done by installing more usable public facilities such as libraries, reading rooms / mini-libraries, recreation center, and other spaces which will enhance all of our lives. Already the traffic in this area is heavy, and parking has become a major issue. We do not welcome more development without careful review of the impact on the existing neighborhood quality of life.

1 (PS-1)

2 (TR-14)

Thank you for your consideration. Please review the conversation on the nextdoor.com feed regarding this issue.

Regards,
Abe Lee

I-LUTHRA

**From:** Ankur Luthra
**To:** CPC.3333CaliforniaEIR; Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS)
**Subject:** 3333 Project - concerns and comments
**Date:** Wednesday, January 02, 2019 8:56:46 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Kei (and Supervisor Stefani),

I am a homeowner in SF, zip 94115. I read a lot of the 3333 project notes and have major concerns.

I strongly oppose this very harmful proposal by the developer. I have no problem with developers making money or building housing in general - but there must be a tradeoff and all things must be considered. In this case, the project is would result in destruvtive and excessive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333. It would greatly hurt the environment of the area and the quality of life. 1 (ME-1)

The developer is trying the same challenge path as the Chase Center stadium. The difference is huge here though - this is in the middle of a residential area effectively, versus the Chase center surrounded by high rise buildings mostly. Every day for 7 years maybe up to 10 years, dozens if not hundreds of construction related heavy trucks would be driving down residential streets in the area. Pine St and Bush St for example, have higher speed limits and are one way - these trucks would be barrelling down these streets, polluting them massively, dirtying all the homes, and creating huge noise pollution - for 7 YEARS or more!! - in areas where the units are mostly dwelling units and many children live and play. 2 (CEQA-4) 3 (PD-1)

I strongly oppose the project as stated. I think the site is historic and a beautiful space in the middle of the city, much like a park is. We need housing, there is no doubt, but this project is using that as a cover for the developer to build parking spaces and a retail complex which is purely for profits - we can build housing only on the existing site in 2 years with far less community and environmental impact. 4 (ME-1)

Thank you,
Ankur

**From:** Larry Mathews
**To:** CPC.3333CaliforniaEIR
**Subject:** Comments on Draft EIR -- 3333 California Street
**Date:** Thursday, December 13, 2018 3:50:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the Planning Department:

I am writing to express my opposition to and dissatisfaction with the Draft EIR circulated for the proposed project at 3333 California Street. I have owned my home directly across the street (at 3326 California Street) for over 17 years and have always appreciated this quiet street and residential neighborhood. The signifiant and unavoidable impacts identified in the Draft EIR would severely damage the fabric of this neighborhood and the City of San Francisco: 1 (ME-1)

1. The park-like setting, with mature landscaping and a midcentury-modern building with historical significance, would be destroyed were the project to proceed in its current form. This integration of landscaping and buildings is so important to this unique site and the proposed plan would destroy this setting — all for unnecessary retail and office space. The developers have created negative and permanent impacts by destroying part of the physical beauty and historical significance of this site. 2 (CR-2)

2. There is insufficient transportation and parking to support this project, and the developers have transferred the burden to the neighborhood and neighboring streets. Furthermore, the neighborhood doesn't need and cannot support additional retail, as the significant retail vacancies in the immediate vicinity will attest. 3 (TR-11) 4 (ME-1)

3. The increase in noise and pollution caused by the increased density and changed use of the site would adversely impact the neighborhood. This is a residential neighborhood and the site cannot support the increase in noise or traffic — either during an extended construction period or with the existence of an unnecessary mixed-use project. 5 (NO-3)

The developers have been disingenuous and dishonest as they've presented this project to the community. While claiming to present a conciliatory and cooperative approach with the neighborhood, they have played "bait-and-switch" and continued to ignore our very real and practical concerns. Those of us who live in Laurel Heights welcome the addition of new housing the site — we are **not** NIMBYs — and recognize the shortage of housing in the City of San Francisco. We fully support — and have repeatedly encouraged the developers to consider — an all-residential use of the site. This would allow the developers to deliver the same number of residential units as what's in their current plan but eliminate many of the significant and adverse impacts presented in the Draft EIR. I strongly encourage the Planning Commission to require the developers to pursue an all-residential project that would directly address these negative impacts outlined in the Draft EIR. 6 (ME-1)

Thank you for your consideration.

Larry Mathews

3326 California St., #3
San Francisco, CA  94118
(415) 860-6080
larrymathews@mac.com

**From:** Larry Mathews
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS)
**Subject:** 3333 California Street Mixed-Use Project
**Date:** Tuesday, January 08, 2019 3:37:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi:

I am a longtime resident of San Francisco and have owned my home at 3326 California Street for over 18 years. I recognize the need for more housing in San Francisco and appreciate the development opportunity presented by the 10 acre site across the street from me. We bought our apartment because of the park-like setting of the UCSF site, and because of the truly residential feel of the block. After carefully reviewing the Draft EIR for 3333 California Street, and meeting with the developers and with so many of my neighbors, I urge you to reject the Draft EIR and instead encourage the developers to pursue a project more in line with the alternative presented by the Laurel Heights Improvement Association (of which I am not a member). An all-residential project would mitigate — if not completely eliminate — many of the negative issues raised in the EIR and would be a solution that would work for the developers and for the community.

The Community Full Preservation Residential Alternative for 3333 California Street provides the same number of housing units as proposed by the developers, but preserves the integrity and historical significance of the site and better integrates the project into the surrounding neighborhood. The neighborhood does not need additional retail or office (or the traffic or environmental problems office and retail would bring with the increased number of users); San Francisco is already over-retailed and our neighborhood has plenty of vacant commercial spaces. Furthermore, as you know, to add the retail or commercial would require a change in zoning, and I strongly believe the zoning should be kept as it is.

I am not a NIMBY; I'm actually a YIMBY and support the addition of new housing stock in our neighborhood. But I encourage you to reject the Draft EIR and the developers' cynical plans for the neighborhood. Although the developers proclaim to be friends of the neighborhood, I suspect that any retail or office space they build will simply be sold off to other investors who might not be local or share the interests the developers claim to support. I believe the developers can make money on an all-residential project without the negative effects outlined in the Draft EIR. I encourage you to have them come back to the table to work with the community (as opposed to the staged photo-ops they've put on at community meetings) to come up with a project that will truly serve the City of San Francisco and the neighborhood I call home. The Community has presented that opportunity to the developers in the form of an all-residential project that can be efficiently and profitably built; we just need the developers to show more willingness to cooperate.

1 (ME-1)
2 (AL-2)
3 (ME-1)

Thank you for your consideration.

Larry Mathews
larrymathews@mac.com

3326 California St. #3
San Francisco, CA  94118

**From:** Adam McDonough
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); Richard Frisbie
**Subject:** 3333 California Street DEIR
**Date:** Monday, January 07, 2019 10:16:41 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Mr. Zushi,

My name is Adam Mcdonough and I'm a 10-year resident of Laurel Heights. I'm writing to voice my opposition to the developer's proposed project at 3333 California Street, and lend my full support for the community "full preservation" alternative. I believe the DEIR is inadequate in a number of ways, including: 1 (ME-1) 2 (AL-2) 3 (GC-1) 4 (CR-2)

1. It understates the negative impacts of destroying the historical characteristics at the current site;

2. It underestimates the negative impacts of retail, office and commercial space to the local community (traffic, pollution, noise, etc.); 5 (GC-1)

3. It overstates the value of "open space" at the expense of "green space", depriving the neighborhood of a local park in return for paved walkways; 6 (PD-3)

4. It inadequately represents the negative impacts of a potential 15-year construction period to the families living in proximity to the site; 7 (PD-1)

5. It incompletely addresses the damaging effects of greenhouse gases emitted during and after the construction period; 8 (GHG-1)

The community alternative provides the same number of housing units without the excessive, bulky, towering, commercialized and paved project proposed by the developer. 9 (AL-2)

Thank you for considering my objections to the developer's proposal, as well as those of a majority of neighborhood residents. 10 (ME-1)

Adam McDonough
(415) 305-8776

December 18, 2018

City Of San Francisco – Planning Commission
Commission Chambers, Room 400, City Hall
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

Re: Case No. 2015-014028ENV
Project Title: 3333 California Street Mixed-Use Project Zoning:
Residential, Mixed, Low Density [RM-1]
Zoning District 40-X Height and Bulk District Block/Lot: Block 1032/Lot 003
Applicant/Agent: Laurel Heights Partners LHP

Dear Planning Commissioners:

The developer has not addressed the historic significance of this property. 1 (CR-2)

I support the Neighborhood Full Preservation Alternative because: 2 (AL-2)

1. It has the same number of residential units as the project (558 with a 744 variant).

2. It would retain the character-defining features of the historically significant landscaping including the beautiful Terrace designed by Eckbo, Royston & Williams, and the majority of the 185 mature trees that would continue to absorb greenhouse gases. People regularly use the green space on the site for recreational purposes and that space is very important to the community.

3. It would not have retail that would compete with the merchants at Laurel Village Shopping Center. By using all the space for housing, some units would be large enough for middle-income families.

4. It would be built in approximately three years rather than the seven to fifteen years the project applicant is proposing.

5. The new Draft EIR Full Preservation Residential Alternative has 24 less residential units than the project. I recommend that some of the 44,306 square feet of retail in this Alternative be used for 24 residential units so the Alternative has the same number of residential units as the proposed project. This Alternative would have retail along California Street but not also at Euclid, which the proposed project would have. The applicant should explain the exact type of replacement windows proposed and why the proposed new rooftop addition would distinguish it from the original building yet be compatible with Midcentury Modern design principles. 3 (AL-3)

6. The proposed project is an unattractive mass of nondescript buildings crammed onto the site with concrete pathways. 4 (ME-1)

7. There is no need to destroy this historically significant site because alternatives are available which will achieve housing production by building on the parking lots. 5 (AL-2)

Thank you for your attention to this matter.

Most sincerely,

Marie McNulty
3169 California Street, #2D
San Francisco, CA 94115

cc: LaurelHeights2016@gmail.com

**From:** Kevin M Meehan
**To:** Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Support for 3333 California
**Date:** Sunday, December 16, 2018 11:52:31 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commissioners and City Planners,

I am writing you to present my full support for the 3333 California project.

As a San Francisco resident and one who lives very close to 3333 California, this project is very significant for me. I have lived in San Francisco now for 2 years and love this city. I want to stay here and raise a family but I honestly don't think I can do that with the cost of living, in particular the cost of housing.

This housing project will be a small but important step in reducing pressure on key communities. We as a city need to allow housing in this neighborhoods and ALL neighborhoods in the city. For too long we have allowed richer residents to block all housing to meet their narrow interests.

I hope you show the leadership that San Francisco needs right now on housing to support this issue.

1
(ME-1)

Best Regards,

Kevin Meehan

**3333 Draft EIR Comments**

**I fully support the Community Full Preservation Residential Alternative for 3333 California**

It preserves the Historic Characteristics of this wonderful historic site.
It provides 558 (or 744 in the Variant) housing units.
It builds them in three years.
It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex envisioned by the Developer.
It does not create 8,000 retail auto trips per day.
It does not generate approx. 15,000 tons of greenhouse gases.
It preserves both the present childcare center and the existing café.
It matches the surrounding neighborhoods for character, style, scale and bulk.
It protects the small, family owned businesses in Laurel Village, Sacramento Street and Presidio Avenue.

1
(AL-2)

**I strongly oppose** the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change.

2
(ME-1)

**From:** Liz J. Miller
**To:** richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Stefani, Catherine (BOS); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California St. Support
**Date:** Wednesday, December 12, 2018 7:05:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Supervisor Stefani, Planning Commissioners, and Planner:

My name is Liz and I want more neighbors.

As a District 2 voter living relatively close to 3333 California St., I would like to voice my strong support for adding 558 to 700+ units of housing on this site. Here in San Francisco, far more jobs are being added than housing. By limiting housing, we continue to make our city unaffordable to working families and young people.

1
(ME-1)

Are parking spaces important? Yes, but they are not more important than solving this housing crisis. Is preserving architectural continuity important? Yes, but not more important than the ability of more working people to live in my neighborhood. I want more folks to be able to live close to where they work and help reduce traffic congestion. I want kids born in San Francisco today to be able to grow up and afford to live here.

This housing will take one small step in reducing pressure on communities of concern. San Francisco should allow more housing in this neighborhood.

Please feel free to contact me at 415 347 9549 or at this email address. Thank you for hearing my concerns about our housing crisis and support for more housing.

Sincerely,
Liz Miller
District 2 Voter

**From:** Cristina Morris <cmomorris@outlook.com>
**Sent:** Monday, December 10, 2018 3:58 PM
**To:** Johnson, Milicent (CPC) <Milicent.Johnson@sfgov.org>; Koppel, Joel (CPC) <Joel.Koppel@sfgov.org>; Richards, Dennis (CPC) <dennis.richards@sfgov.org>; richhillissf@gmail.com; Melgar, Myrna (CPC) <Myrna.Melgar@sfgov.org>; planning@rodneyfong.com <planning@rodneyfong.com>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>
**Subject:** FW: 3333 California Street

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Sirs/Madams,

In anticipation of your hearings regarding 3333 California Street, I am writing in support of protecting the well-established historical designation of the property, as evidenced by the August 31, 2018 letter from Julianne Polanco, State Historic Preservation Officer to the principals of the Laurel Heights Improvement Association of San Francisco. You have been provided with a copy of that letter. 1 (CR-2)

Any future development at that site should comply and honor the historic property designation in the following areas:

1. Retain the historic significance of the landscaping of the property, which has 185 mature trees. Such care of natural resources has an added environmental benefit and the green space is very important to the surrounding neighborhoods, particularly as San Francisco becomes more urbanized and "Manhattanized."

2. Use space (within the historical designation parameters) solely for housing, which allows for larger units to be built for families, consistent with the use and character of the Laurel Heights and Presidio Heights neighborhood. 2 (ME-1)

3. Consider the environmental impact of increased traffic, parking issues and the overall impact on the quality of life for the existing neighborhood as well as for those people who will eventually occupy any new units at 3333 California Street. This includes elimination or a substantial reduction of any plan to add commercial enterprises on the property. 3 (TR-14) 4 (ME-1)

Finally, a detailed economic study should be conducted to see: 5 (GC-2)

1. The impact on existing commercial areas (Sacramento Street, California Street and Masonic Street, if commercial development is allowed at 3333 California Street. The study should take into account the number of current empty commercial properties in those areas. This neighborhood may not support any further commercial development, especially given the congested corridor of Masonic and Geary (Trader Joes, Target, etc.)

2. Whether the San Francisco economy supports the number of units being proposed by the developer, as it current trends indicate that there is an over supply of housing units, young working people leaving San Francisco (and California) and an eventual downturn in the tech bubble, on which San Francisco over-relies for its economy at present.

6
(GC-1)

Thank you for your time in reading this email and for seriously considering alternative plans put forth by the Laurel Heights Improvement Association.

7
(AL-2)

Cristina Morris
Presidio Heights

Sent from Mail for Windows 10

**From:** Cristina Morris <cmomorris@outlook.com>
**Sent:** Wednesday, December 12, 2018 7:43 PM
**To:** Johnson, Milicent (CPC) <Milicent.Johnson@sfgov.org>; Koppel, Joel (CPC) <Joel.Koppel@sfgov.org>; Richards, Dennis (CPC) <dennis.richards@sfgov.org>; richhillissf@gmail.com; Melgar, Myrna (CPC) <Myrna.Melgar@sfgov.org>; planning@rodneyfong.com <planning@rodneyfong.com>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>
**Subject:** 3333 California Street

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Dear Madams/Sirs,

I previously wrote you about 3333 California Street. In addition to the substantive concerns, please consider the following:

**I strongly urge the Planning Commission to grant a 15-day extension of the Due Date for Comments on this DEIR. It is a lengthy and complex document.**

1
(GC-3)

Given the holidays and the importance of the issues to the surrounding neighborhoods and the city generally, an extension would be most appreciated.

Very truly yours,

Cristina Morris

Presidio Heights

Sent from Mail for Windows 10

**From:** Ed Munnich
**To:** Zushi, Kei (CPC)
**Subject:** 3333 California
**Date:** Thursday, December 13, 2018 11:54:30 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Kei Zushi,

I am writing to oppose the historic designation of the current building at 3333 California, and to support the most ambitious plan, to build 700+ new housing units. It is a tremendous opportunity to make a dent in the housing crisis, and I urge you to do whatever you can to remove obstacles to it. 1 (CR-1) 2 (ME-1)

My wife and I have lived in San Francisco for 14 years, and scrapped and saved to be able buy a condo in 2012. At the time, she worked UCSF's Mt Zion campus, and I work at USF, so we focused our search for housing on the area close to 3333 California, with the plan that we could give up our car and walk or take transit to work. This area was also ideal because of the wide variety of stores and activities available within a short walk, and the excellent transit options that link it to the rest of the city. Unfortunately, even with two professional salaries, and no children, we were unable to afford anything in this area. We ended up in the Inner Richmond District, and are very happy with our neighborhood, but note that we would not be able to afford our current home, or, likely, to buy a home at all in our neighbohood today.

History is very important. But when the history of a building disrupted the city rather than enhanced it, we must not reflexively sustain the disruption. 3333 California was built at a time when San Francisco was moving towards suburban, car-centered planning, which we subsequently rejected, deeming ourselves a "transit-first city", opposing additional freeway construction, and choosing not to rebuild freeways damaged by the 1989 earthquake. The 3333 California site is historic in the sense that the Central or Embarcadero Freeways were historic--it has history, but its history disrupted the city rather than enhancing it. An absurd but relevant example is that a cloud of tobacco smoke was once part of the historic character of bars, clubs, and, indeed, City Hall; but we would not allow smoking in those locations today, merely to preserve their historic character. 3 (CR-1)

Most importantly, the history of the City is in its people. Every day, my wife and I see neighbors pushed out of our neighborhood by the high cost of housing. We are losing the most vital aspect of our history--the lifelong San Franciscans in rent-controlled housing, the young who come to the City with a dream, immigrants, diverse groups from different parts of the US, and creative people from all over who give the City its unique character. All of these people are our history, and all of them are key to a vibrant future. Critically, unlike some other projects that have been proposed, no one would be displaced by new housing at 3333 California, since not a single rent-controlled or otherwise affordable housing unit would be lost. It is a win-win for the *people* of San Francisco. 4 (PH-1)

No amount of housing that could reasonably be built at 3333 California will solve the City's housing shortage, but building housing at this site that is consistent with the density of neighboring Lower Pac Heights would help to make a dent. Since this community is so well-situated for walking and transit, people don't need cars, and not needing a car or a parking space makes otherwise unaffordable housing just a little closer to affordable for many. Moreover, with dense housing and minimal parking on this site, we would get the housing we desperately need, without adding to traffic congestion. I urge you to put the preservation of the human dimension of the City ahead of the preservation of a building that ran counter to the history of San Francisco, and runs counter the sustainable future that we strive for. 5 (ME-1)

Thank you for your consideration!

Sincerely Yours,

Ed Munnich

I-MUNNICH

568 Balboa St. #2

**From:** annechome <annechome@yahoo.com>
**Sent:** Wednesday, December 12, 2018 9:03 PM
**To:** CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Moore, Julie (CPC) <julie.moore@sfgov.org>; Foster, Nicholas (CPC) <nicholas.foster@sfgov.org>
**Subject:** Grant a 15 day extension regarding 3333 California St

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To: SF Planning Commission

From: Anne Neill, neighbor at 3179 California St*, CA 94115*
*annechome@yahoo.com*

Date: December 12,

2018 Re: 3333

California St, SF

Dear SF Planning Commission,
I am using my neighbors' letter as a template for a discussion about 3333 California St. However, I am adding my own thoughts as well. I have attended multiple presentations by the developer and I have grave concerns. The project scope is far too big, this neighborhood should not have the type of density that the developer is proposing, and we certainly don't need additional retail. With the historical significance of the building, more time is needed to take these concerns under consideration, thus my request to grant a 15-day extension to January 8, 2019. 1 (ME-1)

**Please grant a 15-day extension of the 45-day comment period on the Draft EIR from December 24 to January 8, 2019, because the project construction would last for 7-15 years and there is substantial community opposition to the developer's concept. 60 days are allowed by law and have often been granted for complex projects or projects that are controversial. Last week, the SF Historic Preservation Commission expressed support for an alternative.** 2 (GC-3)

Approximately 800 residents signed a petition against the rezoning requested by the developer, and he would not plan the project with the community. 3 (PP-1)

Last week, the San Francisco Historic Preservation Commission stated strong support for preserving this resource by building a residential alternative. 4 (AL-2)

The developer proposes to destroy the historically significant characteristics of the site and create a concrete jungle with three underground levels of garages for 896 parking spaces topped with nondescript buildings crowded onto the site. He wants to change the zoning to allow retail which was banned in Planning Commission Resolution 4109 to avoid adverse impacts to Laurel Village and Sacramento Street. 5 (CR-2) 6 (PP-1)

**Also, the developer did not tell the community about the historic significance of the site.** The neighborhood learned last year and had the building and landscaping listed on the California Register of Historical Places because they were designed to complement each other in an integrated composition. So, the landscaping is also a historical resource on this site and has been used for recreation by the public for many years. 7 (CR-1)

I support the Community Full Preservation Alternative which would have the same number of housing units as the proposed project (558) with a variant for 744 and would build new buildings on the vast parking lots along California Street in approximately 3 years rather than the 7-15 years requested by the developer. Under the community alternative, the main building would be converted to housing units rather than demolishing half of it, and there would also be a new Mayfair residential building. The existing cafe and childcare center would remain, and there is an existing pathway through the building that opens onto the Terrace and onto Masonic. **Please direct the Planning Department to evaluate this alternative with the same level of detail as they do for the alternatives in the Draft EIR.** 8 (AL-2)

Draft EIR Full Preservation Alternative C was unreasonably configured to have 26 less housing units than the project and 44,306 square feet of retail, which can be converted to housing to match the number of housing units in the proposed project. 9 (AL-3)

This is a beautiful site that should not be destroyed, and housing can be built sooner in an alternative than in the project. The 15 years the developer is requesting raises a red flag for real estate speculation.

10
(AL-1)

Also, the Draft EIR states that the proposed project would generate 10,057 auto trips per day and would cause substantial additional Vehicle Miles Traveled and/or substantially induce automobile travel. DEIR p. 4.C.74. The DEIR claims that reducing the retail on-site parking supply would mitigate this impact to less than significant. DEIR p. 4.C.80. We think this analysis is bogus.

11
(TR-4)

From: marsha nonn <mwnonnsf@gmail.com>
Sent: Thursday, December 13, 2018 1:41 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Thursday, December 13 , 2018 Planning Dept. Hearing, RE. 3333 California Street DEIR, Case No. 2015-014028ENV

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Mr. Ionin:

Unfortunately due to unforeseen circumstances, we are unable to attend today's Planning Dept's meeting regarding the subject matter.

We are residents and home owners in the Laurel Heights neighborhood and we strongly urge the Planning Commission to grant a 15-day extension of the Due Date for Comments on this DEIR. It is a lengthy and complex document. Thank you. 1 (GC-3)

Marsha and Wolfgang Nonn

**From:** marsha nonn
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS); Richards, Dennis (CPC); Koppel, Joel (CPC); CPC-Commissions Secretary; Moore, Kathrin (CPC); Milicent A. Johnson - Commissioner; Melgar, Myrna (CPC); Rich Hillis - Commission President; Rodney Fong - Commissioner
**Subject:** DEIR - 3333 California Street
**Date:** Tuesday, January 08, 2019 1:35:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Our comments on the subject DEIR are as follow:

1. We fully support the Community Full Preservation Residential Alternative proposal: 1 (AL-2)

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.
- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 8,000 retail auto trips per day.
- It does not generate approx. 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It is compatible with the surrounding neighborhoods for character, style, scale and bulk.

2. We vehemently oppose the Developers' destructive proposal: 2 (ME-1)

- it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333.
- It threatens the quality of life.
- It poses threats to pedestrian safety.
- It contributes to climate change.
- More retail is unneeded and unwanted. It will destroy our local businesses. We do not need the more than 100,000 square feet of retail, office, commercial space that the Developers Destructive Proposal calls for.

Marsha and Wolfgang Nonn
Laurel Heights Community Members

I-PAUL

| | |
|---|---|
| **From:** | phillip paul |
| **To:** | Zushi, Kei (CPC) |
| **Cc:** | Stefani, Catherine (BOS); laurelheights2016@gmail.com; richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary |
| **Subject:** | DEIR for 3333 California St. |
| **Date:** | Monday, January 07, 2019 7:55:13 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zuchi,
As a resident and homeowner of over 10 years and on the 3300 block of California St., I would like to express my opinion regarding the recent DEIR produced for the development of 3333 California St.

I am deeply concerned by the developer's request for 15 years to construct the project. This length of time makes me suspect an alternate motive, such as planning a new entitlement on an up-zoned property. Developers all over San Francisco appear to be using this tactic, create entitlements rather than build housing. The draft EIR considered construction in 3 to 5 years. The Community Preservation Alternate would complete construction in 3 years. If they must have 15 years then they need to agree that there can be no entitlement up-zoning trick. 1 (PD-1)

The DEIR really does not consider the impact on the neighborhood and in this aspect is woefully incomplete. Particularly in that no consideration is given to asking the residents to live in a construction zone for 15 years with streets being blocked by cranes and cement trucks, subjected to construction dust and pollutants, with construction noise dawn-to-dusk. Three to five years of this is asking a lot,15 years is excessive particularity where everything across the street from the site and on all sides is essentially residential housing for families with children.

I fully support the Community Full Preservation Residential Alternative for 3333 California St. I support his plan because: 2 (AL-2)
- It preserves the Historic Characteristics of this unique and wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds these units in three years.
- It does not include the Retail/Office/Commercial Complex (large and unneeded and unwanted but that the Developer continues to insist upon), and in doing so
  - avoids adding another 13,000+ retail auto trips per day to a city already overwhelmed by cars and short of parking
  - avoids forcing traffic and parking demand into the adjacent neighborhoods
  - avoids adding 15 kilotons per year of private transportation-generated pollutants to the cities environment
  - preserves both the present childcare center and the existing café.
  - better matches the character, style and scale of the surrounding residential neighborhoods

I strongly oppose the Developers Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding the 3333 California site. The 15 year construction plan poses a long-term threat to quality of life in the neighborhood surrounding the site and may well suppress the values of surrounding properties 3 (ME-1)

for over a decade.

3 (ME-1) cont'd

The Community Full Preservation Alternative will protect the small, family owned businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses. The Neighborhoods are well served by businesses at Laurel Village, along Sacramento St., Trader Joe's, City Center, along California St. A central reason for the developer to destroy the historic site is to add 100,000 square feet of Retail, Office, Commercial space. We do not need more empty store fronts. The retail world is struggling to survive the rise of the on-line world, adding more retail space will either sit empty or lead to a spiral of failures as the shops compete for a finite number of shoppers.

4 (AL-2)

5 (ME-1)

I fail to see how the CPMC development down the street, a Community supported plan that adds 270 housing units, found a way where the developer and neighbors agreed to have no retail. While at 3333 California, we are told the Retail/Office/Commercial is required against the overwhelming opposition of the surrounding residents.

Several recent studies have questioned the City's method of calculating auto trips, and the resulting chaos and congestion. Some have suggested the methodology is misleading. The methodology is certainly out of date (last updated in 2014) taking no account of how the Uber/Lyft/Chariot swarm alter the traffic landscape. I can see a lane on either side of California street blocked by Ubers double and triple parked. A disaster for those of us when we need to back out of our garages and a disaster for those who need the emergency vehicles that regularly use California St as a fast way across this part of town. This question is easily answered, provide the raw data and the calculations and the defined procedures that were used so that they can be independently verified. At present, the traffic analysis looks like a favor done for the developers where the neighborhood is expected to accept the high-level results blindly and just live with the results.

6 (TR-2)

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact. This does not make sense. Are there published studies that support this idea and if so can we have the references? If the business served are to survive, eliminating parking does not eliminate auto trips it will actually increase driving time as cars cruse for a spot and it will push parking into the surrounding neighborhoods, or it will fill the streets with Ubers. All to the detriment of those that live in the neighbor. Whereas if parking is so bad as to drive away shoppers, we get the failure of the businesses. The Developers Proposal surrounds 3333 California with five major Loading/unloading zones for personnel pick-ups and loading. The Developers started by promising that all commercial loading would be done underground or on-site. Now the site is ringed with loading zones. These zones eliminate many parking spaces and create additional traffic congestion and pollution. Simply put, the traffic flow and the parking impacts do not seem to have been considered in a systematic fashion.

7 (TR-4)

8 (TR-10)

I apologize for sending this at the last minute and hope you will be able to take my comments into account when assessing the impact of the 3333 California development on our community

and neighborhood. The city is changing, my hope is that this change is managed in a smart way that keeps the city a culturally vibrant place, and a fine place to live and raise a family.

with best regards Regards,

Phillip H Paul
3328 California St. apt. 4

**From:** Donald Piombo <dspiombo@pacbell.net>
**Sent:** Wednesday, December 19, 2018 3:38 PM
**To:** PIC, PLN (CPC)
**Subject:** 3333 California Project

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,
I am writing in support of allowing commercial development at the 'project'. That said, I am also in support of a smaller, scaled down project, but mainly and briefly - I believe **it is irresponsible to build residential units without the infrastructure needed to support those new residents**. Restaurants, grocery and other stores, laundry, banking, clothing, etc all need to be allowed with the new development. It seems to me, that the argument of traffic caused by the residential development, is lost if I have to get in my car to shop or have dinner. 1 (ME-1)

I was born and raised in Laurel Heights, and I still own a 3 unit building on Mayfair at Laurel that my parents purchased new in 1949. I love the neighborhood, but it must evolve.

Although I am no longer a resident of Laurel Heights proper (west from Presidio/Masonic to Spruce and south from California partway to Geary), I do live nearby on Jackson near Lyon and I would love to see more commercial in our neighborhoods to support us.

Regards
Don Piombo

**From:** Donald Piombo
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); Melgar, Myrna (CPC); richhillissf@gmail.com
**Subject:** 3333 California St project
**Date:** Thursday, January 03, 2019 10:09:39 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello
I own property in Laurel Heights on Mayfair Dr but live nearby on Jackson and Laurel. I want to voice my concern that I believe building residential units only, with no underlying commercial support for those residents is irresponsible. I cannot imagine building 588 (or 744 alternatively) residential units with no banking, grocery, cleaners, gym, restaurants, café, shops, etc to support those people. The current 'Laurel Village' cannot support that many new residents. Those residents will get in their cars and drive to other neighborhoods - exacerbating traffic congestion. Personally, I think it's irresponsible to build that many units with no support for the residents living in them. Regards Don Piombo

1
(ME-1)

# I-POLIAKIN

**From:** Gilda Poliakin
**To:** CPC.3333CaliforniaEIR
**Date:** Sunday, December 30, 2018 10:55:26 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

I attended the December 13th meeting regarding the Environmental Impact study regarding the 3333 California Development Project. I was very impressed with the commitment and attention which each of you showed to the study of the various aspects of the proposal, and a someone who lives directly across the proposed project, I am reassured that you will carefully examine all the impacts of the proposed project.

To re-iterate the opinion of many of those who spoke on December 13th,

**Intense construction:** The construction period should not be allowed to take too long. The developer's estimate of a decade or more of construction is ridiculous. Traffic: Those of us who live on Presidio Avenue sometimes have to wait up to 5 minutes during morning peak periods before someone is kind enough to allow us to pull out of our garages, and the rush of cars from Pine Street onto Presidio Avenue is dangerous as it presently stands, as cars careen without regard to safety. 1 (PD-1) 2 (TR-7)

**Environmental impact:** Noise level, increased traffic and pollution. What is the impact on the 560 Presidio Building's structure vibrations and water-table while digging the foundation the foundations are dug and concrete poured? 3 (GC-1) 4 (NO-2) 5 (GEO-1)

**Greenspace:** The loss of what little green space that exists on Presidio Avenue, is a loss to all of us who have come to use it as a mini park and enjoy the views of the redwoods (which the proposed project will hide from public view). 6 (PD-3)

**Transportation:**
There are not enough parking spaces for the proposed number of units provided in the plan. As it now stands, street parking is impossible. 7 (TR-11)

MUNI is not able at this time to guarantee that enough buses will be supplied to take the load of 1,000 residents suddenly appearing in the Laurel Heights area. 8 (TR-9)

If Uber or Lyft cars are used, those cars picking up and dropping passengers will simply add to the already intense traffic on Euclid and Presidio Avenues as well as California Street. 9 (TR-2)

**Historical building and design of proposed structures:**
The design for the proposed buildings is of the utmost banality and has no relevance to the city's style. It does not reflect the style and character of either the neighborhood or of the city's tradition. One can argue that the present building has no historical value, but it does represent a style of a period which is has gained appreciation in this present century and while not being on a par of a Mies Van Der Rohe building, it makes more of a statement than the proposed ensemble of buildings which do not reflect any style. 10 (ME-1)

For all these above reasons, I urge the Commission to consider I strongly urge the Commission to consider the Community Full Preservation Residential Alternative for 3333 California. The proposed plans submitted by the developers, 11 (AL-2)

Respectfully submitted.

**Gilda Poliakin**
**Group Travel Consultant**
Mobile (US): + 1 415 279 8554
E: gildapoliakin@aol.com
560 Presidio Avenue, No. 8
San Francisco, CA 94115-USA
Website www.gildapoliakin.us

**From:** Brandon Ponce
**To:** CPC.3333CaliforniaEIR
**Subject:** Comments on DEIR
**Date:** Tuesday, January 08, 2019 10:16:39 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,
Please include the 3637-3657 Sacramento Street Mixed Use Project in your cumulative projects analysis. 1 (CU-1)
Can you confirm receipt of this email?
Thank you,
Brandon Ponce

# I-POWERS

**From:** Cory Powers
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS)
**Subject:** 3333 California Street
**Date:** Wednesday, January 02, 2019 8:55:30 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I live behind Laurel Village on Spruce Street and I am very concerned about the scale and characteristics of this project. 1 (ME-1)

I completely understand the desirability of adding additional residential units to the neighborhood and I applaud the conversion to residential. I do not like the way the project looms onto California Street - the set back and brick wall of the current site are very appealing to me. I also wish it didn't cut into any of the green space at Laurel and Euclid as I have spent many a moment up there with neighbors watching Blue Angels and astrological wonders like lunar eclipses. Or just lying on the grass. I do appreciate the idea of public spaces and the walk-through's and overlooks and hope that they live up to feeling public.

However, so much of this project has the potential to really destroy the characteristics of the neighborhood. Do we really need more retail? Is the incredible charm and usefulness of the Laurel Village shopping center going to be destroyed by this? The California Street construction looks more like some of the newer SOuth of market neighborhoods than Laurel Heights/Inner Richmond.

2 (PD-1)

The numbers are very concerning. The timeline 7-15 years seems really long. Over 700 new housing units seems high for the neighborhood (isn't there a variant with less?). I really don't like the idea of adding more industry (commercial, offices etc) to a residential neighborhood. The hospital, JCC and small shops that are currently in the area provide a manageable amount of traffic as will new residences. I really don't imagine that the neighborhood can manage more than a few additional services (coffee shop, postal/mail service type amenities) to accommodate the new housing units. I hope to God there is nothing that causes the 5& 10/Ace Hardware, Cal-mart or Bryans to close! These are true neighborhood institutions that have helped create the ambiance of the neighborhood for over half a century. 1 (ME-1) cont'd

I can hardly bear the idea of a prolonged construction project on that scale depressing the neighborhood. I walk, transit and bike everywhere and cannot imagine a decade of construction to negotiate (I also frequently lock my bike up in the current Walnut street parking lot to use ZipCar that are parked there and I will really miss that!!!) 2 (PD-1)

Scale back! Concentrate on compatible housing and open space! Keep our neighborhoods unique in there character! 1 (ME-1) cont'd

Cornelia Powers, Laurel Village for over 20 years, family in the area since 1933.

**Subject:** DEIR to 3333 California Street Project
**Date:** Monday, January 7, 2019 at 3:52:06 PM Pacific Standard Time
**From:** aprato_otr@yahoo.com
**To:** Zushi, Kei (CPC)
**CC:** Stefani, Catherine (BOS)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Lei Sushi
Senior Environmental Planner

Dear Lei Sushi:
I am a longtime resident in the Laurel Heights area.
I strongly support the Community Full Preservation Residential Alternate for 3333 California Street Project. 1 (AL-2)

It preserves the historic characteristics of this wonderful site.
It preserves the outdoor open space frequently enjoyed by residents in the neighborhood.
It includes the 558 residential units.
It can be built in 3 years with only 4 additional new buildings.
It does not add a retail or commercial which is not needed due to the local Laurel Heights Shopping Center ( 4 banks, 2 supermarkets, 2 clothing stores, 2 coffee shops, a large variety store, 3 restaurants, Walgreen's drugstore). TraderJoe's and Target are one block from the building site.
This plan does not markedly increase the amount of noise, air pollution, and congestion as the Developers' Proposal.

I strongly oppose the Developers' Destructive Proposal. 2 (ME-1)

The proposed additional 11 buildings will be squeezed onto the site resulting in a dense, haphazard, claustrophobic atmosphere not in keeping with the character of the surrounding neighborhood and providing potential opportunity for crime.
The proposed higher stories with heights to 86 feet or more will create shadows to neighboring residents and are out of proportion with the surrounding area. 3 (WS-2)
The proposed 15 year length of construction time is unreasonable and it is unconscionable to expect the neighborhood to be subjected to demolition, noise,construction,air pollution, traffic and congestion for that length of time. 4 (PD-1)
This proposal will create major traffic congestion at the enter/exit, parking and loading locations. Presidio and Masonic Avenues are already bumper to bumper car jams and also at Laurel Street near California Street. 5 (TR-3)
This proposal will destroy Laurel Hill with the excessive demolition and excavation including removal of serpentine rock which has asbestos. There have been no mention. Of plans of management of this toxic substance. 6 (HZ-1)

Thank you for considering my comments and suggestions.

Sincerely,
Ann Prato

Sent from my iPad

**Monday, January 7, 2019 at 3:54:45 PM Pacific Standard Time**

**Subject:** 3333 California Street/Presidio Blvd UCSF building: Development plans
**Date:** Monday, January 7, 2019 at 2:01:55 PM Pacific Standard Time
**From:** Sandra Price
**To:** Zushi, Kei (CPC)
**CC:** Stefani, Catherine (BOS), richhillissf@gmail.com, Melgar, Myrna (CPC)

I live in the neighborhood affected by any development at 3333 California Street. I support the Community Full Preservation Residential Alternative for 3333 California because: 1 (AL-2)

- It preserves the Historic Characteristics of this wonderful historic site.
- It provides 558 (or 744 in the Variant) housing units.
- It builds them in three years.
- It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.
- It does not create 13,000+ retail auto trips per day.
- It does not generate approx. 15,000 tons of greenhouse gases.
- It preserves both the present childcare center and the existing café.
- It matches the surrounding neighborhoods for character, style, scale and bulk.

I strongly oppose the Developers Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333 California; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 2 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the Developers Destructive Proposal. 3 (AL-2)

Thank you,
Sandra Price
2101 Baker Street
San Francisco

**From:** Zarin Randeria <thezarin@yahoo.com>
**Sent:** Monday, December 03, 2018 11:57 PM
**Subject:** IMPORTANCE OF PRESERVING THE HISTORIC PROPERTY AT 3333 CALIFORNIA Street, San Francisco, CA

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

San Francisco Planning Commissioners:

As a concerned citizen of San Francisco and a resident of Laurel Heights we are very concerned about the developers totally ignoring the concerns of people who live in the neighborhood and their NON-RECOGNITION OF THE HISTORIC SIGNIFICANCE OF THIS PROPERTY. 1 (CR-1)

**1.** In an earlier public meeting the developers **did not even mention that 3333 California Street, San Francisco, CA, if of Historic Significance.**

**2. You should support the Neighborhood Full Preservation Alternative** because: 2 (AL-2)

A. It has the same number of residential units as the project (558 with a 744 variant).

B. It would retain the character-defining features of the historically significant landscaping including the beautiful Terrace designed by Eckbo, Royston & Williams and the majority of the 185 mature trees that would continue to absorb greenhouse gases.

It is important for you to know that people from our neighborhood and other neighborhoods regularly use the green space on this site for recreation playing with their dogs, having impromptu picnics and simply visit with one another. This **SPACE IS VERY IMPORTANT TO OUR COMMUNITY.**

C. We support using all the space for housing which is affordable and can accommodate the diverse population of our City. By using all the space for housing, some units would be large enough for middle-income families. We do **not need retail** space as that would compete with the merchants at Laurel Village Shopping Center.

D. Any construction to re-formulate this space needs to be built in approximately 3 years rather than the 7-15 years the project applicant wants.

**3**. We recommend that some of the 44,306 square feet of retail in this Alternative be used for 24 residential units so the Alternative has the same number of residential units as the proposed project. This Alternative would have retail along California Street but not also at Euclid, which the proposed project would have. Additionally, the applicant should explain the exact type of replacement windows proposed and why the proposed "new rooftop addition" that would distinguish it from the original building yet be compatible with Midcentury Modern design principles. 3 (AL-3)

**4.** The proposed project as designed by the developers is an unattractive mass of nondescript buildings crammed onto the site with concrete pathways and **ALMOST NO GREEN SPACE** which is vital for our City as more and more of it seems to be cement and concrete. 4 (ME-1)

**5.** There is **no need to destroy this historically significant site** because alternatives are available which will achieve housing production by building on the parking lots. 5 (AL-1)

Thank You!

Zarin E. Randeria
38 Lupine Avenue
San Francisco, CA 94118

**From:** Zarin Randeria
**To:** CPC-Commissions Secretary
**Subject:** Planning Commission Meeting on Tuesday January 8, 2019
**Date:** Saturday, January 05, 2019 7:08:07 PM

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## HAPPY NEW YEAR!

**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an up-zoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.**

1
(PD-1)

**So, the FIRST question to ask at Tuesday's Meeting is WHY. Are they totally incompetent or are they blowing smoke?**

**I fully support the Community Full Preservation Residential Alternative for 3333 California Street, San Francisco, CA because:**

2
(AL-2)

**It preserves the Historic Characteristics of this wonderful historic site.**

**It provides 558 (or 744 in the Variant) housing units.**

**It builds them in three years.**

**It does not include the massive *unneeded* and *unwanted* Retail/Office/Commercial Complex that the Developer continues to insist upon.**

**It does not create 8,000 retail auto trips per day, and,**

**It does not generate approx. 15,000 tons of greenhouse gases.**

**Thank You!**

**Sincerely,**
**Zarin E. Randeria**
**Community Resident**

**From:** K Roberson
**To:** Zushi, Kei (CPC)
**Cc:** frfbeagle@gmail.com; Stefani, Catherine (BOS); Laurel Heights
**Subject:** 3333 California Project
**Date:** Tuesday, January 08, 2019 12:00:27 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Ken Zushi,

I hope this note finds you well!

I write in order to express my support for the Community Alternatives which promotes reasonable scale residential development within our quiet Victorian neighborhood and my opposition to the Developer's destructive proposal which has the possibility to allow big box retail the neighborhood where local family businesses are valued rather than undermined by large scale retail. We don't need another big box retailer such as Whole Foods/Amazon with the lovely, family owned Brian's Market and Cal-Mart less than a quarter-mile away. I would think that San Francisco, as a remarkable jewel in the Bay Area crown, would prioritize small scale, historic, and architecturally consistent development over buildings which favor massive, brutalist, concrete, steel, mirrored glass structures commonly found in Houston or Manhattan.

1 (AL-2)

2 (ME-1)

A 15 year construction schedule is equally out of proportion as well. There are three SOMA buildings, with at least 500 apartments, which were completely constructed in less than three years. These are The Paramount building, the Nema building, and the two Rincon towers. All of these projects had much more difficult site access conditions the relatively open site on Laurel Hill. San Francisco has highly competent construction firms willing and able to build 550 apartments in less than three years.

A 15 year development period has practically 0 to do with providing housing for families which might actually need it. I suspect it has much more to do with developers hedging their financial bets over fluctuating market valuations, pro-forma spreadsheets, and the ability to sell future development rights rather than to provide housing for people.

3 (PD-1)

Again, I express my support for the Community Alternatives which promotes reasonable scale residential development and my opposition to the Developer's destructive proposal which could decimating the peaceful Victorian neighborhood where we appreciate the quiet.

4 (AL-2)

Thanks for your time,

Kelly Roberson

**From:** s rosenberg
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS)
**Subject:** I oppose 3333 California development plan
**Date:** Tuesday, January 08, 2019 4:52:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To SF-

I strongly oppose the currently proposed project at 3333 California. I live three blocks away and greatly dread the size and scope of this project and the resulting disruption it will cause during the build as well as forever after with the enormous increase in traffic. Not to mention it doesn't at all match the neighborhood; I was actually shocked when I saw the approved design. 1 (ME-1)

I support the Community Preservation Alternative. I believe it addresses my concerns. It will provide new housing and retail but with less negative impact on the surrounding community. 2 (AL-2)

Thanks,

Stefanie Rosenberg
242 Presidio Ave

**From:** Laura R.
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); M.J. Thomas; Richard Frisbie
**Subject:** 3333 CALIFORNIA--OPPOSITION AND SUPPORT FOR ALTERNATIVE
**Date:** Wednesday, January 02, 2019 10:53:25 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi,

**The developer's request for 15 years to construct the project is suspect. This looks like a plan to sell a new entitlement on an upzoned property. Developers all over town are selling new entitlements rather than build housing. Alternatives analyzed in the Draft EIR would be built in 3 to 5 years. The Community Preservation Alternative would be built within three years.** 1 (PD-1)

**I fully support the Community Full Preservation Residential Alternative for 3333** 2 (AL-2)

It preserves the Historic Characteristics of this wonderful historic site.

It provides 558 (or 744 in the Variant) housing units.

It builds them in three years.

It does not include the massive unneeded and unwanted Retail/Office/Commercial Complex that the Developer continues to insist upon.

It does not create 13,000+ retail auto trips per day.

It does not generate approx. 15,000 tons of greenhouse gases.

It preserves both the present childcare center and the existing café.

It matches the surrounding neighborhoods for character, style, scale and bulk.

**I strongly oppose** the Developers Destructive Proposal as it brings excessive, unnecessary, unwanted and destructive noise, pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it poses threats to pedestrian safety; it contributes to climate change. 3 (ME-1)

The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the Developers Destructive Proposal. 4 (AL-2)

The Community Full Preservation Alternative will protect the small, family owned

businesses in Laurel Village, Sacramento St. and Presidio Ave. A quick walk around these neighborhoods will clearly show the immense pressure these businesses are experiencing. More retail is unneeded and unwanted. It will destroy our local businesses.

The Neighborhoods are well served by businesses at Laurel Village, Sacramento St., Trader Joe's, City Center, California St. etc. we do not need more, more, more.

We do not need the more than 100,000 square feet of Retail, Office, Commercial space that the Developers Destructive Proposal call for.

One of the reasons the Developer destroys this historic site is to create enough space for this unneeded and unwanted Retail/Office/Commercial (ROC) nonsense.

The CPMC development, a Community supported plan by the way, adds 270 housing units and the Developer and neighbors have agreed to have no Retail. Why is 3333 being treated differently by forcing unneeded and unwanted ROC (Retail/Office/Commercial) against the overwhelming opposition of the surrounding residents?

In a recent Petition Drive at Laurel Village over 800 residents signed the Petition opposing the Developers Full Destruction and Massive ROC plan and supporting the Community's residential Alternative. Three people opposed it the Petition. These signatures were gathered in less than 8 hours. In the Petition Drive the 800 signatories opposed rezoning 3333 and also opposed revoking Resolution 4109, an agreement between the City and the surrounding neighborhoods. "A deal is a deal "was how everyone felt.

The Community Full Preservation Alternative will already be more than twice as dense as the surrounding neighborhoods so any rezoning is uncalled for, unneeded and unwanted. These signatures are in the hands of the District 2 Supervisor.

The Developers Destructive Proposal is well named. Based on current estimates, it will generate approx. 15,000 tons of Greenhouse Gases (GHG) and the many associated and far more destructive climate changing gases that accompany the primary CO2.

The Community's Full Preservation Alternative will, by comparison, generate approx. 4,000 tons of GHG.

The Community Alternative mitigates the GHG generated by more than 70 percent, providing a dramatic reduction in a time of climate change.

The GHG calculation is our best estimate. Neither Planning nor the Developer will provide the volume of concrete or weight of steel required. The Developer claims to have built many buildings and many complexes, Planning claims to oversee thousands of such projects and yet no one can even make an educated estimate as to the concrete and steel required.

**Could there be something they want to conceal from the public?**

4 (AL-2) cont'd

5 (PP-1)

6 (GHG-2)

Much like they concealed the Historic nature of 3333 for over 4 years?

**We pollute less and protect the environment:** the Community Alternative will ALWAYS generate less than one third the GHG generated the Developers Full Destructive Alternative.

7
(AL-2)

**We destroy less:** we preserve the historic site.

**We build less:** 4 new buildings versus the Developers'11 new buildings plus creating two tall towers out of the existing main building.

**One single level underground parking garage for 450** spaces versus a complex of parking garages, some of three levels, for 896 spaces;

**We excavate less:** 90,000cubic yards (9,000 dump truck loads) versus 288,000 cubic yards (32,000 dump truck loads);

**We preserve and protect our local businesses and shops:** no added unwanted and unneeded and neighborhood destroying family-owned or small retail or business;

**We better protect the health and well being of everyone:** no 13,000+ auto trips to pollute the air, generate the noise, put pedestrians at risk, unload trucks on the streets, etc. **the Community's solution will always be three times better than the Developers solution.**

The Developers Destructive Proposal not only destroys the Historic Site it destroys our climate. Concrete is a major contributor to GHG, in fact the GHG generated by the manufacture of cement and steel equals the GHG generated by traffic. **And, 95% of the cement used in the Bay Area is manufactured in the Bay Area so the GHGs are OUR GHGs.** The cement is not made somewhere else in the country it is made here.

**We fully support housing:**

8
(ME-1)

The Community has supported the Lucky Penny (95 units), CPMC (270 units) and now 3333 (558) units.Over 1,000 units in a half mile radius.

So please don't offend me and misrepresent the Community's position. We support housing and history; we oppose unneeded, unwanted and unnecessary Retail and mindless destruction of a historic site.

AND we provide housing in as much as 12 years sooner than the Developers Full Destruction Plan does.

The YIMBYs should be 100% in favor of the Community's Full Preservation plan and if they're not then they are being grossly hypocritical.

9
(TR-2)

Recent studies have shown that the City's method of calculating auto trips, and the resulting chaos and congestion is deeply flawed, to the point of being misleading.

At the time the VMT (Vehicle Miles Travelled) methodology was developed, SF CHAMP last updated Nov. 2014, the Transportation Networking Companies (TNCs) -Uber/Lyft/Chariot etc. were still in their infancy and so the VMT methodology fails to account for their incredibly disruptive impact. The TNCs average, conservatively, in excess of 170,000 trips per day in San Francisco. Studies also show that TNCs increase passenger trips by almost 10%.

There are about 2,000 taxi medallions in San Francisco so TNCs do not just replace taxis they overwhelm them by orders of magnitude.

Also, implementation of the VMT methodology is not mandated until 2019 but as Planning and The Developers were unable to explain away the 13,000 Retail Auto trips generated by the existing, and still acceptable, Level of Service methodology, they implemented the VMT methodology with "refinements." In much the same way as they calculated on the "direct" GHG and totally ignored the "indirect" even though required to do so by their own criteria. So, if you don't like the answer, change the question.

Planning calculates the Developers Destructive Proposal using VMT methodology will generate approx. 5,800 total auto trips for 3333 for Retail + Office + Residential which is an entirey bogus number based on questionable assumptions, such as " The SF Guidelines **do not provide a specific methodology to** assess the number of trips….." Planning has therefore, with no supporting documentation or analyses, applied "appropriate refinements to the standard travel demand…." Rather amazing that these "refinements" all work in the Developers favor.

Nowhere in these "refinements" have THCs been taken into account!

Oh, by the way, the "refinements" used were created for The Mission Rock Project at Seawall Lot 337 and Pier 48 as well as the Pier 70 Mixed Use District Project!

Seawall Lot 337 & Pier 48 summary:

**Project type** Mixed-use, open space, residential, commercial
**Project area** Approx. 28 acres
**Proposed building area** 1.3 – 1.7 million sf commercial; 750,000 - 1.5 million sf residential; 150,000 – 200,000 sf retail, 850,000 sf structured parking

Pier 70 summary: " The 35acre waterfront mixed-use neighborhood will provide housing, waterfront parks, artist space, local manufacturing and rehabilitated historic buildings." Altogether the redevelopment covers 35 acres and up to 3,025 new units of housing—the exact count is still in flux, with a low end of 1,645—and its roots stretch back a decade to a 2007 port plan.

**WOW! What remarkably similar projects to 3333. What "refinements" could possibly be comparable. Simply bogus.**

9 (TR-2) cont'd

**The DEIR consistently attempts to misrepresent and mislead the public. It is incomplete, incorrect, inaccurate and invalid and NOTHING demonstrates this better than the above.**

Under their previous, Level of Service, methodology they would have calculated 13,000 retail trips alone. Adding Office and Residential would generate a total of approx. 16,000 auto trips. Somehow we have miraculously reduced auto trips by almost 66%!

I think it safe to say that the numbers presented by Planning are simply bogus. VMT will generate fewer trips, especially since there are no criteria for calculating the impact of TNCs, but there is nothing in the legislation that remotely suggests it would generate 66% less trips! This entire section is suspect and Planning must explain this profound discrepancy. As noted above, nowhere are the TNCs incorporated into the calculations.

**All of which renders the Traffic Analysis incorrect, incomplete, inaccurate, invalid.**

The Planning Department proposes to reduce the number of retail parking spaces as a mitigation measure to reduce the significant traffic impact.This is a false assumption and shows the extent to which the Developer and Planning misunderstand, or simply choose not to understand, the impact that the TNCs

have.

Planning's mitigation measure is a stone age solution to a digital age problem. How will many people respond to a perceived lack of parking? They'll simply call a TNC and go anyway. **Eliminating parking won't eliminate auto trips it will actually increase auto trips.** A UC Davis study shows that people make MORE trips because of TNCs than if they had to use their own cars or take public transit. People now make trips they would never have made in the past – by any mode of transport. The VMT methodology used by the Planning Department fails to account for the impact of TNCs.

Not only does Retail, using the LOS methodology, contribute over 80% of the 16,000 total auto trips, all these auto trips generate GHG. And, the use of TNCs makes the GHG situation worse. Lets assume I want to go to 3333 by auto. I could personally drive 2 miles to get to the 3333 Retail/Office/Commercial complex, park, then shop or do business, the drive 2 miles home for a total of 4 miles. That's a very conservative calculation as the average trip for TAZ 709, 3333 area, states an average trip of 7.9 miles! Data shows that many more people will use a TNC rather than drive their own cars. So now the TNC has to come to me, assume 2 miles, and take me the 2 miles to 3333 for a total of 4 miles. When I go home the same thing happens or an additional 4 miles for a grand total of 8 miles. Twice the GHG generated per trip! So, not only do we have 13,000 retail auto trips to deal with we have many of them generating significant more GHG per trip! Planning needs to do a comprehensive analyses using credible data and a credible methodology so that the public knows the extent of the GHG generated. We are in a crisis with climate change and the methodology shown in the DEIR fails to address this crisis credibly. In fact climate change is more of a threat to the future of San Francisco than housing is and it isn't being addressed accurately in the DEIR.

10 (GHG-1)

The Developers Destructive Proposal first demolishes and destroys the Historic

11 (CR-2)

Characteristics and nature of 3333. Then it virtually destroys all of Laurel Hill itself, with the exception of a small sliver at the southwest corner, by excavating the entire site to depths ranging from 15 to 40 ft. The only area that isn't excavated is under a portion of the existing building! Not sure how they missed that opportunity! Removal of the demolition debris and the excavated soils will require approx. 32,000 dump truck loads, all of which have to pass though and pollute our neighborhoods. By contrast, the Community Full Preservation Alternative generates approx.. 9,000 dump truck loads, one quarter as many! After the demolition the Developer has to then deliver all the new materials required to rebuild what they demolished plus 11 new buildings. How many large truck loads, concrete truck loads, etc. will this require? The Community Alternative only builds 4 new buildings so like the GHG and the debris/soil removals the Community Full Preservation Alternative requires far fewer, probably about one third, or less, as many delivery loads. A quick look at the turning radii of the trucks, ie. SU-30 Circulation Exhibit and WB-40 Circulation Exhibit clearly demonstrates that all the deliveries during destruction, demolition, excavation, construction and long term operations pose significant threats to traffic safety, pedestrian safety, congestion and pollution.In fact, as WB-40 shows large trucks cannot safely navigate 5 of the 6 major intersections surrounding the site. There are no plans to mitigate this profound situation which will essentially exist from the beginning of the project ad infinitum. Planning and the Developers have simply washed their hands of the problem a la Pontius Pilate.

11 (CR-2) cont'd

12 (GEO-1)

13 (TR-6)

14 (TR-7)

The Community Full Preservation Alternative will preserve most of the mature trees at 3333, some of which date back to the time of the Laurel Hill cemetery whereas the Developers Destructive Proposal will attempt to spare approx. 4.

15 (AL-2)

The Developers Destructive Proposal surrounds 3333 with five major Loading/unloading zones for TNCs and Freight traffic. Initially the Developers promised that all the unloading would be done underground or on-site and now the site is ringed with these zones! These zones not only eliminate approx. 40 parking spaces but they will create additional traffic congestion and pollution. So we have a ring of loading zones in addition to the inevitable double parking that occurs for deliveries and drop-offs.

16 (TR-10)

Thank You,

Laura Rubenstein

--
Laura Rubenstein MD
office: 415-862-7135
fax: 415-900-4599
www.laurarubensteinmd.com

**From:** Jim Ryan
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS); Rich Hillis; Melgar, Myrna (CPC); Rodney Fong; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); CPC-Commissions Secretary
**Subject:** DEIR 3333 California Street
**Date:** Tuesday, January 08, 2019 8:22:06 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission,

We are writing as neighbors of 3333 California Street for over 30 years to respectfully request the planning commission consider the Community Full Preservation Alternative as opposed to the developers harsher proposal. 1 (AL-2)

While we support the need for housing and inevitable change, we are convinced a thoughtful approach can benefit everyone. The thought of 15 years of construction, removal of existing beneficial trees and all the ensuing disruption and environmental impacts are a heavy price to pay. We are hopeful that the planning commission can be consensus builders while still fulfilling their mission. The Community Full Preservation Alternative can be completed within 3 years. 2 (ME-1) 3 (PD-1) 4 (AL-2)

As natives of this wonderful city we look forward to this iconic space being utilized in the best possible way.

Sincerely,

Jim, Colleen, Neil, Julia and Seamus Ryan

**From:** Rita Sater
**To:** Zushi, Kei (CPC); Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC)
**Subject:** Re: Objection to 15-year developer development at 3333 California St
**Date:** Tuesday, January 08, 2019 3:13:19 PM

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I am yet another citizen very concerned about and object to the current developers' development plan. I understand it is currently scheduled to take fifteen (15) years to complete. Apart from the incredibly drawn out length[ Even the great wonder of the world, the Great Pyramid in Giza, supposedly took only twenty years. http://www.unmuseum.org/mob/kpyramid.htm] of such a project, the negative effects (such as dust, noise, parking, danger to children, seniors and others), such a development does not fit within the natural, historic, familial, social and aesthetic contours of our community. Not to mention the environmental risks. Wouldn't such a project be more appropriate for Geary Blvd or similar streets. The increasing closing of retail and office premises due to online shopping and work-at-home jobs makes such proposed uses doubtful even fanciful, perhaps to be replaced by even less human friendly high-tech data or A.I. centers by the time occupancy is permitted. I and other community members propose a smaller development (the "Community Full Preservation Alternative" or CFPA) that will still add lots of needed housing but take only three (3) years to complete. The CFPA does not include the massive unneeded and unwanted retail/office/commercial complex that the Destructive 3333 developer continues to insist upon. It does not create outmoded 13,000+ retail auto trips per day. It does not generate approximately 15,000 tons of greenhouse gases. The CFPA preserves both the present childcare center and the existing café., a source of deep, positive social capital in our community. It matches the surrounding neighborhoods for character, style, scale and bulk. I strongly oppose the Destructive 3333 Project as it brings excessive, long-term, unwanted and destructive noise, dust (on top of the recent lung-damaging smoke from the wildfires), other pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it diminishes community members socializing; it poses threats to pedestrian safety, especially the more fragile members of our community; it contributes to climate change; it will leave a bad taste in the mouth of those who remain in the community or are forced to leave due to illness; and worse. The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the developers' Destructive 3333 Project.

Thank you for your time and consideration of this better alternative that can be done in 12 less years with less destruction, obstruction in and around the area and yet preserve the lifestyles of surrounding neighborhoods.

1 (ME-1)
2 (PD-1)
3 (GC-1)
4 (ME-1)
5 (AL-2)
6 (ME-1)
7 (AL-2)

**From:** scarampi@sbcglobal.net <scarampi@sbcglobal.net>
**Sent:** Tuesday, January 8, 2019 4:29 PM
**To:** 'kei.zushi@sfgov.orfg' <kei.zushi@sfgov.orfg>
**Cc:** 'Catherine.Stefani@sfgov.org' <Catherine.Stefani@sfgov.org>; 'richhillissf@gmail.com' <richhillissf@gmail.com>; 'myrna.melgar@sfgov.org' <myrna.melgar@sfgov.org>
**Subject:** Objection to 15-year developer development project (the "Destructive 3333 Project" or D3333P) 3333 California Street, San Francisco

I understand it is currently scheduled to take fifteen (15) years to complete. Apart from the incredibly drawn out length[ Even the great wonder of the world, the Great Pyramid in Giza, supposedly took only twenty years. http://www.unmuseum.org/mob/kpyramid.htm] of such a project,⌜the negative effects (such as dust, noise, parking, danger to children, seniors and others), such a development does not fit within the natural, historic, familial, social and aesthetic contours of our community. Not to mention the environmental risks.⌟Wouldn't such a project be more appropriate for Geary Blvd or similar streets. The increasing closing of retail and office premises due to online shopping and work-at-home jobs makes such proposed uses doubtful even fanciful, perhaps to be replaced by even less human friendly high-tech data or A.I. centers by the time occupancy is permitted.⌜I and other community members propose a smaller development (the "Community Full Preservation Alternative" or CFPA) that will still add lots of needed housing but take only three (3) years to complete. The CFPA does not include the massive unneeded and unwanted retail/office/commercial complex that the Destructive 3333 developer continues to insist upon. It does not create outmoded 13,000+ retail auto trips per day. It does not generate approximately 15,000 tons of greenhouse gases. The CFPA preserves both the present childcare center and the existing café., a source of deep, positive social capital in our community. It matches the surrounding neighborhoods for character, style, scale and bulk.⌟I strongly oppose the Destructive 3333 Project as it brings excessive, long-term, unwanted and destructive noise, dust (on top of the recent lung- damaging smoke from the wildfires), other pollution, traffic and congestion to the neighborhoods surrounding 3333; it threatens the quality of life; it diminishes community members socializing; it poses threats to pedestrian safety, especially the more fragile members of our community; it contributes to climate change; it will leave a bad taste in the mouth of those who remain in the community or are forced to leave due to illness; and worse.⌜The Community Full Preservation Alternative will generate ZERO retail auto trips to 3333 as opposed to the 12,000-15,000 retail caused the developers' Destructive 3333 Project.

1 (PD-1)
2 (GC-1)
3 (ME-1)
4 (AL-2)
5 (ME-1)
6 (AL-2)

Sebastiano Scarampi, neighbor

**From:** SchuT
**To:** CPC.3333CaliforniaEIR
**Cc:** CalStreetROP
**Subject:** Re: Draft EIR townhomes
**Date:** Tuesday, November 20, 2018 12:29:59 PM

---

*Thank you, Ms. Dwyer.*
*I really appreciate you taking the time to write back with the info I requested. Thanks. I only have the Notice of the Public Hearing on December 13th and have not really followed the twists and turns of this project.*
*So roughly speaking each unit in the 2-unit townhouses could approximately be on average approximately 4,200 square feet....which I guess means that the remaining 544 non-townhouse units could be on average approximately 1,400 square feet?*
*Please consider this email as Comment on the DEIR if possible.*
*Have a nice Thanksgiving.*
*Sincerely,*
*Georgia Schuttish*

1
(PD-3)

Sent from my iPad

On Nov 20, 2018, at 12:03 PM, CPC.3333CaliforniaEIR <CPC.3333CaliforniaEIR@sfgov.org> wrote:

> Dear Ms. Schuttish,
>
> In response to your questions, the information about the size of the townhouses is in the Draft EIR. While the Draft EIR does not specify the square footage for each individual townhouse, Table 2.2, Characteristics of the Proposed Buildings, indicates that the gross square footage for all seven 2-unit townhouses would be 58,839 gsf. Table 2.2 is on page 2.23 of the Draft EIR.
>
> Best regards,
>
> Debra Dwyer, Principal Planner
> Environmental Planning Division
> San Francisco Planning Department
> 1650 Mission Street, Suite 400 San Francisco, CA 94103
> Direct: 415.575.9031 | www.sfplanning.org
>
> -----Original Message-----
> From: SchuT <schuttishtr@sbcglobal.net>
> Sent: Saturday, November 17, 2018 6:14 PM
> To: CPC.3333CaliforniaEIR <CPC.3333CaliforniaEIR@sfgov.org>
> Subject: Draft EIR townhomes
>
> This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Kei Zushi:
Has the size (square footage) of the 7 multi-story townhomes proposed for this project been determined and is it included in the DEIR? 2 (PD-3)
Thank you.
Sincerely,
Georgia Schuttish

Sent from my iPad

**From:** SchuT
**To:** Dwyer, Debra (CPC)
**Cc:** CalStreetROP
**Subject:** Re: Table 2.2 of DEIR for 3333 California Street
**Date:** Tuesday, November 27, 2018 2:34:00 PM

---

Thanks for your reply, Ms. Dwyer.
Take care.
Sincerely,
Georgia Schuttish

Sent from my iPad

> On Nov 27, 2018, at 2:22 PM, Dwyer, Debra (CPC) <debra.dwyer@sfgov.org> wrote:
>
> Dear Ms. Schuttish,
>
> In response to your further inquiry, that level of detail (square footage of each unit) is not provided in the EIR. The project plans for the conditional use authorization show the units, but do not provide the square footage of each one. The CU plans may be accessed from the Property Information Map.
>
> Best regards,
>
> Debra Dwyer, Principal Planner
> Environmental Planning Division
> San Francisco Planning Department
> 1650 Mission Street, Suite 400 San Francisco, CA 94103
> Direct: 415.575.9031 | www.sfplanning.org
> San Francisco Property Information Map
>
> -----Original Message-----
> From: Thomas Schuttish <schuttishtr@sbcglobal.net>
> Sent: Tuesday, November 27, 2018 9:00 AM
> To: Dwyer, Debra (CPC) <debra.dwyer@sfgov.org>
> Subject: Table 2.2 of DEIR for 3333 California Street
>
>
> This message is from outside the City email system. Do not open links or attachments from untrusted sources.
>
>
>
>
> Dear Ms. Dwyer:
> Good morning.
> I was finally able to find the table you referenced in your email to me on the website. Thank you for highlighting it.
> I was curious about the two Renovation Buildings: 51 units in Center Building A and 139 in Center Building B. 1
> Do you know what the square footage of these units, particularly the 3 and 4 bedroom units would be? (PD-3)
> (The average size of the units for these two buildings would be approximately 1,754 sq. feet and 1,818 sq. feet respectively….but this can't be for the studio and one-bedroom or maybe even the two bedroom units.) Thank you and have a nice day.
> Sincerely,
> Georgia Schuttish
>

**From:** Nathan Stoll
**To:** Zushi, Kei (CPC); CPC.3333CaliforniaEIR; Moore, Julie (CPC)
**Subject:** Re: Notice of Public Hearing and Availability of DEIR for 3333 California Street Project (2015-014028ENV)
**Date:** Friday, January 18, 2019 1:18:49 PM

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Hi Kei, Julie, et al,

I had written Julie last summer with feedback / concerns about pedestrian safety near 3333 California project. I'm writing again because I'm concerned that I haven't heard our comments addressed -- at least not from what I've read in the report. It's possible I've missed it, as it's a long report! So apologies if so. But I didn't see pedestrian safety in the nearby streets as a known area of concern that was addressed, and what I did see mentioned that there was no impact. 1 (TR-8)

Some background: My wife and I live at the top of Pine street across from the proposed project for 3333 California. We're generally supportive of the project (worth noting, given the community groups that oppose it!). We like the extra people it will bring to the neighborhood, and businesses, and think it will help make the community more vibrant. We generally like the proposals' access pathways and retention of some of the park green space / trees and would emphasize this importance to us, and the importance to us of the space being a potentially valuable addition to the community as a gathering point if developed appropriately (today it is like a gated community, with a couple grass areas on the edges). We were unable to attend the EIR feedback process. 2 (ME-1)

We specifically are worried about pedestrian safety in the area. We believe the conditions for pedestrian in this area to already be hazardous. It's important to note that this is NOT the fault of the developer or their proposal! But, given that improvements are to be made, and the project will increase the number of pedestrians, we think it's wrong that the following conclusion was drawn: 3 (TR-8)

> "TR-7: The proposed project or project variant would not result in substantial overcrowding on public sidewalks, **create potentially hazardous conditions for pedestrians**, or otherwise interfere with pedestrian accessibility to the site and adjoining areas."

The project won't create worse conditions for pedestrians. However, the conditions *today* are hazardous, specifically at the top of Pine street at Presidio, the intersection of California and Presidio, and the intersection of Euclid/Masonic/Pine alongside the new development. I am regularly almost hit by cars flying through these intersections. Often with a stroller or dogs with me.

Some more specifics:

- (Study area 8) The intersection of Pine and Presidio is one of the most dangerous in the city for cars alone -- but even worse for pedestrians, who try to avoid it right now, as drivers coming up the hill cannot see before turning left. There is no cross walk on the other side,

because it is dangerous, but no barriers and pedestrians regularly cross here still at risk of their lives. This project WILL increase the frequency of pedestrians crossing this intersection and something should be done to improve it. Study area 11 (Bush st) has similar problems but slightly different.

- (Study area 10) The intersection of Euclid/Pine/Masonic is equally hazardous for those crossing in various ways; pedestrians crossing from the complex are blocked from view by parked cars for cars coming up the hill at high speed -- who don't slow down, as the corner is today a yield. Will the project address safety there? This is a KEY walking route to Trader Joes, which the proposed project makes into an even bigger walking path. I've nearly been hit twice in the past two months. For example, the parking should be removed well back from the cross walk so cars have visibility, and it should have speed bumps at a minimum before the yield.

- (Study area 6) The intersection of California and Presidio is WAY too short of a light & cross-walk for pedestrians, and because of the three-way nature of the light is almost impossible to get across safely, as drivers who are not used to the three-way system regularly assume it is a normal 2-way, and turn when pedestrians have a cross walk (because the light is red). The traffic that doesn't stop turning right in front of the credit union through the turn lane is even more dangerous. This should be stop sign, if it isn't removed altogether (Julie Moore told me that the muni buses need it for turning radius). Or implement a 4-way walk with no cars, like exists downtown at very busy intersections. Notably, our son attends school at the JCC, so we along with many families are regularly crossing these intersections with small children. Elderly adults are in the facility next door, and I frequently have to help elderly individuals across the street; it's impossible to get across in time.

These study areas and the pedestrian characteristics were discussed in 4.C.21, but I explicitly do NOT feel like the concerns have been mitigated / addressed. It may not be the developers responsibility to fix them, but someone needs before for the project to make them substantially worse and someone dies!

The Vision Zero studied the areas that *currently* have high risk data for pedestrian injuries. I'm asserting that the pedestrian behavior will SHIFT because of the project, because there will be people living or walking to the new retail locations and pathways, and the intersections they will use are hugely dangerous. So even though they don't have a lot of traffic now, they WILL and it will be dangerous.

* I'll add that one of the high risk areas in Vision Zero is California St between Lyon and Scott; it's high risk because all of the mapping software now routes drivers this way to avoid California and Presidio. And so they come flying through a very residential neighborhood trying to get to Bush or Pine. :( Wasn't a problem a decade ago.

3 (TR-8) cont'd

I should note that I provided some details on these concerns to Julie Moore (see thread included below) in the summer -- although some of my notes are new -- so even though I'm late on the comment period, I want to register that I had already provided the input -- and don't feel like I've heard it addressed in this report.

4 (CEQA-1)

Thanks,
Nathan

3044 Pine St

mailing address: 548 Market St #68813 SF 94104
415-683-6228, 650-776-3641 (mobile)

---------- Forwarded message ---------
From: **Moore, Julie (CPC)** <julie.moore@sfgov.org>
Date: Fri, Jun 15, 2018 at 1:34 PM
Subject: RE: 3333 California pedestrian safety concern/questions
To: Nathan Stoll <nathan@nathanstoll.com>

Hi Nathan,
I'll share your comments with the team. The sponsor originally proposed changes at the California/Presidio intersection but SFMTA did not agree with the changes due to the turning radius of Muni buses.

**Julie Moore, Senior Planner**
**Environmental Planning Division**
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.8733 | www.sfplanning.org
San Francisco Property Information Map

**From:** nathanstoll@gmail.com [mailto:nathanstoll@gmail.com] **On Behalf Of** Nathan Stoll
**Sent:** Friday, June 15, 2018 10:55 AM
**To:** Moore, Julie (CPC)
**Subject:** Re: 3333 California pedestrian safety concern/questions
**Sent:** Friday, June 15, 2018 10:55 AM
**To:** Moore, Julie (CPC)
**Subject:** Re: 3333 California pedestrian safety concern/questions

Hi Julie,

Thanks for the fast reply!

I saw the proposed changes for Presidio/Pine/Masonic. I think removing the right turn lane is smart and will slow down traffic in a good way. However, Pine's traffic itself is still incredibly dangerous. The garage egress directly onto Masonic and Presidio will be incredibly dangerous given how traffic flows currently in this area. The proposal also destroys an existing open green space that has been present in the neighborhood for (as my neighbors have expressed, I don't know the exact time frame) decades, if not a half century or more.

5 (TR-7)

6 (ME-1)

Additionally, I think ignoring California and Presidio because they're not part of the direct development is very naive if that's the city's perspective. These new residents will impact ALL nearby intersections with both cars and pedestrian volume, and these are some of the most dangerous intersections in San Francisco. So just because the fire union is it's own building, does not mean the impact should not be considered. I feel similarly about the intersection of Bush and Presidio, which also has incredibly high accident and pedestrian risk today.

7 (TR-8)

I'd like to see the city take STRONG action in these neighboring streets & intersections to assure us as residents that our lives will not be put in danger by the increase in traffic, congestion, and pedestrians. Our families are at stake; we're not safe today, and this project WILL make our lives more at risk.

7 (TR-8) cont'd

Best,
Nathan

On Fri, Jun 15, 2018 at 9:32 AM, Moore, Julie (CPC) <julie.moore@sfgov.org> wrote:

Nathan,

Thank you for your comments. The Initial Study, with a detailed project description, is available online at:
http://sfmea.sfplanning.org/3333%20California%20Street%20Initial%20Study_4-25-18.pdf

Please refer to p. 64, Figure 28A for proposed changes at the Presidio/Pine/Masonic intersection. The project would remove the right turn lane from Presidio onto Masonic and create a public plaza at that corner. There is a rendering of this on p. 28. No changes are proposed for California and Presidio (the Credit Union building is not part of the project). California and Walnut will continue to be an entrance to the project site.

Transportation impacts of the project will be analyzed in the Draft Environmental Impact Report to be released this fall.

**Julie Moore, Senior Planner**
**Environmental Planning Division**
San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.8733 | www.sfplanning.org
San Francisco Property Information Map

**From:** Nathan Stoll [mailto:nathanstoll@gmail.com]
**Sent:** Thursday, June 14, 2018 9:35 PM
**To:** Moore, Julie (CPC)
**Subject:** 3333 California pedestrian safety concern/questions
**Sent:** Thursday, June 14, 2018 9:35 PM
**To:** Moore, Julie (CPC)
**Subject:** 3333 California pedestrian safety concern/questions

Hi Julie,

My wife and I live at the top of Pine street with our two children, and we've been watching the proposed project at 3333 California with interest -- general support -- but concerns about pedestrian safety with the likely increase in traffic.

8 (TR-8)

I know we missed the May 25th deadline for formal comments, but I'd like to understand what the project's sponsors and the city intends to do about our already very dangerous intersections at Pine & Presidio, California & Presidio, and California & Walnut. I've been nearly hit multiple times in each intersection, and witness near monthly crashes on Pine and

Presidio, where the steep hill and timed fast lights prevent cars from fully seeing pedestrians and other traffic while gunning for the light or to turn into the cross walk. There is also no cross walk at present across Presidio to the proposed development. 8 (TR-8) cont'd

We like the idea of more residents in the neighborhood, and the ability to generally add density to support more local businesses, and believe that these buildings and land are under-utilized and would be a boon to the neighborhood. But. The current situation is already dangerous, and with the new garages, cars, and residents and businesses, the situation is poised to be disastrous. 9 (ME-1) 10 (TR-8)

Please please please tell me the city has plans to improve pedestrian safety in enormous ways. I'd love to review any such plans, or provide some constructive input as a local resident.

Thanks in advance!

Best,
Nathan

On Wed, Nov 7, 2018 at 4:31 PM Zushi, Kei (CPC) <kei.zushi@sfgov.org> wrote:

Attached please find the Notice of Public Hearing and Availability of a Draft Environmental Impact Report (DEIR) for the 3333 California Street Mixed-Use Project, Case No. 2015-014028ENV. The DEIR is available to download or view at the San Francisco Planning Department website noted below. You are being provided this information as you have expressed an interest in this project in the past.

> https://sf-planning.org/environmental-impact-reports-negative-declarations

The public comment period is from November 8, 2018 to 5:00 p.m. on December 24, 2018. Written comments on the DEIR should be submitted to the Planning Department at the following address:

> Kei Zushi, EIR Coordinator, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA, 94103, or email: CPC.3333CaliforniaEIR@sfgov.org.

Comments on the DEIR may also be made at the Planning Commission hearing on December 13, 2018.

Please contact me if you have any questions.

**Kei Zushi, Senior Planner**
**Environmental Planning Division**

San Francisco Planning Department
1650 Mission Street, Suite 400 San Francisco, CA 94103
Direct: 415.575.9038 | www.sfplanning.org

I-STRATTON

**MICHELE D. STRATTON**

3110 California Street #4
San Francisco, CA 94115
Tel: 415-931-3324
mdstratton@att.net

January 8, 2019

Kei Zushi, EIR Coordinator
Planning Department
1650 Mission Street , Suite 400
San Francisco, CA 94103

Dear Mr. Kushi,

I have read the EIR and find that almost nowhere does it address the effect on people. People make their homes in the neighborhood, they raise children or retire in the area, they work nearby, and they are ignored in this report. Further, the EIR does not address the cumulative effect on people's everyday lives of all the incremental changes from construction and operation of the Project on their general wellbeing. There is a tipping point when a little more of everything—noise, air pollution, traffic, general congestion and crowding—makes a place substantially less livable. I live 1 ½ blocks east of the Project on the north side of California Street. 1 (GC-1)

A. Street view greenery and open space. The EIR fails to consider one of the most important attributes of the property and the effect of losing it-- providing a substantially green and calm oasis in an area that is densely developed and congested. 2 (PD-3)

Right now the north edge of the property along California Street is an arcade of greenery, a significant visual resource. Fifteen mature evergreen street trees (New Zealand Christmas trees) arc over the wide sidewalk for two blocks and meet the high shrubs extending above the brick wall along the property. Between the sidewalk and the brick wall (set back from the property) is a row of greenery with flowering azaleas, camellias and dietes. It is a beautiful, calm and event spacious place to walk, unlike most of California Street in the vicinity, where buildings meet the sidewalks and the street trees (pollarded sycamores) are leafless much of the year.

The Project plans to cut down these beautiful street trees and remove all the sidewalk shrubbery as well as much of the other greenery that is now visible from the street. Trees and landscaping are the first items to be removed in construction and the last to be replaced. The California streetscape will be barren for a decade or more, and to be followed eventually by struggling trees on one side of the sidewalk and 4-story buildings with busy ground floor commercial on the other. The ability to walk beneath the trees or view the general greenery of the site will be gone forever. 3 (BR-1)

The property also currently provides a swath of open grassy area along Euclid Avenue and part of Laurel Street, with views into the shrubbery and trees around the current building from Pine Street, Masonic Avenue and Presidio Avenue, as well as from Euclid and Laurel. The Project will remove most of this greenery, replacing it with 3 or 4 story buildings at street side, flanked by a few trees some of which will be planted on what is now public side walk and road. (The Project incorporates 2,000 sq ft of sidewalk and road for "street improvements" p. 176 and uses it to plant trees that otherwise should go on the property.)

The idea that open space in the interior of the Project will compensate for significant changes along the streets is false. One or two plazas surrounded by concrete and glass walls hardly substitutes for the expansiveness of the greenery at Euclid viewed by thousands of people a day or the green archway on California Street enjoyed by pedestrians and passing riders alike. This greenery is a unique visual resource in an area largely devoid of anything green, and contributes to the wellbeing of anyone in the area. (See it with a virtual walk around the site on Google maps using street view.)

Note: There is very little visible greenery nearby or within walking distance of the Project. The closest park is Alta Plaza, 8-9 blocks away. Otherwise, there is only a patch of grass in front of the Presidio Library. The Presidio Heights Playground is fully paved; and the Laurel Hill Playground, also paved and with a ball field, sits out of sight, down a steep walkway below Euclid Avenue. The mini-park on Bush is a dark, narrow lot squeezed between 3-4 story buildings, totally shaded all day long. The Presidio looks close, but it is on the other side of hill surrounded by a wall and the backs of houses. Access is through the Presidio Gate, along a busy and steep thoroughfare with no sidewalks.

4
(PD-3)

B. Noise. Already street noise is loud and annoying enough to reduce a sense of wellbeing. For Project operations, the methodology of adding noise estimates to current average noise figures is flawed and does not account for unacceptable levels or types of noise throughout the day. The mitigation measures suggested for construction noise, which will be at unacceptable levels, is inadequate.

5
(NO-5)

6
(NO-1)

It is deceptive to look at average noise levels, and then conclude that the additional noise will not be perceptible. Added noises from construction or operation of the Project may occur when ambient noise is low (early morning truck delivery), or the noise may occur when noise levels already are unacceptable (during rush hour.) Noise may be combined with vibration (heavy truck) which calls attention to the noise. Noise may be rhythmic (motor or fan) or unpleasant (car alarm, dog barking) which causes annoyance. Noise at street level may be different than 3-4 stories up, where noise reverberates from buildings across the street and is amplified. On my block the clanging of delivery truck doors and banging of pallets wakes me up at 5:30am; a pulsating motor (HVAC system?) somewhere that is imperceptible during the day keeps me awake at night.

Any rise in average noise levels may be too much. Average means there are times when the noise level is already much higher. We sense the need to talk louder, to strain to hear others. In the 8 years at my present address, I have never used the roof deck due to traffic noise. I do not invite people over open during peak hours due to the noise from California Street and Presidio Avenue, and cannot leave my windows open, even on hot days. The chart on Page D.4.20 says that adding to noise—which this Project will do—when the ambient noise in residential areas is 65bBA or higher should be discouraged. Noise measurements (Table 4.D.2) show that LT noise on California Street (R5) already is over 65dBA on average, and so are higher many time of the day.

The EIR concludes that noise from increased traffic from Project operations will not be significant, and may in fact non-existent. How can adding 10,000 vehicle trips per day not significantly increase noise levels? Ride share vehicles, the ever present UPS and FedEx trucks, and pizza and home delivery services for the new residents will add to the noise, not just through higher traffic levels, but by causing more starting-stopping sounds, doors opening and closing, horns as irritated drivers try to pass them, etc.

7
(NO-5)

Construction period noises will be unacceptable. In many construction projects, dump trucks and other big trucks travel at night, rumbling loudly when ambient noise levels finally are low, adding to the discomfort of residents. 8 (NO-1)

C. Air pollution. The air in the vicinity of the Project is already dirty and Project operations will add to the problem. Mitigation measures described for construction dust are inadequate. 9 (AQ-4) 10 (AQ-1)

Vehicle emissions may be less today, but brake pads, tires and road wear still generate unhealthy particulates. Ever present neighborhood construction and street repair work add to dust and grime. I live 1 ½ blocks eastward and mostly downwind of the Project, and even now there are quantities of black soot/dust on my windows, window sills and balcony. My balcony, on the east side of the building sheltered from California Street and prevailing winds, cannot be used without wiping all surfaces. Then the wash rag is black. Unless I keep my windows closed and stay inside, I am breathing those same pollutants. However, the EIR concludes that Project operations and related traffic generation will not have a significant impact. I believe the traffic projections understate traffic and pollution levels that will occur when the Project is completed. The delivery vans and ride share services are increasing. This kind of traffic has more idling vehicles, more frequent stops and brake use, and more starts, all of which will increase the amount of emissions per vehicle in the vicinity of the Project. 11 (AQ-4) 12 (AQ-3)

The report recognizes construction dust as a problem, but the proposed mitigation measures will not solve it. Even with dampened dirt, dust will penetrate the neighborhood. It will be blown onto the streets and stirred up again by vehicle traffic; it will be blown off construction trucks leaving the Project and permeate the neighborhood; it will be tracked off the site and into the air on worker's shoes and clothes. A short road repair project in the neighborhood blackened my windows almost immediately, with the rainy season five months away. It will be extremely unpleasant to see and breathe construction grime and dust for seven or more years. 13 (AQ-1)

D. Conclusion. The EIR is inadequate with many flawed assumptions and analyses. 14 (GC-1)

This Project will bring a more of everything—noise, air pollution, traffic, general congestion and crowding, will reduce street side greenery and open space, and will make the area substantially less livable. The only way to reduce the negative impacts of the Project is to reduce its size, maintain more street side and street view open space, and eliminate most of the office and commercial uses with their related traffic.

Very truly yours,



Michele Stratton

cc: Planning Commissioners
Supervisor Stefani

California Street near Walnut



**From:** andrew sullivan
**To:** Rich Hillis; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Stefani, Catherine (BOS); Brown, Vallie (BOS)
**Cc:** Laura Clark
**Subject:** 500+ homes at 3333 California - SUPPORT
**Date:** Tuesday, December 11, 2018 6:02:56 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the Commissioners:

I am a resident of the Haight Ashbury and a frequent user of the JCC on California Street, and I urge you to reject the proposal to delay housing at 3333 California for historic preservation reasons. This building, while interesting as an example of suburban offices, is not particularly notable in comparison to others like it (e.g. Bell Labs Holmdel), and it is not worth preserving when the alternative is to add 500 or more homes in this wealthy, well-served by transit neighborhood. 1 (ME-1)

This location is a two-block walk from the future Geary Bus Rapid Transit line and is served by the 1, 2, 3, 38/38R, and 43 lines, and it is also walking distance from shopping, jobs, and the JCC - the exact perfect location for new transit-oriented housing. In addition, it is in a wealthy neighborhood that is not at risk of any further gentrification - on the contrary, it will provide housing at a more reasonable cost than any existing property nearby, and take pressure off other neighborhoods where cost pressures continue to increase. This is exactly the type of location that should host apartments as well as green space, as planned.

Please reject all appeals and approve this project!

Thanks,
Andrew Sullivan

**From:** Zachary Thomas
**To:** Zushi, Kei (CPC)
**Subject:** 3333 California - Please Support Housing!
**Date:** Friday, December 14, 2018 6:56:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi! As a San Francisco resident, I hope you choose HOUSING over business offices and parking spaces when it comes to 3333 California. This housing will take one small step in reducing pressure on communities of concern, like the Fillmore or Mission. **San Francisco should allow more housing in this neighborhood!** 1 (ME-1)

Yours Truly,

ZT

--
Zachary Thomas
https://www.linkedin.com/in/thomaszi | zthomas.nc@gmail.com | zachary-i-thomas.com
Learn something new everyday! >> https://www.khanacademy.org/a/x5gd

I-UNDERWOODA

| | |
|---|---|
| **From:** | Adrienne Underwood |
| **To:** | richhillissf@gmail.com; Melgar, Myrna (CPC); planning@rodneyfong.com; Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Stefani, Catherine (BOS) |
| **Subject:** | More housing, less parking! |
| **Date:** | Monday, December 10, 2018 5:29:30 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commissioners, Planner, and Supervisor Stefani,

I am writing to **urge you to support new homes at 3333 California**.

As a renter in the city of San Francisco, currently living in the Sunset, I know how charming it is to live in a quiet neighborhood in the city. I also know first hand how incredibly challenging it is to find housing in this city as a young professional.

We need to do everything we can to create more housing so that people can afford to build their lives and careers in San Francisco over the long term. That starts with building housing in every neighborhood. Prioritizing buildings that don't house people, like parking, is exactly the opposite of what we need.

1
(ME-1)

Thanks for your time and consideration.

Best,
Adrienne
1719 29th Ave, San Francisco, California, 94122

December 4, 2018

City Of San Francisco – Planning Commission
Commission Chambers,
Room 400, City Hall,
1 Dr. Carlton B. Goodlett Place,
San Francisco, CA 94102-4689

Commissions.secretary@sfgov.org

Re: Case No. 2015-014028ENV
Project Title: 3333 California Street Mixed-Use Project Zoning: Residential, Mixed, Low Density [RM-1] Zoning District 40-X Height and Bulk District Block/Lot: Block 1032/Lot 003
Applicant/Agent: Laurel Heights Partners LHP

Dear Planning Commissioners:

This letter is in direct response to the Draft EIR, Volume2c: Appendices D-G, published November 7, 2018. I have read the report and I have a number of comments and concerns.

The Notice of Public Hearing was posted at the corners of the 3333 California location, but both pages failed to be posted providing informative and critical information to the public. 1 (CEQA-1)

1. Your name and email contact address and phone number
2. The Planning Department's website address in order to download the Draft EIR document assessment
3. The Notice of a Public Hearing before the Historic Preservation Commission on Wednesday December 5th at 12:30 p.m. at which the Historic Commission is to make its comments on the Draft EIR.
4. Notice to the Public that public comments to the Historic Preservations will be accepted from 11/8/2018 – 12/24/2018.

The Draft EIR states that the project would have a ***Significant and Unavoidable with Mitigation*** impact on noise because it would "expose people to or generate noise levels in excess of applicable standards or cause a substantial temporary or periodic increase in ambient noise levels." (page 4.D.36) ***The estimated construction period is 7 to 15 years.*** 2 (NO-1)

The Draft EIR states that the project would have a ***Significant and Unavoidable with Mitigation*** impact on historic architectural resources because the project "would demolish portions of the office building... and remove all of the project site's existing designed landscape elements and features, including, but not limited to, the curvilinear shapes in pathways, driveways, and planting areas; integrated landscape features, including planter boxes and seating; brick perimeter walls; and the concrete pergola and terraced planting feature facing Laurel Street." (p. 4.B.41) 3 (CR-2)

The DEIR admits that the project would be expected to generate higher Vehicle Miles Traveled than retail, office or residential average projects in the area. The DEIR compares the project with city average data but not with actually measured traffic conditions in the project area. However, the DEIR concludes that the project would have an impact on traffic that would be ***Less Than Significant with Mitigation.*** (page 4.C.74) ***The DEIR claims that reducing the retail parking supply would mitigate the Vehicle Miles Traveled impacts of the project.*** (page 4.C.80) 4 (TR-4)

The DEIR estimates that the project would generate 10,057 daily automobile trips (page 4.C.58). This is probably an understatement because another EIR for a mixed use project estimated 13,000 automobile trips generated by the retail square footage alone (approximately 54,000 square feet), and the proposed project also has 558 or 744 residential units and a 49,999 square foot new office building that would generate additional vehicle trips. 5 (TR-1)

The EIR Intersection Operations Analysis (Page 9,Task 7.2) has focused on transit timing on California Street. To say that Applicant's Proposed Project will have little or no impact on transit and traffic flow on all surrounding streets, simply is NOT true. As it is currently during the commute, Masonic Avenue is solid cars between Presidio and 6 (TR-9)

To m

Euclid during evening commute hours and that is with the right most lane on Presidio with the additional lane to Euclid; both of which are to be removed as part of Applicant's Proposed Project. As it is currently, for every southbound vehicle that stops on Presidio at the Presidio/Pine/Masonic light, three now utilize the right most lane up to Masonic or Euclid. That means that if 3 to 5 cars stop for the traffic light, 9 have driven up Masonic and no are longer sitting waiting to turn right at the light. But, if you eliminate that right most lane, those cars will have to wait for the light to change and back up to the SFFD Credit Union Building at Presidio and California. Additionally, Muni buses have a shift change and buses are coming off California onto Presidio Avenue; add one or two buses and traffic on Presidio will back up to California. The impact for anyone familiar with these intersections is clear. I just have to look out the window. The idea that you can add three total ingress/egress active driveways on Presidio next to the SFFD Credit Union ingress/egress garage driveway and then do the same on Masonic and, not overload all the surrounding streets as the Applicant's Proposed Project does by using criteria from other sites without understanding these major thoroughfares, will be disastrous. You could end up backing traffic all the way down to the financial district.

6 (TR-9) cont'd

The DEIR claims that project impacts on air quality, geology, hydrology, vegetation and other matters would be less than significant.

7 (GC-1)

During the 15-year construction period the developer is requesting, the developer would be able to apply for changes to make the project bigger, expand the retail and increase the heights and amounts of development. This suggests further entitlements and profiting from real estate speculation on the back of the neighborhoods affected by the proposed Project. The Applicant is trying to make us all believe that their proposed project is for the better good and will address the more immediate issue the City has for additional and affordable housing. It is ludicrous that it would take 15 years of construction to accomplish that. It is clear that anyone who supports the Proposed Project and the proposed construction schedule does not live within the immediate proximity of this site.

8 (PD-1)

I, along with many of my neighbors, have opposed the developer's concept from the beginning. We are in of the need for additional and affordable housing in our neighborhood. We stand against the Applicant's proposed project because it would be destructive to the neighborhood. The developer's proposal is too massive, too commercialized and out of character with the neighborhood and, since we know now about the Historic Preservation Commission's assessment about the value of the existing historic building and landscaping, we continue to wonder how the Applicant has been able to push a plan that would do so much damage to the site and the neighborhood so far down the road.

9 (ME-1)

We have objected to the destruction and removal of the existing green areas. We've asked the Applicant of the Proposed Project for an alternative preservation plan that is consistent with the design and aesthetics of the condominiums directly across the street from the Project on California Street between Laurel and Walnut (for example) without touching any of the green and landscaped areas on Masonic, Euclid or Laurel. The neighborhood has expressed its desire to have the Applicant redesign the proposed Project so preserve as much of the site as possible and complete critically needed residential housing in the shortest time possible. We've written letters to the Applicant, addressed these issues in person with the Applicant at the Developer's poster-board sessions and at the Scoping Meeting at the JCC with the Planning Department but we have yet to see a design that warrants serious consideration by the neighborhood or the City.

10 (AL-1)

I believe the Project, as proposed, will have an enormously, negative impact on the neighborhood and surrounding areas. The proposed uses and high density of the proposed project will increase traffic flow and congestion, increase noise and pollution and increase the loss of parking, etc. The proposed removal of the green spaces and mature trees and plants will unnecessarily impact the local environment and deprive the surrounding area from continued public use.

The increased noise from the Proposed Project, including construction activities, will adversely affect nearby sensitive receptors including existing residential housing units surrounding the 10-acre site, the elderly residential facility at the JCC across the street from the site and child care uses at the JCC. There is no reason or justification for relocating the Child Care Center from its current location on the existing site. We know that the existing zoning limits heights greater than 40 feet at Euclid and Masonic and no retail is permitted.

11 (ME-1)

To m

A Community Alternative Plan (hereinafter referred to as "CAP") is being created to reflect what we believe will preserve the entire Historical Building. The design will include re-purposing of the Historical Building to residential use. The "CAP" will preserve Eckbo Terrace, Children's Childcare Playground, along with the Redwood trees, and preserve all Historic Landscaping. The existing green spaces on Laurel, Euclid, Masonic and Presidio will remain intact in this redesign. The "CAP" will accomplish the Applicant's goal of providing 558-744 housing units (Variant) by a design of three or four, four-story buildings on the existing surface parking lots facing California Street; with no retail or office. As we understand it, the housing units facing California Street in the CAP will be consistent with the design and aesthetics of the condominiums directly across the street as mentioned above. The number of trees and landscaping to be removed will be substantially less in the CAP Plan. We have not seen the fully-designed CAP but we whole heartedly support the draft of a plan that we have seen because it is less destructive and can be completed and on line satisfying the immediate need for additional housing within the timeline of three to five years; not 15 years.

12
(AL-2)

Applicant's Proposed Plan does not serve any of us well. They have had every opportunity to redesign and submit an Alternative Preservation Plan and they have refused to do that. My sincerely hope is the Planning Department will want to consider the CAP which is timely and less impactful to the neighbors and the many neighborhoods and stop the negative impact that will undoubtedly occur by approval of the Applicant's Proposed Plan before this goes any farther.

Thank you.

Victoria Underwood
510 Presidio Avenue
San Francisco, CA 94115

Victoria.underwood@att.net

cc:
LaurelHeights2016@gmail.com

To m

December 12, 2018

City Of San Francisco – Planning Commission
Commission Chambers,
Room 400, City Hall,
1 Dr. Carlton B. Goodlett Place,
San Francisco, CA 94102-4689

Commissions.secretary@sfgov.org

Re: Case No. 2015- 014028ENV
Project Title: 3333 California Street Mixed- Use Project Zoning: Residential, Mixed, Low Density [RM- 1]
Zoning District 40- X Height and Bulk District Block/Lot: Block 1032/Lot 003
Applicant/Agent: Laurel Heights Partners LHP

Dear Planning Commissioners:

This letter is in follow-up to my letter dated December 4, 2018 which was submitted to the Commission via email prior to the San Francisco Historic Preservation Commission meeting on December 5, 2018.

Last week, the **San Francisco Historic Preservation Commission** expressed strong support for reviewing an alternative development plan that would **not** destroy the historic resource of the building by cutting it in half along with the removal of the surrounding landscaping including trees; referred to as the character of the defined feature of the site.

1 (AL-2)

The Commissioners expressed their strong assessment of the interconnection between the building and the landscaping as the important resource and vital to the neighborhood. They believe that this project needs the neighborhood and the developer to come together to create a win-win for all parties as the only way it can be measured as a success. The Commission stated they wished they could have reviewed the **Community Full Preservation Alternative Plan** which was discussed but not available for review by the **S.F. Historic Preservation Commission** at the December 5th meeting. The Commissioners expressed their willingness to insure the integrity of the Historic elements are maintained and to get a second look at what will be the "final" alternative development plan supported by the community and the developer when sent back to them from the Planning Commission.

**Also, the developer did not tell the community about the historic significance of the site.** It was revealed during last week's hearing by UCSF's former architect that they were made aware of this back **in 2010**. The neighborhood learned that last year and had the building and landscaping listed on the **California Register of Historical Places** because they were designed to complement each other in an integrated composition. So, the landscaping is also a historical resource on this site and has been used for recreation by the public since built.

2 (CR-1)

Under the community alternative, the main building would be converted into housing units rather than demolishing the smaller wing and cut through half of it. There would be, in addition to the residential units on California Street, a new Mayfair residential building. The existing cafe and childcare center would remain, and the existing pathway through the building that opens onto the Terrace and onto Masonic, would remain eliminating the need for additional public pass-through access to be constructed.

3 (AL-2)

It should be noted that the **DEIR Full Preservation Alternative C** shows 26 fewer housing units than the Project and 44,306 square feet of retail, which we already thought was planned to be converted to housing to match the number of housing units in the proposed project.

4 (AL-3)

The Community has already shown that it supports reasonable and sustainable levels of housing as seen with the CPMC project with 270 units, the Lucky Penny with 95 units. And, now, 3333 California with 558 units. 5 (ME-1)

We urge you to extend the **comment period on the Draft EIR** in order to evaluate this **Community Full Preservation Alternative Plan** and compared it to the **DEIR Full Preservation Alternative C** with the same level of detail as the alternatives in the **DEIR** because it will be less impactful on the surrounding neighborhoods and **will not** destroy the historic resource of the building and the surrounding landscaping. The **Community Full Preservation Alternative Plan** will give the City of San Francisco the housing it desires for the site in 3-5 years and builds 4 new buildings versus 14 new buildings in 7 to 15 years as proposed by the developer. 6 (AL-2)

The developer proposes to destroy the historically significant characteristics of the site and create nondescript buildings crowded onto the site. They look to changing the zoning to allow retail which was banned in **Planning Commission Resolution 4109** to avoid adverse impacts to Laurel Village and Sacramento Street. 7 (ME-1) 8 (PP-1)

We feel that this site deserves respect and that any decision made on how it's redeveloped is important enough to not rush but get right. With that in mind, I would hope that the historical cemetery plaque be returned to the site and a historical plaque with the designers and historical significance of the building and the landscaping be memorialized on the site as well since the building and landscaping are listed on the **California Register of Historical Places.** 9 (CR-4)

Thank you in advance for your time and serious consideration of the **Community Full Preservation Alternative Plan**. 10 (AL-2)

**I strongly urge the Planning Commission to grant a 15-day extension of the Due Date for Comments on this DEIR. It is a lengthy and complex document.** 11 (GC-3)

Thank you.

Victoria Underwood
510 Presidio Avenue
San Francisco, CA 94115

Victoria.underwood@att.net

cc:
LaurelHeights2016@gmail.com

January 4, 2019

City Of San Francisco – Planning Commission
Commission Chambers,
Room 400, City Hall,
1 Dr. Carlton B. Goodlett Place,
San Francisco, CA 94102-4689

Commissions.secretary@sfgov.org
richhillissf@gmail.com
Myrna.melgar@sfgov.org
planning@rodneyfong.com
Millicent.johnson@sfgov.org
Katherin.moore@sfgov.org
Dennis.richards@sfgov.org

Re: Case No. 2015- 014028ENV
Project Title: 3333 California Street Mixed- Use Project Zoning: Residential, Mixed, Low Density [RM- 1]
Zoning District 40- X Height and Bulk District Block/Lot: Block 1032/Lot 003
Applicant/Agent: Laurel Heights Partners LHP

Dear Planning Commissioners:

This letter is in follow-up to my letters dated December 4, 2018 and December 12, 2018. Since I never received a confirmation receipt back from your email system that you even received them, I am including them again along with this transmittal letter (via hard copy).

I attended the Planning Commission Meeting on December 13, 2018 where DEIR comments were heard by the Commission relative to the redevelopment plans for 3333 California Street. After hearing some of the statements made by all, I offer these additional comments.

Thank you for voting for the fifteen-day extension so our plan could be submitted to you for review. Most of us are lay people and there are no classes to help us get through the on-slot of information contained in the report or to help us with understanding the full impact of what is being presented; much less its accuracy. By granting the extension, many of my neighbors who traveled to see their families during this national break have had the welcomed additional time needed to get through the DEIR materials.

We have been working hard, donating our time and money over the last four or five years because we believe what will eventually get built on the site is extremely important for our Community; not only for the future but for those of us living here now.

The Community has been portrayed as opposing additional housing but that has not been the case. The community has supported the CPMC project with 270 residential units, the Lucky Penny site with 95 units, and now 3333 California Street with 558 units. There are also additional housing units getting built in the neighborhood, but they don't get the attention these locations get because of the number of housing units are much smaller but all need to be counted and recognized for their impact on the community at large. Over 1,000 residential units in a half mile radius is a lot of development.

1
(ME-1)

I know for myself, I want to see a common-sense approach to building as we look to the future. Why destroy, remove or create hazardous conditions when you don't need to. With that in mind, "The Community Full Presentation Residential Alternative" for 3333 California Street as it is now called, **would** do the following: 2 (AL-2)

a) Preserve the Historic characteristics of the building and landscaping.
b) It would limit construction to the California Street side of the property and to Mayfair
c) It will match the surrounding architectural design in character and style consistent with those residential condominiums directly across the street on California.
d) It will allow for the retention of far more of the mature trees and landscaping
e) It will provide for 558 (or 744 in the Variant) housing units without rezoning and revoking Resolution 4109, the agreement that runs with the site between the City and the surrounding neighbors.
f) It builds the housing units in three years
g) It will keep the impact of construction on the community and environmental risks to a minimum.
h) It will preserve the present childcare center and play area and the community's access to the existing green areas bordering the site on four sides.
i) It will protect the small, family-owned businesses in Laurel Village, Sacramento Street, Presidio Avenue which are the very fabric of the neighborhood. They are already under immense pressure.

What it **won't** do:

j) It won't bring excessive, unnecessary, and unwanted traffic and congestion, noise, pollution to the neighborhoods this site touches by turning it into a mini-city and destination
k) It won't bring unneeded retail/office/commercial spaces as the developer has insisted upon
l) It won't add unneeded height to a building when we already have six floors to look at on Presidio Avenue.
m) It won't take 15 years to built and decimate the community and surrounding streets.
n) It won't be an opportunity to sell a new entitlement on an up-zoned property.

I live on the southeast corner of Presidio Avenue at California Street which provides me with views from Presidio Avenue and California south to Pine and Masonic Avenue up towards Euclid as well as up California towards Walnut. The traffic in these two intersections on any given day much less any commute is overwhelming NOW. Add tech shuttle buses, express buses on California and Pine and a Fire Department Emergency Response calls from Fire Station 10 and it's over the top. 3 (TR-3)

What the developer has proposed for these two intersections is beyond all comprehension. I was glad when one of your colleague Commissioner, Kathrin Moore, described the run up Pine and on Masonic similar to driving on the freeway and that's NOW. Finally, a reality check from someone other than a resident who lives here who experiences it every day. And, as I've stated now in at least five letters, adding ingress and egress driveways, deletion of the right most lane on to Masonic from Presidio and adding loading zones and driveways on Masonic and Euclid, a crosswalk on Presidio Avenue and bicycles and you have not only a huge traffic mess but an impasse zone and parking lot and a dangerous mess. None of this was addressed in the DEIR. 4 (TR-7)

The traffic noise along with blasting music and honking is unbelievably loud now. As I've mentioned in my prior letter addressing the DEIR, I have addressed the issue of the traffic and what affect the developer's project would do to not only the surrounding streets but our entire neighborhood as traffic unloads on to other side streets in order to alleviate their frustration. The westbound traffic on California between Presidio Avenue and Walnut can be a nightmare as cars line up on Walnut Street, around the 5 (TR-3)

corner and east on the California and from there all the way down to Presidio Avenue. An example of poor design approval and its effect on daily traffic.

The DEIR doesn't reflect the potential conditions that would result if the developer's plan is approved. I leave the auto counts, green-house gas measurements, pollution counts and other technical facts and calculations to the consultants from donations we've made to help us through this.

5
(TR-3)
cont'd

There are so many downsides to the developer's proposals and I now choose light and positive energy instead. None of the "issues" are issues under our Community Full Presentation Plan. Whether it be too many ingress-egress driveways cutting into traffic on Masonic, Euclid, Presidio Avenue, eliminating the right most lane at Presidio Avenue, introduction of retail on city blocks with almost no pedestrians because it's basically a freeway, the loss of parking and the addition of loading zones that people and mini-buses will have to back into on this "freeway" maze. The tremendous loss of quality of our lives at the advancement of noise, pollution, environment impact, loss of green spaces and trees. All of it, unnecessary and hardly a positive step forward.

When considering the future, please don't forget the neighborhoods that currently thrive and exist around this site. Repurposing isn't a bad thing when the impact is less overall. Everyone says we need more housing and that they think it's a great idea. But when I say back to them, "So you wouldn't mind 558-744 housing units being built across the street from where you live over the course of 15 years? The reply is always the same, "Oh, no I wouldn't like that at all!" We are trying to find something that works and doesn't burden the people who already live in direct proximity and work in nearby small businesses. What is really happening when you drill down past the minutia is taking a single-user site and repurposing it to accept multi-users. Nothing in that description implies destruction. We believe our plan accomplishes that and it has Community support.

The Commission is faced with making a decision on whether to go with the "Community Full Preservation Plan" or to go with some version of the developer's "Destructive Plan". We think our plan makes the most sense for all the right reasons. We believe that our plan can be approved without further studies and delays in construction to bring the needed housing on line.

Thank you for your time and serious consideration of our Community Full Preservation Plan.

6
(AL-2)

Victoria Underwood
510 Presidio Avenue
San Francisco, CA 94115

Victoria.underwood@att.net

cc:
LaurelHeights2016@gmail.com
kei.zushi@sfgov.org
Catherine.Stefani@sfgov.org

**From:** Tony Vega <tvega@mail.thebluebook.com>
**Sent:** Tuesday, January 08, 2019 9:52 AM
**To:** Moore, Julie (CPC) <julie.moore@sfgov.org>
**Subject:** In reference to 3333 California Street Mixed-Use Project, 2015-014028ENV

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good morning Ms. Moore,

I wanted to reach out in hopes that I can get a status update on this project. I believe it had an environmental meeting last year but I was wondering if this project have move forward at all since then. Just trying to get a grasp on how the application process is for these type of projects. 1 (CEQA-1)

Hope to hear from you soon,

-Tony

**From:** Steven Zeluck
**To:** CPC.3333CaliforniaEIR
**Subject:** 3333 California Street proposed project
**Date:** Saturday, November 10, 2018 8:00:24 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Mr. Zushi,

I am a renter approximately 3 blocks from the site at 3333 California. Today I noticed a planning department sign at the site.

I have lived in the area for **26 years** at the same apartment on Sutter Street. In that time I have come to admire the beautiful trees as well as the open space at the 3333 California site. The open space and trees are extremely valuable not only for myself but for the residents of the area to provide a break from the mad whirlwind of activity that surrounds the site **on a daily basis**. And there are a pair of glorious pair of Coastal Oaks on Laurel that are probably 100 years old, as well as the towering Monterey Pine at Laurel and Euclid (that is one wise old tree.) 1 (BR-1)

I am also concerned about the livelihood of the grocers and shops in Laurel Village should your proposals be adopted. I would think the last thing they want is more competition. 2 (ME-1) I am also **very concerned** about the level of noise and traffic disturbance caused by a construction project that is planned to last **7** years. 3 (PD-1)

In short, I do not think it is at all fair to foist this proposed project onto the unsuspecting public and the current businesses. 4 (ME-1)

What I recommend is **Alternative Plan B**. That would be much less disruptive, while providing some residential units which the city needs. We (the people that live here) would also not be subjected to disruption for **7** years. 5 (AL-1)

Lastly, UCSF is this case showing an utter disregard for the neighborhood by seeking a project that will make them the most money, particularly after they have recently received $500M **bequest** to build their new hospital at Parnassus.

I will be present at the upcoming hearing on December 13.

Regards,

Steven C. Zeluck

**From:** john zlatunich
**To:** CPC.3333CaliforniaEIR
**Subject:** 3333 California Street Project
**Date:** Sunday, December 09, 2018 3:47:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

I would like to submit comments on the DEIR for 3333 California Street project. I live on Lupine and overlook Euclid Ave. In reviewing the DEIR, I would not be supportive of the current plan. Adding retail space to the area would, in my opinion, not be positive for the neighborhood. The area would benefit by residential units and some office space. No additional underground parking should be added above what is already in existence. The project height should not be increased more than one additional level from current height. Based on the DEIR, neither the planned project nor any of the alternatives satisfy these requirements. Hopefully the Planning Dept. and developer can adjust the proposal to include residential and office space only. 1 (AL-1)

Thank you for your attention to my comments.

Regards,

John Zlatunich
39 Lupine Ave.

**From:** john zlatunich
**To:** Zushi, Kei (CPC)
**Cc:** Stefani, Catherine (BOS); Richard Frisbie
**Subject:** 3333 California Priject
**Date:** Saturday, January 05, 2019 1:34:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

I would like to reiterate my comments submitted previously on the DEIR for 3333 California Street project. I live on Lupine and overlook Euclid Ave. In reviewing the DEIR, I would not be supportive of the current plan. Adding retail space to the area would, in my opinion, not be positive for the neighborhood. The area would benefit by residential units and some office space. No additional underground parking should be added above what is already in existence. The project height should not be increased more than one additional level from current height. Based on the DEIR, neither the planned project nor any of the alternatives satisfy these requirements. I understand the local neighborhood association has submitted an alternative plan that I would support AND would be built in approximately three years. Hopefully the Planning Dept. and developer can adjust the proposal to include residential and office space only as detailed by this or one of the other alternative plans.

1 (AL-1)

2 (AL-2)

Thank you for your attention to my comments.

Regards,

John Zlatunich
39 Lupine Ave.

# 3333 CALIFORNIA STREET MIXED-USE PROJECT



# RESPONSES TO COMMENTS ON DRAFT EIR VOLUME 2 (ATTACHMENTS A-E, PART 3)

**CITY AND COUNTY OF SAN FRANCISCO**
**PLANNING DEPARTMENT: CASE NO. 2015-014028ENV**
**STATE CLEARINGHOUSE NO. 2017092053**

DRAFT EIR PUBLICATION DATE: NOVEMBER 7, 2018
DRAFT EIR PUBLIC HEARING DATE: DECEMBER 13, 2018
DRAFT EIR PUBLIC COMMENT PERIOD: NOVEMBER 8, 2018 - JANUARY 8, 2019
FINAL EIR CERTIFICATION HEARING: SEPTEMBER 5, 2019

SAN FRANCISCO
PLANNING
DEPARTMENT

# 3333 CALIFORNIA STREET MIXED-USE PROJECT

# RESPONSES TO COMMENTS ON DRAFT EIR VOLUME 2 (ATTACHMENTS A-E, PART3)

**CITY AND COUNTY OF SAN FRANCISCO**
**PLANNING DEPARTMENT: CASE NO. 2015-014028ENV**
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SAN FRANCISCO
PLANNING
DEPARTMENT

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# ATTACHMENT C

## Comment Letters and E-mails Received After Close of Public Comment Period

# PACIFIC HEIGHTS RESIDENTS ASSOCIATION

## 2443 Fillmore Street #178

## San Francisco, California 94115


**August 12, 2019**

**Supervisor Catherine Stefani**

**1 Dr. Carlton B. Goodlett Place**

**San Francisco, CA 94102**

**Dear Supervisor Stefani,**

***PHRA is writing to state our support for the Prado Group's plan for the 3333 California proposal.***

***Over several years we have attended many meetings and presentations by the developers, and have participated in discussions between the developers and neighborhood groups. The plan that is currently presented includes alterations made to accommodate neighbors' comments. Throughout the discussions, PHRA has been most concerned about parking and circulation in and around the property. We wish to continue to be involved in discussions with the developers, city agencies, your office, and other neighbors and merchants to help address parking and traffic solutions.***

***This is clearly a very significant property that will undoubtedly change the neighborhood, but it is very large and strategically located. We do not find the Fireman's Fund building historically significant, or important to the community. If left unused and underdeveloped it will be a magnet for blight and undesirable activity. Conversely, if the property is developed as proposed, it will bring desperately needed housing, appropriate for the setting and the neighborhood, to a significant transit corridor.***

***PHRA would like to participate in discussions about staging and construction, throughout the process.***

***PHRA is available to answer any questions, or comment more fully at your convenience.***

***Thank you.***

***Terry McGuire***

***PHRA President***

**PACIFIC HEIGHTS RESIDENTS ASSOCIATION**

**2443 Fillmore Street #178**

**San Francisco, California 94115**

**Sincerely,**

**L. Gregory Scott**

**Treasurer**

**CC: Scott Sanchez, Zoning Administrator**

## Zushi, Kei (CPC)

**From:** cferguson <cferguson@ENERGYSOLUTION.US.COM>
**Sent:** Tuesday, July 30, 2019 9:51 AM
**To:** Stefani, Catherine (BOS)
**Cc:** richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Fung, Frank (CPC); dsafier@pradogroup.com
**Subject:** Letter of Support for 3333 California Street Project
**Attachments:** PHAN ltr. re 3333 California.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani:

Please find attached a letter of support from the Presidio Heights Association of Neighbors for the project currently being proposed for the site at 3333 California Street. We are sending this letter to you and the members of the Planning Commission listed above in the hope that you also will join us in supporting this project as it is currently proposed.

Thank you for your consideration.

Charles Ferguson
President
Presidio Heights Association of Neighbors

*Presidio Heights Association of Neighbors*

July 29, 2019

Supervisor Catherine Stefani
City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, Ca. 94102-4689

Re: Proposed Project at 3333 California Street, former UCSF Laurel Heights Campus

Dear Supervisor Stefani:

I am the President of the Presidio Heights Association of Neighbors (PHAN) and, on behalf of PHAN, I am writing to convey PHAN's support for the proposed development plan for the former UCSF Laurel Heights Campus site, whose street address is 3333 California Street.

This will certainly be a very significant development project and it is directly adjacent to the southern border of our neighborhood. Our neighborhood is well over a century old and is comprised of 800 residences, most of which (perhaps over 90%) are eligible for inclusion on the State Historic Register. The entire neighborhood is itself eligible for inclusion on the State Historic Register as an historic district, something which few neighborhoods in San Francisco can claim. As you are probably aware, Presidio Heights includes some of the most revered architectural homes in America. None of the other neighborhoods adjacent to the 3333 California Street site are as old or can claim as many architectural treasures. Equally important to the residents of Presidio Heights is the fact that from its inception to the present, against an appalling decline citywide in the number of families with children, it has retained its reputation as a family-oriented neighborhood. Thus, the impact on our neighborhood of any development at 3333 California Street is of critical importance to all our residents. Accordingly, the directors of PHAN have carefully followed the plans for development of 3333 California Street as those plans have evolved during the application process. I am pleased to inform you that the PHAN board of directors has voted in favor of informing you that PHAN supports the current project as proposed by the sponsor in both its original and alternative format.

For the past nearly three years, I and fellow directors of mine have participated in numerous meetings regarding development of 3333 California Street. Likewise, we have met on many occasions to discuss concerns that we and residents of Presidio Heights had regarding various aspects of the project. Fortunately, the developer of 3333 California Street was quick to adopt the same laudable process that was mandated for the development of the CPMC site at 3700 California Street, a process that I personally

worked on with former Mayor/Supervisor Mark Farrell to embed in the City's development agreement for the new CPMC hospital on Van Ness Avenue. I am pleased to report that not only has the developer of 3700 California Street met CPMC's commitment that the purchaser of 3700 California Street would be bound to meet with and listen to neighborhood concerns, but the developer of 3333 California Street has voluntarily adopted the same obligation to meet with and give thoughtful consideration to neighborhood concerns, at least insofar as the PHAN board of directors is concerned.

I want to express our strong support for and appreciation of this proactive and interactive approach to such a significant redevelopment project. We hope that this approach will set an example for future projects in the City and that the Planning Department, Planning Commission and your Board, if necessary, will support the extensive effort that has gone into this process by favorably acting on those plans when presented.

The outreach from the project team has been extensive and the development team has listened to numerous comments from the neighborhood regarding the types of housing, design, parking, and other key project elements in developing the plan which will soon be submitted to the Planning Department as part of the Preliminary Project Assessment. We feel the developer has studied our neighborhood to develop a plan that is respectful of the surrounding community and is consistent with the existing neighborhood pattern. In the process, numerous design changes were made to respond to neighborhood comments in order to develop a plan that has support from as many neighbors and neighborhood groups as possible.

We also thoroughly support the amount of parking requested by the project and would support additional parking consistent with the parking in the surrounding neighborhood if the Planning Department and Planning Commission are willing to support it. We have endured our neighborhood being inundated with high parking demand from the under-parked hospital for too long and want both 3700 and 3333 California Street projects built with an adequate number of parking spaces, particularly given the likelihood that larger units with families will likely require more than one car to manage the challenges of raising multiple children in the City.

Finally, I will take this opportunity to add a personal note. My wife and I have owned an architecturally significant home at The Sea Ranch for over 30 years, William Turnbull's first single family home, known as Experimental House One. It sits adjacent to the well-known Esherick Hedgerow Houses, on the nearly sacred ground for architects where the first few houses at Sea Ranch were constructed. Turnbull redesigned our house for us before his untimely death, so I know from personal experience this one truth about preservation of architecturally significant structures and it is simply this. They cannot and do not survive well with age if left in their original state. They can be, and must be,

repurposed over time if they are to survive at all. The old Firemen's Fund headquarters at 3333 California Street is in serious need of repurposing and I, personally, as well as the majority of my fellow board members support the plans for repurposing it that are before the Planning Department and Commission now.

In closing, we applaud the process that has led to the current development plans for 3333 California Street, and we ask that the Planning Department, the Commission and you provide the same support for the project as we do.

Sincerely,

Charles Ferguson
President
Presidio Heights Association of Neighbors

## Zushi, Kei (CPC)

**From:** Kristy Wang <kwang@spur.org>
**Sent:** Wednesday, July 10, 2019 9:39 AM
**To:** Stefani, Catherine (BOS); Rich Hillis; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Fung, Frank (CPC); Zushi, Kei (CPC); Herzstein, Daniel (BOS); CPC-Commissions Secretary
**Cc:** Dan Safier; Don Bragg; Cindy Park; Dan Kingsley; Charmaine Curtis; Diane Filippi
**Subject:** SPUR endorses 3333 California Street (Laurel Heights)
**Attachments:** SPUR Endorsement of 3333 California.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani and Planning Commissioners,

Laurel Heights Partners, LLC presented the 3333 California Street project in Laurel Heights to SPUR's Project Review Advisory Board at our May 2019 meeting for review and consideration. SPUR is generally focused on policies, plans and codes rather than on individual projects. In order to make infill development easier, we prefer to help set good rules around zoning, fees, housing affordability, sustainability, etc. However, on occasion, SPUR's Project Review Advisory Board will review and endorse development proposals of citywide or regional importance, evaluating their potential to enhance the vitality of the city and region according to the policy priorities and principles of good placemaking supported by SPUR.

**The SPUR Project Review Advisory Board finds this development to be an appropriate and welcome use for this site and endorses 3333 California Street.**

Please see attached letter for full details. Do not hesitate to reach out if you have any questions.

Best,
Kristy Wang

Kristy Wang, LEED AP
Community Planning Policy Director
SPUR • Ideas + Action for a Better City
(415) 644-4884
(415) 425-8460 m
kwang@spur.org

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June 3, 2019

Supervisor Catherine Stefani
1 Dr. Carlton B. Goodlett Place
City Hall, Room 244
San Francisco, CA 94102-4689

San Francisco Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

**RE: SPUR Endorsement of 3333 California Street**

Dear Supervisor Stefani and Planning Commissioners:

Laurel Heights Partners, LLC presented the 3333 California Street project in Laurel Heights to SPUR's Project Review Advisory Board at our May 2019 meeting for review and consideration. **The SPUR Project Review Advisory Board finds this development to be an appropriate and welcome use for this site and endorses 3333 California Street.**

SPUR is generally focused on policies, plans and codes rather than on individual projects. In order to make infill development easier, we prefer to help set good rules around zoning, fees, housing affordability, sustainability, etc. However, on occasion, SPUR's Project Review Advisory Board will review and endorse development proposals of citywide or regional importance, evaluating their potential to enhance the vitality of the city and region according to the policy priorities and principles of good placemaking supported by SPUR.

3333 California Street is a major mixed-use development project planned for a 10.25-acre parcel in the Presidio Heights neighborhood. The site is currently occupied by UCSF's Laurel Heights campus. The proposed project will transform the site from a corporate campus with office, research, child care and parking uses into an mixed-use neighborhood with residential, retail, office, child care and parking uses. 3333 California Street will include 13 new buildings and the adaptive reuse of the existing office building, which would be split into two residential buildings.

Laurel Heights Partners is considering two variations on the project, one of which includes more housing units instead of office space. The project will include between 558 and 743 residential units, up to 49,999 square feet of office space, 34,000 to 40,000 square feet of retail and 13,000-15,000 square feet of child

care space. **The SPUR Project Review Advisory Board prefers the proposal with higher residential density.**

3333 California Street in Laurel Heights:

- ✓ **Is located at an appropriate location for development**, near transit and infrastructure and not on a greenfield site. This site is located near the future Geary bus rapid transit (BRT) line and several other good bus lines that run frequently. The site has been underutilized to date, with buildings on only 3 of its 10 acres, in spite of being located at the intersection of many neighborhoods and close to many amenities.
- ✓ **Provides an appropriate mix of land uses** of residential and retail, contributing to diverse stock of housing, fostering economic development, providing amenities and services to the surrounding community. The proposed project would bring new housing to a part of the city that has seen little new residential development, and it includes a significant retail component that ties into the existing Laurel Village corridor.
- ✓ **Provides sufficient density at the site** at 54 to 72 dwelling units per acre, supporting adjacent transit and prevents underutilization of land, serving the future needs of Bay Area residents. This project makes good use of this key site, which has been until now a suburban campus walled off from the adjacent neighborhoods.
- ✓ **Creates a good place for people and contributes to a walkable environment** with active ground floor uses. The plan for the site integrates the proposed buildings into the neighborhood, connecting to cross streets and breaking up the superblock into more appropriately scaled street blocks. The retail uses along California Street connect visually and functionally to the existing Laurel Village retail corridor, and the other street frontages have designed to be porous and pedestrian-friendly. The public realm plan, which includes several different kinds of public and open spaces, brings the public into and across the project site.

The SPUR Project Review Advisory Board finds this development to be an appropriate and welcome use for this site and endorses 3333 California Street. The urban design and site plan are particularly thoughtful, especially in dealing with the major grade changes at this location. The quantity, quality and variety of open space are excellent, and we appreciate the project team's decision to protect some of the older trees onsite as well as adapt the existing building to a new use. We also appreciate that the project team includes several different architects and landscape architects, helping to foster the feeling of a neighborhood built over time rather than a single master-planned project.

The potential partnership with the Jewish Community Center is an excellent idea that could help fill retail spaces if there is not sufficient retail demand in the neighborhood. We are also impressed with the neighborhood outreach given the sensitivity and location of this site.

Our only concern with this plan is the amount of parking. While we appreciate that all parking will be tucked out of sight in underground parking garages in order to maximize the useable open space, we feel that the project parking could be further reduced. Given the project's transit-oriented location near many bus lines, the Geary BRT line currently underway, and our city's evolving transportation options, SPUR recommends that the project sponsor consider reducing the number of parking spaces.

Please do not hesitate to contact us or Kristy Wang, SPUR's Community Planning Policy Director, with any questions or clarifications.

Sincerely,

Charmaine Curtis Diane Filippi
Co-Chairs, SPUR Project Review Advisory Board

cc: SPUR Board of Directors

## Zushi, Kei (CPC)

**From:** Will Bartlett <WBartlett@parallaxfund.com>
**Sent:** Saturday, June 01, 2019 3:38 PM
**To:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); Fung, Frank (CPC)
**Subject:** 3333 California Street
**Attachments:** 3333Californiastreet.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani and Members of the Planning Commission Team,

Attached please find a letter regarding the proposed development at 3333 California Street.

Thank you for your time and consideration.

Will Bartlett

**William F. Bartlett**
131 Jordan Avenue
San Francisco, CA 94118
415-850-3332

**VIA EMAIL**

June 1, 2019

Supervisor Catherine Stefani
Commissioner Myrna Melgar
Commissioner Joel Koppel
Commissioner Rich Hillis
Commissioner Milicent Johnson
Commissioner Kathrin Moore
Commissioner Dennis Richards
Commissioner Frank Fung
Senior Environmental Planner Kei Zushi

Re: 3333 California Street Proposed Development

Dear Supervisor Stefani and Esteemed Members of the Planning Commission:

I am writing to you as a neighbor in support of the proposed development at 3333 California Street. I have lived in the area for the last 30+ years and look forward to seeing the current eyesore at the site razed and replaced with a beautiful, well thought out, addition to our neighborhood. The proposed project would bring much needed housing to San Francisco as well as more retail, restaurants, and open space that our family could easily walk to. In addition to improving our neighborhood and providing housing, this project will generate substantial tax revenue for San Francisco.

The development team has put in a substantial effort to engage with the community and has been responsive and proactive in making changes based on feedback received. I have no doubt they will continue to be good neighbors throughout the development and construction process.

I urge you to support this family-oriented project that will improve our neighborhood and the City.

Respectfully,



William F. Bartlett

## Zushi, Kei (CPC)

**From:** Suzanne Blumenthal <suzanneblu@gmail.com>
**Sent:** Sunday, June 16, 2019 1:11 PM
**To:** Stefani, Catherine (BOS)
**Cc:** Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); richhillissf@gmail.com; Micaela Scarpulla
**Subject:** 3333CALSF Project
**Attachments:** 3333 CALSF Support 06-15-2019.docx

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Please see attached letter in support of this important project.

Thank you.

Suzanne

Suzanne Blumenthal
415.309.1355

# *Suzanne Blumenthal*

1480 Page Street San Francisco, CA 94117
Telephone 415.309.1355
Email: suzanneblu@gmail.com


June 16, 2019

Dear Sir or Madam:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of the neighborhood, I've seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Suzanne Blumenthal

## Zushi, Kei (CPC)

**From:** lbunim@pacbell.net
**Sent:** Sunday, June 02, 2019 4:55 PM
**To:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Cc:** 'Lynn Bunim'
**Subject:** Lynn Bunim - neighbor of the 3333 California Street proposed development - urges support

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani / Members of the San Francisco Planning Commission

**I am writing to urge you to support the proposed development at 3333 California Street.** From my perspective, a Presidio Heights neighbor of the project for 70 years, with children and grandchildren in the neighborhood as well, there are three reasons this project should be approved.

1) **Provides a positive response to the current housing crisis**: This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood. The proposal will connect the existing site to the greater Laurel Heights community, creating open spaces, community amenities, and homes.
2) **Opens up what has been a closed off 5 acres:** In addition to allowing more people to remain in the city and bringing new homes to San Francisco's west side, the proposed development will provide over 5 acres of open space, where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. I was born on Clay Street between Locust and Spruce in 1947. I have a daughter and grandchildren living near Laurel Village. I live close to the JCC. It would be wonderful to be able to walk from California Street to Euclid or Presidio to Laurel….before I become 100 years old! The proposed pedestrian walkways through the site will make my wish come true. It will connect neighbors in the Laurel Village and surrounding neighborhoods by reimagining the currently walled-off space on the UCSF campus.
3) **Expands "shop/dine small business" opportunities**: Our family often walks/shops Fillmore Street, Sacramento Street, and Laurel Village, frequenting the various merchants and restaurants. We would welcome new stores, especially the proposed smaller, non-traditional "big box" variety and new, casual, moderately priced places to eat breakfast/lunch/ dinner

**San Francisco is an innovative city that values inclusion, diversity, and community. I sincerely hope that you will support the proposed development at 3333 California Street for the reasons stated ab**ove.

Sincerely,
Lynn

Lynn Burrows Bunim
2017 Lyon Street
San Francisco, CA 94115
lbunim@pacbell.net

## Zushi, Kei (CPC)

**From:** Ryan Chatley <ryan.chatley@gmail.com>
**Sent:** Tuesday, May 07, 2019 3:56 PM
**To:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Support for 3333 California California Street

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of San Francisco, I've seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Ryan Chatley
99 Uranus Terrace, San Francisco

| | |
|---|---|
| **From:** | Shanan Delp |
| **To:** | Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC) |
| **Subject:** | UCSF Laurel Heights Redevelopment / 3333 California |
| **Date:** | Tuesday, May 07, 2019 4:44:29 PM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Supervisor Stefani,

As a resident of San Francisco and D2, I want to write and share my stident support for the redevelopment plans at the UCSF Laurel Heights Campus. This type of urban infill is just the type of development that San Francisco needs in every corner of the city, and I urge you and the rest of city government to support it and help expedite it.

**It'll be well served by improved Muni Service:**
It's a lovely old corporate campus, and it's at the hub of several high density transit lines (1 california, 2 clement, 3 jackson, 43 masonic, hell even the 38 Geary).

**And it's in a scale appropriate to the neighborhood.** I'm super excited by the additional retail space to Laurel Village, and also the improved pedestrian flow to the the site-- I love the two paths through the site.

Please approve this without delay!

Best,

Shanan Delp

## Zushi, Kei (CPC)

**From:** CPC-Commissions Secretary
**Sent:** Friday, July 12, 2019 1:53 PM
**To:** Zushi, Kei (CPC); Foster, Nicholas (CPC)
**Cc:** Feliciano, Josephine (CPC)
**Subject:** FW: Presentation to Planning Commission for July 11, 2019
**Attachments:** July 11 Slides Portrait NOTES PAGES (2).pdf

Jonas P. Ionin,
Director of Commission Affairs

Planning Department | City & County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103
Direct: 415-558-6309 | Fax: 415-558-6409

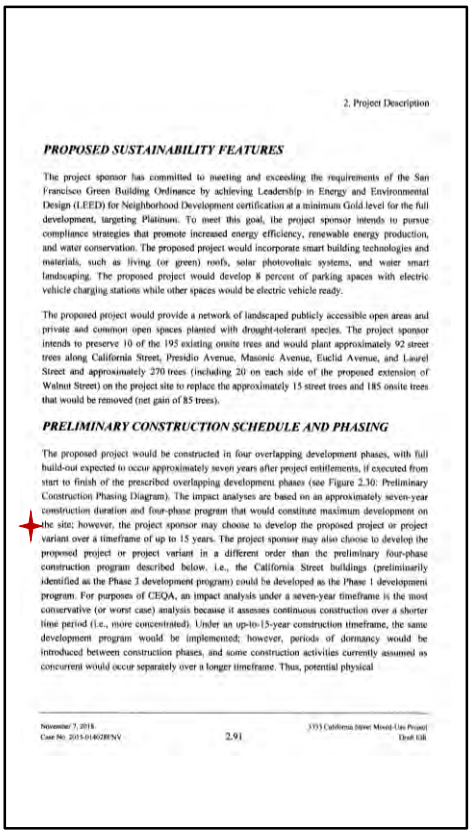
jonas.ionin@sfgov.org
www.sfplanning.org

---

**From:** Richard Frisbie <frfbeagle@gmail.com>
**Sent:** Friday, July 12, 2019 10:03 AM
**To:** Melgar, Myrna (CPC) <myrna.melgar@sfgov.org>; Rich Hillis - Commissioner <richhillissf@gmail.com>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>
**Subject:** Presentation to Planning Commission for July 11, 2019

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Richard Frisbie here.
As you were not at yesterday's Planning Commission meeting I am attaching my notes concerning 3333 California St. for your consideration.
If you have any questions please let me know.
Thanks,
Richard Frisbie



2. Project Description

***PROPOSED SUSTAINABILITY FEATURES***

The project sponsor has committed to meeting and exceeding the requirements of the San Francisco Green Building Ordinance by achieving Leadership in Energy and Environmental Design (LEED) for Neighborhood Development certification at a minimum Gold level for the full development, targeting Platinum. To meet this goal, the project sponsor intends to pursue compliance strategies that promote increased energy efficiency, renewable energy production, and water conservation. The proposed project would incorporate smart building technologies and materials, such as living (or green) roofs, solar photovoltaic systems, and water smart landscaping. The proposed project would develop 8 percent of parking spaces with electric vehicle charging stations while other spaces would be electric vehicle ready.

The proposed project would provide a network of landscaped publicly accessible open areas and private and common open spaces planted with drought-tolerant species. The project sponsor intends to preserve 10 of the 195 existing onsite trees and would plant approximately 92 street trees along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street and approximately 270 trees (including 20 on each side of the proposed extension of Walnut Street) on the project site to replace the approximately 15 street trees and 185 onsite trees that would be removed (net gain of 85 trees).

***PRELIMINARY CONSTRUCTION SCHEDULE AND PHASING***

The proposed project would be constructed in four overlapping development phases, with full build-out expected to occur approximately seven years after project entitlements, if executed from start to finish of the prescribed overlapping development phases (see Figure 2.30: Preliminary Construction Phasing Diagram). The impact analyses are based on an approximately seven-year construction duration and four-phase program that would constitute maximum development on the site; however, the project sponsor may choose to develop the proposed project or project variant over a timeframe of up to 15 years. The project sponsor may also choose to develop the proposed project or project variant in a different order than the preliminary four-phase construction program described below, i.e., the California Street buildings (preliminarily identified as the Phase 3 development program) could be developed as the Phase 1 development program. For purposes of CEQA, an impact analysis under a seven-year timeframe is the most conservative (or worst case) analysis because it assesses continuous construction over a shorter time period (i.e., more concentrated). Under an up-to-15-year construction timeframe, the same development program would be implemented; however, periods of dormancy would be introduced between construction phases, and some construction activities currently assumed as concurrent would occur separately over a longer timeframe. Thus, potential physical

November 7, 2018
Case No. 2015-014028ENV

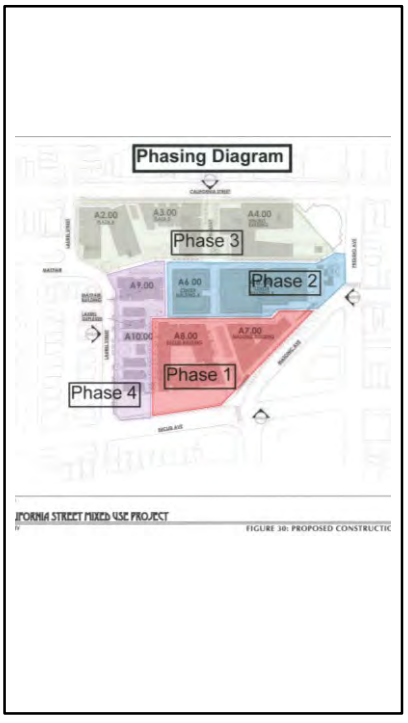
2.91

3333 California Street Mixed-Use Project
Draft EIR

Good afternoon President Melgar and Commissioners.
I am Dick Frisbie.
I'd like to continue the discussion on 3333 California St.

Take a look at the starred item; the Developer is requesting a 15 year entitlement period which is outrageous.

NEXT SLIDE




Can any of you imagine living next to, or actually inside of, a construction site that goes on for up to 15 years?
No one should be exposed to such abuse.

Dan Safier <dsafier@pradogroup.com> Thu, Oct 12, 2017 at 3:45 PM
To: John Rothmann <johnrothmann2@yahoo.com>, Dan Kingsley <dkingsley@sksre.com>
Cc: Kathy Devincenzi <krdevincenzi@gmail.com>, Catherine Carr <catherine.a.carr@gmail.com>, "M.J. Thomas" <mjinsf@comcast.net>, Richard Friable <frfbeagle@gmail.com>

Dear John, Kathy, Catherine, M.J., and Dick:

First of all John, thank you for the meeting last week at your home. As we agreed in the meeting, we are responding to your recent questions regarding the project. We have re-arranged your questions slightly to group them according to subject. If we haven't answered any of your questions, please let us know. We very much appreciate your willingness to promptly write back to us with your five outstanding issues on the project that are currently preventing us from obtaining LHIA support for the project. We appreciate your doing this so we can set a follow up meeting to find a mutually workable solution.

**LHIA Questions:**

**Q: You also stated that Prado wants to have a development agreement to lock in entitlements for longer periods of time than would normally be allowed?**

**A:** Yes, we are looking to enter into a development agreement (DA) with the City for a term of approximately 15 years. For large projects with multiple buildings like 2333 California Street, the City generally requires a DA. The DA vests the entitlements, protecting the entitlements from changes in the law in exchange for certain community benefits. This would include the community benefit of certainty of the entitlements during that period. If we did not build the project during the term of the DA, then the DA would expire and we would lose the protections of the DA.

**Q: What is the period of time that you anticipate that construction will occur?**

**A:** We anticipate that construction will occur in the spring of 2020.

**Q: What is the reason for constructing the project in phases?**

**A:** By allowing for potential phased construction, we would have the ability to complete and occupy portions of the project as each phase is completed. If conditions do not exist to build out the entire project, we can phase construction in order to align with market conditions and financing availability.

**Q: How many extensions do you anticipate requesting for the entitlements?**

**A:** None. Any extension of the DA's term would be a material amendment that would require Board of Supervisor's approval.

**Q: During those extended periods, would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased numbers of residential units, increased amounts of retail or office space? What about the possibility of design changes or other changes? Could Prado apply to change any part of the construction to provide the opportunity to have high rise construction?**

**A:** Once the EIR is certified and the project is approved, any material changes to the project would be subject to new environmental review, would require Planning Commission and Board of Supervisor approvals and also an amendment to the DA. Any increase in height over what is entitled in our project would require a revision to the Planning Code and Zoning Maps that would entail Planning Commission and Board of Supervisors approval.

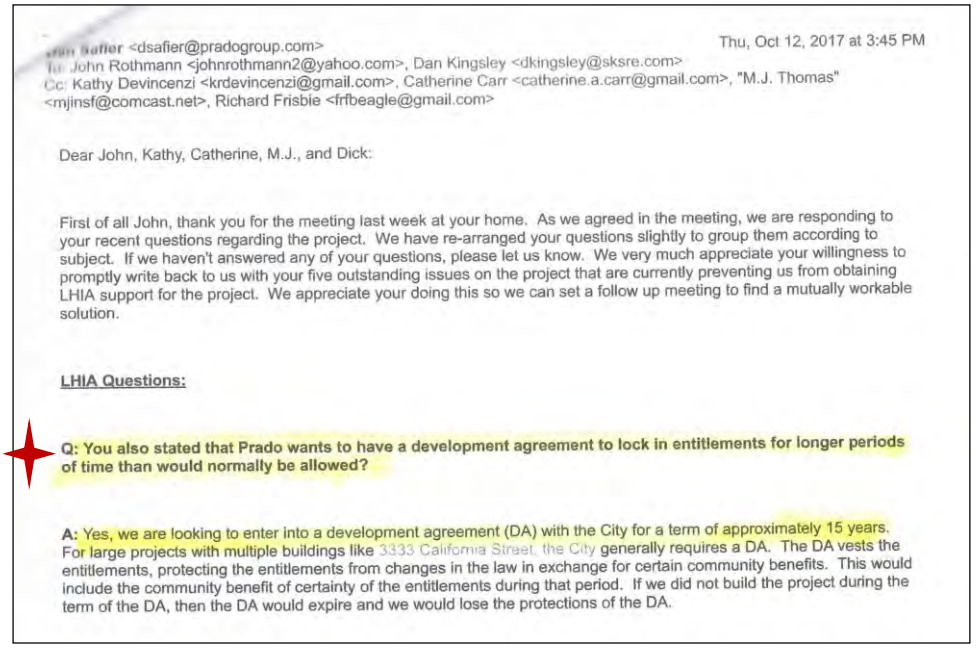
**Q: There are genuine concerns about reducing open spaces and reduced on-site parking places.**

**A:** Open space will be part of the entitlements and will likely be considered by the City as one of the public benefits supporting the DA -- for that reason alone, reducing the amount of it would be very difficult if not impossible. The open space requirements will be carefully described in the project's approvals and will also be recorded against the property. So, as with any material changes to the approved project, any material change to the open space would be very difficult and would involve a public process and City approval. As to parking spaces, as you know, the City would like to see the number of spaces reduced. We plan to continue advocating for the proposed number of project parking spaces in our application.

**Q: During the phased construction could Prado transfer shares in the project to provide for new or additional investors?**

**A:** We have no plan to transfer any shares in the project and construction lenders generally prohibit any changes of ownership by the project developer during construction and stabilization of a project. PSKS, along with our equity partners and lenders, intend to provide all of the capital necessary to construct, own and operate the project. We plan to

# Entitlement Period/Issues



Jon Safier <dsafier@pradogroup.com> Thu, Oct 12, 2017 at 3:45 PM
To: John Rothmann <johnrothmann2@yahoo.com>, Dan Kingsley <dkingsley@sksre.com>
Cc: Kathy Devincenzi <krdevincenzi@gmail.com>, Catherine Carr <catherine.a.carr@gmail.com>, "M.J. Thomas" <mjinsf@comcast.net>, Richard Frisbie <frfbeagle@gmail.com>

Dear John, Kathy, Catherine, M.J., and Dick:

First of all John, thank you for the meeting last week at your home. As we agreed in the meeting, we are responding to your recent questions regarding the project. We have re-arranged your questions slightly to group them according to subject. If we haven't answered any of your questions, please let us know. We very much appreciate your willingness to promptly write back to us with your five outstanding issues on the project that are currently preventing us from obtaining LHIA support for the project. We appreciate your doing this so we can set a follow up meeting to find a mutually workable solution.

**LHIA Questions:**

**Q: You also stated that Prado wants to have a development agreement to lock in entitlements for longer periods of time than would normally be allowed?**

**A:** Yes, we are looking to enter into a development agreement (DA) with the City for a term of approximately 15 years. For large projects with multiple buildings like 3333 California Street, the City generally requires a DA. The DA vests the entitlements, protecting the entitlements from changes in the law in exchange for certain community benefits. This would include the community benefit of certainty of the entitlements during that period. If we did not build the project during the term of the DA, then the DA would expire and we would lose the protections of the DA.

So we asked the Developer about these issues.

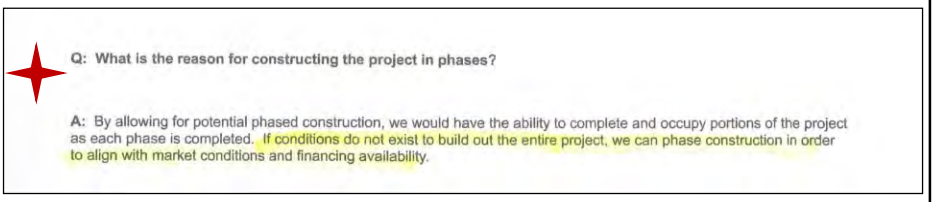
**FIRST STARRED ITEM**
Q: You also stated that Prado wants to have a Development Agreement to lock in entitlements for longer periods of time than would normally be allowed?

Simple Answer: Yes
15 years

**PRETTY SELF EXPLANATORY.**

You gotta wonder about a Housing Crisis.

# Entitlement Period/Issues




**SECOND STARRED ITEM**

Q: What is the reason for constructing the project in phases?

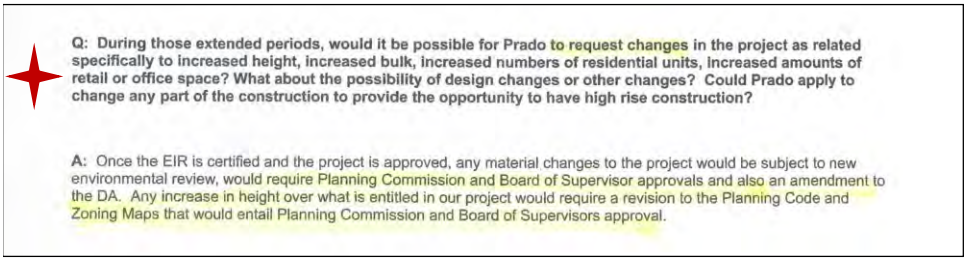
A: "If conditions do not exist to build out the entire project we can phase construction to align with market conditions and financing availability."

"What a powerful, unambiguous commitment to Housing.

Could also mean they want to redo the entitlement, or sell it or…..Pick a reason

We'll speak to this later.

# Entitlement Period/Issues



**Q: During those extended periods, would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased numbers of residential units, increased amounts of retail or office space? What about the possibility of design changes or other changes? Could Prado apply to change any part of the construction to provide the opportunity to have high rise construction?**

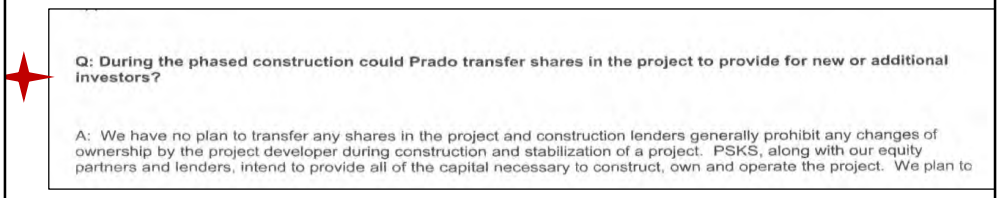
A: Once the EIR is certified and the project is approved, any material changes to the project would be subject to new environmental review, would require Planning Commission and Board of Supervisor approvals and also an amendment to the DA. Any increase in height over what is entitled in our project would require a revision to the Planning Code and Zoning Maps that would entail Planning Commission and Board of Supervisors approval.

**THIRD STARRED ITEM**:
Q: During those extended periods would it be possible for Prado to request changes in the project as related specifically to increased height, increased bulk, increased number of residential units, increased amounts of retail or office space? Design Changes? Other Changes? High Rise Construction?

Simple answer “Sure.”
Nothing prevents us going back to Planning, the Commission and the Board of Supervisors and request such changes.

This opens up an immense opportunity for the Developer to radically redesign and up-zone the site!
This is simply a blank check.

# Entitlement Period/Issues



**Q: During the phased construction could Prado transfer shares in the project to provide for new or additional investors?**

A: We have no plan to transfer any shares in the project and construction lenders generally prohibit any changes of ownership by the project developer during construction and stabilization of a project. PSKS, along with our equity partners and lenders, intend to provide all of the capital necessary to construct, own and operate the project. We plan to

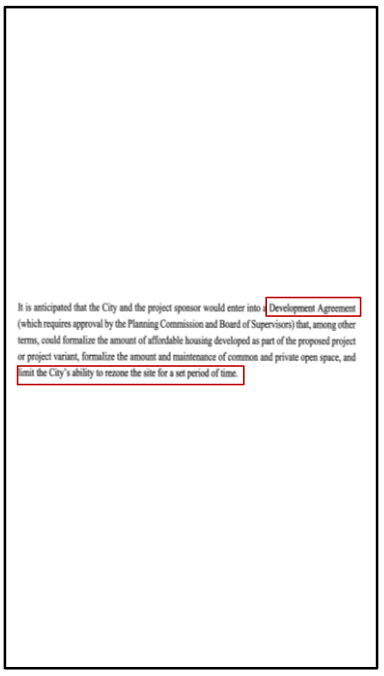
**FOURTH STARRED ITEM**

Q: During the phased construction could Prado transfer share in the project to provide for new or additional investors?

A: "We have no plans to transfer any shares……

We'll take a closer look at that answer momentarily as there is considerable information to the contrary.

THIS IS NOT A DEVELOPMENT PLAN ITS AN ENTITLEMENT SCHEME AS WE WILL SEE NEXT.




Read the lower box carefully “limit the City’s ability to rezone the site for a set period of time.”
First, no set period of time is stated which should ALWAYS raise red flags.

Let’s be generous and just put in 5 years.
After 5 years the Developer could request an entirely new set of Zoning criteria for this site Taller, Denser, Retail Focused…….
Bear in mind that after 5 years they haven’t actually created much housing according to their Phasing Plans and that’s assuming they don’t claim “Market conditions” as an excuse.
So the site may get rezoned before  much actual work gets done.

Would it, Could it; Might it happen?



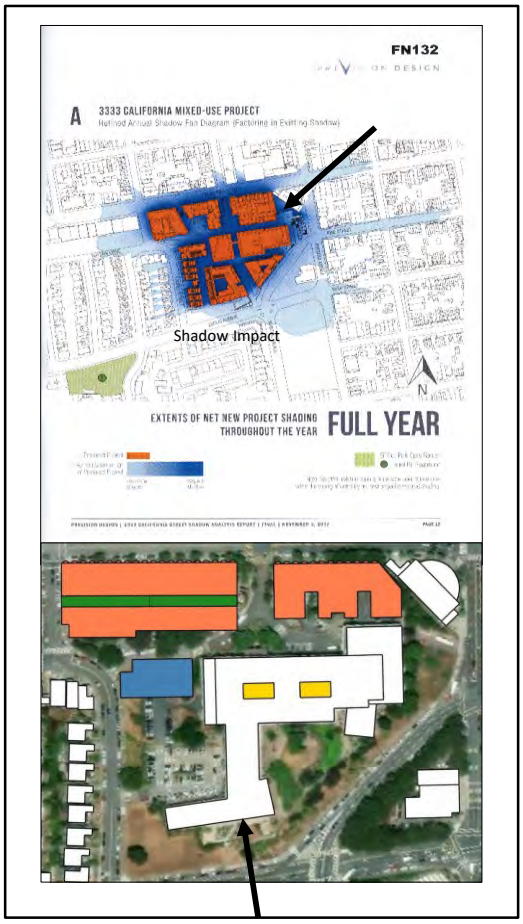
Lendlease construction senior superintendent Casey Curren surveys condominium construction at 160 Folsom St., a former parking lot in the South of Market.

"Most entitled projects in the city are for sale right now — either publicly or privately," said Bill Witte, president of developer Related California, which has 1,300 units under construction in the city. "We're at that point in the cycle."

There are 6,750 units under construction in the city, about 1,000 units more than a year ago. While that is well above the historic average, there are another 15,000 units that have been approved by planning officials but have not started construction. Projects containing 6,690 of those units have secured all the permits needed to start construction but have not broken ground, Planning Department documents show.

Folks, here's reality.
This is the view of a pretty significant Developer in San Francisco.
Every time you sell an entitlement the cost of the housing units go up-the original Developer needs to make his money, the new Developer needs to make his money starting with a higher cost basis.
So, any claims about "no intentions to transfer shares; if market conditions permit; limit the City's ability to rezone the site" need to be taken with the biggest dose of salt one can swallow.
Housing is getting pricier and pricier and a 15 year entitlement guarantees more expensive housing.

BUILD THE HOUSING IN 3 YEARS AND A LOT LESS FINANCIAL ENGINEERING CAN TAKE PLACE.




I call this the Shadow Box Development as shown in the Top View.
Lots of dark blue.
Imagine living along those hardscaped concrete canyons?
The Bottom View shows the Community Alternative-pretty stark differences.
Just one quick reference:
The childcare center playground is presently here – ion the sun-here and that's where it will stay in the Community Alternative.
In the Top View the childcare center playground is here in the Deep Blue up against the Credit Union.
I'll leave it to you to decide.

THANK YOU

## Zushi, Kei (CPC)

**From:** Bella Shen Garnett <drshengarnett@yahoo.com>
**Sent:** Friday, August 09, 2019 1:36 PM
**To:** Stefani, Catherine (BOS)
**Cc:** richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California Street

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani and Planning Commissioners:

As a resident and small business owner who has lived and worked in the Presidio Heights neighborhood for 15 years, I am writing to express my support for the proposed development at 3333 California Street. The development at 3333 California would provide much needed housing, parking, commercial space, and open areas to the neighborhood.

Additionally, I am very concerned that the ongoing debate on this proposed project (along with the similar debate on the proposed project at the former CPMC hospital site on Cherry Street) will lead to perpetual construction delays and, eventually, result in two gigantic abandoned properties in the Presidio Heights, Laurel Heights and Jordan Park neighborhood that will attract homelessness, public drug use and crime. We have already seen a dramatic increase in vagrants, public drug use, and assaults on residents since these former properties have been vacated a short time ago.

I urge you to support this project so that construction can begin as quickly as possible to minimize the time of transition from one planned use of the space to another.

Sincerely,

Dr. Bella Shen Garnett

Bella Shen Garnett, DMD, MMSc, PC
Specialist in Orthodontics for Children & Adults
www.bellasmile.com(415)292-2345 **CONFIDENTIALITY NOTICE** This e-mail communication and any attachments may contain confidential and privileged information for the use of the designated recipients named above. Distribution, reproduction or any other use of this transmission by any party other than the intended recipient is prohibited. Please delete it and any attachments and notify the sender that you have received it in error. Unintended recipients are prohibited from taking action on the basis of information in this e-mail.

## Zushi, Kei (CPC)

**From:** Massimiliana Glynn <maxiboyer@me.com>
**Sent:** Wednesday, June 05, 2019 11:04 AM
**To:** Zushi, Kei (CPC)
**Subject:** 3333 California

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Kei,

As a neighbor and resident who has lived in the neighborhood for almost forty years, I am writing to express my support for the proposed development at 3333 California Street. This thoughtfully developed project will create housing to help alleviate San Francisco's housing crisis, while better connecting the Laurel Heights neighborhood for families.

The development at 3333 California would create 558 or 744 units, allowing more people to remain in the city and bringing new homes to San Francisco's west side. Additionally, the proposed development will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco. The proposed pedestrian walkways through the site will connect neighbors in the Laurel Village and surrounding neighborhoods by reimagining the currently walled-off space on the UCSF campus. And with most units designed for two or more bedrooms, the project will be a fantastic place to raise a family and a great amenity for existing residents and neighbors.

I urge you to support this project that is thoughtfully developed and will create an opportunity for families to stay and thrive in our city. Our city is evolving and we are not addressing the needs of the people who make this city interesting. San Francisco is becoming a city for the 1 % or the homeless and that is simply unacceptable.

Sincerely,

Massimiliana Boyer Glynn

## Zushi, Kei (CPC)

**From:** jeremiah hallisey <jfhallisey@gmail.com>
**Sent:** Wednesday, May 15, 2019 3:13 PM
**To:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California Street City Project

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor / Planning Commissioner:

I strongly support the proposed development at 3333 California Street. The project has been thoughtfully developed with input from San Francisco residents. The property will address San Francisco's housing crisis. In addition, the proposal will connect the existing site to the greater Laurel Heights community, creating open spaces, community amenities, and homes.

The project has sought community views on design and use. Throughout the design process, the developer held over 125 community meetings, and collaborated with two design-focused community advisory groups. These community leaders provided helpful suggestions that improve the project and enhance the neighborhood, and meet much needed new housing.

The development team changed the design multiple times to continue to improve the project after community input. With most units designed for two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a place to raise a family and an asset for everyone who lives in the neighborhood.

The project includes retail space to reduce the need to drive outside of the neighborhood. The proposed retail will be designed to fill-in where goods and services are lacking, complementing the existing retail establishments and helping to stitch the neighborhood together. After collaboration with stakeholders, the designs were updated to fit with the neighborhood's 'classic San Francisco' feel. The development fits into the neighborhood's character. To keep the Laurel Heights community family-friendly, the project includes a mix of apartments and townhomes.

I look forward to the contribution of this project to the character of the neighborhood. It is a project that will result in a beneficial relationship of the development, the neighborhood, and the city.

Sincerely,

Jeremiah F Hallisey
Jeremiah F. Hallisey
Hallisey and Johnson
465 California Street, Suite 405
San Francisco, CA 94104
Telephone: (415) 433-5300

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The foregoing applies even if this notice is embedded in a message that is forwarded or attached.

## Zushi, Kei (CPC)

**From:** William Holleran <whollera@gmail.com>
**Sent:** Monday, May 13, 2019 2:14 PM
**To:** Stefani, Catherine (BOS); Rich Hillis; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Excited for this Housing Project at 3333 Cal

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Supervisor Stefani and Planning Commissioners,
I wanted to express my strong interest in this project at 3333 California Street. These are the types of projects that can revitalize neighborhoods and maximize use of great urban real estate for more housing. I am a 3rd generation SF native and current homeowner, and strongly believe that we need to continue to build responsible housing projects like this! Great open space component, and I love the community that it will build in that area. More walkable streets in that area will create a whole new neighborhood and add vibrancy to what is only a drive-through area. The potential for new restaurants/bars/cafes is really exciting!

Thanks,
Will Holleran

## Zushi, Kei (CPC)

**From:** Dennis Hong <dennisj.gov88@yahoo.com>
**Sent:** Friday, August 02, 2019 3:15 PM
**To:** Zushi, Kei (CPC)
**Subject:** 3333 California DEIR Comments

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi,

Thank you for the opportunity to submit my limited comments and the adequacy of UCSF's DEIR for their 3333 California Street project.

I was born and raised in San Francisco. I'm a homeowner / resident of San Francisco, seventy plus years and live in District 7. I all too often shop at the Laurel Village Shopping area and know of this site all too well.

I have reviewed UCSF's DEIR, case 2015-014028ENV and adding my limited comments to this DEIR, a job well done with the DEIR.

Focusing mostly on the Housing part of the DEIR and Project.

Wow, how impressive it is to see the amount of housing that will be developed on this site for a total of 558 units, including adding up to 27 units of four bedroom units, almost the first of its kind! This will definitely help with our current Housing issues. In general, we need this housing as fast as we can get it built. The open space is an exciting proposal. The overall architecture of the buildings, the landscaping and the mixed use of the site has been well thought out.
With all that said, in my opinion this DEIR covers most import issues and I fully support UCSF's project and the adequacy of this DEIR.

UCSF continues to add value to the city it serves and is a great asset to the city. As I mentioned we need to approve this all too Wonderful PROJECT.

Finally, in closing I would like to see this project placed on an **expedited process** from now thru the final Certification of the DEIR thru the Permit process. We need this housing. We can not afford to loose this project.

Please consider my full support for this project and the adequacy of the DEIR for this project.
Should you have any question, please do not hesitate to reach out to me.

Respectfully,

Dennis H

## Zushi, Kei (CPC)

**From:** martine krumholz <martinek2@hotmail.com>
**Sent:** Friday, April 26, 2019 11:12 AM
**To:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani and San Francisco Planning Commissioners,

I'm a writing to you to show my full support of the proposed 3333 California mixed-use residential project. As a Pacific Heights homeowner and parent I welcome this well thought out, and beautiful addition to our neighborhood.

Our family often walks to the Presidio, Fillmore Street, Sacramento Street, and Laurel Village, frequenting the various merchants and restaurants. We would welcome new stores, especially the proposed smaller non-traditional "big box" variety and love to walk to brunch (not an option in Laurel Village besides Noah's) and dinner as family on Sunday evening somewhere close by. Our children will be attending the neighborhood Presidio Hill School starting in the Fall of 2019. We plan to walk there and back, and I can see us walking through the 3333 California walkways and open spaces then.

We also support the much needed additional housing units. As an urban San Francisco family, we want a more diverse and inclusive neighborhood.

Thank you for your support and dedication to making our neighborhood and life in San Francisco safer, greener, and more inviting!

Best regards,
Martine Krumholz
2919 Jackson Street
San Francisco, CA 94115
martinek2@hotmail.com

## Zushi, Kei (CPC)

**From:** David Levine <dml3221@gmail.com>
**Sent:** Saturday, May 18, 2019 3:22 PM
**To:** Stefani, Catherine (BOS)
**Cc:** Zushi, Kei (CPC); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC)
**Subject:** In support of 3333 California

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani,

My name is David Levine and I live on the 3200 block of Washington. I would like you to know I am a neighbor who would love to see more high quality, well designed, family housing in our neighborhood. 3333 California appears to be just that. The planned open space, low-density design works well with the aesthetic of our neighborhood. The unit mix will attract and retain more families in San Francisco.

We are facing a housing crisis and this proposed community will add much needed supply. We are losing too many families because there are simply not enough housing options. I hope you can find a way to make 3333 California a reality. Thank you.

If there is anything I can do as a concerned San Francisco Resident and neighbor to this project, please do not hesitate to let me know what that is.

Thank you.

## Zushi, Kei (CPC)

**From:** Daniel S. Mason <dmason@FSMLLAW.COM>
**Sent:** Tuesday, May 14, 2019 1:37 PM
**To:** Stefani, Catherine (BOS)
**Cc:** richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California Street Development

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

May 14, 2019

Dear Supervisor Stefani and San Francisco Planning Commissioners,

I am writing to you to show my full support of the proposed 3333 California Street mixed-use residential project. As a neighborhood resident, I welcome this addition to the neighborhood.

The plan and design put forth by the developer (Prado Group and SKS) is thoughtful, thorough, environmentally conscious, and inclusive. The developer's plan for 3333 California would turn an under-utilized piece of property into an area accessible to the community, providing much needed housing and businesses to this family-oriented and transit-friendly neighborhood.

As we have seen many young families move outside the City (to Marin, East Bay, and the Peninsula), the 3333 California project will help more people remain in this great city and bring new homes to San Francisco's west side, where has seen very little development in the last few decades.

The project as outlined by Prado Group and SKS deserves all of our support, and I urge you to help push this project forward to approval so that the residents of San Francisco have access to quality housing, green space, and community.

Sincerely,

Daniel S. Mason
2304 Vallejo Street
San Francisco 94123
415.407.7796

## Zushi, Kei (CPC)

**From:** Anna Morfit <annamorfit@gmail.com>
**Sent:** Tuesday, May 14, 2019 9:24 AM
**To:** Stefani, Catherine (BOS); richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Letter of Support.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of the neighborhood, I've seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Anna Morfit
3660 Jackson Street
San Francisco, CA 94118
annamorfit@gmail.com

## Zushi, Kei (CPC)

**From:** David L. Morse <davidlmorse@gmail.com>
**Sent:** Wednesday, May 15, 2019 12:16 PM
**Subject:** 3333 California Project Support

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

The development at 3333 California would create 558 or 744 units, allowing more people to remain in the city and bringing new homes to San Francisco's west side. Additionally, the proposed development will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco. The proposed pedestrian walkways through the site will connect neighbors in the Laurel Village and surrounding neighborhoods by reimagining the currently walled-off space on the UCSF campus. And with most units designed for two or more bedrooms, the project will be a fantastic place to raise a family and a great amenity for existing residents and neighbors.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

David Lawrence Morse

## Zushi, Kei (CPC)

**From:** Tyler Norsworthy <tnorsworthy84@gmail.com>
**Sent:** Monday, April 29, 2019 3:46 PM
**To:** Stefani, Catherine (BOS)
**Cc:** Zushi, Kei (CPC); Koppel, Joel (CPC); richhillissf@gmail.com; Johnson, Milicent (CPC); Richards, Dennis (CPC); Melgar, Myrna (CPC); Moore, Kathrin (CPC)
**Subject:** Letter of Support - 3333 California Street Development
**Attachments:** Letter of Support for 3333 California Street Development.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani and SF Planning Commissioners,

I writing to express my complete support for the proposed development at 3333 California Street. As a current resident of the neighborhood I was interested to review the project upon hearing of the idea; and I couldn't be more impressed with their well thought out, respectful proposal.

Housing is a constant concern within our city and this proposal would immediately address the matter for current/future residents of the area by producing 500+ homes. The project exhibits tremendous respect for the area by proposing a sustainable minded building approach, while "blending into" the neighborhood through community designed tactics; including much needed child care space. My favorite component of the proposal is how it would improve our beautiful community by developing "green area" that includes additional trees, gardens, open space and a public green park. These types of improvements will maintain our neighborhood look and feel while adding innovation to the vicinity.

Finally, please find a PDF copy of this letter attached. I appreciate your time and urge you to strongly consider this special proposal.

Best,

Tyler Norsworthy

Dear Supervisor Stefani and SF Planning Commissioners,

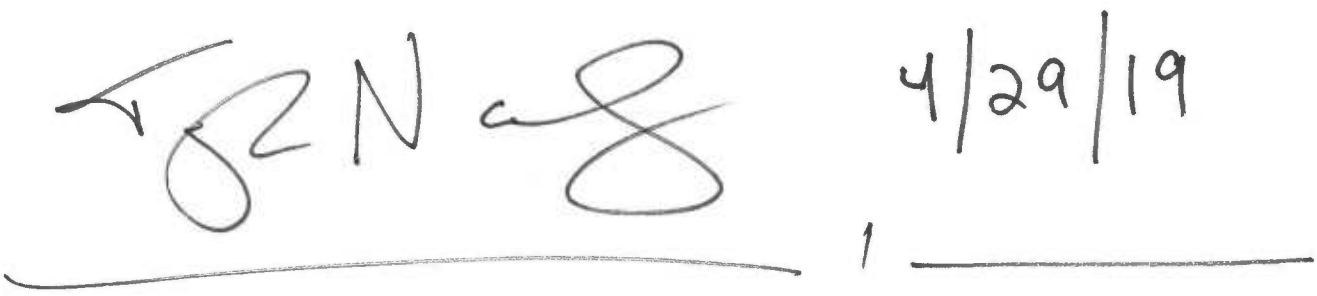
I writing to express my complete support for the proposed development at 3333 California Street. As a current resident of the neighborhood I was interested to review the project upon hearing of the idea; and I couldn't be more impressed with their well thought out, respectful proposal.

Housing is a constant concern within our city and this proposal would immediately address the matter for current/future residents of the area by producing 500+ homes. The project exhibits tremendous respect for the area by proposing a sustainable minded building approach, while "blending into" the neighborhood through community designed tactics; including much needed child care space. My favorite component of the proposal is how it would improve our beautiful community by developing "green area" that includes additional trees, gardens, open space and a public green park. These types of improvements will maintain our neighborhood look and feel while adding innovation to the vicinity.

I appreciate your time and urge you to strongly consider this special proposal.

Sincerely,

Tyler Norsworthy



**From:** Marie Que
**To:** Zushi, Kei (CPC)
**Subject:** Letter of Support for proposed development at 3333 California Street
**Date:** Tuesday, May 07, 2019 5:03:41 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtime resident of the neighborhood, I've seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,



Marie Que

| | |
|---|---|
| **From:** | Francis Scarpulla |
| **To:** | Stefani, Catherine (BOS) |
| **Cc:** | richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC) |
| **Subject:** | 3333 California Street Development |
| **Date:** | Wednesday, May 08, 2019 10:37:47 AM |

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani and Honorable Members of the San Francisco Planning Commission:

I have lived in District 2 going on 78 years, as did my parents, both sets of grandparents and all of my aunts and uncles, all of whom ran successful business in San Francisco. That is why I am writing to all of you to lend my support to the proposed development of 3333 California Street, which is a well thought out development, which will bring housing and open space to the Laurel Heights area, not to mention the increased tax revenue to the City and County through not only property taxes, but also increased spending at Laurel Village businesses.

I urge you all to support this thoughtfully developed project, which will permit families to stay in San Francisco and which will ensure that our lovely City continues to thrive.

Respectfully yours,

Francis O. Scarpulla

## Zushi, Kei (CPC)

**From:** Karen Scarpulla <karenmscarpulla@gmail.com>
**Sent:** Tuesday, May 14, 2019 8:15 AM
**To:** Stefani, Catherine (BOS)
**Cc:** richhillissf@gmail.com; Melgar, Myrna (CPC); millicent.johnson@sfgov.org; Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Development at 3333 California St.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani:

I support the proposed development at 3333 California Street. This project has been thoughtfully developed with input from the community, and marks a critical step forward in addressing San Francisco's housing crisis. Additionally, the proposal will connect the existing site to the greater Laurel Heights community, creating open spaces, community amenities, and homes.

The project has prioritized community input on design and use from the start. Throughout the design process, the developer held over 125 community meetings, engaged with community groups, and collaborated with two design-focused community advisory groups. These community leaders all provided helpful suggestions that will improve the project and enhance the neighborhood while providing much needed new housing.

Based on community feedback, the development team changed the design multiple times to continue to improve the project. With most units designed for two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

The project includes retail space in the hopes of reducing the need to drive outside of the neighborhood. The proposed retail will be designed to fill-in where goods and services are lacking, complementing the existing retail establishments and helping to stitch the neighborhood together. After collaboration with stakeholders, the designs were updated to fit with the neighborhood's 'classic San Francisco' feel so that the development fits into the neighborhood's character. Additionally, to keep the Laurel Heights community family-friendly, the project includes a mix of apartments and townhomes.

Having lived in the area for over 30 years, I look forward to this project contributing to the character of the neighborhood while also creating much needed new housing opportunities.

Sincerely,

Karen Mondon Scarpulla

--
K A R E N M O N D O N S C A R P U L L A, E.A.
T. 415.751.6164 F. 415.751.0889 C. 415.509.1846
3 7 0 8 C l a y S t | S a n F r a n c i s c o, C A | 9 4 1 1 8

**From:** Kristina Scarpulla
**To:** Stefani, Catherine (BOS); Richards, Dennis (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Zushi, Kei (CPC); Johnson, Milicent (CPC); Melgar, Myrna (CPC); richhillissf@gmail.com
**Subject:** 333 California
**Date:** Tuesday, May 07, 2019 5:46:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor / Planning Commissioner:

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a longtimeresident of the neighborhood, I've seen neighbors and friends move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walkable retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

Sincerely,

Kristina Scarpulla

--
Best regards,
Kristina Octaviano

## Zushi, Kei (CPC)

**From:** Stephen <stephenscarpulla@gmail.com>
**Sent:** Sunday, April 28, 2019 4:17 PM
**To:** Stefani, Catherine (BOS)
**Cc:** Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC); richhillissf@gmail.com
**Subject:** 3333 California Street

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor Stefani,

I am writing to urge you to support the proposed development at 3333 California Street. This project is a critical step forward in addressing San Francisco's housing crisis by providing much-needed housing for families in a transit-friendly neighborhood.

Over the past 8 years San Francisco has produced jobs 8 times faster than housing--a clear imbalance that makes it hard to live here, build a community, and raise a family. As a native San Franciscan and life-long resident of the neighborhood, I've seen neighbors, friends and family move out of the city due to the housing shortage. The combined effects of job creation and slow housing production have created difficult situations for newcomers and longtime San Franciscans alike.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project. The development would create 558 or 744 units that will help more people remain in this great city and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years.

Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods.

A family-friendly community like this is desperately needed in a city that has seen a rapid flight of young families. With most units designed with two or more bedrooms, along with five new acres of open space and a vibrant and walk-able retail district, the project will be a fantastic place to raise a family and a great asset for everyone who lives in the neighborhood.

Furthermore, the site's transit-rich location will give the new residents access to five different bus lines within walking distance. If the city wants to encourage people to drive less, to both lessen traffic and protect the environment, then projects in transit-rich locations like this need to be built.

San Francisco is an innovative city that values inclusion, diversity, and community. The people opposing this project value preserving the imputed equity of their homes and their views more than ensuring that San Francisco remains an inclusive, diverse community for all income classes.

Please, in this moment of crisis, I hope that you will support this project and ensure that the residents of San Francisco have access to housing, instead of a small group of privileged homeowners with a view they don't want blocked.

Sincerely,

Stephen Scarpulla, MBA
CA BRE License #01975812
(415) 601-5767
stephenscarpulla@gmail.com

## Zushi, Kei (CPC)

**From:** Jeff Schlarb <jeff@jeffschlarb.com>
**Sent:** Friday, May 10, 2019 11:03 AM
**To:** catherine.stefani@sfgov.com; richhillissf@gmail.com; Melgar, Myrna (CPC); Johnson, Milicent (CPC); Koppel, Joel (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Fwd: 3333 California
**Attachments:** Support for 3333 California.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Catherine,

It was great seeing you with your neighbor, Olivia, a couple of weeks ago, your block looks more amazing every day.

Please see our support letter for 3333 California. We are supporting the proposed development because it will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco.

we hope that this finds you well.

my best, always,

js

**jeff schlarb** | principal.designer
M. 415.336.3550
T. 415.295.4567
www.jeffschlarb.com

3525 Sacramento St.
san francisco, ca 94118

Dear Supervisor Catherine Stefani and Planning Commissioners:

My name is Jeff Schlarb and I have been a resident and small business owner in San Francisco for nearly 20 years. I am writing to express my support for the proposed development at 3333 California Street. I have met with a few of the project managers and developers of this project and I strongly believe this project marks a critical step forward in addressing San Francisco's housing crisis. The development at 3333 California would create 558 or 744 units, allowing more people to remain in the city and bringing new homes to San Francisco's west side. Additionally, the proposed development will provide over 5 acres of open space where kids can play, neighbors can relax, and friends can spend time with one another in this part of the city. It will help create a family-friendly community environment that is desperately needed in a city that has seen a rapid flight of families leaving San Francisco. Furthermore, it will create an environment for employees that work in the neighborhood to frequent and enjoy.

I am glad to see the City government put forward a goal of producing 5,000 residential units annually for the next 20 years. In order to help realize this goal, I hope that you will support the 3333 California project and bring new homes to San Francisco's west side, where very little new housing has been built over the past 40 years. Additionally, this new project will also include affordable housing that will help preserve the diversity of our city and the vibrancy of our neighborhoods. San Francisco is an innovative city that values inclusion, diversity, and community. In this moment of crisis, we hope that you will support this project and ensure that the residents of San Francisco have access to housing.

The development at 3333 has the support of my family, as well as my business Green Couch Staging and Design Inc. which has seen first-hand the impact the housing crisis has had on my employees.

Sincerely,

Jeff Schlarb

## Zushi, Kei (CPC)

**From:** Frances Stark <frances.w.stark@gmail.com>
**Sent:** Tuesday, August 13, 2019 2:46 PM
**To:** Stefani, Catherine (BOS); Melgar, Myrna (CPC); Koppel, Joel (CPC); Fung, Frank (CPC); richhillissf@gmail.com; Johnson, Milicent (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** 3333 California Street

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors and/or Planning Commissioners:

Building more housing in San Francisco is essential to creating a more equitable and vibrant city. New housing in San Francisco must also be sustainable. The 3333 California development in Laurel Heights is not only adding more housing—it's adding sustainable housing. That's why, as a 5th generation San Franciscan and proud Jordan Park neighborhood resident, I support 3333 California.

The 3333 California development team intends to meet or exceed the requirements of the San Francisco Green Building Ordinance by achieving a minimum of LEED Gold for Neighborhood Development Plan certification. The project will also serve as a net positive development for the community and the environment, exceeding code requirements for energy and water. 3333 California also adds density in a smart way. When our cities increase density with in-fill development, we reduce greenhouse gas emissions, and people utilize public transit more. Dense urban environments make a positive impact on community wellness, material and waste management, and our urban ecosystems.

3333 California will be constructed using natural, top-quality materials without sacrificing important view corridors. Efficient and renewable energy systems and waste management will minimize the project's carbon footprint, and the use of green roofs, storm-water capture, and solar panels will improve the eco-friendliness of 3333 California.

The development provides unprecedented sustainability features without compromising San Francisco's natural beauty. Landscaping throughout the site celebrates California's indigenous biodiversity, inspired by a Cypress grove, flowering gardens, a verdant ravine, Oak trees, Walnut trees, Redwood trees and other old-growth trees. A large green park is perched on the southwest corner of the site above the neighborhood to take in scenic vistas, including the Golden Gate Bridge and downtown city views.

3333 California isn't simply just providing 15 new residential buildings with 744 new homes. It's an asset uplifting our community's health today and into the future. I hope you support this critical project.

Sincerely,

Frances Stark

San Francisco

## Zushi, Kei (CPC)

**From:** Zachary Thomas <zthomas.nc@gmail.com>
**Sent:** Friday, August 16, 2019 9:44 PM
**To:** Stefani, Catherine (BOS); Melgar, Myrna (CPC); Koppel, Joel (CPC); Fung, Frank (CPC); richhillissf@gmail.com; Johnson, Milicent (CPC); Moore, Kathrin (CPC); Richards, Dennis (CPC); Zushi, Kei (CPC)
**Subject:** Support for the 3333 California Street project - PLEASE BUILD!

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi, everyone! As a SF resident who lives in D2 by Fort Mason, I wanted to voice my support for 3333 California Street.

The proposed 3333 California mixed-use development in Laurel Heights answers the city's housing needs by providing 744 new housing units. These units aren't just studios—approx. 58% of total homes are family friendly: two, three, and four-bedroom homes.

The City has set an important goal of producing 5,000 new housing units annually for the next 20-years. The 3333 California project alone can help the city meet almost 20% of that important annual goal.

The 3333 California project has been guided by strong public policy and is balanced by community input. Throughout the development process, the Prado Group held over one hundred and sixty community meetings, engaged with the community, city leaders, and collaborated with two design-focused community advisory groups. These community leaders all provided helpful suggestions that will improve the project and enhance the neighborhood while providing much needed new housing.

Based on Community and District Supervisor's feedback, the development team changed the design multiple times and has now added 186 new, on-site affordable housing units, a quarter of all the project's housing, for low-income seniors. In the long term, 3333 California represents the types of solutions our city needs. In the short term, it's an opportunity for more families to stay and thrive in our incredible city. I urge you to support this project.

Thanks,

Zachary

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Zachary Thomas
https://www.linkedin.com/in/thomaszi | zthomas.nc@gmail.com
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# ATTACHMENT D

**San Francisco Public Works Independent Peer Review of 3333 California – Proposed Alternative, August 15, 2019**

SAN FRANCISCO PUBLIC WORKS

London N. Breed
Mayor

Mohammed Nuru
Director

**Julia Laue, AIA, LEED AP**
Principal Architect
and Bureau Manager

Bureau of Architecture
Building Design & Construction
30 Van Ness Ave.
San Francisco, CA 94102
tel 415-557-4700

sfpublicworks.org
facebook.com/sfpublicworks
twitter.com/sfpublicworks

August 15, 2019

Kei Zushi, Senior Environmental Planner
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Re: **Independent Peer Review of 3333 California – Proposed Alternative**
**Planning Department Case No. 2015-014028ENV**

Dear Mr. Zushi,

You have requested that the Department of Public Works, Bureau of Architecture review and evaluate information provided by the Prado Group and SKS (hereafter referred to as the "project sponsor"), the project sponsor of the 3333 California Street project, Planning Department Case No. 2015-014028ENV, regarding the "Community alternative" submitted by the Laurel Heights Improvement Association (LHIA) in response to the Draft Environmental Impact Report (Draft EIR) prepared for the project. We have completed our review and evaluation, and are pleased to submit this report.

In this report, "proposed project" refers to the project proposed by the developer as represented by the "Planning Application Re-Submittal-1," dated February 22, 2019 and the "Community alternative" refers to the proposed alternative project submitted by LHIA on January 8, 2019. The Community alternative is described in the document entitled "Community Full Preservation Alternative Overview."

Contained herein is background information, an analysis of the April 2, 2019 letter from Don Bragg to Kei Zushi, regarding "Response to Request for Information regarding 3333 California;" a description of the key findings; and a list of documents reviewed. This report is based on the Public Works staff's knowledge and professional judgement in the standard practice of the architectural and construction industries; the City's permitting process and requirements; and applicable codes, regulations, and ordinances.

## BACKGROUND AND EXISTING CONDITIONS

The Planning Department is reviewing and responding to public comments submitted on the Draft Environmental Impact Report (DEIR) prepared for the 3333 California Street Mixed-Use Project. As part of the process, staff is responding to comments from LHIA. In a letter dated March 20, 2019, the Planning Department requested information from the sponsor to help the department evaluate the Community alternative with respect to the characteristics of the project site, methods and practice of construction, and physical feasibility. The department received additional information from the sponsor on April 2,

2019. Planning staff has requested that the Bureau of Architecture at Public Works conduct an independent review of the sponsor's evaluation of the LHIA Community alternative.

The subject lot is bounded by California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street and has the address 3333 California Street. The lot contains the existing 455,000 square foot (sf) "main building", which is a 4-story office building with a three-story partial basement built in 1954, and subsequent additions. There is also a small annex building located at the northwest corner of the lot, at California and Laurel streets. The site is sloped and features asphalt parking lots on the west and north sides, brick landscape walls, a concrete trellis at the entry court, concrete paving, a large expanse of lawn on the south side at Euclid Avenue, and numerous trees and shrubs primarily on the east and south edges of the existing main building, as the site slopes down to Presidio and Masonic avenues.

The property is considered a historic resource for the purpose of environmental review because it is listed on the California Register of Historical Resources.

## SUMMARY OF PROPOSED PROJECT

The proposed project would modify the main building by (1) removing the lower projecting wings, (2) rebuilding the 4th floor, (3) adding a 5th, 6th and partial 7th floors, and (4) renovating all interiors and the entire exterior envelope as required for the new residential use. The proposed project includes removing 217,205 sf of the existing main building and adding 83,607 sf, for a new total area of 321,402 sf in what the proposed project calls Center Building A and Center Building B. The proposed project would remove the annex building (also referred to as the service building in some of the documentation) located at the northwest corner of the site, and all of the site's landscaping except for 10 existing mature trees.[1]

The proposed project would construct 13 new buildings, including seven duplexes along Laurel Street, and adaptive reuse of the existing main building, which would be divided into two separate residential buildings. New underground garages would be built below seven of the new buildings. All underground garages except the Laurel duplexes would be interconnected with below-grade access tunnels, thus reducing the number of vehicular access points. Plaza Building A and Plaza Building B, along California Street, would include residential and retail uses, and the Walnut Building (along California Street and the extension of Walnut Avenue), would include retail, office and childcare uses. Center Buildings A and B, and the Masonic, Euclid, Mayfair, and Laurel duplex buildings would include residential uses only.

[1] Two of the retained trees appear to be Monterey Cypress trees located in the proposed Cypress Square, which LHIA claims have existed since the site was used as the Laurel Hill Cemetery based upon Figure 5 found in Exhibit 3 to LHIA's January 8, 2019 letter addressing project alternatives. The Historic Resource Evaluation – Part I, prepared by Michael Hibma with LSA dated December 2017, states that several large onsite Monterey Cypress trees are likely remnant trees from the Lone Mountain/Laurel Hill Cemetery (see pp. 9, 23, and 27 of the Historic Resources Evaluation – Part I).

A variant is also proposed that would differ from the proposed project only in the development of the Walnut Building. Under the variant, the Walnut building would be approximately 67 feet in height, and in total, the variant would provide up to 744 residential units and no office uses.

Plans provided for the proposed project have a sufficient level of architectural information to convey size, areas, and arrangement of uses and to demonstrate substantial compliance with Planning Code requirements and basic life-safety code requirements. Where our analysis leads to a conclusion not specifically stated in the project sponsor's response dated April 2, 2019, the phrase "based on Public Works analysis" is used.

## SUMMARY OF LHIA'S "COMMUNITY ALTERNATIVE"

The LHIA Community alternative would keep most of the existing office building and convert it to residential use. The Community alternative would also demolish the circular speed ramps to the existing parking garage; but does not describe how cars can access the proposed basement parking without these ramps. Although not disclosed in the comment, the Community alternative would also likely require the demolition of approximately 50 feet of the northern portion of the three stories of partial basement parking, due to the placement of the proposed Walnut Building, which is proposed to be located very close to the existing main building's northern wing. This analysis is based on comparison of the Community alternative "Site Plan", the aerial photographs in Exhibit 3,[2] and drawing C2.01 "Existing and Proposed Building Overlay" from the proposed project.

The Community alternative proposes to retain all the site and landscaping work on the south side of the site, including the primary brick landscape walls, the entry court on the west side including concrete trellis, the lawn areas, and much of the landscaping on the south side that has been added over the years as part the Fireman's Fund office building according to the series of aerial photographs in Exhibit 3. It appears that all six of the large trees in the East and West parking lots noted on page 2 of Exhibit 3 would be removed as part of the Community alternative to make way for proposed new residential construction, even though LHIA states that California Back Building would be sculpted around the large Monterey Cypress trees (see p.7 of Appendix A[3] of LHIA's January 8, 2019 letter). Denise Bradley Cultural Landscapes states that these trees appear to have been part of the Laurel Hill Cemetery. These six trees are referred to in the Exhibit 3 as #24, #25, #118, #119, #120 and #121.

The Community alternative would demolish the annex building located at the northwest corner of the site, and construct four new buildings. These four buildings include a new Mayfair building very similar to the proposed project but without the below grade parking, a California Front Building,[4] a California

[2] Exhibit 3 in this memo refers to Exhibit 3 (April 24, 2018 letter from Denise Bradley Cultural Landscapes to Kathy Devincenzi, Location of Trees that were part of the Laurel Hill Cemetery) to LHIA's January 8, 2019 letter, unless otherwise noted.

[3] Appendix A in this memo refers to Appendix A (Community Full Preservation Alternative Overview) of LHIA's January 8, 2019 letter, unless otherwise noted.

[4] LHIA states that the California Front Building would include 14 new buildings containing 56 units for middle-income families. In contrast, LHIA does not specifically provide the number of buildings that would be included in the

Back Building over a 1-story basement garage, and a Walnut building over a 1-story basement garage. All new buildings would include residential uses only.

LHIA's January 8, 2019 letter includes the "Site Plan" and the "Circulation Plan" which are diagrammatic plan views of the site, and the text-based document, "Appendix A: Community Full Preservation Alternate Overview." These documents do not have a sufficient level of architectural information (e.g., a scaled site plan showing the dimensions of the subject lot and buildings, landscaped areas, and setbacks, floor plans, roof plans, sections and elevations) to convey size, area, arrangement of uses or to demonstrate compliance with Planning Code requirements and basic life-safety code requirements.

## METHODOLOGY, ASSUMPTIONS, AND DEFINITIONS

- Within this document we use the term residential to mean multi-family residential buildings that have more than two units or are otherwise required to be designed to the California Building Code (which applies to buildings with two or more residential units) and not the Residential Code (which applies to single-family homes). Public Work's analysis is based on the proposed project and the Community alternative would both be required to comply with the California Building Code.

- For measurement of areas at each floor level, we use the following terms which may differ from how the terms are used by Planning Code, Building Code, or by the Building Owners and Managers Association ("BOMA"):
    - Gross Area is measured at the exterior face of exterior wall such as the exterior face of window wall or exterior face of cladding. Gross area includes structure and all vertical penetrations such as shafts. This gross area also represents the footprint of the building.
    - Usable Area is measured to the exterior walls enclosing occupiable spaces and excludes vertical shafts, stairs, and elevators.
    - Net Area is measured to the interior wall of the enclosing occupiable spaces and includes all areas within this perimeter other than common shafts, stairs or elevators already deducted above. The net areas is the saleable or leasable area.

- To calculate the number and size of units based upon the available footprint, our analysis uses standard metrics such as sizes of typical components such as units, corridors, and parking stalls. These components are arranged into common configurations as much as possible to maximize efficiency. Typical sizes and configurations of these components are not published standards but are developed by each professional through experience. We use the term layout study to describe the architectural process of arranging components into acceptable configurations for the purposes of determining best approaches to solving particular problems.

California Back Building, but states that each building would be approximately 28.5 feet wide. (See Appendix A of LHIA's January 8, 2019 Letter).

- The term efficiency is used herein, and frequently by the project sponsor in their review of the Community alternative. With regard to residential spaces, efficiency is the percentage of usable area to the gross area of a space or building. Typically, multi-family building designers use the term efficiency to describe the percentage of the building that can be marketed, leased and sold as residential units. The project sponsor states that they expect most residential projects to have efficiencies of 70% to 74%. Based on our experience in large multi-family residential and mixed-use projects, we agree with the project sponsor and refer herein to the buildings within the Community alternative as "efficient" or "inefficient" by comparison to the target 70% to 74% efficiency.

- Building areas can be measured in different ways and there are different methods for measurement depending on the different purposes. For example, areas are calculated differently to demonstrate compliance with planning codes, to demonstrate compliance with building codes, to record a deed for condo maps, or to establish areas for commercial leases. While BOMA published a standard for measuring areas of multi-family residential projects in 2010, most developers and architects have had their own methods for many years. We consider it best practice to define the method used for each project's documentation.

- For projects at an early conceptual level where only block diagrams are used, such as the Community alternative, estimates of the overall footprint of the building is the only measurable area. Without additional floor plans that show and dimension units, corridors, structure, mechanical shafts, etc., efficiency percentages are the only means available to calculate the approximate amount of residential area.

- Once floor plans are complete to the point of showing all rooms, corridors, structure, mechanical shafts, etc., it is possible to tabulate usable area, which excludes vertical shafts, stairs, and elevators. The usable area is very close to the actual net space within one residential unit that is marketed and sold or leased.

- The project sponsor also uses the term efficiency with regard to parking. The project sponsor states, "In the context of parking, efficiency is the total gross area of parking facility divided by the number of parking spaces." We agree with this definition and the project sponsor's consideration of 300-325 square feet per stall as a theoretical maximum rate of efficiency, with 400-500 square feet per stall as more typical for underground parking in mixed-use projects, where structural columns and layouts are compromised to meet the needs of residential or retail uses above in addition to cars.

- The term junior 1-bedroom is a bedroom configured to allow the bedroom to have access to light and air through the living area. The bedroom has its own space but must be substantially open to the living area to meet code requirements. Junior 1-bedrooms are smaller than 1-bedroom units.

- The term studio combines the sleeping areas with the living areas within one room. Studios are smaller than junior 1-bedrooms.

- The term double-loaded corridor describes an arrangement of units along both sides of a linear corridor. This arrangement is the most efficient and allows for a minimum number of stairs and elevators. A single-loaded corridor arrangement has units along only one side of a linear corridor and is typically less efficient because only one side of the building has access to required light and air. Single-loaded and double-loaded can also be used to describe arrangement of parking stalls along drive aisles.

- Flats are units that are stacked in a vertical arrangement with all access provided vertically via stairs and elevators; there are no corridors in flats.

- The term window wall is used to describe exterior fenestration, or windows, that are supported by the floor level slab below and the next floor level slab above. Window walls typically occur in continuous sequence such as on all four sides of a building. This term is used by TreanorHL in Exhibit 1,[5] to describe the existing fenestration system at the existing main building.

- For purposes of this analysis, we assume standard 12-foot planning modules for widths of living rooms and bedrooms. For example, a studio would be 12 feet wide (combined sleeping and living room), a 1-bedroom would be 24 feet wide (living room and bedroom), and a 2-bedroom would be 36 feet wide (living room plus 2 bedrooms). Room widths as narrow as 10 feet are acceptable only for projects focused on small units for second or third bedrooms, and will typically only be used for a small percentage of units in a building. Larger widths are typically less efficient and can result in larger units but without a commensurate increase in the number of bedrooms. This is because to comply with the Building Code, all habitable spaces such as living rooms and bedrooms require access to light and air (e.g., a window). Rooms that do not have required access to light and air could be used for other non-habitable rooms such as bathrooms, closets, or kitchens. The term habitable is defined by the Building Code.

- For purposes of this analysis, we assume standard unit depths of 30 to 35 feet. Deeper units are typically less efficient, as there would be less window area available for bedrooms given the same unit area. We agree with the project sponsor's assumption of average unit sizes: 1-bedrooms of 750 square feet, 2-bedrooms of 1,100 square feet, and 3-bedrooms of 1,350 square feet.

- The project sponsor states that the Community alternative plan for the existing main building would result in the majority of units that range from 16 feet wide by 50 feet deep to 13 feet

[5] Exhibit 1 in this memo refers to Exhibit 1 (January 7, 2019 memo prepared by Nancy Goldenberg with TreanorHL) to LHIA's January 8, 2019 letter, unless otherwise noted.

wide by 61 feet deep. We agree that such unit configurations are undesirable as they will be long and deep studios or junior 1-bedroom units.

## ANALYSIS OF PROJECT SPONSOR'S RESPONSE TO REQUEST FOR INFORMATION REGARDING 3333 CALIFORNIA STREET

This section is an analysis of the project sponsor's response to the Planning Department's request for information to evaluate the Community alternative as contained in the April 2, 2019 letter prepared by Don Bragg, Senior Vice President of the Prado Group. The numbered items correspond to the project sponsor's numbering of their responses. We have summarized the question in bold text followed by our analysis.

1. **Is it possible to determine the LHIA Community alternative's dwelling unit mix and unit sizes by type for each proposed structure? If so, calculate this information and state assumptions and sources used.**

   a. The project sponsor analyzes the five main building groups in the Community alternative: California Front and Back Buildings, Walnut Building, Mayfair Building and the existing main building. The project sponsor states that the Community alternative could provide 492 units, not the 558 units stated in the comment letter. In a follow-up email dated April 4, 2019, the project sponsor revised this total number to 470 units. Based on Public Works analysis, we estimate that 473 units could be built in the Community alternative scheme. The Table 1 below compares the number of units in the Community alternative that LHIA claims it could provide, with the project sponsor's and Public Works' analysis of what the Community alternative could provide:

**TABLE 1: NUMBER OF RESIDENTIAL UNITS**

| BLDGS IN COMMUNITY ALTERNATIVE | LHIA'S DESCRIPTION OF COMMUNITY ALTERNATIVE | SPONSOR'S REVIEW OF LHIA ALTERNATIVE | PUBLIC WORKS ESTIMATE |
|---|---|---|---|
| EXISTING MAIN BUILDING | 292 | 231 | 226 |
| CALIFORNIA FRONT | 56 | 56 | 56 |
| CALIFORNIA BACK | 56 | 40 | 40 |
| WALNUT | 118 | 107 | 115 |
| MAYFAIR | 36 | 36 | 36 |
| TOTAL | 558 | 470 | 473 |

   b. At the existing main building, the Community alternative would keep all areas of the building above grade that are usable for residential uses. LHIA does not state how much area of this building would be used, but proposes 292 units at an average of 798 square feet each, resulting in 233,016 square feet of residential area. It is unclear if this is gross or net residential area. In contrast, the project sponsor states that only 231 units are possible due to there being 263,500

sf of gross residential square feet available and 184,450 net residential square feet, or (263,500 x70% / 798 = 231).

c. In the existing building, we agree with project sponsor's conclusion that the width of the existing building, shown at 144'-8" wide in the proposed project drawings, would create inefficient units. Based upon the Community alternative diagrams and Appendix A description, there would be one residential unit at each side with a light court and two single-loaded corridors in the middle. 798 square foot units at 50-feet deep would result in 16-foot-wide units (798/50 = 15.96). Such narrow units will be restricted to studios or junior 1-bedroom units since there is space for only one room to face the glass (providing required access to light and air). Given the size of the building, this means that the Community alternative would have at least 75% of the project's total units as large studios and junior 1-bedroom units.

d. Public Works has analyzed the computer-aided drawing (CAD) files of the existing building contained in the file "Building Plans_2017-0726 BDC Areas.dwg." For the existing building, we have determined there is a total of 458,292 gross area of the building, of which after subtracting 130,578 sf for parking; 4,112 sf for the auditorium; 11,500 sf for childcare (stated by LHIA but not shown in CAD); and 1,183 Sf for café (stated by LHIA but not shown in CAD), there is a total of 271,154 SF area for residential area.

e. Of this 271,154 SF, we subtract 91,090 SF that would be required for corridors or are otherwise unfit for use within residential units. We assumed 6-foot-wide corridors, wider than the typical 5-foot-wide corridors due to the unusually long corridors since some corridors are over 300 feet long. We also deducted areas that are over 50 feet from exterior windows as we consider that space to be unusable within units because they would be too remote from bedrooms or living areas that must have access to light and ventilation per the Building Code. These areas could be amenity spaces such as storage, bike storage, meeting rooms or other communal spaces that do not need windows. As an example, half of the perimeter of Level 1 and twenty percent of the perimeter of Level 2 are below grade, cannot accommodate windows unless large lightwells are created, and are thus unsuitable for residential units.

f. Based on our calculations, if the units averaged 798 sf (as proposed in the Community alternative), the remaining 180,064 square feet could accommodate 226 units. This 798-sf unit is usable area.

g. We agree with project sponsor's and LHIA's analysis that the California Front Buildings, composed of fourteen 28.5' by 75' four-story buildings, can accommodate 56 units (with four units (flats) in each of the 14 buildings). We also support the project sponsor's conclusion that these units would be less than the 85% efficiency assumed in LHIA numbers (1,821 SF unit/2,137.5 SF footprint = 85%). An efficiency percentage of 85% is unusually high, and not reasonable. The arrangement of having one elevator, two stairs, corridor, and mechanical shafts within each 28.5' by 75' building (in order to include "direct access" to the parking garage and meet the building code's egress and accessibility requirements) would reduce efficiency below the stated 85% to approximately 65%. At approximately 2,000 square feet, the units would be large enough to fit a mix of 2-bedroom and 3-bedroom units.

h. For the California Back Buildings, we agree with the project sponsor's conclusion that the 40-foot-deep units are not buildable. Based on Public Work's layout studies, the arrangement of

having one elevator, two stairs, a short corridor and mechanical shafts within each 28.5' by 40' building, would reduce efficiency to 42%. The resulting unit size would average 425 square feet. There are no dimensioned site plans to confirm how many 40-foot deep units would be provided, but upon review of the TreanorHL "Site Diagram", and the figures within the memorandum from Denise Bradley Cultural Landscapes (Exhibit 3), we believe the loss of sixteen units to be a reasonable estimate based on the trees' impact to four of the 28.5-foot-wide buildings.

i. The project sponsor states that to stay within the 40-foot height limit, the California Back Building would be built at the height of the rear yard of the California Front Building. The massing for the Back Building could still work, but would require the "rear yards" of the Front Buildings to be considered as mostly common open space – not "private" as described in comment - in order to access the Back Buildings through the Front Buildings' "rear yards" (otherwise the first- and second-floor units in the Back Building must be accessed from the south side of the Back Building and this would require a greater amount of excavation). Therefore, Public Works agrees with the project sponsor's conclusion that this is an issue not addressed in the Community alternative.

j. For the Walnut Building, the project sponsor concludes that only 3-1/2 stories could be built to stay within a 40-foot height limit. Public Works believes that the 'E' configuration of the building footprint will allow for the Walnut Building to have double-loaded corridors with the units on the south side facing inwards towards the courts. Only some of the units on the lowest level of the west side would be buried below grade. Therefore, Public Works believes that only 3 units would be lost, so that 115 units could be provided.

k. We agree with the project sponsor and LHIA that the Mayfair Building, which is very similar to the proposed project's Mayfair building, can achieve 36 units. In both projects this is a small residential building using a conventional layout with an elevator and two stairs with units arranged along a double loaded corridor. However, in the Community alternative version, the parking would be in the garage below the adjacent California Front and Back Buildings, which would preclude the "direct access" described in the LHIA comment. By "directly accessed," Public Works expects the parking to be within the same building.

l. In summary, based on our analysis, and our review of the project sponsor's assessment, we believe the Community alternative could provide a maximum of 473 units: 115 units in the Walnut Building, 56 units in the California Front Building; 40 units in the California Back Building, 36 units in the Mayfair Building, and 226 units in the existing building.

m. The average unit sizes are less than 900 sf in the Walnut Building, and less than 800 sf in the existing main building. Thus, these buildings would have mostly junior 1-bedroom and 1-bedroom units as noted in the table below. Planning Code section 207.7 requires projects to provide a minimum of 25% 2-bedroom units and a minimum of 10% 3-bedroom units. The Community alternative would be required to provide fewer total units in order to meet this required unit mix. We agree with the project sponsor's estimated unit mix that the Community alternative could provide, as shown in Table 2 below.

**TABLE 2: UNIT MIX**

| UNIT TYPE | SPONSOR'S REVIEW OF LHIA ALTERNATIVE | PUBLIC WORKS ESTIMATE |
|---|---|---|
| STUDIO OR JR 1-BEDROOM | 49% | 48% |
| 1-BEDROOM | 27% | 25% |
| 2-BEDROOM | 17% | 20% |
| 3-BEDROOM | 7% | 7% |
| TOTAL | 100% | 100% |

n. Based upon the above analysis, we agree with the project sponsor's conclusion that the community alternative would not support 558 units, nor would it comply with the unit mix requirements of Planning Code Section 207.7.

**2. The Community alternative describes site circulation and access points for single-level, underground parking garages with 460 on-site spaces. Please confirm constraints or conditions would allow development of the access points, 460 on-site parking spaces, passenger and commercial loading as shown in the attached Circulation Plan.**

a. The Community alternative proposes to re-use the existing garage below the existing main building and to provide a one-level below grade parking garage below the Walnut and California Front and Back Buildings, for a total of 460 spaces. In the table below we have summarized the car parking stalls in the Community alternative, the project sponsor's review of the Community alternative, and an estimate based on Public Work's analysis. The following is the Public Works analysis.

**TABLE 3: PARKING STALLS**

| UNDERGROUND GARAGES IN COMMUNITY ALTERNATIVE | COMMUNITY ALTERNATIVE | SPONOR'S REVIEW OF LHIA ALTERNATIVE | PUBLIC WORKS ESTIMATE |
|---|---|---|---|
| CALIFORNIA FRONT AND BACK BLDG | 460 | 183 | 75 |
| WALNUT BLDG | | | 106 |
| EXIST. MAIN BLDG | | 154 | 142 |
| **TOTAL PARKING STALLS** | **460** | **337** | **323** |

b. The project sponsor states that the one-level below grade parking garage underneath the Walnut Building and California Front and Back Buildings would have a gross area of approximately 110,000 gross square feet (65,000 + 45,000). This is gross area, inclusive of structural components, mechanical equipment, drive aisles for circulation, etc. The project

sponsor states that the inefficiencies of having an elevator and stairway for each of the 28 buildings at the California Front and Back building would result in an inefficient garage and estimates that 600 SF per stall is appropriate, which would result in 183 stalls (110,000/600=183 stalls). The project sponsor states an average efficiency of 425 square feet per stall could be used if the design were changed to provide centralized stairs and elevators, resulting in 258 stalls (110,000/425=258). However, Table 3 above includes the 183 stalls based on the configuration LHIA describes for the Community alternative on page 7 of Appendix A with a total of 28 buildings with direct access from each building to the basement level garage.

c. Public Works has analyzed the Walnut Building and California Front and Back Buildings separately due to the complexity of the arrangement of elevators and stairs at the California Buildings. Based on Public Work's analysis, the one-level below grade parking garage underneath the California Front and Back Buildings would have a gross area of 63,840 gross square feet (160'-0" x 28'-6" x 14) (compared to the 65,000 sf estimated by the project sponsor). However, the 63,840 gross area needs to be reduced by the narrower depth of 40 foot lots at the California Back buildings since the LHIA states that these lot depths would accommodate existing trees. Therefore, the garage would only able to use the narrower dimensions of 399 feet (28.5' x 14) and 140 feet, or 55,860 GSF. At 425 sf per stall, this allows of a maximum of 131 stalls.

d. We agree with the project sponsor that, to provide "direct access" the California Front and Back Buildings would require 28 elevators and 28 stairs that reached to the garage level. Each of the 28 buildings would require accessible access via elevator due to the grade change and direct stair access. This is a significant loss of space in which two parking stalls would be likely removed for each of the elevators and stairways for each of the 28 buildings, resulting in a total loss of at least 56 stalls. Therefore, Public Works estimates include 75 stalls as shown in Table 3 above (131-56=75 stalls).

e. The Walnut garage, at approximately 45,000 square feet and 425 square feet per stall, could provide approximately 106 parking stalls.

f. We agree with the project sponsor that the Community alternative would not be able to access most of the existing below-grade garage because the circular access ramps would be removed to build the Walnut Building. The Walnut Building, per the Treanor HL Site Diagram, is shown as being constructed over the area where the circular ramps are and over a portion of the existing garage.

    1 The project sponsor concludes that 154 stalls could be retained below the existing main building if internal ramps were constructed displacing 60 stalls. Public Works estimates that a maximum of 142 stalls could be retained based on analysis below.
    2 Two minimum 12-foot wide ramps would be required at each level. Due to column layouts, a single aisle of 20 to 24 feet would not fit within the existing column bays.
    3 Since the floor to floor height of the existing garage is 10'-6" per the proposed project's drawing sheets A6.02, A6.03, and A6.04, the ramps with top and bottom landings would be about 126 feet in length. The 126 feet includes two 25-foot landings, two 10-foot transition zones at 1:12.5 slope and a 66-foot sloped ramp at 1:6 slope. To accommodate 2 ramps at each level, there would be a loss of about 72 stalls.

4 Since all existing drive aisles are needed to access parking, any new ramps would displace parking stalls and not access aisles.
5 For this study, Public Works assumes the new ramps would be straight rather than circular since the configuration of the existing garage lends itself to straight ramps. This study did not take into account the requirements for structural modifications to the existing garage to construct the ramps.

g. Based on the above discussion, the Community alternative would not be able to include 460 parking spaces in one level below the California Buildings, the Walnut Building and in the existing garage. Either fewer spaces could be provided or additional levels of parking (requiring additional excavation) would be required.

h. We agree with the project sponsor's conclusion that due to the sloping site, the garage below the California Front and Back Buildings would effectively require two levels of excavation at this location for one level of parking.

i. We agree with the project sponsor's assessment that an additional level of below grade parking would be necessary in the Community alternative to provide 460 spaces described in the comment letter. An additional 123 car spaces would be required if using the project sponsor's estimate of 337 stalls or an additional 137 car spaces would be required if using Public Work's estimate of 323 stalls.

j. Any additional levels of parking would require additional excavation. As the Community alternative also provides fewer units and smaller units, any additional residential area added to increase the number of units would require additional increases in parking and excavation, if the Community alternative is to achieve the 460 parking stalls as stated on page 3 of Appendix A.

k. With regard to freight loading, we agree with the project sponsor's conclusion that the Community alternative could not include underground freight loading and unloading accessed off Presidio Avenue using the existing garage openings. The height of the existing opening on Presidio Avenue and the height of the existing parking levels are not tall enough to accommodate freight vehicles. Therefore, we agree with the project sponsor that the Community alternative could not physically include underground freight loading or unloading spaces, as described page 8 of Appendix A.

3. **"What is the anticipated amount of excavation that would be needed to construct the LHIA alternative or variant?"** We estimate that one additional level of parking below the Walnut and California Front and Back Buildings would be required to provide the number of parking spaces referenced in the comment (a total of 460 on-site spaces). Due to the slope of the site as discussed above, this would require two levels of excavation plus foundation depth along California Street, and three levels plus foundation depth in other areas (i.e., on the south of the excavation area along California Street) due to the up-slope of the site.

4. **Pedestrian Pathways**: We agree with the project sponsor's observation that the Community alternative appears to rely on the few existing pedestrian pathways between the north and south sides of the existing main building to provide for a north-south connection between California Street

and Euclid Avenue. These paths do not appear to be accessible per ADA requirements due to the multiple flights of stairs, in particular the path leading through the existing building along the eastern side.

## ADDITIONAL PUBLIC WORKS ANALYSIS

This section includes additional information based upon Public Work's analysis of the Community alternative.

a. The Community alternative does not demonstrate compliance with bulk regulations (Planning Code Section 270), Rear Yard (PC Section 209), open space (PC Section 135), clear area per (PC Section 140), or bicycle parking (PC Section 155). In addition, there is no description of any spaces for trash and recycling access. As noted above, vehicles used for trash and recycling could not be accommodated in the existing garage accessed from Presidio Avenue due to the height of the opening and the height of the levels in the garage.

b. The Community alternative includes retention of the historic landscapes that surround the existing main building on the east, west, and south sides. Without new private yards or decks adjacent to the existing main building, none of the new units at the existing building would have private open space.

a. On page 3 of Appendix A, LHIA states the Community alternative would be built in 3 years with concurrent renovation of the main building and new construction of the Walnut and California Front and Back Buildings. A 3-year construction schedule seems challenging given there would be excavation along the entire California Street frontage; approximately 469,000 gross square feet of new construction including garage at the Walnut and California Front and Back buildings; and 458,000 gross square feet of renovation at the existing building. With excavation, construction and renovation occurring across much of the site at the same time, the only areas suitable for construction staging would be the asphalt parking lot of the Entrance Court unless some of the historic landscaped areas would be used.

b. On page 9 of Appendix A, LHIA describes a variation of the Community alternative we are referring to as the Community alternative variant, or variant. This variant includes 3 additional floors at the Walnut building for a total of 7 stories of residential units. These extra floors would provide 118 additional units and all the units in the building would be reduced from an average of 809 square feet to 732 square feet with 84 studios or junior 1-bedrooms and 134 1-bedroom units. Given the added floors and reduced unit size, the 218 units in the Walnut building, as stated by LHIA, is reasonable and increases public works' estimated overall unit count 473 (Community alternative) to 576 units (Community alternative variant). The overall project unit mix would change from what is shown in Table 2 (48% Studio, 25% 1-bedroom, 20% 2-bedroom, 7% 3-bedroom) to 54% Studio, 30% 1-bedroom, 11% 2-bedroom, 5% 3-bedroom.

## SUMMARY OF ANALYSIS

The Community alternative proposes to provide 558 residential units, 460 parking spaces, and required freight loading underground. Public Works agrees with the project sponsor's conclusions that the Community alternative could not be constructed as proposed to provide 558 residential units and 460

parking spaces, and would not meet the unit mix, bicycle parking, and freight loading/unloading requirements of the Planning Code.

## DOCUMENTS REVIEWED

We have reviewed the following documentation available as part of the project file:

1. Letter from Don Bragg, Senior Vice President and Director of Development with Prado Group, to Kei Zushi, San Francisco Planning Department, regarding the Response to Request for Information regarding 3333 California Street, dated April 2, 2019.

2. Email from Jing Ng, Development Associate with Prado Group, to 3333 California St Project Team, regarding the Response to Request for Information regarding 3333 California Street, dated April 4, 2019.

3. 3333 California Street Mixed-Use Project EIR (Case No. 2015-014028ENV), Table S.3, Comparison of Characteristics of the Proposed Project, Project Variant, and EIR Alternatives and Table 2.2, Characteristics of Proposed Buildings on the Project Site.

4. Letter from Kathryn R. Devincenzi, Laurel Heights Neighborhood Association, to Kei Zushi Planning Department, regarding "Draft EIR for 3333 California Street, San Francisco, CA 94118 / Planning Department Case No.: 2015-014028ENV / State Clearinghouse No: 2017092053", dated January 8, 2019, including the following attachments:

    - Exhibit 1, Report by TREANORHL regarding Secretary of the Interior's Standards Compliancy Evaluation of 3333 California Street, San Francisco, California, dated January 7, 2019.
    - Appendix A, "Community Full Preservation Alternate Overview", (no date), (no author).
    - Exhibit A, Letter from Julianne Polanco, State Historic Preservation Author, to John Rothman, President, and Kathryn Devincenzi, Vice President, Laurel Heights Improvement Association of San Francisco; dated August 31, 2018.
    - Exhibit B, "Aerial View Looking SE" and "Site Plan", (prepared by TreanorHL), (no date).
    - Exhibit C, "Circulation Plan", (prepared by TreanorHL), (no date).
    - Exhibit 2, Letter from Andrew Wolfram, President, Historic Preservation Committee, to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department, dated December 11, 2018.
    - Exhibit 3, Memo from Denise Bradley Cultural Landscapes to Kathryn Devincenzi, Vice President, Laurel Heights Improvement Association of San Francisco, dated 24 April 2018.

5. "Planning Application Re-Submittal-1", dated February 22, 2019. (268 drawing sheets)

6. Cover Letter from Don Bragg to Nick Foster with the Planning Department regarding, "3333 CalSF – NOPDR #1 Response", dated March 1, 2019.

7. Letter from BAR Architects to Nick Foster regarding "3333 CalSF – NOPDR #1 Response", dated March 1, 2019. Presents itemized responses to Planning Department comments.

8. Autocad file named “Building Plans_2017-0726 BDC Areas.dwg”, dated July 26, 2019. This file has partial floor plans drawn for each level of the existing building with dimensions shown at exterior of the building. The levels included in the file are Third Sub-level, Second Sub-level, First Sub-level, First Level, Second Level, Third Level, Fourth Level, and Fifth Level (Roof). These floor plans include structure, core and exterior elements only and exclude non-structural interior partitions and doors.

## AUTHOR

This document has been prepared at the request of the San Francisco Planning Department, based upon review and analysis by the following individuals with San Francisco Public Works:

- Prepared by Vito Vanoni, AIA, Senior Architect and Technical Manager
- Reviewed by Julia Laue, AIA, Principal Architect and Bureau Manager

We are pleased to present this analysis of the sponsor’s analysis of the Community alternative. Please let us know if you have any questions.

Regards,

Vito Vanoni, AIA
Senior Architect & Technical Manager

# ATTACHMENT E

## SFPUC Revised Water Supply Assessment, June 11, 2019

# PUBLIC UTILITIES COMMISSION

City and County of San Francisco

RESOLUTION NO. **19-0114**

WHEREAS, Under the California Environmental Quality Act (CEQA) and State of California Water Code (Section 10910(g)(1)), the San Francisco Public Utilities Commission (SFPUC) is required to prepare and approve a Water Supply Assessment (WSA) for the cumulative water demands presented by the proposed 3333 California Street Project, which would redevelop the existing University of California San Francisco (UCSF) Laurel Heights Campus into a mixed-use residential development; and

WHEREAS, This the 3333 California Street Project is required to comply with the City's Non-potable Water Ordinance, Article 12C of the San Francisco Health Code, and as a result, the Project will offset its potable water use through the use of alternate water sources; and

WHEREAS, A WSA is an informational document that assesses the adequacy of water supplies to serve a proposed project and is required to be prepared as part of the CEQA environmental review process; and

WHEREAS, Approval of a WSA as an informational document is not considered an approval action as defined in Section 15378 of the CEQA Guidelines; and

WHEREAS, A WSA must be approved at a public meeting by the governing body of the public water supplier that would serve the proposed project; and

WHEREAS, On June 13, 2017 by Resolution No. 17-0142, this Commission approved a WSA for the 3333 California Street Project, which concluded that the SFPUC has adequate water supplies to meet the proposed project's water demands through 2040; and

WHEREAS, Following this Commission's approval of the WSA, the water demand estimates for the current proposed project are greater than those provided in the WSA approved on June 13, 2017 due to recent changes in the project description; and

WHEREAS, On December 12, 2018, the State Water Resources Control Board adopted an amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (i.e., Bay-Delta Plan Amendment), which, if implemented in the future, would affect the Regional Water System supply and the SFPUC's ability to meet the projected demands of existing and future retail customers, including the proposed project; and

WHEREAS, Multiple lawsuits are pending challenging the Bay-Delta Plan Amendment, and the City is a party to one of those suits; and

WHEREAS, In accordance with the State Water Resources Control Board's instruction, on March 1, 2019, the SFPUC, in partnership with other key stakeholders, submitted a proposed "voluntary agreement" (March 1st Proposed Voluntary Agreement) for the State's consideration as a substitute or replacement of the Bay-Delta Plan Amendment; and

WHEREAS, On March 26, 2019 by Resolution No. 19-0057, this Commission endorsed the SFPUC's continued participation in the voluntary agreement negotiation process and stated its intent that the terms of any final voluntary agreement would improve the health of the fisheries and maintain the reliability of its water supply including maintenance of its level of service (LOS) goal of no more than 20% system-wide rationing; and

WHEREAS, Because implementation of the Bay-Delta Plan Amendment or an alternative Voluntary Agreement is uncertain at this time, the SFPUC staff prepared the attached Revised WSA for the proposed 3333 California Street Project, analyzing water supply and demand under three scenarios: (1) No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement ("Scenario 1"), (2) Implementation of the March 1st Proposed Voluntary Agreement ("Scenario 2"), and (3) Implementation of the Bay-Delta Plan Amendment ("Scenario 3"); and

WHEREAS, The Revised WSA concludes that the SFPUC's total projected water supplies through 2040 will (1) meet the demands of the proposed project in normal years under all three scenarios, (2) meet the demands of the proposed project in dry years without rationing beyond the SFPUC's LOS goal of 20% system-wide rationing under Scenario 1, (3) meet the demands of the proposed project in dry years but require rationing closer to the LOS goal under Scenario 2, and (4) not reliably meet the demands of the proposed project without rationing at a level greater than that required to achieve the LOS goal under Scenario 3; now, therefore, be it

RESOLVED, This Commission approves the Revised Water Supply Assessment for the proposed 3333 California Street Project pursuant to the State of California Water Code Section 10910(g).

*I hereby certify that the foregoing resolution was adopted by the Public Utilities Commission at its meeting of June 11, 2019.*

Donna Hood

*Secretary, Public Utilities Commission*

San Francisco
Water Power Sewer
Services of the San Francisco Public Utilities Commission

525 Golden Gate Avenue, 13th Floor
San Francisco, CA 94102
T 415.554.3155
F 415.554.3161
TTY 415.554.3488

May 29, 2019

TO: Commissioner Ann Moller Caen, President
Commissioner Francesca Vietor, Vice President
Commissioner Anson Moran
Commissioner Sophie Maxwell
Commissioner Tim Paulson

THROUGH: Harlan L. Kelly, Jr., General Manager

FROM: Steven R. Ritchie, Assistant General Manager, Water

RE: Revised Water Supply Assessment for the 3333 California Street Project

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# 1.0 Summary

## *1.1 Introduction*

Under the Water Supply Assessment law (Sections 10910 through 10915 of the California Water Code), urban water suppliers like the San Francisco Public Utilities Commission (SFPUC) must furnish a Water Supply Assessment (WSA) to the city or county that has jurisdiction to approve the environmental documentation for certain qualifying projects (as defined in Water Code Section 10912 (a)) subject to the California Environmental Quality Act (CEQA). The WSA process typically relies on information contained in a water supplier's Urban Water Management Plan (UWMP), and involves answering specific questions related to the estimated water demand of the proposed project. This memo serves as the WSA for the proposed 3333 California Street Project ("proposed project"), for use in the preparation of an environmental impact report by the San Francisco Planning Department (case no. 2015.014028ENV, San Francisco Planning Department).

This WSA is a revision to and supersedes the WSA that was previously prepared for the same proposed project dated May 17, 2017 and approved on June 13, 2017 (Resolution No. 17-0142). While the project description has not substantially changed, the WSA was revised to reflect changes to the distribution of residential, retail, child care, and parking uses throughout the site resulting in higher water demands than previously estimated, as well as recent changes to water supply availability under implementation of the Bay-Delta Plan Amendment, described in Section 1.1.2.

### 1.1.1 2015 Urban Water Management Plan

The SFPUC's most current UWMP is the UWMP update for 2015, which the Commission adopted in June 2016 (Resolution No. 16-0118). The water demand projections in the UWMP incorporated 2012 Land Use Allocation (LUA 2012) housing and employment growth projections from the San Francisco Planning Department. The water demand projections are presented in five-year increments through 2040, meeting Water Code requirements. Growth associated with the proposed project was encompassed within the LUA 2012, and water demand associated with the proposed project was encompassed within the 2015 UWMP water demand projections.

**London N. Breed** Mayor
**Ann Moller Caen** President
**Francesca Vietor** Vice President
**Anson Moran** Commissioner
**Sophie Maxwell** Commissioner
**Tim Paulson** Commissioner
**Harlan L. Kelly, Jr.** General Manager

The WSA for a qualifying project within the SFPUC's retail service area[1] may use information from the UWMP. Therefore, ***the 2015 UWMP is incorporated via references throughout this WSA shown in bold, italicized text.*** The UWMP may be accessed at www.sfwater.org/uwmp.

### 1.1.2 2018 Bay-Delta Plan Amendment

In December 2018, the State Water Resources Control Board (SWRCB) adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) to establish water quality objectives to maintain the health of the Bay-Delta ecosystem. The SWRCB is required by law to regularly review this plan. The adopted Bay-Delta Plan Amendment was developed with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (the Stanislaus, Merced, and Tuolumne Rivers) and the Bay-Delta. The Bay-Delta Plan Amendment requires the release of 40% of the "unimpaired flow"[2] on the three tributaries from February through June in every year type, whether wet, normal, dry, or critically dry.

If the Bay-Delta Plan Amendment is implemented, the SFPUC will be able to meet the projected water demands presented in the 2015 UWMP in normal years but would experience supply shortages in single dry years or multiple dry years. The 2015 UWMP already assumes limited rationing may be needed in multiple dry years to address an anticipated supply shortage by 2040, but implementation of the Bay-Delta Plan Amendment will require rationing in all single dry years and multiple dry years and to a greater degree to address supply shortages not accounted for in the 2015 UWMP.

The SWRCB has stated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by the year 2022, assuming all required approvals are obtained by that time. But implementation of the Plan Amendment is uncertain for several reasons. First, under the Clean Water Act, the United States Environmental Protection Agency (U.S. EPA) must approve the water quality standards identified in the Plan Amendment within 90 days from the date the approval request is received. It is uncertain whether the U.S. EPA will approve or disapprove the water quality standards. Furthermore, the determination could result in litigation.

Second, since adoption of the Bay-Delta Plan Amendment, over a dozen lawsuits have been filed in both state and federal court, challenging the SWRCB's adoption of the Bay-Delta Plan Amendment, including a legal challenge filed by the federal government, at the request of the U.S. Department of Interior, Bureau of Reclamation. That litigation is in the early stage and there have been no dispositive court rulings as of this date.

Third, the Bay-Delta Plan Amendment is not self-implementing and does not allocate responsibility for meeting its new flow requirements to the SFPUC or any other water rights holders. Rather, the Plan Amendment merely provides a regulatory framework for flow allocation, which must be accomplished by other regulatory and/or adjudicatory proceedings, such as a comprehensive water rights adjudication or, in the case of the Tuolumne River, the 401 certification process in the Federal Energy Regulatory Commission's relicensing proceeding for Don Pedro Dam. The license amendment process is currently expected to be completed in the 2022-23 timeframe. This process and the other regulatory and/or adjudicatory proceedings would likely face legal challenges and have lengthy timelines, and quite possibly could result in a different assignment of flow responsibility (and therefore a different water supply impact on the SFPUC).

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[1] SFPUC's "retail service area" refers to water customers inside the City and County of San Francisco, as well as select areas outside of the City.

[2] Unimpaired flow represents the water production of a river basin, unaltered by upstream diversions, storage, or by export or import of water to or from other watersheds. Bay-Delta Plan Amendment, Introduction, p.1-8.

Fourth, in recognition of the obstacles to implementation of the Bay-Delta Plan Amendment, SWRCB Resolution No. 2018-0059 adopting the Bay-Delta Plan Amendment directed staff to help complete a "Delta watershed-wide agreement, including potential flow measures for the Tuolumne River" by March 1, 2019, and to incorporate such agreements as an "alternative" for a future amendment to the Bay-Delta Plan to be presented to the SWRCB "as early as possible after December 1, 2019." In accordance with the SWRCB's instruction, on March 1, 2019, SFPUC, in partnership with other key stakeholders, submitted a proposed project description for the Tuolumne River that could be the basis for a voluntary substitute agreement with the SWRCB ("March 1st Proposed Voluntary Agreement"). On March 26, 2019, the Commission adopted Resolution No. 19-0057 to support SFPUC's participation in the Voluntary Agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency and the leadership of the Newsom administration.[3] The negotiations for a voluntary agreement have made significant progress since an initial framework was presented to the SWRCB on December 12, 2018. The package submitted on March 1, 2019 is the product of renewed discussions since Governor Newsom took office. While significant work remains, the package represents an important step forward in bringing together diverse California water interests.

For all these reasons, whether and when the Bay-Delta Plan Amendment will be implemented, and how those amendments if implemented will affect the SFPUC's water supply is currently uncertain and possibly speculative. Given this uncertainty, this WSA analyzes water supply and demand through 2040 under three scenarios: (1) No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement ("Scenario 1"), (2) Implementation of the March 1st Proposed Voluntary Agreement ("Scenario 2"), and (3) Implementation of the Bay-Delta Plan Amendment ("Scenario 3").

### 1.1.3 Basis for Requiring a WSA for the Proposed Project

Except for the WSA approved on June 13, 2017 (Resolution No. 17-0142), which is superseded by this revised WSA, the proposed project has not been the subject of a previous WSA, nor has it been part of a larger project for which a WSA was completed.

The proposed project qualifies for preparation of a WSA under Water Code Section 10912(a) because it is a mixed-use residential development that includes more than 500 dwelling units. The proposed project is characterized further in Section 1.2.

### 1.1.4 Conclusion of this WSA

This WSA concludes that under Scenarios 1, 2, and 3, the SFPUC's total projected water supplies would meet the demands of the proposed project and cumulative retail water demands through 2040 in normal years. Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully-implemented infrastructure under the 2018 Phased Water System Improvement Program (WSIP) Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly 9 normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly 1 out of every 10 years. This frequency is expected to increase as climate change intensifies.

**Scenario 1 - No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement:** Under Scenario 1, SFPUC's total projected water supplies would meet the projected demands of the retail service area in normal years. During dry years, there would be a shortfall of 3.6-6.1 million gallons per day (mgd), or 5-7%. The SFPUC could manage this relatively small shortfall by prohibiting certain discretionary outdoor water uses and/or calling for voluntary rationing among all retail

[3] California Natural Resources Agency. "Voluntary Agreements to Improve Habitat and Flow in the Delta and its Watersheds." http://resources.ca.gov/voluntary-agreements/. Accessed April 8, 2019.

customers pursuant to its Retail Water Shortage Allocation Plan (***Appendix L of the UWMP***).

**Scenario 2 - Implementation of the Voluntary Agreement:** The March 1st Proposed Voluntary Agreement has yet to be accepted by SWRCB as an alternative to the Bay-Delta Plan Amendment and thus the shortages that would occur with its implementation are not known with certainty. An analysis of water supply impacts comparable to the one provided in this WSA for Scenarios 1 and 3 is not available for Scenario 2. However, the flow releases under the Voluntary Agreement, unlike the Bay-Delta Plan Amendment, are not based on an unimpaired flow approach but on a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years when less flow is required, preserving more of the SFPUC's stored water supply from the Tuolumne River. The resulting RWS supply shortfalls during dry years under the Voluntary Agreement would be less than those under the Bay-Delta Plan Amendment, and therefore would require rationing of a lesser degree and closer in alignment to the SFPUC's adopted level of service (LOS) goal for the RWS of rationing of no more than 20% system-wide during dry years than that which would occur under Scenario 3. Indeed, in Resolution No. 19-0057, the Commission stated its intention that any final voluntary agreement "would allow the SFPUC to maintain the (1) Water Supply Level of Service Goal and Objectives and (2) Sustainability Level of Service Goal and Objectives adopted in Commission Resolution No. 08-0200." Under Scenario 2, if SFPUC's March 1st Proposed Voluntary Agreement were accepted by the SWRCB as an alternative to the Bay-Delta Plan Amendment, SFPUC would still face a shortfall in single dry and multiple dry years, thus requiring rationing across the retail service area, but of a much smaller magnitude. Rationing under Scenario 2, with implementation of the Voluntary Agreement, would be to a lesser degree than that under Scenario 3, with implementation of the Bay-Delta Plan Amendment.

**Scenario 3 - Implementation of the Bay-Delta Plan Amendment:** Under Scenario 3, during single dry and multiple dry years starting as soon as the year 2022, the estimated year of implementation of the Bay-Delta Plan Amendment, the SFPUC's total projected water supplies cannot meet the demands of the retail service area, including those of the proposed project, without gradually increasing higher levels of water rationing of up to 50% through 2040 across the retail service area. For the proposed project specifically, the SFPUC may impose a lower level of rationing that takes into account the installation of water-efficient plumbing fixtures and non-potable water systems associated with new construction.

The relatively small volume of water demand generated by the proposed project itself would not exacerbate the projected shortfalls resulting from implementation of the Bay-Delta Plan Amendment. Regardless of whether the proposed project is constructed, with implementation of the Bay-Delta Plan Amendment, the SFPUC's existing and planned water supplies will not meet the water demands of its retail service area in dry years without greater rationing than previously projected in the 2015 UWMP.

Refer to Section 4.0, Conclusion, for a tabulated comparison of projected retail water supplies and demands under Scenarios 1 and 3, the resulting shortfalls, and the implications of rationing to the proposed project.

## *1.2 Proposed Project Description*

The proposed project would redevelop the 10.25-acre parcel at 3333 California Street in the northwest portion of San Francisco from an office and parking use to a mix of residential, retail, commercial office, child care, and parking uses. It is currently used as the University of California San Francisco (UCSF) Laurel Heights Campus and is developed with two structures, three surface parking lots, two circular garage ramp structures, internal roadways and landscaping or landscaped open space.

Overall, the proposed project would entail the removal of approximately 376,000 gross square feet (gsf) of office uses with approximately 49,999 gsf relocated to the proposed

Walnut Building. The proposed project would include 558 dwelling units within 829,847 gsf of residential floor area. The proposed project would provide 49,999 gsf of commercial office floor area; 40,261 gsf of retail floor area; and a 13,630-gsf child care center use. Up to 823 vehicle parking spaces, including ten car share spaces, would be provided in multiple garages with up to three subterranean levels totaling approximately 374,809 gsf. Additionally, the proposed project would develop nearly half of the overall lot area (198,198 square feet) with a combination of public and private open spaces including: Euclid Park, Cypress Square, Mayfair Walk, and Walnut Walk. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site.

The project sponsor is considering a variant to the proposed project, referred to as the Walnut Building Variant. This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. The approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. Overall, approximately 1,434,098 gsf of new and rehabilitated space, comprising approximately 977,437 gsf of residential floor area; approximately 34,496 gsf of ground floor retail spaces; and approximately 14,665 gsf of childcare center space would be developed under the variant. Up to 919 vehicle parking spaces would be provided in multiple garages with up to three subterranean levels totaling approximately 407,500 gsf. Under this variant the footprints of the other proposed new buildings would not change. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site.

Construction of the proposed project, or its variant, would be phased. The preliminary construction plan would include four overlapping construction phases and is subject to change. Project construction would commence in 2020 and would occur within a maximum development period of 15 years.

Further details on both the proposed project and the Walnut Building Variant are provided in Attachment B. However, for the purpose of the WSA, only the Walnut Building Variant is assessed for water supply as it would result in the most conservative water demand estimate and would encompass the demands estimated for the proposed project. All references to the “proposed project” in this memo refers to the Walnut Building Variant unless otherwise noted.

# 2.0 Water Supply

This section reviews San Francisco’s existing and planned water supplies.

## *2.1 Regional Water System*

See ***Section 3.1 of the UWMP*** for descriptions of the RWS and ***Section 6.1 of the UWMP*** for water rights held by City and County of San Francisco and the SFPUC Water System Improvement Program (WSIP).

## *2.2 Existing Retail Supplies*

Retail water supplies from the RWS are described in ***Section 6.1 of the UWMP***.

Local groundwater supplies, including the Westside Groundwater Basin, are described in ***Section 6.2.1 of the UWMP***.

Local recycled water supplies, including the Harding Park Recycled Water Project and Pacifica Recycled Water Project, are described in ***Section 6.2.1 of the UWMP***.

## *2.3 Planned Retail Water Supply Sources*

The San Francisco Groundwater Supply Project is described in ***Section 6.2.2 of the UWMP***. Since adoption of the UWMP, four wells have been completed and the start-up

phase of the project has begun. Starting in April 2017, small amounts of groundwater have been blended with RWS supplies for drinking water. Two remaining wells are under construction as part of the next phase of the project.

The proposed Westside and Eastside Recycled Water Projects, as well as non-potable water supplies associated with onsite water systems implemented in compliance with San Francisco's Non-potable Water Ordinance (Health Code Chapter 12C), are also described in ***Section 6.2.2 of the UWMP***.

## *2.4 Summary of Current and Future Retail Water Supplies*

A breakdown of water supply sources for meeting SFPUC retail water demand through 2040 in normal years is provided in ***Section 6.2.5 of the UWMP***. For dry years, see the next section.

Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully-implemented infrastructure under the 2018 Phased Water System Improvement Program (WSIP) Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly 9 normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly 1 out of every 10 years. This frequency is expected to increase as climate change intensifies.

## *2.5 Dry-Year Water Supplies*

A description of dry-year supplies developed under WSIP is provided in ***Section 7.2 of the UWMP***. Other water supply reliability projects and efforts that are currently underway or completed are described in ***Section 7.4 of the UWMP***. Since adoption of the UWMP, the following milestones have occurred:

- Calaveras Dam Replacement Project – Construction of the new dam was completed in September 2018, while the remainder of the overall project will be completed in spring 2019.
- Regional Groundwater Storage and Recovery Project – Construction of this project is still underway. Phase 1 of the project, consisting of installation of 13 production wells, will be completed in 2019. Since May/June 2016, the project has been in a storage phase through periodic deliveries of RWS surface water in lieu of groundwater pumping by Daly City, San Bruno, and the California Water Service Company.

## *2.6 Additional Water Supplies*

In light of the adoption of the Bay-Delta Plan Amendment and the resulting potential limitations to RWS supply during dry years, the SFPUC is increasing and accelerating its efforts to acquire additional water supplies and explore other projects that would increase overall water supply resilience. Developing these additional supplies would reduce water supply shortfalls and reduce rationing associated with such shortfalls. In addition to the Daly City Recycled Water Expansion project[4], which was a potential project identified in the 2015 UWMP and had committed funding at that time, the SFPUC has taken action to fund the study of potential additional water supply projects. Capital projects under consideration to develop additional water supplies include surface water storage expansion, recycled water expansion, water transfers, desalination, and potable reuse. The SFPUC is also considering developing related policies and ordinances, such as funding for innovative water supply and efficiency technologies and requiring potable water offsets for new developments. A more detailed list and descriptions of these efforts are provided below.

[4] While this potential project was identified in the 2015 UWMP, it has since been approved by Daly City following environmental review and has a higher likelihood of being implemented.

The capital projects that are under consideration would be costly and are still in the early feasibility or conceptual planning stages. Because these water supply projects would take 10 to 30 or more years to implement, and because required environmental permitting negotiations may reduce the amount of water that can be developed, the yield from these projects are not currently incorporated into SFPUC's supply projections. Capital projects would be funded through rates from both Wholesale and Retail Customers based on mutual agreement, as the additional supplies would benefit all customers of the RWS, unless otherwise noted. State and federal grants and other financing opportunities would also be pursued for eligible projects, to the extent feasible, to offset costs borne by ratepayers.

1. **Daly City Recycled Water Expansion (Regional, Normal- and Dry-Year Supply, 3 mgd)**

   **Project Description:** The SFPUC and North San Mateo County Sanitation District (NSMCSD, or Daly City) have been exploring ways to increase the recycled water treatment capacity in Daly City to serve additional customers and decrease irrigation water withdrawals from the Westside Groundwater Basin, both in San Francisco and further south of Daly City. The majority of the irrigation demand met by groundwater withdrawals, approximately 2 mgd, serves cemeteries in Colma. An initial feasibility study completed in 2010 identified the capital requirements that would be needed to produce additional capacity at the existing treatment plant location. The study demonstrated that a new tertiary treatment facility would be required onsite to produce additional capacity of up to 3.4 mgd. Currently, flows that exceed the capacity of the existing treatment plant are discharged into the Pacific Ocean. With this project, some of that discharge may be treated and used for irrigation. New facilities would include a treatment facility, pump station, distribution pipelines, and storage.

   **Estimated Costs and Financing:** The capital cost is estimated to be $85 million, which is budgeted for in the SFPUC's 10-year capital planning horizon. The annual operations and maintenance (O&M) cost is estimated to be $3 million. This project may present regional benefits that would result in cost-sharing with Wholesale Customers because the replacement of groundwater used for irrigation with recycled water will result in a greater volume of groundwater storage that can be used in dry years as part of the SFPUC's existing Groundwater Storage and Recovery project, approved by the SFPUC in 2014 in Resolution no. 14-0127.

   **Permits and Approvals:** Daly City adopted a Final Initial Study/Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring and Reporting Program (MMRP) for the proposed project in September 2017. The SFPUC has not yet approved its participation in the project. Other permits and/or approvals that may be needed for this project include: BART, CAL/OSHA, San Francisco Bay RWQCB, and encroachment permits from Caltrans, Daly City, South San Francisco, SFPUC, San Mateo County, and Colma to construct distribution and storage facilities. Institutional agreements between the project partners for project construction and operation, as well as with the customers whose supplies will change from groundwater to recycled water, will also need to be developed.

   **Estimated Acquisition:** Construction may occur as soon as 2023 with operation beginning in 2027.

2. **Alameda County Water District Transfer Partnership** (Regional, Normal- and Dry-Year Supply, 5 mgd)

   **Project Description:** Water would be acquired from Contra Costa Water District (CCWD) for delivery to Alameda County Water District (ACWD) through the South Bay Aqueduct utilizing a planned expansion of the Los Vaqueros Reservoir.

**Estimated Costs and Financing:** The capital cost is estimated to be $50-150 million, with an annual O&M cost of $2.5 million.

**Permits and Approvals:** Planning and environmental review of the Los Vaqueros Reservoir Expansion is underway by CCWD, and has several objectives beyond water deliveries to the SFPUC. CCWD has identified over 15 permits, approvals and consultations that will be necessary such as Dredge and Fill, National Pollutant Discharge Elimination System (NPDES), Streambed Alteration, and Encroachment permits. These permits and approvals will be obtained by CCWD and/or its contractor. To enable a water supply transfer between ACWD and the SFPUC, water right modifications may be necessary and if additional infrastructure is needed, additional permits will be required. As this project is in the conceptual stage, permitting details have not yet been identified.

**Estimated Acquisition:** Construction may occur as soon as 2028 with operation beginning in 2032.

3. **Brackish Water Desalination in Contra Costa County** (Regional, Normal- and Dry-Year Supply, 9+ mgd)

**Project Description:** The Bay Area Brackish Water Treatment (Regional Desalination) Project is a partnership between CCWD, East Bay Municipal Utility District (EBMUD), SFPUC, Santa Clara Valley Water District (SCVWD) and Zone 7 to turn brackish water into a reliable, drought-proof drinking water supply, delivering a total of up to 10-20 mgd in drought and non-drought years (i.e., dry and normal years), throughout the region. A new brackish water treatment plant would be constructed in East Contra Costa and tie into the existing CCWD system for delivery through Los Vaqueros Reservoir and the South Bay Aqueduct, or delivery via a connection with EBMUD.

The SFPUC would rely on existing infrastructure and institutional agreements to receive water transfers from partner agencies. For planning and cost estimation purposes, it was assumed that the SFPUC's share of the regional water supply would be 9 mgd in all year types; however, if additional capacity is available, the SFPUC may secure additional water supply, based on negotiations with partner agencies.

**Estimated Costs and Financing:** The capital cost is estimated to be $200-800 million, with an annual O&M cost of $12-20 million.

**Permits and Approvals:** To proceed, this concept would require extensive institutional agreements, permitting, and environmental review. Construction of a new desalination plant will require construction and operating permits such as NPDES, Dredge and Fill, consultations with federal and state agencies, and others. In addition, water rights will need to be secured and/or modified. In California, permitting and regulatory approvals of desalination projects has typically taken 10-18 years. In addition, institutional agreements among partner agencies will be needed.

**Estimated Acquisition:** Construction may occur as soon as 2032 and be phased so that 5-9 mgd would be available to the region by 2035 and a total of 5-11 mgd would be available after 2040.

4. **ACWD-USD Purified Water Partnership** (Regional, Normal- and Dry-Year Supply, 5 mgd)

**Project Description:** This may be an indirect or direct potable reuse project that would inject highly-treated water from Union Sanitary District (USD) for groundwater recharge, then recover the water through the ACWD Brackish

Groundwater Desalination Plant. How the water is transferred to the SFPUC remains to be determined.

**Estimated Costs and Financing:** The capital cost is estimated to be $200-400 million, with an annual O&M cost of $2.5 million.

**Permits and Approvals:** An initial assessment will be underway in 2019, which will identify potential project scenarios. Permitting and approvals for a project will depend on its design and nature, which have not yet been identified.

**Estimated Acquisition:** Construction may occur as soon as 2038 with operation beginning in 2045.

5. **Crystal Springs Purified Water** (Regional, Normal- and Dry-Year Supply, 6+ mgd)

**Project Description:** This is an indirect potable reuse project that would blend wastewater from Silicon Valley Clean Water and possibly San Mateo into Crystal Springs Reservoir and treat the blended water at Harry Tracy Water Treatment Plant for potable reuse.

**Estimated Costs and Financing:** The capital cost is estimated to be $400-700 million, with an annual O&M cost of $18-25 million.

**Permits and Approvals:** Construction and operating permits would be required for this project. They would likely include NPDES, Encroachment, consultations with state and federal agencies, and others. Surface water augmentation is regulated by the SWRCB, and consultations and public hearings would be required.

**Estimated Acquisition:** Construction may occur as soon as 2034 and be phased so that 3-5 mgd would be available to the region by 2035 and a total of 3-7 mgd would be available after 2040.

6. **Eastside Purified Water** (Retail, Normal- and Dry-Year Supply, 5 mgd)

**Project Description:** A purified water plant would be constructed at the Southeast Treatment Plant to blend wastewater with Regional Water System supplies for potable use.

**Estimated Costs and Financing:** The capital cost is estimated to be $220-400 million, with an annual O&M cost of $5-10 million.

**Permits and Approvals:** There is currently no regulatory framework in place to enable direct potable reuse. In California, no regulations are anticipated before 2025, but it is anticipated that extensive consultation will be required with the SWRCB. In addition, construction and operating permits and approvals will be required, as identified.

**Estimated Acquisition:** Construction may occur as soon as 2025 with operation beginning in 2030.

7. **San Francisco Eastside Satellite Recycled Water Facility** (Retail, Normal- and Dry-Year Supply, < 1 mgd)

**Project Description:** A centralized recycled water treatment facility would be constructed on the eastern side of San Francisco, along with pipelines and a storage reservoir, to meet demands not addressed by the Non-potable Water Ordinance and Auxiliary Water Supply System (AWSS).

**Estimated Costs and Financing:** The capital cost is estimated to be $200 million, with an annual O&M cost of $2.5 million.

**Permits and Approvals:** In addition to construction-related permits and approvals, this project would require a permit from the Regional Water Quality Control Board under its General Order for water reuse. Discharges from the recycled water treatment plant to the San Francisco Bay would also require NPDES permitting by the Regional Water Quality Control Board.

**Estimated Acquisition:** Construction may occur as soon as 2032 with operation beginning in 2037.

8. **Additional Storage Capacity in Los Vaqueros Reservoir from Expansion** (Regional)

**Project Description:** Expansion of storage capacity in Los Vaqueros is to allow the ACWD Transfer Partnership and Brackish Water Desalination in Contra Costa County to be optimized.

**Estimated Costs and Financing:** The capital cost is estimated to be $20-50 million. SFPUC's portion of the project yield and cost share are not yet known. The annual O&M cost is yet to be estimated.

**Permits and Approvals:** Planning and review of the Los Vaqueros Reservoir Expansion is underway by CCWD, and has several objectives beyond water deliveries to the SFPUC. CCWD has identified over 15 permits, approvals and consultations that will be necessary such as Dredge and Fill, NPDES, Streambed Alteration, and Encroachment permits. These permits and approvals will be obtained by CCWD and/or its contractor. To enable a water supply transfer between ACWD and the SFPUC, water rights modifications may be necessary and if additional infrastructure is needed, additional permits will be required. As this project is in the conceptual stage, permitting details have not yet been identified.

**Estimated Acquisition:** Construction may occur as soon as 2021 with operation beginning in 2027.

9. **Calaveras Reservoir Expansion** (Regional)

**Project Description:** Calaveras Reservoir would be expanded to create 289,000 AF additional capacity to store excess Regional Water System supplies or other source water in wet and normal years. In addition to reservoir enlargement, the project would involve infrastructure to pump water to the reservoir, such as pump stations and transmission facilities.

**Estimated Costs and Financing:** The costs of this project is yet to be determined.

**Permits and Approvals:** Similar to Los Vaqueros Reservoir Expansion, this project would require numerous permits, approvals and consultations, such as Dredge and Fill, NPDES, Streambed Alteration, Encroachment, possible water right modifications, etc. These permits and approvals will be obtained by SFPUC and/or its contractor. As this project is in the conceptual stage, permitting details have not yet been identified.

**Estimated Acquisition:** Construction may occur as soon as the early 2040s with operation beginning around 2050.

Even if all the capital projects above are implemented, the total amount of water and storage yielded would not be enough to make up for the dry year shortfall that may result from implementation of the Bay-Delta Plan Amendment as adopted, and would occur years after such shortfalls begin. Thus, the SFPUC continues to proactively

explore opportunities for reuse and innovation, such as the following policies and ordinances:

- **Evaluation of Recycled Water Throughout Service Area** (Regional and Retail)

  Wastewater treatment plants throughout the SFPUC service area would be surveyed to identify potential non-potable, indirect potable, and direct potable projects.

- **Innovative Technology Project Funding** (Retail)

  SFPUC would award grants for innovative demonstration projects that would increase water efficiency and availability (e.g., fog catchers, heat exchangers in non-potable water systems, rainwater for potable use, breweries treating process water for reuse).

- **New Development Potable Offset Ordinance** (Retail)

  The Board of Supervisors could adopt an ordinance requiring certain large development projects, to offset the water demand impacts above historical water consumption averages for the corresponding parcel(s). Developments could be required to achieve a certain offset of potable demands.

# 3.0 Water Demand

This section reviews the climatic and demographic factors that may affect San Francisco's water use, projected retail water demands, and the demand associated with the proposed project.

## *3.1 Climate*

San Francisco has a Mediterranean climate. Summers are cool and winters are mild with infrequent rainfall. Temperatures in the San Francisco area average 57 degrees Fahrenheit annually, ranging from the mid-40s in winter to the upper 60s in late summer. Strong onshore flow of wind in summer keeps the air cool, generating fog through September. The warmest temperatures generally occur in September and October. Rainfall in the San Francisco area averages about 22 inches per year and is generally confined to the "wet" season from late October to early May. Except for occasional light drizzles from thick marine stratus clouds, summers are nearly completely dry. A summary of the temperature and rainfall data for the City of San Francisco is included in Table 1.

**Table 1: San Francisco Climate Summary**

| Month | Average Maximum Temperature (°F) | Average Minimum Temperature (°F) | Average Monthly Rainfall (inches) |
|---|---|---|---|
| January | 58.0 | 45.7 | 4.36 |
| February | 60.3 | 47.3 | 4.41 |
| March | 61.4 | 48.1 | 2.98 |
| April | 62.3 | 49.1 | 1.38 |
| May | 63.2 | 50.9 | 0.68 |
| June | 64.8 | 52.7 | 0.18 |
| July | 65.6 | 54.3 | 0.02 |
| August | 66.6 | 55.3 | 0.06 |
| September | 68.1 | 55.0 | 0.19 |
| October | 67.8 | 53.3 | 1.04 |
| November | 61.2 | 48.1 | 2.85 |
| December | 58.3 | 45.9 | 4.33 |
| **Annual Average** | **63.3** | **50.6** | **22.45** |

Source: Western Regional Climate Center (www.wrcc.dri.edu), 1981-2010 data from two San Francisco monitoring stations (Mission Dolores/SF#047772 and Richmond/SF#047767).

### *3.2 Proposed Project Water Demand*

The project sponsor's consultants provided a memo describing the methods and assumptions used to estimate the water demand of the proposed project, along with the resulting demand (Attachment B).

Because the proposed project must comply with San Francisco's Non-potable Water Ordinance (Article 12C of the San Francisco Health Code), estimates for both potable and non-potable demands were submitted as part of the WSA request. The Non-potable Water Ordinance requires new commercial, mixed-use, and multi-family residential development projects with 250,000 square feet or more of gross floor area to install and operate an onsite non-potable water system. Such projects must meet their toilet and urinal flushing and irrigation demands through the collection, treatment, and use of available graywater, rainwater, and foundation drainage. While not required, projects may use treated blackwater or stormwater if desired. Furthermore, projects may choose to apply non-potable water to other non-potable water uses, such as cooling tower blowdown and industrial processes, but are not required to do so under the ordinance. As indicated in the water demand memo provided on behalf of the project sponsor in Attachment B, the proposed project would exceed the minimum requirements of the Non-potable Water Ordinance by using non-potable water for cooling in addition to using graywater and rainwater to meet toilet and urinal flushing and irrigation.

Both potable and non-potable demands for the proposed project were estimated using the SFPUC's Non-potable Water Calculator and supplemented with additional calculations for cooling demands. The SFPUC reviewed the memo to ensure that the methodology is appropriate for the types of proposed water uses, the assumptions are valid and thoroughly documented along with verifiable data sources, and a professional standard of care was used. The SFPUC concluded that the demand estimates provided on behalf of the project sponsor are reasonable. Water demand associated

with the proposed project over the 20-year planning horizon is shown in the following Table 2.

The non-potable demand estimates in Table 2 are based on building uses anticipated at the time the WSA was requested, i.e., during the planning and environmental review stage of the proposed project. It is understood that these estimates will likely change as the proposed project's design progresses, and information submitted for the WSA request is not part of the proposed project's compliance with the Non-potable Water Ordinance. City review and approval of a proposed onsite water system must be performed separately through the Non-potable Water Program. However, the intent of providing a breakdown of potable and non-potable demand estimates in this WSA is to demonstrate that the proposed project will incorporate water reuse per City requirements and the proposed project's sustainability goals, if any. As noted earlier, the total demand of the proposed project, regardless of non-potable use, is already encompassed in the 2015 UWMP water demand projections. Furthermore, total demand represents the most conservative estimate and accounts for back-up potable supplies that must be provided by the SFPUC in the event that non-potable supplies serving the proposed project are unavailable.

**Table 2: Water Demand Based on Project Phasing**

| Demand of Proposed Project (mgd) | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Potable Demand | -- | 0.032 | 0.064 | 0.064 | 0.064 |
| Non-potable Demand | -- | 0.011 | 0.020 | 0.020 | 0.020 |
| Total Demand | -- | 0.043 | 0.084 | 0.084 | 0.084 |
| Potential Potable Water Savings as Percentage of Total Demand | -- | 25.6% | 24.3% | 24.3% | 24.3% |

Notes:
Construction would occur over four overlapping phases commencing in 2020 and within a maximum development period of 15 years (subject to change). While full buildout could occur as late as 2035, full buildout is assumed to occur earlier to provide conservative projections. Phases 1 is estimated to be completed as soon as in 2022, Phase 2 in 2023, Phase 3 in 2025, and Phase 4 in 2027.

The estimates above reflect the Walnut Building Variant. The non-potable demand estimates above reflect non-potable water use for cooling (0.005 mgd) Water demand estimates for the proposed project are slightly lower and are provided in Attachment B.

The San Francisco Planning Department has determined that the proposed project is encompassed within the projections presented in LUA 2012 as indicated in the letter from the Planning Department to the SFPUC (Attachment A). Therefore, the demand of the proposed project is also encompassed within the San Francisco retail water demands that are presented in ***Section 4.1 of the UWMP***, which considers retail water demand based on the LUA 2012 projections. The following Table 3 shows the demand of the proposed project relative to total retail demand.

**Table 3: Proposed Project Demand Relative to Total Retail Demand**

| | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Total Retail Demand (mgd)[1] | 72.1 | 79.0 | 82.3 | 85.9 | 89.9 |
| Potable Demand of Proposed Project (mgd) | -- | 0.032 | 0.064 | 0.064 | 0.064 |
| Potable Demand of Proposed Project as Percentage of Total Retail Demand | -- | 0.04% | 0.08% | 0.07% | 0.07% |
| Total Demand of Proposed Project (mgd) | -- | 0.043 | 0.084 | 0.084 | 0.084 |
| Total Demand of Proposed Project as Percentage of Total Retail Demand[3] | -- | 0.05% | 0.10% | 0.10% | 0.09% |

Notes:
1. Retail water demands per ***Table 4-1 of the UWMP***, except for the 2020 demand projection, which was re-projected to take into account the lower demands being experienced due to the recent drought and the lag in occupancy of built units.
2. The proposed project is accounted for in the LUA 2012 projections, and subsequently, total demands associated with the proposed project are accounted for in the 2015 UWMP retail water demand projections.

# 4.0 Conclusion

## *4.1 Comparison of Projected Supply and Demand*

### 4.1.1 Scenario 1: No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement

Table 4 below is adapted from ***Section 7.5 of the UWMP*** (Table 7-4) and compares the SFPUC's retail water supplies and demands through 2040 during normal year, single dry-, and multiple dry-year periods under Scenario 1.

Local supplies (i.e., supplies not from the RWS) correspond to those in ***Table 6-7 of the UWMP***. Procedures for determining RWS supply availability per the SFPUC's WSAP, applicable to all three scenarios, are described in ***Section 8.3 of the UWMP***.

The projections shown in Table 4 differ from those in the 2015 UWMP due to two reasons. First, the 2009 Water Supply Agreement between SFPUC and its Wholesale Customers was recently amended and approved by the Commission on December 11, 2018 by Resolution No. 18-0212. Table 4 incorporates the minimum level of 5% rationing during supply shortages as required by the amendment, and therefore, the resulting shortfalls are greater than those previously projected in the 2015 UWMP.

Second, the projections in Table 4 differ from those in the 2015 UWMP because Table 4 reflects SFPUC's full 8.5-year design drought sequence instead of the minimum 3-year sequence required to be provided in the 2015 UWMP. Under legislation adopted in 2018 (S.B. 606) future UWMPs will be required to project water supply availability during a minimum of 5 years of continuous drought (Water Code section 10631(b)(1)).

As explained previously in Section 3.2, water demands associated with the proposed project are already captured in the retail demand projections presented in the UWMP. The proposed project is expected to represent up to 0.10% of the total retail water demand. Total retail demands correspond to those in ***Table 4-1 of the UWMP***, and reflect both passive and active conservation, as well as water loss.

As shown in Table 4, under Scenario 1 without implementation of the Bay-Delta Plan Amendment, existing and planned supplies would meet all projected RWS demands in all years except for an approximately 3.6-6.1 mgd, or 5-7%, shortfall during dry years through the year 2040. This relatively small shortfall is primarily due to implementation of the amended 2009 Water Supply Agreement. To manage a small shortfall such as this, the SFPUC may prohibit certain discretionary outdoor water uses and/or call for voluntary rationing by its retail customers pursuant to its Retail Water Shortage Allocation Plan (***Appendix L of the UWMP***). The required level of rationing is well below the SFPUC's RWS LOS goal of limiting rationing to no more than 20% on a system-wide basis (i.e., an average throughout the RWS).

**Table 4: Projected Supply and Demand Comparison Under Scenario 1**
**(No Implementation of the Bay-Delta Plan Amendment or the Voluntary Agreement) (mgd)**

| | | Normal Year | Single Dry Year[1] | Multiple Dry Years | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Year 1[1] | Year 2[2] | Year 3[2] | Year 4[2] | Year 5[2] | Year 6[2] | Year 7[3] | Year 8[3] |
| 2020 | Total Retail Demand[4] | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 |
| | Total Retail Supply[5] | 72.1 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 |
| | Shortfall | 0.0 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 |
| | Shortfall as % of Demand | 0.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% |
| 2025 | Total Retail Demand[4] | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 |
| | Total Retail Supply[5] | 79.0 | 75.0 | 75.0 | 75.0 | 75.0 | 75.0 | 75.0 | 75.0 | 75.0 | 75.0 |
| | Shortfall | 0.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 | 4.0 |
| | Shortfall as % of Demand | 0.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% |
| 2030 | Total Retail Demand[4] | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 |
| | Total Retail Supply[5] | 82.3 | 78.2 | 78.2 | 78.2 | 78.2 | 78.2 | 78.2 | 78.2 | 78.2 | 78.2 |
| | Shortfall | 0.0 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 | 4.1 |
| | Shortfall as % of Demand | 0.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% |
| 2035 | Total Retail Demand[4] | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 |
| | Total Retail Supply[5] | 85.9 | 81.6 | 81.6 | 81.6 | 81.6 | 81.6 | 81.6 | 81.6 | 79.5 | 79.5 |
| | Shortfall | 0.0 | 4.3 | 4.3 | 4.3 | 4.3 | 4.3 | 4.3 | 4.3 | 6.4 | 6.4 |
| | Shortfall as % of Demand | 0.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 7.4% | 7.4% |
| 2040 | Total Retail Demand[4] | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 |
| | Total Retail Supply[5] | 89.9 | 85.4 | 85.4 | 84.4 | 84.4 | 84.4 | 84.4 | 84.4 | 83.8 | 83.8 |
| | Shortfall | 0.0 | 4.5 | 4.5 | 5.5 | 5.5 | 5.5 | 5.5 | 5.5 | 6.1 | 6.1 |
| | Shortfall as % of Demand | 0.0% | 5.0% | 5.0% | 6.2% | 6.2% | 6.2% | 6.2% | 6.2% | 6.8% | 6.8% |

Notes:
1. During a single dry year and multiple dry year 1 (year 2 of SFPUC's design drought sequence), the retail allocation under the WSAP is 36.0% of available RWS supply, or 85.9 mgd. However, due to the Phased WSIP Variant, only 81 mgd of RWS supply can be delivered. RWS supply is capped at this amount.
2. During multiple dry years 2-6 (years 3-7 of SFPUC's design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 79.5 mgd.
3. During multiple dry years 7 and 8 (years 8 and 8.5 of SFPUC's design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 74.5 mgd.
4. Total retail demands correspond to those in ***Table 4-1 of the UWMP***, except for the 2020 demand projection, which was re-projected to take into account the lower demands being experienced due to the recent drought and the lag in occupancy of built units.
5. Local supplies (i.e., supplies not from the RWS, including groundwater, recycled water, and non-potable water) correspond to those in ***Table 6-7 of the UWMP***, with an additional 5% reduction in retail water use (incorporated as a reduction in total retail supply) per the amended Water Supply Agreement. Local supplies are assumed to be used before RWS supplies to meet retail demand.

### 4.1.2 Scenario 2: Implementation of the Voluntary Agreement

As stated earlier, the March 1st Proposed Voluntary Agreement has yet to be accepted by SWRCB as an alternative to the Bay-Delta Plan Amendment and thus the shortages that would occur with its implementation are not known with certainty. However, given that the objectives of the Voluntary Agreement are to provide fishery improvements while protecting water supply through flow and non-flow measures, the RWS supply shortfalls under the Voluntary Agreement would be less than those under the Bay-Delta Plan Amendment, and therefore would require rationing of a lesser degree than that which would occur under Scenario 3. The degree of rationing would also more closely align with the SFPUC's RWS LOS goal of limiting rationing to no more than 20% on a system-wide basis in drought years. This goal was adopted in 2008 by the Commission (Resolution No. 08-0200).

### 4.1.3 Scenario 3: Implementation of the Bay-Delta Plan Amendment

Table 5 below provides projected supplies and demands under Scenario 3. The RWS is projected to experience significant shortfalls in single dry and multiple dry years starting as soon as 2022 and through 2040, regardless of whether the proposed project is constructed. These significant shortfalls are a result of implementation of the Bay-Delta Plan Amendment and not attributed to the incremental retail demand associated with the proposed project. Shortfalls would range from about 12 to 45 mgd, corresponding to rationing in the retail service area ranging 16-50%, over the next 20 years.

If additional water supplies were not acquired before the Bay-Delta Plan Amendment were implemented, the SFPUC would impose customer rationing to help balance water supply deficits during dry years.

Given the severity of the reduction in RWS supply with implementation of the Bay-Delta Plan Amendment, existing and planned dry-year supplies would not be enough to meet projected retail demands without rationing above the SFPUC's RWS LOS goal of limiting rationing to 20% on a system-wide basis for all dry years starting as soon as 2022. Although the WSAP does not address implications to retail supply during system-wide shortages above 20%, the WSAP indicates that if system-wide shortage greater than 20% were to occur, RWS supply would be allocated between retail and Wholesale Customers per the rules corresponding to a 16-20% system-wide reduction, subject to consultation and negotiation between the SFPUC and its Wholesale Customers to modify the allocation rules. The allocation rules corresponding to the 16-20% system-wide reduction are reflected in Table 5 above for Scenario 3. These allocation rules result in shortfalls of 16-50% across the retail service area as a whole under Scenario 3.

**Table 5: Projected Supply and Demand Comparison Under Scenario 3 (Implementation of the Bay-Delta Plan Amendment) (mgd)**

| | | Normal Year | Single Dry Year[1] | Multiple Dry Years | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Year 1[1] | Year 2[2] | Year 3[2] | Year 4[2] | Year 5[2] | Year 6[2] | Year 7[3] | Year 8[3] |
| 2020 | Total Retail Demand[4] | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 | 72.1 |
| | Total Retail Supply[5] | 72.1 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 | 68.5 |
| | Shortfall | 0.0 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 | 3.6 |
| | Shortfall as % of Demand | 0.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% | 5.0% |
| 2025 | Total Retail Demand[4] | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 | 79.0 |
| | Total Retail Supply[5] | 79.0 | 66.7 | 66.7 | 52.8 | 52.8 | 52.8 | 52.8 | 52.8 | 42.9 | 42.9 |
| | Shortfall | 0.0 | 12.3 | 12.3 | 26.2 | 26.2 | 26.2 | 26.2 | 26.2 | 36.1 | 36.1 |
| | Shortfall as % of Demand | 0.0% | 15.6% | 15.6% | 33.2% | 33.2% | 33.2% | 33.2% | 33.2% | 45.7% | 45.7% |
| 2030 | Total Retail Demand[4] | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 | 82.3 |
| | Total Retail Supply[5] | 82.3 | 68.7 | 68.7 | 54.8 | 54.8 | 54.8 | 54.8 | 54.8 | 44.9 | 44.9 |
| | Shortfall | 0.0 | 13.6 | 13.6 | 27.5 | 27.5 | 27.5 | 27.5 | 27.5 | 37.4 | 37.4 |
| | Shortfall as % of Demand | 0.0% | 16.5% | 16.5% | 33.4% | 33.4% | 33.4% | 33.4% | 33.4% | 45.4% | 45.4% |
| 2035 | Total Retail Demand[4] | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 | 85.9 |
| | Total Retail Supply[5] | 85.9 | 68.8 | 68.8 | 54.9 | 54.9 | 54.9 | 54.9 | 54.9 | 45.0 | 45.0 |
| | Shortfall | 0.0 | 17.1 | 17.1 | 31.0 | 31.0 | 31.0 | 31.0 | 31.0 | 40.9 | 40.9 |
| | Shortfall as % of Demand | 0.0% | 19.9% | 19.9% | 36.1% | 36.1% | 36.1% | 36.1% | 36.1% | 47.6% | 47.6% |
| 2040 | Total Retail Demand[4] | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 | 89.9 |
| | Total Retail Supply[5] | 89.9 | 68.9 | 68.9 | 55.0 | 55.0 | 55.0 | 55.0 | 55.0 | 45.1 | 45.1 |
| | Shortfall | 0.0 | 21.0 | 21.0 | 34.9 | 34.9 | 34.9 | 34.9 | 34.9 | 44.8 | 44.8 |
| | Shortfall as % of Demand | 0.0% | 23.4% | 23.4% | 38.8% | 38.8% | 38.8% | 38.8% | 38.8% | 49.8% | 49.8% |

Notes:
1. During a single dry year and multiple dry year 1 (year 2 of SFPUC's design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 59.6 mgd.
2. During multiple dry years 2-6 (years 3-7 of SFPUC's design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 45.7 mgd.
3. During multiple dry years 7 and 8 (years 8 and 8.5 of SFPUC's design drought sequence), the retail allocation under the WSAP is 37.5% of available RWS supply, or 35.8 mgd.
4. Total retail demands correspond to those in ***Table 4-1 of the UWMP***, except for the 2020 demand projection, which was re-projected to take into account the lower demands being experienced due to the recent drought and the lag in occupancy of built units.
5. Local supplies (i.e., supplies not from the RWS, including groundwater, recycled water, and non-potable water) correspond to those in ***Table 6-7 of the UWMP***. Local supplies are assumed to be used before RWS supplies to meet retail demand.

### *4.2 Rationing Implications to the Proposed Project*

While the levels of rationing described above apply to the retail service area as a whole (i.e., 5-7% under Scenario 1, 16-50% under Scenario 3), the SFPUC may allocate different levels of rationing to individual retail customers based on customer type (e.g., dedicated irrigation, single family residential, multi-family residential, commercial, etc.) to achieve the required level of retail system-wide rationing. Allocation methods and processes that have been considered in the past and may be used in future droughts are described in the SFPUC's current Retail Water Shortage Allocation Plan (***Appendix L of the UWMP***). However, additional allocation methods that reflect existing drought-related rules and regulations adopted by the Commission during the recent drought (2015-2016 Drought Program adopted by Resolution 15-0119) are more pertinent to current and foreseeable development and water use in San Francisco and may be included in the SFPUC's update to its Retail Water Shortage Allocation Plan. The updated Retail Water Shortage Allocation Plan will be brought forward to the Commission along with the 2020 Urban Water Management Plan for consideration and adoption through a public hearing process in 2021. It is anticipated that the updated Retail Water Shortage Allocation Plan would include a tiered allocation approach that imposes lower levels of rationing on customers who use less water than similar customers in the same customer class, and would require higher levels of rationing by customers who use more water. This approach aligns with the SWRCB's statewide emergency conservation mandate imposed during the recent drought, in which urban water suppliers who used less water were subject to lower reductions than those who used more water. Imposing lower rationing requirements on customers who already conserve more water is also consistent with the implementation of prior rationing programs based on past water use, in which more efficient customers were allocated more water through an appeal process administered by the General Manager. Staff expects that under a future Retail Water Shortage Allocation Plan adopted by the Commission, the allocation method or combination of methods that would be applied during water shortages caused by drought would similarly be subject to the discretion of the General Manager.

The SFPUC anticipates that, as a worst-case scenario under Scenario 3, a mixed-use residential customer such as the proposed project could be subject to up to 38% rationing during a severe drought.[5] In accordance with the Retail Water Shortage Allocation Plan, the level of rationing that would be imposed on the proposed project would be determined at the time of a drought or other water shortage and cannot be established with certainty prior to the shortage event. However, newly-constructed buildings, such as the proposed project, have water-efficient fixtures and non-potable water systems that comply with the latest regulations. Thus, if these buildings can demonstrate below-average water use, they would likely be subject to a lower level of rationing than other retail customers that meet or exceed the average water use for the same customer class.

[5] This worst-case rationing level for San Francisco multi-family residential was estimated for the purpose of preparing comments on behalf of the City and County of San Francisco on the SWRCB's Draft Substitute Environmental Document in Support of Potential Changes to the Bay-Delta Plan, dated March 16, 2017. See comment letter Attachment 1, Appendix 3, Page 5, Table 3. The comment letter and attachments are available on the SWRCB website: https://www.waterboards.ca.gov/public_notices/comments/2016_baydelta_plan_amendment/docs/dennis_herrera.pdf. The rationing estimates prepared for the comment letter apply to the first 6 years of the SFPUC's 8.5-year design drought as they reflect the 1987-92 drought. For the last 2.5 years of the design drought, a corresponding worst-case rationing level for San Francisco multi-family residential customers was not estimated. While the level of rationing imposed on the retail system will be higher for the outer years of the design drought compared to the first 6 years, it is reasonable to assume that multi-family residential customers such as the proposed project would not have to conserve more than 38%.

### *4.3 Findings*

Regarding the availability of water supplies to serve the proposed project beginning in 2022, the SFPUC finds, based on the entire record before it, as follows:

- During normal years, the SFPUC's total projected water supplies will meet the projected demands of its retail customers, including those of the proposed project, existing customers, and foreseeable future development under Scenario 1, Scenario 2, and Scenario 3.
- During single dry years and multiple dry years under Scenario 1—No implementation of the Bay-Delta Plan Amendment or the March 1st Proposed Voluntary Agreement—the SFPUC can meet the projected demands of its retail customers, including those of the proposed project, existing customers, and foreseeable future development without the need for rationing beyond the LOS goal of 20% system-wide rationing. Based on past hydrology, statistically speaking dry years occur roughly once out of every 10 years.
- During single dry years and multiple dry years under Scenario 2—Implementation of the March 1st Proposed Voluntary Agreement—the SFPUC would still face a shortfall in single dry and multiple dry years, thus requiring rationing, but to a lesser degree and in closer alignment to the LOS goal of no more than 20% system-wide rationing compared to that which would occur under Scenario 3.
- During single dry years and multiple dry years under Scenario 3—Implementation of the Bay-Delta Plan Amendment—the SFPUC cannot reliably meet the projected demands of its retail customers, including the proposed project, existing customers, and foreseeable future development, without rationing at a level greater than that required to achieve the LOS goal of a maximum of 20% system-wide average rationing starting as soon as 2022. The SFPUC estimates it would impose up to 50% rationing across the retail service area and up to 38% rationing for mixed-use residential customers such as the proposed project.

Approval of this WSA by the Commission is not equivalent to approval of the development project for which the WSA is prepared. A WSA is an informational document required to be prepared for use in the City's environmental review of a project under CEQA. It assesses the adequacy of water supplies to serve the proposed project and cumulative demand.

Furthermore, this WSA is not a "will serve" letter and does not verify the adequacy of existing distribution system capacity to serve the proposed project. A "will serve" letter and/or hydraulic analysis must be requested separately from the SFPUC City Distribution Division to verify hydraulic capacity.

While this WSA contains information provided by or on behalf of the project sponsor regarding the proposed project's plans for onsite water reuse and demand estimates using the SFPUC's Non-potable Water Calculator, any information submitted to the SFPUC for preparation of this WSA does not fulfill the requirements of the Non-potable Water Ordinance. City review and approval of a proposed onsite water system must be performed separately through the Non-potable Water Program.

If there are any questions or concerns, please contact Steve Ritchie at (415) 934-5736 or SRitchie@sfwater.org.

Attachments: Attachment A, Communications from San Francisco Planning Department
Attachment B, 3333 California Street Project Demand Memo

# Attachment A –

## Communications from San Francisco Planning Department

SAN FRANCISCO
**PLANNING DEPARTMENT**

**MEMO**

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

**DATE:** **June 13, 2013**

**TO:** **SF Planning EP Planners & SFPUC Planners**

**FROM:** **Scott T. Edmondson, AICP; Aksel Olsen**

**RE:** **Project Types Represented in the Land Use Allocation**

This Memorandum explains the Planning Department's Land Use Allocation (LUA) and the types of projects included in the LUA. The 2012 LUA is the most recent update and uses the Association of Bay Area Governments' (ABAG) May 2012 Jobs-Housing Connection Scenario. As this memorandum explains, the Planning Department expects that the LUA will encompass the vast majority of development proposals that project sponsors will present to the Planning Department. This memorandum also identifies possible unusual circumstances under which EP Planners and the SF PUC Planners may want to consult further with the Planning Department's Information and Analysis Group to determine whether a project is encompassed within the LUA.

**ABAG's Projections of San Francisco's Economic Growth and the LUA**

The LUA takes ABAG's 30-year projections of citywide household and job growth and allocates them to smaller geographic units, in this case, the traffic analysis zones of the SF Transportation Authority's Countywide Transportation Model. Thus, the LUA does not project growth but simply allocates ABAG's growth projections to subarea locations within the city. The current 2012 LUA uses ABAG's Jobs-Housing Connection Scenario projections for San Francisco and covers the period from 2010 to 2040; these projections were released in May 2012 and are represented in five-year increments.

ABAG derives its demographic and economic growth projections from assumptions about long-term demographic and economic growth.[1] ABAG maintains its own set of regional models and develops each forecast with its in-house experts and private economic consultants.[2] The forecasting is informed by the best information and assumptions available through federal and State agencies, such as the State Department of Finance, and private sources. However, ABAG develops its forecast based on local knowledge from over 50 years of forecasting and develops the forecast to reflect local conditions in contrast to more general forecasting assumptions of State or federal sources. ABAG's estimate of total citywide growth for the 30-year period is expected to best represent actual growth at the end of the 30-year period. However, projected growth for any portion of the projection period, such as growth in a one-year or a five-year period, would be expected to vary from actual growth in such periods. Within the 30-year growth projection period, higher than average growth periods could be followed by lower than average growth periods such that growth over the period would ultimately equal the projected 30-year

total. All projection methodologies make assumptions based on the best available information at the time. To minimize the effects of imprecision intrinsic to any projections methodology when used in for planning decisions, ABAG follows professional best practices and updates its projections every two years. Accordingly, the Planning Department updates its LUA every two years. The planning practice of frequently updating projections and plans allows the incorporation of new information over time to provide for the most up-to-date projections.

The SFPUC updates its Urban Water Management Plan (UWMP) every five years. The UWMP typically relies on LUA projections or similar information. But, because the LUA is updated every two years, the SFPUC may want to review the LUA issued within SFPUC's 5-year UWMP cycle; and if it varies in a significant way from the SFPUC's projections used in its UWMP, discuss with Planning whether it should make any changes in its own water supply needs assessment during an UWMP cycle.

**Types of Projects Included in the LUA**

The LUA translates ABAG's projected household and job growth into total expected development in San Francisco over a 30-year period. The LUA translates ABAG's household growth into residential housing units and ABAG's job growth into commercial space.[3] Thus, the LUA projections of housing units and commercial space include all project types expected from San Francisco growth, such as housing, office, retail, production-distribution-repair (PDR), visitor, and cultural-institutional-educational (CIE). The LUA does not exclude any project type or potential growth. As such, the LUA and the ABAG economic projections upon which it is based contain the best estimates available of reasonably foreseeable growth and development in San Francisco over a 30-year period.

**Unusual Circumstances**

The LUA can be considered to include all reasonably expected growth and development and it is frequently updated to correct for expected variations. Nevertheless, there are possible unusual circumstances under which the EP Planners or SFPUC Planners may want to request further Planning Department consultation with the Information and Analysis Group to determine if a particular project falls within the LUA. ABAG's projections and the Department's LUA take into account urban economic trends and based on that information capture all reasonably foreseeable growth in San Francisco. Limited capital and aggregate demand of any urban economy constrains growth. However, occasionally the reality or perception may arise that a project lies outside the normal growth constraints of the San Francisco economy for some reason, and therefore lies outside ABAG's projection's and the Department's current spatial allocation in its LUA.

One can envision the rare case of a project arising outside the City's economy (demand and capital) from an organization not located in San Francisco using nonprofit foundation funds or private donations to construct a large institutional project in San Francisco, such as a major hospital, a university, or an office complex. These projects would represent spending and demand beyond that normally active in the San Francisco economy, and therefore represent net additions to projected growth beyond that captured by ABAG's projections and reflected in the Department's LUA. Indicative characteristics of such projects

would include those with non-local sponsors, of large size, and for an institutional land use. Alternatively, very large project proposals from local project sponsors active in the SF economy involving a large site, land assembly, a planned unit development (PUDs), master plans, or area plan and rezoning proposals may warrant individual assessment for a range of reasons even though they are likely captured in ABAG's projections and the LUA. Such projects would be similar to recent projects such as Hunters Point/Candlestick, Park Merced, Treasure Island, Pier 70 Master Plan, Eastern Neighborhoods, or the Transit Center District Plan.

The bi-annual update of ABAG's projections and the LUA would be able to capture development associated with such projects. However, should such a project be proposed between updates, the EP Planners and SFPUC could treat its appearance as sufficient cause to request the Planning Department's assistance in determining whether to consider the project outside the latest LUA projections.

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[1] Please see ABAG's summary of its research and forecasting on its website: http://www.abag.ca.gov/planning/research/index.html

[2] ABAG describes its current Jobs-Housing Scenario policy-based forecast here: http://onebayarea.org/pdf/JHCS/May_2012_Jobs_Housing_Connection_Strategy_Appendices_Low_Res.pdf.

[3] The LUA citywide totals only differ slightly, up to within one percent of ABAG totals (+/-). The difference is produced by LUA's complex method of translating ABAG projections into development (residential units and commercial space) and allocating total citywide growth to subarea locations. The minor difference between the LUA and ABAG citywide totals is real in absolute terms, but not in the sense that they are different projections. The one percent difference does not constitute a difference of projections. ABAG and MTC consider variation of one percent in citywide totals, plus or minus, as sufficiently representing ABAG's projections for consistency with the MTC regional projections and modeling purposes (congestion management, etc.). Even if a few versions of the LUA must be done to make minor subarea spatial allocation corrections, as long as the LUA's citywide totals are within one percent of ABAG's projections, and ABAG's projections have not changed, the LUA citywide totals have not effectively changed either. Any of those LUA versions' citywide totals fully represent the same unchanged ABAG projection totals.

# Attachment B –

## 3333 California Street Project Demand Memo

SAN FRANCISCO
PLANNING DEPARTMENT

MEMO

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

**DATE:** May 16, 2019

**TO:** Fan Lau, SFPUC

**FROM:** Chris Thomas, Environmental Planning

**CC:** Kei Zushi, Environmental Planning

**RE:** 3333 California Street Project Revised Water Supply Assessment Request (Planning Department Case No. 2015-014028ENV)

On June 13, 2017 the San Francisco Public Utilities Commission (SFPUC) approved a Water Supply Assessment (WSA) for the proposed 3333 California Street project (Resolution 17-0142). After this approval, on December 12, 2018, the State Water Resources Control Board (SWRCB) adopted an amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan), which establishes water quality objectives to maintain the health of certain rivers and the Bay-Delta ecosystem. Specific requirements for unimpaired flow on the Tuolumne River under the Bay-Delta Plan Amendment, as currently adopted, would have a significant impact to the regional water system supply delivered by the SFPUC.

Certain aspects of the project description of the 3333 California Street project provided with this request has changed somewhat from the project description included with the June 13, 2017 approval. The total number of 13 buildings proposed has remained the same:

- Two (2) four- to five-story mixed use residential buildings with ground floor retail along California Street between Laurel and Walnut Streets (the Plaza A and Plaza B Buildings);
- One (1) three-story mixed use (ground floor retail and child care) with commercial office building along California Street east of Walnut Street (the Walnut Building);
- Two (2) four- to six-story mixed use buildings along Masonic and Euclid Avenues (the Masonic and Euclid Buildings);
- Seven (7) three- to four-story townhomes along Laurel Street (the Laurel Duplexes); and
- One (1) four-story residential building near the Laurel Street and Mayfair Drive intersection (the Mayfair Building).

Both the project proposed in June 2017 and the currently proposed project also include a total of 558 residential units. As indicated in the table below, the combined areas by use have changed somewhat.

**Previous and Current Proposed Project Sub-Areas**

| Existing Use | June 2017 Project Totals (gsf) | Current Project Totals (gsf) |
|---|---|---|
| Office | 49,999 | 49,999 |
| Residential | 818,247 | 829,847 |
| Retail | 54,967 | 40,261 |
| Child Care | 14,620 | 13,630 |
| Structured Parking[a] | 435,767 | 374,809 |
| **Total gsf** | **1,373,600** | **1,308,546** |

[a] Structured parking would have no water demand and is therefore not included in water demand calculations.

As discussed in the project sponsor memo, a variant to the proposed project, referred to as the Walnut Building Variant ("variant"), is also being considered. This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. Under this variant, the approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. In this variant, the Walnut Building would be comprised of 147,590 gsf of residential use, 8,500 gsf of retail use, 14,665 gsf of childcare use, and a 172,211 gsf below grade garage. The total Walnut Building in the variant would be 342,966 gsf. Demand estimates are also provided for the variant. Although the total number of units (744) has remained the same, sub-areas by use in the proposed variant have also changed somewhat; however, its total size (1,434,098 gsf) is smaller than the variant proposed in June 2017 (1,473,001 gsf).

The proposed project and the variant would be built in four overlapping construction phases, with a maximum development period of 10 years.

Changes in the areas of use and refinements in some of demand estimates between the project and variant proposed in June 2017 and the current proposal have resulted in changes in demand. The total demand for the June 2017 project at buildout in 2035 was 0.0596 million gallons per day (mgd) while the total demand for the current project is 0.067 mgd. The total demand for the June 2017 variant was 0.0729 mgd while the total demand for the current variant is 0.084 mgd.

The purpose of this memorandum is to request that the SFPUC prepare a revised WSA for the proposed 3333 California Street mixed use project, in recognition of the Bay-Delta Plan Amendment and in compliance with CEQA Guidelines Section 15155 and Sections 10910 through 10915 of the California Water Code. The project description and water demand calculations for the 3333 California Street project have changed from the project considered by the WSA approved on June 13, 2017. The information provided by the project sponsor, intended to meet the requirements outlined in the SFPUC guidance memo dated September 6, 2016, is provided with this request. As indicated in the attached request for a Water Supply Assessment, two projects are currently under consideration: the proposed project which includes 558 dwelling units and the project variant which includes a total of 744 dwelling units. As indicated,

both developments would also include commercial office, retail, day care and open space components.

The project sponsor has provided project information intended to meet the requirements outlined in the SFPUC guidance memo dated September 6, 2016. The project is proposed to be constructed in four phases over a 10-year period. A summary of the project description, proposed average daily water demands, and supporting tables prepared by the project sponsor's consultant (based on the SFPUC District Calculator Version 7), are attached. Non-Potable Water Calculator spreadsheets for both the proposed project and the variant are also attached.

Should you have questions or need additional information from the Planning Department or the project sponsor, please contact me at 415-575-9036 or christopher.thomas@sfgov.org.

Attachments

3333 California Updated WSA Package for SFPUC_051619.pdf

NP District Scale Calc_V7.1_3333CA_050919_phased.xlsx

NP District Scale Calc_V7.1_3333CA_050919_phased_variant.xlsx

May 16, 2019

Chris Thomas
SFPUC: Water Resources Division
Non-Potable Program
525 Golden Gate Ave, 10th Floor
San Francisco, CA 94102
christopher.thomas@sfgov.org
Phone: 415-575-9036

*Via Email*

Re: 3333 California Street
**Case File No. 2015.014028ENV**

Revised Water Supply Assessment

Dear Mr. Thomas,

Upon your request, we have rerun the water supply calculations for the proposed redevelopment project at 3333 California Street (Block 1032 and Lot 003). The updates pertain to both minor changes to the proposed project and its variant (the Walnut Building Variant) and the use of the current version of the SFPUC Nonpotable District Scale Calculator Tool (version 7.1).

## PROJECT DESCRIPTION

The proposed project would redevelop the 10.25-acre parcel at 3333 California Street in the northwest portion of San Francisco from an office and parking use to a mix of residential, retail, commercial office, child care, and parking uses. It is currently used as the University of California San Francisco (UCSF) Laurel Heights Campus and is developed with two structures, three surface parking lots, two circular garage ramp structures, internal roadways and landscaping or landscaped open space.

The proposed project would entail the demolition of the existing one-story annex building at the corner of California and Laurel Streets (northwest corner of the site), the demolition of the existing surface parking lots and circular garage ramp structures, and the partial demolition (approximately 49 percent) of the existing office building located at the center of the project site. The remaining portion of the existing office building would be divided into two separate residential buildings, Center Building A and Center Building B, with a two-story addition atop Center Building A and a two- to three-story addition above Center Building B. The proposed project would also include the construction of 13 new buildings along the California Street, Masonic Avenue, Euclid Avenue, and Laurel Street edges:

- Two (2) four- to five-story mixed use residential buildings with ground floor retail along California Street between Laurel and Walnut Streets (the Plaza A and Plaza B Buildings);
- One (1) three-story mixed use (ground floor retail and child care) with commercial office building along California Street east of Walnut Street (the Walnut Building);
- Two (2) four- to six-story mixed use buildings along Masonic and Euclid Avenues (the Masonic and Euclid Buildings);
- Seven (7) three- to four-story townhomes along Laurel Street (the Laurel Duplexes); and
- One (1) four-story residential building near the Laurel Street and Mayfair Drive intersection (the Mayfair Building).

**Figure 1: Site Plan with Building Names Referenced in this Memorandum**




Overall, the proposed project would entail the removal of approximately 376,000 gross square feet (gsf) of office uses with approximately 49,999 gsf relocated to the proposed Walnut Building. Table 1 provides a summary of the proposed changes.[1] As noted below, the proposed project would include 558 dwelling

[1] Square footages presented are approximate.

units within 829,847 gross square feet of residential floor area. The proposed project would provide 49,999 gross square feet of commercial office floor area; 40,261 gross square feet of retail floor area (29,263 of general retail and 12,998 gross square feet of food and beverage retail; and a 13,630-gross-square-foot child care center use. Up to 823 vehicle parking spaces, including ten car share spaces, would be provided in multiple garages with up to three subterranean levels totaling approximately 374,809 gross square feet. Estimated occupancy totals for the proposed uses were calculated using the occupant density defaults from the SFPUC Nonpotable Calculator Spreadsheet, which appear appropriate for the proposed mix of units. Additionally, the proposed project would develop nearly half the overall lot area (198,198sf) with a combination of public and private open spaces including: Euclid Park, Cypress Square, Mayfair Walk, and Walnut Walk. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site. The proposed project would also widen the adjacent sidewalks to meet the requirements of the *Better Streets Plan* and include street trees and other improvements as part of a series of proposed streetscape changes.

**Table 1: Proposed Project Summary**

| Project Features | Existing | Existing to Be Retained [b] | New Construction | Proposed Totals |
|---|---|---|---|---|
| Dwelling Units | -- | -- | 558 | **558** |
| Number of Buildings | 2 | 1 | 13 | **14** |
| Open Space | 165,200 square feet | 165,200 square feet | 32,998 square feet | **198,198 square feet** |
| Parking Spaces | 543 [a] | 543 | 280 | **823** |
| Loading Spaces | 5 | -- | 6 | **6** |
| Bicycle Spaces | 15 | -- | 653 | **653** |
| **Use** | **Existing Gross Square Footage** | **Existing Uses to Be Retained (gsf) [b]** | **New Construction / Additions (gsf)** | **Proposed Project Totals (gsf)** |
| Office | 364,500 | 49,999 [c, d] | -- [d] | **49,999** |
| Residential | -- | -- | 829,847 [e] | **829,847** |
| Retail | -- | -- | 40,261 [f] | **40,261** |
| Child Care | 11,500 | 11,500 | 2,130 | **13,630** [g] |
| Structured Parking [h] | 93,000 | 93,000 | 281,809 | **374,809** |
| ***Total gsf*** | ***469,000*** | ***154,499*** | ***1,154,047*** | ***1,308,546*** |

***Notes***:

[a] Surface (331) and garage (212) parking spaces.

[b] Retained numbers are use types retained rather than specific elements to be retained (e.g. office and child care use relocations to proposed Walnut Building, new and redeveloped open spaces, or parking count rather than specific parking lots to be retained). In some cases, the actual element is retained but modified from one use type to another (e.g. existing office building).

[c] Existing office building would be retained and adaptively reused as two separate residential buildings (proposed Center Buildings A and B), the annex building would be demolished, and new office space would be added in the proposed Walnut Building.

[d] Existing office uses would be relocated to the proposed Walnut Building..

[e] Includes the adaptively reused office building (proposed Center Buildings A and B) and new residential uses along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street.

[f] New retail uses would be developed at the ground floor of the proposed Plaza A, Plaza B and Walnut Buildings.

[g] All proposed child care uses would be developed in the proposed Walnut Building.

[h] The existing three-level, partially below-grade parking garage under the eastern portion of the existing office building would be reconstructed as part of the proposed California Street Garage under the proposed Plaza A, Plaza B, and Walnut Buildings as well as the adaptively-reused Center Building B. New below-grade parking would be developed under the proposed Masonic and Euclid Buildings, the proposed Laurel Duplexes, and the proposed Mayfair Building.

***Source**:* Prado Group/PSKS, Planning Application Submittal, February 22, 2019.

**Table 2: Project Unit Types**

**UNIT MIX/COUNT**

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED or PH | TOTAL |
|---|---|---|---|---|---|---|
| Plaza Bldg A | 18 | 22 | 23 | 4 | 0 | 67 |
| Plaza Bldg B | 9 | 21 | 25 | 6 | 0 | 61 |
| Walnut | 0 | 0 | 0 | 0 | 0 | 0 |
| Center Bldg A | 0 | 24 | 11 | 10 | 6 | 51 |
| Center Bldg B | 0 | 51 | 49 | 30 | 9 | 139 |
| Masonic | 0 | 22 | 25 | 10 | 0 | 57 |
| Euclid | 0 | 55 | 54 | 30 | 0 | 139 |
| Laurel Duplexes | 0 | 0 | 0 | 2 | 12 | 14 |
| Mayfair | 0 | 12 | 7 | 11 | 0 | 30 |
| | | | | | | |
| Total | 27 | 207 | 194 | 103 | 27 | 558 |
| | *5%* | *37%* | *35%* | *18%* | *5%* | *100%* |

## PROJECT DESCRIPTION: WALNUT BUILDING VARIANT

The project sponsor is considering a variant to the proposed project, referred to as the Walnut Building Variant ("variant"). This variant would allow for the development of 744 dwelling units on the project site; an increase of 186 dwelling units over the number in the proposed project. Under this variant, the approximately 49,999 gsf of commercial office space in the proposed Walnut Building would be changed to a residential use. In this variant, the Walnut Building would be comprised of 147,590 gsf of residential use, 8,500 gsf of retail use, 14,665 gsf of childcare use, and a 172,211 gsf below grade garage.. The total Walnut Building in the variant would be 342,966 gsf.

Under this variant the footprints of the other proposed new buildings would not change. Overall, approximately 1,434,098 gsf of new and rehabilitated space would be developed under the variant, broken down by space type in Table 3. Approximately 234,599 square feet of planted space, including roofs and ground level, would be provided throughout the site.

**Table 3: Walnut Building Variant Project Summary**

| **Project Features** | **Existing** | **Existing to Be Retained [b]** | **New Construction** | **Proposed Totals** |
|---|---|---|---|---|
| Dwelling Units | -- | -- | 744 | **744** |
| Number of Buildings | 2 | 1 | 13 | **14** |
| Open Space | 165,200 square feet | 165,200 square feet | 32,998 square feet | **198,198 square feet** |
| Parking Spaces | 543 [a] | 543 | 376 | **919** |
| Loading Spaces | 5 | -- | 6 | **6** |
| Bicycle Spaces | 15 | -- | 839 | **839** |
| **Use** | **Existing Gross Square Footage** | **Existing Uses to Be Retained (gsf) [b]** | **New Construction / Additions (gsf)** | **Proposed Project Totals (gsf)** |
| Office | 364,500 | -- [c] | -- | **--** |
| Residential | -- | -- | 977,437 [d] | **977,437** |
| Retail | -- | -- | 34,496 [e] | **34,496** |
| Child Care | 11,500 | 11,500 | 3,165 | **14,665** [f] |
| Structured Parking [g] | 93,000 | 93,000 | 314,500 | **407,500** |
| ***Total gsf*** | ***469,000*** | ***104,500*** | ***1,329,598*** | ***1,434,098*** |

***Notes***:

[a] Surface (331) and garage (212) parking spaces.

[b] Retained numbers are use types retained rather than specific elements to be retained (e.g. office and child care use relocations to proposed Walnut Building, new and redeveloped open spaces, or parking count rather than specific parking lots to be retained). In some cases, the actual element is retained but modified from one use type to another (e.g. existing office building).

[c] Existing office building would be retained and adaptively reused as two separate residential buildings (proposed Center Buildings A and B) and the annex building would be demolished.

[d] Includes the adaptively reused office building (proposed Center Buildings A and B) and new residential uses along California Street, Masonic Avenue, Euclid Avenue, and Laurel Street.

[e] New retail uses would be developed at the ground floor of the proposed Plaza A, Plaza B and Walnut Buildings.

[f] All proposed child care uses would be developed in the proposed Walnut Building.

[g] The existing three-level, partially below-grade parking garage under the eastern portion of the existing office building would be reconstructed as part of the proposed California Street Garage under the proposed Plaza A, Plaza B, and Walnut Buildings as well as the adaptively-reused Center Building B. New below-grade parking would be developed under the proposed Masonic and Euclid Buildings, the proposed Laurel Duplexes, and the proposed Mayfair Building.

**Table 4: Walnut Building Variant Project Unit Types**

VARIANT UNIT MIX TOTALS

| Level | JR | 1-BED | 2-BED | 3-BED | 4-BED or PH | TOTAL |
|---|---|---|---|---|---|---|
| Plaza Bldg A | 18 | 22 | 23 | 4 | 0 | 67 |
| Plaza Bldg B | 9 | 21 | 25 | 6 | 0 | 61 |
| Walnut Variant | 0 | 185 | 1 | 0 | 0 | 186 |
| Center Bldg A | 0 | 24 | 11 | 10 | 6 | 51 |
| Center Bldg B | 0 | 51 | 49 | 30 | 9 | 139 |
| Masonic | 0 | 22 | 25 | 10 | 0 | 57 |
| Euclid | 0 | 55 | 54 | 30 | 0 | 139 |
| Laurel Duplexes | 0 | 0 | 0 | 2 | 12 | 14 |
| Mayfair | 0 | 12 | 7 | 11 | 0 | 30 |
| | | | | | | |
| Total | 27 | 392 | 195 | 103 | 27 | 744 |
| | *4%* | *53%* | *26%* | *14%* | *4%* | *100%* |

## PROPOSED CONSTRUCTION SCHEDULING AND PHASING

It is the intent of the project sponsor to phase the construction of the proposed project or its variant. The preliminary construction plan would include four overlapping construction phases and is subject to change. Project construction would commence in 2020 and would occur within a maximum development period of 15 years as follows:

Phase 1: Masonic and Euclid Buildings

- Duration: 30 month
- Phase would include the demolition of the existing annex building and the construction of residential, retail and garage space, as well as associated landscape area and public right of way improvements.

Phase 2: Center Buildings A and B (existing office building)

- Duration: 24 months; anticipated to commence on Month 20 of Phase 1
- Phase would include the partial demolition of the existing office building and the construction of residential and garage space.

Phase 3: California Street Buildings (Plaza A, Plaza B, and Walnut Buildings)

- Duration: 36 months; anticipated to commence on Month 15 of Phase 2
- Phase would include the construction of residential, retail, office, childcare, and garage space, as well as associated landscape and public right of way improvements (office is removed in the Walnut Variant).

Phase 4: Mayfair Building and Laurel Duplexes

- Duration: 20 months; anticipated to commence on Month 30 of Phase 3
- Phase would include the construction of residential and garage as well as associated landscape and public right of way improvements.

The preliminary construction phasing plan would also be applicable to the Walnut Variant.

Please note that the non-potable calculator has been run for the maximum number of phases it is configured to allow (three), by combining Phases 3 and 4.

*Landscape, Roof Totals, and Phasing*

The following table summarizes surface properties and areas for ground-level hardscape and planting (this area is actually mostly over subsurface parking) and building roofs.

**Table 5: Landscape and roof areas by coverage type**

| | |
|---|---|
| Phase 1 | |
| Hardscape | 48,440 |
| Planting Area | 40,150 |
| Conventional Roof | 13,000 |
| Green Roof | 40,000 |
| Total Area | 141,590 |
| | |
| Phase 2 | |
| Hardscape | 16,320 |
| Planting Area | 23,170 |
| Conventional Roof | 37,365 |
| Green Roof | 16,607 |
| Total Area | 93,462 |
| | |
| Phase 3+4 | |
| Hardscape | 52,900 |
| Planting Area | 44,160 |
| Conventional Roof | 30,688 |
| Green Roof | 70,512 |
| Total Area | 198,260 |

## PROPOSED INTEGRATED WATER MANAGEMENT APPROACH

The proposed water management approach has not changed since the original application, and it is applicable to both the proposed project and its variant. Through this approach, the proposed project and its variant would comply with the requirements of City and County of San Francisco ordinances related to water conservation and resources, as applicable, including the San Francisco Green Building Ordinance, the Stormwater Management Ordinance and the Alternate Water Supplies/Reuse Ordinance, as well as the Water Efficient Irrigation, Residential Water Conservation, and Commercial Water Conservation Ordinances.

*Water Conservation*

The project site is served by San Francisco's potable water supply system. To reduce the use of potable water on a per-unit basis, the proposed project would provide high-efficiency fixtures and appliances in new and existing buildings. These savings are not fully represented in the estimates here because the non-potable calculator uses flowrate defaults. Water wise landscaping would be employed. All nonpotable flushing and irrigation demands are intended to be met by collected rainwater and greywater treated onsite. The site is projected to use about 1/3 less potable water than a comparable development that meets the stringent CALGreen Code.

*Stormwater and Wastewater*

The project site is served by San Francisco's combined sewer system and is subject to the City's stormwater management requirements. The proposed project would reduce loading on the neighborhood stormwater infrastructure by collecting rainwater for reuse and managing stormwater through landscape and storage. These strategies combined with a site plan targeting over 50 percent planted area, including living roofs, should result in runoff reductions beyond the 25 percent required by the Stormwater Management Ordinance. No new or enlarged off-site wastewater collection facilities are proposed.

*Water + Ecology*

A site of this size has the potential to enhance the ecological assets of the neighborhood and city. The proposed project would preserve several major trees and greatly increase the total number of trees on the project site and the adjacent sidewalks. The proposed landscaping plans would favor native and adapted trees and plants that reduce irrigation demands while managing stormwater and promoting biodiversity.

## WATER USE ESTIMATES

The following tables summarize the potable and nonpotable water demand estimates for the proposed project and the Walnut Building Variant and are based on the proposed uses and the preliminary construction phasing program, which has not changed. These estimates are preliminary and may be refined at a later time as project designs progress. The estimates include better than code average fixture flowrates (though are conservative in that they do not take the very lowest flowrate available in all cases), and include the high end of potential living roof area contemplated as a conservative case from a water supply perspective (more irrigation, less capturable rainwater). Targeted rainwater and greywater reuse would offset about 1/4 of the projected use according to the SFPUC calculator tool (see Attachment A for the Proposed Project and Attachment B for the Variant), but nonpotable demand is not subtracted from the below estimates.

### *Existing Usage*

Site water use data provided to the project team from 2012-2014 indicate that existing usage tends to average about 20,000 gpd (0.02 mgd), with peak months averaging around 26,000 gpd (0.026 mgd). It is possible that this data set does not include 100% of the current site water demands.

***Proposed Project***

**Table 6: Proposed Project Estimated Total Water Demand Based on Water Year Type**

| | Normal | Single dry | Multiple 2 | Multiple 3 | Multiple 4 |
|---|---|---|---|---|---|
| Total estimated demand of proposed project (mgd) | 0.067 | 0.068 | 0.069 | 0.069 | 0.069 |
| Potable | 0.046 | 0.046 | 0.046 | 0.046 | 0.046 |
| Nonpotable | 0.020 | 0.022 | 0.023 | 0.023 | 0.023 |

Note: Relative to the normal year, calculations assume that irrigation demand increases 30% in a single dry year, 40% in Multiple 2, 45% in Multiple 3 and 50% in Multiple 4. The increases are all to be served by nonpotable water, and no change to potable usage is assumed in dry years.

**Table 7: Proposed Project Estimated Total Water Demand Based on Project Phasing**

| Usage at End of Year | 2015 | 2020 | 2025* | 2030 | 2035 |
|---|---|---|---|---|---|
| Total estimated demand of proposed project (mgd) | 0 | 0 | 0.043 | 0.067 | 0.067 |
| Potable | 0 | 0 | 0.032 | 0.048 | 0.048 |
| Nonpotable | 0 | 0 | 0.011 | 0.018 | 0.018 |

*Phase 3 is scheduled for completion in December of 2025, so the 2025 estimate includes only Phases 1 and 2. All phases are included in the estimates for 2030 and 2035, but this is conservative from a water supply perspective because full buildout could occur as late as 2035.

***Walnut Building Variant***

**Table 8: Variant Estimated Total Water Demand Based on Water Year Type**

| | Normal | Single dry | Multiple 2 | Multiple 3 | Multiple 4 |
|---|---|---|---|---|---|
| Total estimated demand of proposed variant (mgd) | 0.084 | 0.086 | 0.086 | 0.087 | 0.087 |
| Potable | 0.064 | 0.064 | 0.064 | 0.064 | 0.064 |
| Nonpotable | 0.020 | 0.022 | 0.023 | 0.023 | 0.023 |

Note: Relative to the normal year, calculations assume that irrigation demand increases 30% in a single dry year, 40% in Multiple 2, 45% in Multiple 3 and 50% in Multiple 4. The increases are all to be served by nonpotable water, and no change to potable usage is assumed in dry years.

**Table 9. Variant Estimated Total Water Demand Based on Project Phasing**

| | **2015** | **2020** | **2025*** | **2030** | **2035** |
|---|---|---|---|---|---|
| Total demand of proposed variant (mgd) | 0 | 0 | 0.043 | 0.084 | 0.084 |
| Potable | 0 | 0 | 0.032 | 0.064 | 0.064 |
| Nonpotable | 0 | 0 | 0.011 | 0.020 | 0.020 |

*Phase 3 is scheduled for completion in December of 2025, so the 2025 estimate includes only Phases 1 and 2. All phases are included in the estimates for 2030 and 2035, but this is conservative from a water supply perspective because full buildout could occur as late as 2035.

If you have any questions, please feel free to reach out directly to me at 415-857-9324 or dbragg@pradogroup.com.

Regards,

Don Bragg
Development Director, Prado Group Inc.

Attachments: A: NP District Scale Calc v7.1: Proposed Project Summary (2 pgs.)
B: NP District Scale Calc v7.1: Variant Summary (2 pgs.)

cc: Kei Zushi, SF Planning Department
Peter Mye, SWCA
Lisa Congdon, Prado Group

# Attachment A: Proposed Project Summary

## NON-POTABLE WATER CALCULATOR

### Project Summary Sheet

**Project Contact:** Don Bragg
415.395.0880
dbragg@pradogroup.com

Estimated Site/Building Permit Issuance Date: 12/31/2019

**Total Gross Square Footage:** 933,737

### 1. Demands and Supplies Summary

| | | |
|---|---|---|
| **Demands Met by Non-Potable Supply for Project (gpy):** | 6,667,100 | **Meets Grant Criteria for Annual Offset in Year 2023** |
| **Demands Met by Non-Potable Supply for Project*:** | 27% | Achieving estimated offset may require storage to store excess monthly supplies; |
| **Project Total Annual Water Demand (gpy)*:** | 24,309,573 | |
| **If Grant Offset Criteria Met, Occurs in Year:** | 2023 | |
| **Potable Make-Up Water Allocation (gpy):** | 477,004 | **Potable supplies are allocated to this project to meet remaining demands. Projects are allocated an additional 10% in potable supplies as a buffer.** |
| **Avg. Daily Wet Weather Potable Allocation (gpd):** | 1,045 | **Projects are allocated these potable supplies during wet weather months (October - March)** |
| **Avg. Daily Dry Weather Potable Allocation (gpd):** | 1,567 | **Projects are allocated these potable supplies during dry weather months (April - September)** |

*Note: Estimates based on Tab 6 - Building Potential Summary total water demand values. Manually entered non-potable demands that exceed auto-calculated non-potable demands from Tab 6 may result in Total Annual Water demands greater than the value used in this analysis

### 2. Building Information Summary

| | Main Project Site 1 | Site 2 | Site 3 |
|---|---|---|---|
| **Project / Building Name:** | **3333 California** | **3333 California Phase 2** | **3333 California Phase 3+4** |
| **Project Address:** | 3333 California St, San Francisco, CA | 3333 California St, San Francisco, CA | 3333 California St, San Francisco, CA |
| **Assessor's Block & Lot No. / APN:** | 1032/003 | 1032/003 | 1032/003 |
| **Year Online:** | 2022 | 2023 | 2027 |
| **Building Type:** | Mixres | Mixres | Mixres |
| **Total Building Size (gross square footage or GSF):** | 267,675 | 321,402 | 344,660 |
| **Total Lot Size ($ft^2$):** | 178,587 | 89,294 | 178,588 |
| **Number of Residential Units:** | 196 | 190 | 172 |
| **Impervious Surface Above Grade ($ft^2$):** | 13,000 | 37,365 | 30,688 |
| **Impervious Surface Below Grade ($ft^2$):** | 48,440 | 16,320 | 52,900 |
| **Landscaped Area ($ft^2$):** | 80,150 | 39,777 | 114,672 |
| **Site Location (Zone):** | Eastern SF | Eastern SF | Eastern SF |

### 3. Summary of Nonpotable Demands and Supplies for the Project

**Non-Potable Water Supply Estimates**

| On-site Alternate Water Source Supplies | Annual Supply (gpy) | Annual Supply (gpy) | Annual Supply (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Rainwater:** | 130,101 | 285,496 | 266,179 | **681,776** |
| **Stormwater:** | 0 | 0 | 0 | **0** |
| **Graywater:** | 3,435,862 | 3,330,682 | 3,048,552 | **9,815,095** |
| **Blackwater:** | 0 | 0 | 0 | **0** |
| **Foundation Drainage** | 0 | 0 | 0 | **0** |
| **Cooling & Other Supplies** | 0 | 0 | 0 | **0** |
| **TOTAL:** | **3,565,962** | **3,616,178** | **3,314,731** | **10,496,871** |

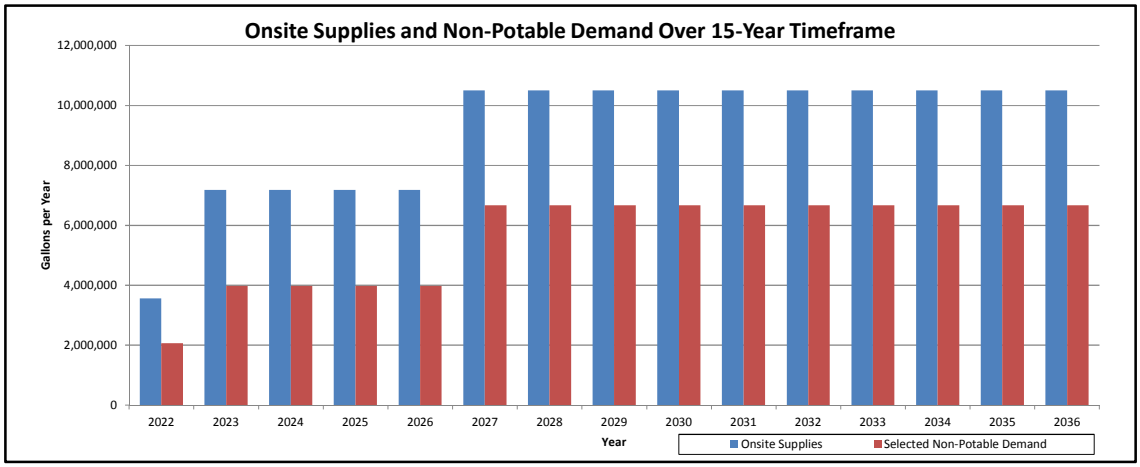
**Non-Potable Applications Estimates**

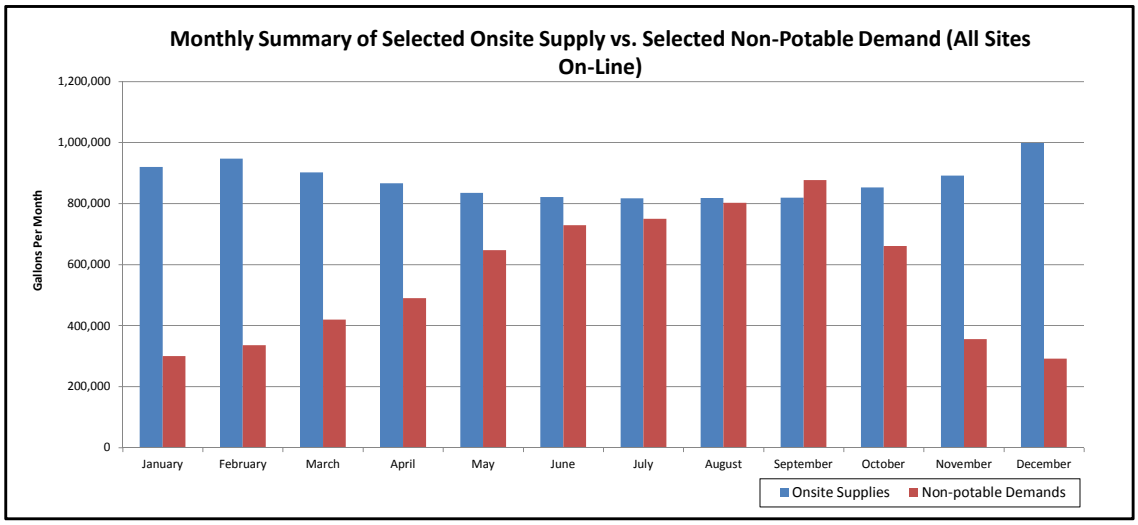
| Project Specific Non-Potable Application Demands | Annual Demand (gpy) | Annual Demand (gpy) | Annual Demand (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Toilets/Urinals:** | 874,276 | 847,512 | 1,116,689 | **2,838,477** |
| **Irrigation:** | 705,531 | 366,593 | 859,434 | **1,931,559** |
| **Toilets/Urinals + Irrigation:** | 1,579,807 | 1,214,106 | 1,976,123 | **4,770,036** |
| **Cooling Tower:** | 492,516 | 698,250 | 706,230 | **1,896,996** |
| **Commercial Laundry & Other** | 0 | 0 | 0 | **0** |
| **TOTAL:** | **2,072,323** | **1,912,356** | **2,682,353** | **6,667,031** |

## *4. Project Phasing*

| 15-Year Timeframe | SITE 1: 3333 California -- 3333 California St, San Francisco, CA | | SITE 2: 3333 California Phase 2 -- 3333 California St, San Francisco, CA | | SITE 3: 3333 California Phase 3+4 -- 3333 California St, San Francisco, CA | | |
|---|---|---|---|---|---|---|---|
| | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | Re-Used Non-Potable Supplies (gpy) |
| 2022 | 3,565,962 | 2,072,323 | 0 | 0 | 0 | 0 | 2,072,323 |
| 2023 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2024 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2025 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2026 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2027 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2028 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2029 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2030 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2031 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2032 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2033 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2034 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2035 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |
| 2036 | 3,565,962 | 2,072,323 | 3,616,178 | 1,912,356 | 3,314,731 | 2,682,353 | 6,667,031 |

This offset analysis assumes the full year of supplies is available to offset non-potable demands. Some scenarios may require storage to store excess supplies from one month in order to use those supplies in another month with unmet demands.



# Attachment B: Variant Summary

## NON-POTABLE WATER CALCULATOR

### Project Summary Sheet




**Project Contact:** Don Bragg
415.395.0880
dbragg@pradogroup.com

Estimated Site/Building Permit Issuance Date: 12/31/2019

**Total Gross Square Footage:** 1,026,598

### 1. Demands and Supplies Summary

| | | |
|---|---|---|
| **Demands Met by Non-Potable Supply for Project (gpy):** | 7,476,800 | Meets Grant Criteria for Annual Offset in Year 2023 |
| **Demands Met by Non-Potable Supply for Project*:** | 24% | |
| **Project Total Annual Water Demand (gpy)*:** | 30,723,797 | |
| **If Grant Offset Criteria Met, Occurs in Year:** | 2023 | |
| **Potable Make-Up Water Allocation (gpy):** | 559,971 | Potable supplies are allocated to this project to meet remaining demands. Projects are allocated an additional 10% in potable supplies as a buffer. |
| **Avg. Daily Wet Weather Potable Allocation (gpd):** | 1,273 | Projects are allocated these potable supplies during wet weather months (October - March) |
| **Avg. Daily Dry Weather Potable Allocation (gpd):** | 1,794 | Projects are allocated these potable supplies during dry weather months (April - September) |

*Note: Estimates based on Tab 6 - Building Potential Summary total water demand values. Manually entered non-potable demands that exceed auto-calculated non-potable demands from Tab 6 may result in Total Annual Water demands greater than the value used in this analysis

### 2. Building Information Summary

| | Main Project Site 1 | Site 2 | Site 3 |
|---|---|---|---|
| **Project / Building Name:** | **3333 California** | **3333 California Phase 2** | **3333 California Phase 3+4** |
| **Project Address:** | 3333 California St, San Francisco, CA | 3333 California St, San Francisco, CA | 3333 California St, San Francisco, CA |
| **Assessor's Block & Lot No. / APN:** | 1032/003 | 1032/003 | 1032/003 |
| **Year Online:** | 2022 | 2023 | 2027 |
| **Building Type:** | Mixres | Mixres | Mixres |
| **Total Building Size (gross square footage or GSF):** | 267,675 | 321,402 | 437,521 |
| **Total Lot Size ($ft^2$):** | 178,587 | 89,294 | 178,588 |
| **Number of Residential Units:** | 196 | 190 | 358 |
| **Impervious Surface Above Grade ($ft^2$):** | 13,000 | 37,365 | 30,688 |
| **Impervious Surface Below Grade ($ft^2$):** | 48,440 | 16,320 | 52,900 |
| **Landscaped Area ($ft^2$):** | 80,150 | 39,777 | 114,672 |
| **Site Location (Zone):** | Eastern SF | Eastern SF | Eastern SF |

### 3. Summary of Nonpotable Demands and Supplies for the Project

**Non-Potable Water Supply Estimates**

| On-site Alternate Water Source Supplies | Annual Supply (gpy) | Annual Supply (gpy) | Annual Supply (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Rainwater:** | 130,101 | 285,496 | 282,620 | **698,216** |
| **Stormwater:** | 323,546 | 179,934 | 429,954 | **933,434** |
| **Graywater:** | 3,435,862 | 3,330,682 | 6,309,114 | **13,075,658** |
| **Blackwater:** | 0 | 0 | 0 | **0** |
| **Foundation Drainage** | 0 | 0 | 0 | **0** |
| **Cooling & Other Supplies** | 0 | 0 | 0 | **0** |
| **TOTAL :** | **3,889,508** | **3,796,112** | **7,021,688** | **14,707,308** |

**Non-Potable Applications Estimates**

| Project Specific Non-Potable Application Demands | Annual Demand (gpy) | Annual Demand (gpy) | Annual Demand (gpy) | Total (gpy) |
|---|---|---|---|---|
| **Toilets/Urinals:** | 874,276 | 847,512 | 1,946,359 | **3,668,147** |
| **Irrigation:** | 705,531 | 366,593 | 859,434 | **1,931,559** |
| **Toilets/Urinals + Irrigation:** | 1,579,807 | 1,214,106 | 2,805,793 | **5,599,706** |
| **Cooling Tower:** | 492,516 | 698,250 | 686,280 | **1,877,046** |
| **Commercial Laundry & Other** | 0 | 0 | 0 | **0** |
| **TOTAL:** | **2,072,323** | **1,912,356** | **3,492,073** | **7,476,752** |

## 4. Project Phasing

| 15-Year Timeframe | SITE 1: 3333 California -- 3333 California St, San Francisco, CA | | SITE 2: 3333 California Phase 2 -- 3333 California St, San Francisco, CA | | SITE 3: 3333 California Phase 3+4 -- 3333 California St, San Francisco, CA | | |
|---|---|---|---|---|---|---|---|
| | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | NP Offset Supplies (gpy) | Selected NP Demand (gpy) | Re-Used Non-Potable Supplies (gpy) |
| 2022 | 3,889,508 | 2,072,323 | 0 | 0 | 0 | 0 | 2,072,323 |
| 2023 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2024 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2025 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2026 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 0 | 0 | 3,984,679 |
| 2027 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2028 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2029 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2030 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2031 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2032 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2033 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2034 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2035 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |
| 2036 | 3,889,508 | 2,072,323 | 3,796,112 | 1,912,356 | 7,021,688 | 3,492,073 | 7,476,752 |

This offset analysis assumes the full year of supplies is available to offset non-potable demands. Some scenarios may require storage to store excess supplies from one month in order to use those supplies in another month with unmet demands.

